

HOW DOES THE CONTEMPORARY HYGIENIST MEET GDC QUALITY REQUIREMENTS FOR ENHANCED CPD

The UK General Dental Council requires UK dental professionals to meet their requirements for enhanced verifiable CPD as outlined on their web site. Part of this advice directs registrants to ensure the CPD provider they choose has rigorous quality controls in place.

The detail of their advice is regularly changed and updated and here at the Contemporary Hygienist HQ, we ensure it continues to meet and exceed the GDC's Quality Assurance requirements as a provider of Enhanced CPD.

GDC REQUIRED QUALITY CONTROLS

1. Certificates

GDC requirement	How this is met by Contemporary Hygienist
Documentary evidence that the DCP has undertaken the CPD	CPD Certificates provide documentary evidence that the dentist or DCP has undertaken the CPD
Documentary evidence that the CPD has clear anticipated outcomes	CPD Certificates contain clear anticipated outcomes
Documentary evidence that the CPD has concise educational aims and objectives	CPD Certificates contain concise educational aims and objectives
Documentary evidence that the CPD has quality controls	CPD Certificates contain a statement that quality controls have been applied by Contemporary Hygienist, as in the tables below.

2. Quality controls that should be applied before CPD is undertaken by dentists and DCP's

GDC requirement	How this is met by Contemporary Hygienist
Pre-CPD quality controls by a CPD provider could include:	
Educational governance policy	The Contemporary Hygienist Educational Governance policy is available on request
Equality and diversity policy	The Contemporary Hygienist Equality and Diversity policy is available on request
CPD needs assessment	The Contemporary Hygienist provides a free and openly available PDP planner for subscribers to use for creating a needs assessment prior to selecting and undertaking CPD power lectures
Peer reviewed content	All of Contemporary Hygienist's educational content is reviewed by academic staff from the University of (varies)
Integration of pre-existing feedback	The Contemporary Hygienist Course Feedback and Evaluation Policy is available on request. In addition to structured 'power lecture' feedback at the end of every lecture, the Contemporary Hygienist social media and google pages offer the opportunity to provide quick open-text feedback and a page "star rating". All feedback is examined by Contemporary Hygienist staff and any appropriate changes that would benefit the site are made as soon as possible
Accurate advertising and marketing	The Contemporary Hygienist Advertising and Marketing policy is available on request

GDC requirement	How this is met by Contemporary Hygienist
Pre-CPD quality controls by a CPD provider could include:	
Transparency of verifiable criteria	This is detailed in Contemporary Hygienist Educational Governance Policy, which is available on request. Only pages that meet the GDC's requirements for Enhanced CPD contribute to your CPD time.
Linking content to GDC Standards	Where appropriate, The Contemporary Hygienist's educational pages refer to GDC standards
Delivery of evidence-based content	The Contemporary Hygienist's educational content is evidence based and where appropriate the evidence sources are listed. When conflicting evidence exists, this is normally discussed within the lectures
Policies and procedures to avoid commercial bias	The Contemporary Hygienist's Commercial Bias policy is available on request
Appropriate recruitment and selection of those delivering CPD	The Contemporary Hygienist Recruitment and Selection of educators policy is available on request

2. Quality controls that should be applied while CPD is undertaken by dentists and DCP's

GDC requirement	How this is met by Contemporary Hygienist
Quality control during a CPD activity by a CPD provider could include:	
Implementation of an equality and diversity policy	The Contemporary Hygienist Equality and Diversity policy is available on request.
Robust methods in place to confirm attendance and complete participation by attendees	See our "measuring" section
Methods to monitor and evaluate content delivery	Our content is all delivered in lecture and online webinar forms, after going through strict quality control measures. Feedback about the speaker and the contents of the lecture/webinar are collated from the delegates at the end of each lecture
Documentary evidence of aims, objectives, anticipated learning outcomes and quality controls provided to every participant for them to keep	The Contemporary Hygienist CPD certificates give all this information.
Content relating to anticipated learning outcomes throughout delivery	All of Contemporary Hygienist's Educational Content is based on the power lecture's learning outcomes

