

Putney Dental Surgery Ltd

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Inspection Report

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Overall summary

We carried out an unannounced comprehensive inspection on 12 December 2016 to ask the practice the following key questions; Are services safe, effective, caring, responsive and well-led?

Our findings were:

Are services safe?

We found that this practice was providing safe care in accordance with the relevant regulations.

Are services effective?

We found that this practice was providing effective care in accordance with the relevant regulations.

Are services caring?

We found that this practice was providing caring services in accordance with the relevant regulations.

Are services responsive?

We found that this practice was providing responsive care in accordance with the relevant regulations.

Are services well-led?

We found that this practice was not providing well-led care in accordance with the relevant regulations.

Background

Putney Dental Practice, located in Putney, London provides NHS and private dental treatment to patients of all ages. The services provided include preventative advice and treatment and routine dental care.

The practice staffing consists of a principal dentist, two additional dentists, one dental nurse, one hygienist, a practice /registered manager and a receptionist/nurse.

The practice manager is the registered manager. A registered manager is a person who is registered with the Care Quality Commission to manage the service. Like registered providers, they are 'registered persons'. Registered persons have legal responsibility for meeting the requirements in the Health and Social Care Act 2008 and associated Regulations about how the practice is run.

The practice consists of two treatment rooms, a decontamination room, a reception/waiting area for patients and a staff room/kitchen

The practice opening hours are Monday to Friday 9am to 6pm and Saturdays 9am to 2pm.

Patients we spoke with and those who were very positive about the care they received and about the service. Patients told us that they were happy with the dental treatment and advice they had received.

Our key findings were:

Summary of findings

- Staff had received safeguarding children and adults training and knew the processes to follow to raise any concerns. The practice had whistleblowing policies and procedure and staff were aware of these and their responsibilities to report any concerns.
- Patients were treated with dignity and respect and patient confidentiality was maintained.
- Patients' care and treatment was planned and delivered in line with current legislation and evidence based guidelines such as from the National Institute for Health and Care Excellence (NICE).
- There were sufficient numbers of suitably qualified staff to meet the needs of patients.
- The practice had a procedure for handling and responding to complaints.
- There were systems in place to ensure that equipment including the compressor, X-ray unit was maintained and PAT (portable appliance testing) had been carried out.
- Staff had been trained to handle medical emergencies; however not all recommended medicines and life-saving equipment were readily available.
- Infection control protocols were not being followed in line with recommended national guidance.
- The practice had not ensured that all the specified information relating to persons employed at the practice was obtained and appropriately recorded.
- Governance systems were not effective. The practice had not carried out audits in key areas, such as radiography and infection control. The practice had carried out limited risk assessments to safeguard the health and safety of staff and patients.

We identified regulations that were not being met and the provider must:

- Ensure an effective system is established to assess, monitor and mitigate the various risks arising from undertaking of the regulated activities.
- Ensure systems are in place to assess, monitor and improve the quality of the service. This could include

for example undertaking regular audits of various aspects of the service and ensuring that where appropriate audits have documented learning points and the resulting improvements can be demonstrated.

- Ensure the practice's recruitment policy and procedures are suitable and the recruitment arrangements are in line with Schedule 3 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 to ensure necessary employment checks are in place for all staff and the required specified information in respect of persons employed by the practice is held.

You can see full details of the regulations not being met at the end of this report.

There were areas where the provider could make improvements and should:

- Review availability of medicines and equipment to manage medical emergencies giving due regard to guidelines issued by the Resuscitation Council (UK), and the General Dental Council (GDC) standards for the dental team.
- Review the practice's policy and the storage of products identified under Control of Substances Hazardous to Health (COSHH) 2002 Regulations to ensure a risk assessment is undertaken and the products are stored securely.
- Review the practice's infection control procedures and protocols taking into account guidelines issued by the Department of Health - Health Technical Memorandum 01-05: Decontamination in primary care dental practices and The Health and Social Care Act 2008: 'Code of Practice about the prevention and control of infections and related guidance'
- Review stocks of medicines and equipment and the system for identifying and disposing of out-of-date stock.
- Review staff awareness of the requirements of the Mental Capacity Act (MCA) 2005 and ensure all staff are aware of their responsibilities under the Act as it relates to their role.
- Review the staff supervision protocols and ensure an effective process is established for the on-going appraisal of all staff.

