

RMC Medical Zrt.

Complaints Handling Policy

Effective as of: June 1, 2016

Purpose of the Policy

To enforce the provisions of Act CLIV of 1997 on Health Care, which states: “the detailed rules for the investigation of complaints shall be set out by the healthcare provider in its internal regulations.”

Scope of the Policy

This policy applies to the patient care unit of RMC Medical Zrt., as a healthcare service provider, located at: 1026 Budapest, Gábor Áron Street 74-78/A.

Placement of the Complaints Handling Policy

The “Complaints Handling Procedure” of RMC Medical Plc. must be displayed in the work areas listed in Annex 4, in the format specified in Annex 2, in order to inform patients.

To facilitate the submission of written complaints, five copies of the complaint form specified in Annex 3 must always be placed next to the procedure document.

The head of each unit is responsible for checking the presence of the displayed documents.

Definition

Complaint: In healthcare, a complaint is information drawing attention to a procedural, patient rights-related, ethical, or professional error or deficiency (hereinafter referred to as a complaint situation), the elimination of which serves the interests of the individual or the healthcare institution.

A complaint may concern conduct, omission, any act or circumstance related to patient care that violates legislation, healthcare ethics, or professional rules, thereby disturbing, infringing upon, or endangering medical activities.

Procedure for Investigating Complaints

In the case of complaints made against individuals, the investigation shall be ordered by the Managing Director of the Institution or, in their absence, by the acting expert appointed in their place.

Procedure in Case of Anonymous Complaints

Anonymous or unsigned reports and complaints shall be handled at the discretion of the Managing Director (or their deputy in their absence), after evaluating their content.

An investigation shall only be initiated if the report or complaint reasonably suggests that its content may correspond to reality.

A.) Complaints May Be Submitted To:

1. The Medical Director or the Head Nurse
2. The Secretariat of the Managing Director
3. The Patient Rights Representative

No person may participate in the substantive handling of a complaint if impartial handling cannot reasonably be expected from them. The administrator handling the matter must immediately inform their direct superior if they are biased in the matter. Failure or delay in reporting such bias may result in disciplinary and financial liability.

B.) Complaints May Be Submitted:

1. By telephone
2. Verbally (in person)
3. In writing

C.) Complaints by Subject Matter:

1. The procedures of patient admission and patient care
2. Ethical matters
3. Professional matters (omissions, disregard of regulations, failure to comply with professional rules)
4. Mixed complaints (a combination of items 1–3)

D.) Procedure for Investigating Complaints:

Complaints received by telephone shall be investigated in the same manner as complaints submitted personally or in writing, provided that the complainant identifies themselves in a verifiable manner.

1. For the management of complaints, the Secretariat of the Managing Director shall maintain a form entitled “Register of Complaint Cases” (Annex 1), containing: the date of submission (receipt) of the complaint, its subject, the name of the person responsible for action, the name and position of the person investigating the complaint, measures taken to resolve the complaint, the closing date and registration number of the complaint.

2. Complaints concerning patient admission or patient care procedures, submitted verbally or by telephone, must be documented in written minutes by the person receiving the complaint.

3. If a complaint received by telephone concerns a serious offense or irregularity (see below), the complainant must be asked to submit it in writing or in person. Every assistance must be provided for this purpose. If the complainant declines to do so or refuses to identify themselves, the rules applicable to anonymous complaints shall apply.

Verbal reports or personal submissions must be recorded in writing by the recipient, signed by both the complainant and the recipient of the complaint.

Following the submission of the complaint and preparation of the minutes, the documents must immediately be forwarded to the Managing Director of the institution, who shall arrange for the investigation. According to Section 29 (2) of Act CLIV of 1997 on Health Care, the maximum time permitted between receipt and adjudication of a complaint is 30 working days. If the investigation is expected to take longer, the complainant must be informed immediately, including the expected completion date.

If the complainant submitted the complaint within the framework of their employment relationship, they may not suffer any disadvantage as a result. The Managing Director or their appointed representative responsible for investigating the complaint must notify the persons concerned and initiate or arrange the internal investigation immediately upon receipt of the complaint (within 24 hours). During the internal investigation, if clarification of the issue is sufficient, explanatory reports shall be requested from the persons concerned, and an opinion shall be formed based on these reports.