GDC requirement	How this is met by Contemporary Hygienist
Quality control during a CPD activity by a CPD provider could include:	
Opportunities for participant reflection during activity	The Contemporary Hygienist power lectures have reflection moments - every lecture has "pause points" in the form of reflective questions designed to activate the brain and get delegates thinking
Assessment of learning	As part of the feedback forms given to each delegate at the end of each power lecture, there is a section of reflective learning with short answer questions and MCQ to assess learning
Accurate measurement of duration of CPD activity	See our "measuring" section

3. Quality controls that should be applied after CPD is undertaken by dentists and DCP's

GDC requirement	How this is met by Contemporary Hygienist
Quality control after a CPD activity by a CPD provider could include:	
Participant evaluation methods	The Contemporary Hygienist provides a formal end-of-lecture evaluation form. We can also be contacted via email at claire@contemporaryhygienist.com or Faye@contemporaryhygienist.com

GDC requirement	How this is met by Contemporary Hygienist
Quality control after a CPD activity by a CPD provider could include:	
Post-delivery evaluation	Every power lecture has a structured feedback form at the end of the evening
A complaints procedure	The Contemporary Hygienist Complaints Handling policy is available on request.

MEASURING CPD ENGAGEMENT

How CPD time is recorded

The Contemporary Hygienist power lectures are 2 hours, which includes teaching of theory and practical with industry expert guest speakers and reflection. Even if you are present at the venue longer, only this CPD time is awarded. We ask that you arrive promptly for the start of the lecture to avoid gaining less than the 2 hours of awarded CPD.

Essentially, the CPD timer starts as soon as the delegates are seated and the power lecture begins and ends when the 2 hour power lecture is complete. Therefore all sessions are awarded 2 hours of CPD on successful completion of the assessment of learning.

In the event of webinars, the CPD timer starts at the beginning of the webinar. A period of questions and answers are carried out at the end of the slides for reflective learning. This will also be counted toward your total CPD hours. The CPD timer will end at the end of the questions and answers, which will not exceed 10 minutes. In the event of webinars, the length of time will be recorded on your CPD certificate on successful completion of the assessment of learning.

EDUCATIONAL GOVERNANCE POLICY-

The Contemporary Hygienist study club

This policy is about making sure that Contemporary Hygienist has effective systems of educational governance and leadership to manage and control the quality of enhanced CPD.

These systems should treat learners according to principles of safety, equality and fairness. They should ensure appropriate assessment, manage learners' progression and share outcomes of education and training programmes. It is in the public's best interests that clinicians undertake effective, robust, transparent and fair oversight of education and training.

Responsibility

The Contemporary Hygienist must demonstrate leadership of medical and dental education and training through effective educational governance. They should integrate educational, clinical and medical/dental governance to keep patients and learners safe and create an appropriate learning environment and organisational culture.

The Contemporary Hygienist and its peer review panel control the quality of education leading to enhanced CPD certificates.

A director must be accountable for educational governance and those in educational leadership roles must have demonstrable educational credibility and capability. The Contemporary Hygienist is able to maintain curricula and assessment frameworks according to the standards set by the General Dental Council (GDC).

Standards

1. The Contemporary Hygienist educational governance system continuously improves the quality and outcomes of education and training by measuring performance against the standards, demonstrating accountability and responding when standards are not being met.
2. The educational and clinical governance systems are integrated, allowing Contemporary Hygienist to address concerns about patient safety, standards of care and the standard of education and training.
3. The educational governance system makes sure that education and training is fair and is based on principles of equality and diversity.
4. The Contemporary Hygienist facilitates these standards and requirements for the delivery of all topics for CPD in education and training.

Promoting excellence: standards for the 'Contemporary Hygienist' sets the standards that we expect clinicians responsible for treating patients in the UK to meet.

The standards and requirements are organised around control by the following organisations listed below:

- NICE <https://www.nice.org.uk/guidance/qs139/chapter/About-this-quality-standard>
- CQC Fundamental Standards: <https://www.cqc.org.uk/what-we-do/how-we-do-our-job/fundamental-standards>
- GDC Focus on standards: <https://standards.gdc-uk.org>

Requirements

5. The Contemporary Hygienist has effective, transparent and clearly understood educational governance systems and processes to manage or control the quality of dental CPD education and training.

6. The Contemporary Hygienist are able to show they are meeting the standards for the quality of dental CPD education and training within their organisation and respond appropriately to concerns.

7. The Contemporary Hygienist must consider the impact on learners of policies, systems or processes. They must take account of the views of learners, educators and where appropriate, patients and the public.

8. The Contemporary Hygienist regularly evaluates and review the curricula and assessment frameworks, education and training programmes as they are responsible to make sure standards are being met and to improve the quality of CPD education and training.

9. The Contemporary Hygienist must evaluate learners' performance and outcomes – such as the results of post lecture assessments – by collecting, analysing and using data on quality and on equality and diversity.

10. Delegates must be able to assess the quality of teaching, support, facilities and learning and must respond when standards are not being met.

10.1. The Contemporary Hygienist has a system for raising concerns about education and training. They must investigate and respond when such concerns are raised, and this must involve feedback to the individuals who raised the concerns.

10.2. The Contemporary Hygienist must share and report information about quality control of education and training with other bodies that have educational governance responsibilities. This is to identify risk, improve quality locally and more widely, and to identify good practice.

10.3. The Contemporary Hygienist must collect manage and share all necessary data and reports to meet GDC approval requirements.

10.4. The Contemporary Hygienist is responsible for managing and providing education, and training must monitor how educational resources are allocated and used.

10.5. The Contemporary Hygienist must have systems and processes to make sure learners have appropriate supervision in practical sessions. Educational and clinical governance must be integrated so that learners do not pose a safety risk, and education and training takes place in a safe environment and culture.

10.6. The Contemporary Hygienist must have systems to manage the delegates learning in the lectures, to inform decisions about their progression.

10.7. The Contemporary Hygienist has systems and processes to identify, support and manage learners when there are concerns about a learner's knowledge, skills, or conduct that may affect a learner's wellbeing or patient safety.

10.8. The Contemporary Hygienist has systems to make sure that education and training comply with all relevant legislation.

10.9. The Contemporary Hygienist ensures that recruitment, selection and appointment of learners and educators are open, fair and transparent.

10.11. The Contemporary Hygienist is involved in the collating, results, student information, analysis of data, and is therefore registered with the (ICO.) Information Commissioners Office under

EQUALITY AND DIVERSITY POLICY

This document sets out our policy on equality and diversity.

We have introduced this policy as confirmation of our commitment to ensuring equality and diversity and to the prevention of discrimination.

We are particularly concerned that equality and diversity is maintained in the following areas:

- in the training environment
- in our dealings with third parties, eg companies and brands

This policy also explains how we will deal with complaints, the potential consequences of failure to comply, our monitoring procedures and training.

This policy does not form part of any contract. We may amend it at any time and decide to follow a different procedure where we consider it appropriate.

If you are in any doubt or have any concerns about the application of this policy in any particular instance or situation, please contact us as soon as possible.

Statement of principle

Our statement of principle on equality and diversity is:

'We are committed to a policy of treating all our trainers, speakers and assistants equally. No person will receive less favourable treatment because of any "protected characteristic", namely:

- age (or perceived age)
- disability (past or present)
- gender reassignment
- marriage or civil partnership status
- race, colour, nationality or ethnic or national origins
- religion or belief
- sex
- sexual orientation
- trade union membership (or non-membership)
- part-time or fixed term status

No trainee or delegate trained by the Contemporary Hygienist will be disadvantaged by any conditions that cannot be justified as necessary on operational grounds. We aim to encourage, value and manage diversity and are committed to equality for everyone involved. We wish to attain a training team that is representative of the communities from which it is drawn.

These principles of equality and diversity also apply to the manner in which we treat delegates, our business partners and supporting staff. An equality policy statement will be displayed on our socials. A copy of this policy is available on request.

The principles set out in this policy apply:

- in the training workplace
- outside of training in supportive communities (eg Facebook groups)

Who is responsible for equality and diversity?

We all have a part to play in promoting equality and diversity. The board and training team are also committed to achieving effective equality and diversity and will ensure adequate resources are available to meet equality and diversity needs.

Discrimination, victimisation and harassment

There should be no discrimination, whether direct or indirect, because of any of the protected characteristics set out in Contemporary Hygienist's Statement of principle on equality and diversity (see above).

The types of discrimination that are prohibited are:

- direct discrimination
- indirect discrimination
- victimisation
- harassment

Direct discrimination

This is treating someone less favourably because of a protected characteristic. An example of this is paying someone less because of their sex or because they belong to a particular racial group. 'Because of' is very wide and includes less favourable treatment based on a perception of another person, for example that the person is gay, or is disabled, whether or not this perception is correct and even if the perpetrator knows that his perception is, in fact, wrong. It also includes less favourable treatment because someone is associated with another person who has a protected characteristic.