If the facts necessitate personal hearings or witness testimonies, the internal investigation shall be conducted in accordance with the provisions of the Labor Code, depending on the nature of the complaint. Minutes must be taken during the internal investigation and authenticated by the signatures of the participants.

E.) If the Complaint Is Found to Be Well-Founded, the Following Measures Must Be Taken:

- a.) Elimination of the causes of the identified errors
- b.) Remedying the harm caused and ensuring that the disadvantaged person receives appropriate compensation, including reimbursement of any financial damage arising from the matter
- c.) Where justified, initiation of disciplinary or financial liability proceedings under the Labor Code, or ethical proceedings
- d.) If the complaint may establish reasonable suspicion of a criminal offense, the competent authority authorized to proceed must be informed immediately

The most serious complaints are those concerning medical ethics or professional matters (medical malpractice, violation of professional rules and regulations, errors, omissions), as these may endanger the reputation and effective operation of the healthcare institution.

Before closing a complaint case, the complete file of the investigated complaint, together with the preliminary decision, must immediately be forwarded to the institution's legal counsel, who shall review and comment on any legal or formal deficiencies and return it to the decision-maker within 8 working days.

On the 30th day following receipt of the complaint, the Managing Director must notify the complainant and all persons concerned of: the decision made upon completion of the investigation, the measures taken, or the omission of such measures.

The reasons for the decision must also be communicated.

After the investigation and closure of a complaint, it is the duty of the employer exercising disciplinary authority to regularly and continuously monitor the safeguards preventing recurrence of the complaint.

The Secretariat of the Managing Director shall prepare the statistical data necessary for the annual evaluation of complaints occurring within the institution and submit them to the Managing Director for assessment by January 20 each year.

Annexes

Annex 1: Register of Complaint Cases

Annex 2: Complaints Handling Procedure

Annex 3: Complaint Submission Form

Annex 4: Locations for Displaying the Complaints Handling Procedure Documentation

This policy shall enter into force on June 1, 2016.

Budapest, May 30, 2016

RMC MEDICAL ZRT.

Register of Complaint Cases

Date of complaint submission (receipt):

Registration number:

Subject:

Name of the person responsible for action:

Name and position of the person investigating the complaint:

Measures taken to resolve the complaint:

Date of closure of the complaint:

Attachments:

1. Minutes

Annex 2

Complaints Handling Procedure

Dear Patients,

The provisions of Act CLIV of 1997 on Health Care stipulate that:

“The detailed rules for the investigation of complaints shall be laid down by the healthcare provider in its internal regulations.”

RMC Medical Zrt. fulfills this legal obligation through its Complaints Handling Procedure, which forms part of its quality management system.

We consider it important to make the Complaints Handling Procedure publicly available to you so that you may exercise your right to express your opinion.

Understanding your opinions helps the management of the institution continuously ensure the high standard of patient care provided within the institution.

A complaint may concern conduct, omission, any act or circumstance related to patient care that violates legislation, healthcare ethics, or professional rules. It may disturb, infringe upon, or endanger medical activities.

Complaints may be submitted by the patient or by their close relative.

Procedure for Investigating Complaints

In the case of complaints made against individuals, the investigation shall be ordered by the Managing Director of the Institution or, in their absence, by the acting expert appointed in their place.

1. Forms of Complaint Submission:

Anonymous Complaint Submission

Anonymous or unsigned reports and complaints shall be handled at the discretion of the Managing Director (or their deputy in their absence), after evaluation of their content.

An investigation shall be initiated if the report or complaint reasonably suggests that its content may correspond to reality.

Complaint Submitted Under the Complainant's Name

If the complainant undertakes to identify themselves and provides their name, the complaint shall be handled by the Managing Director or, in their absence, their deputy, who shall order an investigation.