Indirect discrimination

This is treating people in the same way but in a way which adversely affects those with a protected characteristic. An example of this is telling all employees that they have to work late at night—although applied to everyone, it will adversely affect those employees with childcare responsibilities.

Victimisation

This is treating someone less favourably because they have asserted their right not to be discriminated against because of a protected characteristic. An example of this is an employee claiming they had been discriminated against on the grounds of their disability and then their manager deciding when they left not to give them a reference because they had claimed disability discrimination.

Harassment

This is unwanted conduct, related to a protected characteristic, which has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment for someone or violating their dignity. Harassment may also be of a sexual nature or may occur because someone has harassed the victim and the victim either rejects or submits to it and, because of that rejection or submission, that person treats the victim less favourably.

Equality and diversity in the training workplace

We will appoint, train, develop and reward on the basis of merit and ability.

Recruitment and selection of trainees

The following principles will apply whenever recruitment or selection for training positions takes place, whether externally or internally:

- individuals will be assessed according to their personal capability to train delegates
- assumptions that only certain types of person will be able to perform certain types of work must not be made
- any limits applied to a job will be retained only if they can be objectively justified in terms of the job to be done
- the use of years of experience as a criteria for a particular role will need to be objectively justified
- recruitment solely or primarily by word of mouth should be avoided as its effect is or may be to prevent certain types of person from applying
- selection tests will be specifically related to job requirements and will measure the person's actual or inherent ability to do or train for the position
- selection tests will be reviewed regularly to ensure they remain relevant and free from any unjustifiable bias
- applications from different types of person will be processed in the same way and the same questions asked at interview
- written records of interviews and reasons for appointment and non-appointment will be kept
- questions at interview will relate to the requirements of the role
- where any provision, criterion or practice for recruitment and selection puts disabled people at a substantial disadvantage due to a reason connected with their disability, reasonable adjustments will be made to eliminate or, if that is not reasonably practicable, reduce the disadvantage.
- decisions regarding the method of recruitment or selection or who is recruited or selected will be made only by a person who has read and understood this policy and undergone relevant training

Disability policy

It is our policy that disabled people should be able to participate in all our activities and training fully, on an equal basis with people who are not disabled.

Due to the wide variety of potential disabilities and the likelihood of a disability affecting different people in different ways, it would be inappropriate to have rigid rules on how issues concerning disabled people should be dealt with.

What is essential, however, is that all trainers take all reasonably practical steps to ensure that disabled people are not less favourably treated or disadvantaged by comparison to people who are not disabled in relation to their training environment or by any provision, criterion or practice used by the us.

For the purpose of this policy, disabilities are either physical or mental impairments that have a substantial and long-term effect upon a person's ability to carry out normal day-to-day activities. Some disabilities are immediately obvious, for example use of a wheelchair, while other disabilities may not be apparent at all, for example mental health illness. Certain conditions are not considered to be disabilities, for example poor eyesight that is corrected simply by wearing prescription spectacles, or addiction to alcohol or other substances. The general equality and diversity principles set out earlier in this policy will apply in relation to disabled people whether they currently have a disability or have had a disability in the past.

We will take all reasonably practicable steps to ensure that disabled people are able to participate in our training on an equal basis with people who are not disabled.

We will not, for a reason relating to a person's disability, treat disabled people less favourably than we treat, or would treat, others to whom the same reason does not or would not apply.

If any provision used by Contemporary Hygienist, or any physical feature of premises used by the Contemporary Hygienist, puts disabled people at a substantial disadvantage compared to people who are not disabled, we will take such reasonably practicable steps as we can to prevent this disadvantage. This is known as the **Duty to Make Reasonable Adjustments**.

Complaints procedure

Our Grievance procedure is available to any delegate who believes that they may have been unfairly discriminated against. Please contact us for a copy of the Grievance procedure. Delegates will not be victimised in any way for making such a complaint in good faith. Complaints of this nature will be dealt with promptly, fairly, openly, effectively, seriously, and in confidence.

Failure to comply

All trainers must be aware of and adhere to this policy. You may be liable to disciplinary action if you fail to comply with its provisions or related policies and procedures.

Disciplinary action will be taken against any trainer who is found to have committed an act of unlawful discrimination. Serious breaches of this policy and serious incidents of harassment and bullying will be treated as gross misconduct. Unwarranted allegations that are not made in good faith may also be considered as a disciplinary matter.

Annual review

The Contemporary Hygienist founders will review this policy regularly—at least annually. We will provide information and/or training on any changes we make.

Monitoring and review

The Contemporary Hygienist founders are responsible for this policy. We regularly monitor the effectiveness of this policy to ensure it is working in practice and we will review and update this policy as and when necessary.

Our monitoring will include ongoing checks and analysis in the following areas:

- recruitment of trainers
- pay and remuneration
- training
- appraisals
- any delegate complaints

Training

We will ensure that all trainers are provided with the appropriate equality and diversity training.

All staff will receive appropriate training on our equality and diversity policy including:

- regular training for existing trainers
- training for new trainers at induction
- updates following any changes to the policy that affect trainers

FEEDBACK AND EVALUATION POLICY

The directors of Contemporary Hygienist are committed to securing and reviewing advice and feedback from all its delegates/subscribers/members involved in the delivery of its Training and Assessment.

Client Feedback and Evaluation Procedures

- All delegates attending any event that will be provided with a Client Feedback Form.
- Completed Client feedback forms shall be returned to Contemporary Hygienist administration team and submitted for review
- On receiving Client Feedback forms the administration team shall designate compliments or suggestions for improvement to the directors of Contemporary Hygienist. Complaint will be given directly to the directors of Contemporary Hygienist, who will follow the complaints policy
- All trainers and management members shall consider and review the Client feedback form as an opportunity for Continuous Improvement
- Delegates and members/subscribers completing power lectures and attending set CPD training programs will be requested to complete 'feedback and evaluation forms'
- Any information on the forms will be treated as confidential and only necessary persons from training and management will have access

ADVERTISING AND MARKETING POLICY

Contemporary Hygienist management will ensure that marketing and advertising of CPD certification to prospective learners is ethical, accurate and consistent with its scope of registration.

All staff with responsibility to prepare advertising and marketing materials are to be fully conversant with the requirements detailed in this document and that outlined by the GDC.

All advertisements and marketing material must be approved by the directors of Contemporary Hygienist (namely Claire Berry and Faye Donald), before it is released. No other trainers or staff member of Contemporary Hygienist brand is authorised to approve the use of any advertisements or marketing material.

The following guidelines are to be followed when preparing advertisements and promotional information.

Contemporary Hygienist must:

- Provide accurate information about the courses being advertised and the outcomes associated with those courses;
- Provide accurate information about any work-based training a delegate is required to undertake as part of the CPD
- Identify Contemporary Hygienist in any marketing material by its full and legal name
- Clearly distinguish where training and assessment is being delivered on behalf of Contemporary Hygienist by any third-party organisation, eg BLS training
- Include details about any financial support arrangements associated with the provision of training and assessment
- Include details about the companies and brands that support and sponsor training carried out by Contemporary Hygienist
- Monitor closely the advertising and marketing been provided by any third-party organisation on behalf of Cotemporary Hygienist

Contemporary Hygienist must not:

- Provide false or misleading information in relation to subscriptions/membership or training when seeking to enter into a written agreement
- Provide any guarantees to learners about the successful completion of training or any employment outcome that is outside of the control of Contemporary Hygienist
- Integrate or confuse in any way training that is nationally endorsed with training that is not accredited
- Refer to another person or organisation in any marketing material without obtaining prior consent and approval
- Provide approval for any third-party organisation to advertise on behalf of Contemporary Hygienist unless it is appropriately specified with limitations within a written and signed agreement with the third-party organisation

Informing learners of their rights and obligations

It is a mandated requirement within the Standards for Registered Training Organisations for Contemporary Hygienist to inform learners prior to their enrolment onto the subscription platform, about their rights and obligations, about the services to be provided and about the payment of fees, other charges and refund arrangements. Whilst this requirement relates to the marketing and advertising of training, it is addressed in policy arrangements detail within the Enrolment Policy.

COMMERCIAL BIAS POLICY

Contemporary Hygienist education must protect learners from commercial bias and marketing.