2. Complaints May Be Submitted To:

- The Medical Director or the Head Nurse
- The Secretariat of the Managing Director
- The Patient Rights Representative

3. Complaints May Be Submitted:

- By telephone
- Verbally (in person)
- In writing

4. Complaints by Subject Matter

- Matters concerning patient admission and patient care procedures
- Ethical matters
- Professional matters (omissions, disregard of regulations, non-compliance with professional rules)
- Mixed complaints (combining items 1–3)

5. Procedure for Investigating Complaints

Complaints received by telephone shall be investigated in the same manner as complaints submitted in person or in writing, provided that the complainant identifies themselves in a verifiable manner.

For the administration of complaint cases, a “Complaint Case Register / Complaint Report Form” (Annex 1) shall be maintained by the Secretariat of the Managing Director. This register must contain the date of submission (receipt) of all complaints, the subject matter of the complaint, the name of the employer responsible for taking action, the name and position of the person investigating the complaint, the measures taken to resolve the complaint, the date of closure of the complaint, and its registration number.

In the case of complaints concerning patient admission and patient care procedures submitted verbally or by telephone, the person receiving the complaint shall prepare a written record (minutes).

If a complaint received by telephone concerns a serious misconduct or irregularity (see below), the complainant must be asked to submit the complaint in writing or in person. Every possible assistance shall be provided for this purpose. If the complainant declines to do so or refuses to identify themselves, the rules applicable to anonymous complaints shall apply.

Verbal reports or personal submissions must be recorded in writing by the person receiving the complaint, and the record must be signed by both the complainant and the person receiving the complaint.

Following the submission of the complaint and the preparation of the minutes, the complaint must immediately be forwarded to the Managing Director of the institution for further action, who shall arrange for the investigation thereof.

Pursuant to Section 29 (2) of Act CLIV of 1997 on Health Care, the permitted period between receipt and adjudication of a complaint is 30 working days. If the investigation is expected to take longer, the complainant must be informed immediately, together with the expected date of completion. If the complainant submitted the complaint within the scope of their employment (or public service employment) relationship, they may not suffer any disadvantage as a result thereof.

The Managing Director or their authorized representative conducting the investigation shall, immediately upon receipt of the complaint (within 24 hours), notify the persons concerned and initiate, or have initiated, the internal investigation. During the internal investigation, if clarification of the issue is sufficient, explanatory reports shall be requested from the persons concerned, and an opinion shall be formed on the basis thereof. If the facts require personal hearings or the hearing of witnesses, the internal investigation shall be conducted, depending on the nature of the complaint, in accordance with the provisions of the Public Employees Act and the Labor Code. Minutes must be taken during the internal investigation and authenticated by the signatures of the participants.

6. If the Complaint Is Found to Be Well-Founded, the Following Measures Must Be Taken:

- a.) elimination of the causes of the identified deficiencies;
- b.) remedying the harm caused and ensuring that the injured party receives appropriate satisfaction and compensation for any financial loss arising from the matter;
- c.) where justified, initiation of disciplinary or financial liability proceedings pursuant to the Public Employees Act (KJT), or ethical proceedings;
- d.) if the complaint may also give rise to a well-founded suspicion of a criminal offence, the competent authority authorized to proceed must be informed without delay.

The files relating to complaints already investigated must, prior to the closure of the complaint case and together with the preliminary decision, be forwarded without delay to the institution's legal counsel, who shall review and comment on them from the perspective of possible legal and formal deficiencies, and shall return them to the decision-maker within 8 working days.

Upon completion of the investigation, the Managing Director must notify the complainant and all persons concerned, within 30 days following receipt of the complaint, of the decision taken, the measures

implemented, or the omission of such measures. The reasons for the decision must also be communicated.

Following the investigation and closure of a complaint, it shall be the duty and responsibility of the employer exercising disciplinary authority to regularly and continuously monitor those safeguards that exclude the recurrence of the complaint already closed.

Complaint Report Form

Name of the person submitting the complaint:

Address:

Name of the patient concerned:

Address:

Medical specialty/department where the patient received care:

Date when the grievance occurred:

Contact details of the complainant (telephone, email):

Description of the Complaint:

Budapest, 20.....

Signature of the complainant

Work Areas Covered by the Complaints Handling Procedure of RMC Medical Zrt.

- **Rózsakert Medical Center Reception**