- The accredited provider must ensure that all decisions related to the planning, faculty selection, delivery, and evaluation of education are made without any influence or involvement from the owners and employees of an ineligible company
- Education must be free of marketing or sales of specific products or services for financial gain
- Contemporary Hygienist will not actively promote or sell products or services that serve their professional or financial interests
- All sponsors have been chosen due to their willingness to support Contemporary Hygienist delegates, however there is no bias or obligation for the delegate to take sponsors up on support
- Delegates have full prerogative to use and choose any products or services they want and in no way are coerced into using or buying any products or services
- Contemporary Hygienist must not share the names or contact information of its delegates with any ineligible company or its agents without the explicit consent of the individual
- Delegates will have to sign consent to allow their names and email addresses to be sent to the Contemporary Hygienist sponsors and these people only, who are in place to support and aid the work of the delegate and are therefore considered eligible

RECRUITMENT SELECTION OF EDUCATORS POLICY

The Contemporary Hygienist is committed to equality and fair treatment in recruitment and selection and all appointments will be based on merit. We will ensure that recruiting managers follow this procedure.

The purpose of the Recruitment and Selection Policy is to provide a fair, consistent and transparent framework that adheres to statutory requirements, enabling managers to:

- Attract the best possible applicants to vacancies
- Recruitment and selection and is robust throughout the process
- Follow a fair and consistent process in recruiting and selecting trainers
- Adhere to all relevant legislation and statutory requirements
- Ensure the most cost-effective use is made of resources
- Give applicants a clear understanding of the post and what is expected of them, measuring candidates against the criteria in a fair, transparent and reasonable way
- Minimise the risk of making an unsuitable appointment

Shortlisting, assessments and selection processes will always be carried out without regard to the nine protected characteristics:

- Age
- Disability
- Sex
- Gender reassignment
- Pregnancy and maternity
- Race
- Sexual orientation
- Religion or belief
- Marriage and civil partnership

Recruitment managers must ensure they carry out recruitment and selection fairly and consistently in line with this policy and procedure, accessing support, guidance and training as and when required. Managers must also provide appropriate, constructive feedback to candidates. Detailed, meaningful feedback should be offered to all unsuccessful candidates, and to candidates who are not shortlisted, should they request feedback.

The Contemporary Hygienist is committed to:

- Promoting equality and diversity in its policies, procedures and guidelines, adhering to the Equality Act 2010.
- Delivering high quality teaching and services that meet the diverse needs of its delegates population, ensuring that no individual or group is disadvantaged.
- The Contemporary Hygienist is committed to providing equality of opportunity for all and ensuring that all stages of recruitment and selection are fair.

- Job descriptions, person specifications, advertisements and other recruitment and selection documentation must only contain objective, justifiable, non-discriminatory information.

Management should take care not to include:

- Explicit references to age or age ranges
- Language that could be perceived as age bias (such as young, mature, energetic)
- Specifications for a particular gender, race, religion or age unless it is defined as a Genuine Occupational Qualification
- Language that could be perceived as discriminatory (e.g. 'must be fit', 'able bodied', 'generally healthy', or 'able to drive')

The Contemporary Hygienist adheres to the following principles in recruitment and selection:

- All applicants will receive fair and reasonable treatment.
- The job description/person specification is an essential tool, which is used throughout the process and applied equally to all applicants.
- Recruitment decisions will be based on the assessment of how candidates match the criteria detailed in the job description/person specification (e.g. knowledge, skills, qualifications, experience, abilities and competencies).
- Selection should be carried out by a panel of at least two people, preferably three people where possible.
- Selection should be based on a minimum of a completed application form, shortlisting and interview.

COMPLAINTS HANDLING POLICY

The purpose of this policy is to provide a clear statement of intent with regards to the assessment, handling and investigation of delegate complaints. Contemporary Hygienist's complaint handling policy has been created to meet general standards and requirements and complies with standard compliant handling procedures.

The aim of this policy is to ensure that all delegate complaints, either written or verbal, are handled in a consistent and regulated manner and that further complaint incidents are mitigated and where possible, prevented. Where a delegate has cause to complain, the complaints handling procedure will be followed in every instance and a record will be made of the complaint nature and details to help improve our services and reduce the occurrence of similar complaints.

1 Purpose

Contemporary Hygienist is committed to delivering a fair, open and clear process for complaints and ensure a satisfactory outcome for all delegates who raise a complaint. We provide thorough management training in our internal complaint handling procedures and staff know how to handle complaint situations in a face-to-face, written and/or telephone environment.

This policy sets out our intent and objectives for how we handle complaints, from offering a clear and approachable system for delegates to complain, through to conducting root cause analysis on all complaints received to identify the cause, issues and corrective actions regarding the complaint, and to implement measures to prevent reoccurrences where applicable.

2 Scope

The policy relates to all trainers and management within the organisation and has been created to ensure that they deal with the area that this policy relates to in accordance with legal, regulatory, contractual and business expectations and requirements?

3 Objectives

Contemporary Hygienist objectives are laid out below regarding delegate complaint handling. For the purposes of this policy, a complaint is defined as any delegate contact whereby a negative communication or outcome has occurred. The delegate does not have to formally address their communication as an official complaint or to request a response for Contemporary Hygienist to treat the incident as a complaint and to follow the related procedures.

Contemporary Hygienist's objectives for internal complaint handling are:

- To provide a fair complaints procedure which is clear and easy to use for anyone wishing to make a complaint
- To ensure that our complaints procedure is fully accessible so that people know how to contact us to make a complaint
- To make sure everyone at Contemporary Hygienist knows what to do if a complaint is received
- To make sure all complaints are investigated fairly and in a timely way
- To gather information which helps us to improve what we do and how we do it

- To ensure that the Data Protection Officer (or appointed person) is involved in any complaints relating to personal data

Contemporary Hygienist's objectives for the complaint handling process are:

- Complaints will be investigated and responded to within 8 weeks from the initial delegate contact
- Delegates will be sent a copy of the formal complaints procedure along with any relevant or mandatory literature
- Complaint responses will always be provided in writing (unless the complainant makes a specific request for an alternate form of communication, which will be provided in addition to the written format)
- Complaint procedures and forms will be available via the company website as well as upon written and/or verbal request
- All complaints will be investigated by a trained member of staff and a full outcome summary provided to Senior Management
- Complaint records will be used to revise company procedures and to improve communication and business practices where applicable
- Complainants are advised of their rights and provided with any relevant right to refer/lodge the complaint and the applicable contact details

Procedures & Guidelines

5.1 Raising a Complaint

Delegates who request the Contemporary Hygienist complaint handling procedure will be provided a copy of the procedure and form either by email, in a .pdf format or in the post, and will be asked to raise their complaint in writing as soon as possible after the incident.

NOTE: Complaints are to be raised in writing, however verbal complaints will be accepted and dealt with as per the same procedures.

If a customer telephones Contemporary Hygienist and wishes to raise a complaint, they should be passed through to a senior member of staff who will try to resolve the complaint then and there. Even if the complaint is resolved at the time, the delegate must still be offered the option of receiving the complaints handling procedure and form prior to ending the call and the call recording must be retained and logged in the complaints record.

5.1.1 Data Protection Related Complaints

Where a complaint is related to the processing of personal data, this policy ensures that Contemporary Hygienist complies with the data protection laws and notification requirements. Every individual has the right to lodge a complaint with the supervisory authority (ICO) where they consider that the processing of personal data relating to them infringes the General Data Protection Regulation (GDPR) or we have breached data protection law. All individuals using our products or services and those employed by us are notified of this right via our Privacy Notice, in our complaint handling procedures and in our information disclosures.

The supervisory authority with which the complaint has been lodged, is responsible for informing the complainant on the progress and the outcome of the complaint, including the possibility of a judicial remedy where the supervisory authority does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint lodged.

5.2 Informal Complaint Resolution

Contemporary Hygienist considers and responds to all complaints and issues, no matter how they are raised or what they refer to. Some issues and complaints we can resolve immediately or within a 3-working day timeframe and are referred to as informal complaints. Such instances are where an investigation is not required because the nature of the complaint is clear, and a resolution can be obtained without further review of the facts. Where we resolve a complaint within the timeframe, the details are still logged on our complaint register, and the complainant is still informed of their rights.

Contemporary Hygienist takes every opportunity to resolve complaints at the first initial point of contact where feasible and possible. Informal resolution is always attempted where the issues raised are straightforward and potentially easily resolved, requiring little or no investigation. Most face to face and telephone issues can be resolved in this manner, however the complainant is always offered the option of making the complaint formal if the resolution is not to their satisfaction.

Where an informal complaint is received, it is acceptable for the point of contact or addressed employee to attempt to resolve the issue without involving the Complaints Officer. However, any issue relating to data protection infringes or breaches, no matter how small or informal, are always brought to the attention of the DPO or appointed person.

Management staff are trained to deal with basic issues and informal complaint resolution and are aware of their obligations and the subsequent reporting lines. Such employees are equipped to attempt to resolve a complaint relevant to their area of service or expertise, wherever possible.

5.2.1 Timeframe for Informal Resolution

It is the aim of Contemporary Hygienist to resolve informal complaints immediately, or at least within the first 24-hours. Such complaints and issues will have a quick, but informative response and do not need to have an investigation or enter the formal complaint process.

No matter how small or informal the complaint, if a satisfactory resolution has not been achieved within 3 working days of the complaint being raised or identified, the issue is passed to the Complaints Officer to enter the formal complaint process.

5.3 Responding to a Complaint

Where an official complaint has been received or the informal complaint was unable to be resolved at the frontline point of contact, a written acknowledgement is sent to the delegate within 3 working days. The response should detail the complaint handling procedure and provide approximate timelines and expectations for the investigation and future responses.

A trained manager, the Data Protection Officer or the Complaints Officer are the only staff members who should respond to customers regarding their complaints.

5.4 Investigating the Complaint

The designated employee will be assigned the role of investigating complaints and will gather all necessary documents, recordings and information to make an independent review of the incident. If internal interviews are to be conducted, a note taker will be present alongside the investigator and interviewee and a copy of the interview notes will be written up and signed by the interviewer and interviewee prior to them being added to the complaint history.

All investigations must take place within 6-weeks of the initial complaint being received so that a final response (decision letter) can be sent to the customer within our designated 8-week period.

Investigations must utilise all the facts and any previous, related information to produce an unbiased outcome and an expected course of action. A complaint reference should be assigned and all documents relevant to the complaint should have the reference written on them for continuity.

The reference will also be added to the Complaints Register so that complaint and documents can be audited and traced back in the future.

All trainers are provided with clear guidelines of when a complaint is formal and requires an appropriate investigation.

Complaints must be referred to the Data Protection Officer where:

- The complainant has requested such a referral or investigation
- The complaint involves any type of personal data issue
- The informal complaint resolution stage failed or was inappropriate
- There is a conflict of interest between the complainant and a member of staff
- The issues are complex and require an investigation
- The complaint represents a high or serious risk to the company
- The facts are unclear, or the complaint will require additional time to resolve
- There has been any media contact or attention
- The issues do or may affect more delegates (whether identified or not)

5.5 Decision Letter (Final Response)

After the complaint has been investigated in full and an outcome and action decision has been reached, the investigator or Complaints Officer will draft a final response letter to the customer with their findings and decision regarding any action(s) to be taken.

The final response must be sent within 8 weeks of the initial response being raised and will also specify the complainant's right to refer or lodge the complaint with the appropriate body (where applicable) should the delegate be unhappy with the decision received.

For complaints related to personal data and/or breaches of the data protection laws and regulations, the final response will reiterate the complainant's right to lodge a complaint with the supervisory authority (the Information Commissioners Office) and will detail the ICO's telephone number and address, along with the possibility of seeking a judicial remedy.

6 Complaint Recording

All complaints, whether formal or informal, are recorded on a Customer Complaint Register. The register should consist of the below information and should be audited on a frequent basis to ensure that incidents are not being repeated and improvements are being made.

- Date
- Nature of Complaint
- Department(s) Involved
- Complaint Reference
- Lead Investigator
- Decision Letter Sent (Y/N)
- Date Complaint Closed

7 The Complaints Officer

Contemporary Hygienist has an appointed Complaints Officer who is provided with the training and support to understand, investigate and respond to complaints of all types. Where the complaint involves personal data, the Complaints Officer is assisted by the Data Protection Officer/Appointed Person to ensure that the Regulation and laws are followed, and the individuals' rights are exercised and complied with.

The Complaints Officer can complete their complaint handling duties independently and without bias and each complaint is reviewed to ensure that there is no conflict of interest with the appointed officer. If a conflict is identified (i.e. the complaint involves the investigating person) a deputy has been trained to handle the complaint.

The Complaints Officer has full authority and internal credibility to ask questions, carry out investigations and interviews, obtain and analyse evidence, recommend policy and process changes and be involved in department functions for the purposes of complaint handling.