Summary of findings

The five questions we ask about services and what we found

We always ask the following five questions of services.

Are services safe?

We found that this practice was providing safe care in accordance with the relevant regulations.

The practice had a system for reporting significant events and staff were aware of how to utilise information through the use of Medicines and Healthcare products Regulatory Agency (MHRA) alerts.

Staff members including clinical staff had received safeguarding children and vulnerable adults training and were aware of the processes to follow to raise any concerns.

The practice had undertaken limited risk assessment in relation to the Control of Substances Hazardous to Health 2002 (COSHH) regulations. Not all substances used at the practice that had a potential risk to safety of staff, patients and others had been recorded and graded as to the risk.

Infection control protocols were not being followed in line with national guidance- 'Health Technical Memorandum 01-05 Decontamination in primary care dental practices' guidelines. (HTM-105).

The principal dentist sent us evidence within two days of the inspection that additional infection control training had been undertaken and various issues raised by us had been rectified.

No action



Are services effective?

We found that this practice was providing effective care in accordance with the relevant regulations.

The dentist told us they carried out a consultation in line with current guidelines such as those from the National Institute for Health and Care Excellence (NICE). This also included a review of the patients' medical history.

The staff and patients we spoke with on the day told us that patients were given advice about risks associated with alcohol and tobacco consumption and were given sufficient information about their proposed treatment to enable them to give an informed consent

Health education for patients was provided by the dentist and information leaflets were available within the practice waiting area. They provided patients with advice to improve and maintain good oral health. We received feedback from patients who told us that they found their treatment successful and effective.

No action



Are services caring?

We found that this practice was providing caring services in accordance with the relevant regulations.

No action



Summary of findings

Patients were complimentary about the practice and how staff treated them. Patients commented positively on how caring and helpful staff were, describing them as friendly, compassionate and professional.

Patients felt listened to by all staff and were given appropriate information and support regarding their care or treatment. They felt their dentist explained the treatment they needed in a way they could understand. They told us they understood the risks and benefits of each treatment option.

Are services responsive to people's needs?

We found that this practice was providing responsive care in accordance with the relevant regulations.

Appointment times met the needs of patients and waiting time was kept to a minimum. Staff told us all patients who requested an urgent appointment would be seen where possible within 24 hours. They would see patients suffering dental pain, extending their working day if necessary.

The practice had made reasonable adjustments to accommodate patients with a disability or limited mobility. Patients who had difficulty understanding care and treatment options were suitably supported.

The practice had a procedure in place for dealing with complaints. The dentists told us that there had been no complaints made in the last year.

No action



Are services well-led?

We found that this practice was not providing well-led care in accordance with the relevant regulations. We have told the provider to take action (see full details of this action in the Requirement Notices at the end of this report).

The culture of the practice encouraged candour, openness and honesty. Staff told us there was an open culture at the practice and they felt valued and well supported. They reported the dentists were very approachable and available for advice where needed.

The provider however did not have effective governance arrangements at the practice. Policies and procedures were not effective to ensure the smooth running of the practice.

There were limited arrangements for identifying, recording and managing risks and monitoring and improving the quality through the use of monitoring tools and effective audits. Audits had not been carried out in key areas.

Requirements notice



Putney Dental Surgery Ltd

Detailed findings

Background to this inspection

We carried out this inspection under Section 60 of the Health and Social Care Act 2008 as part of our regulatory functions. This inspection was planned to check whether the practice was meeting the legal requirements and regulations associated with the Health and Social Care Act 2008.

This unannounced inspection was carried out on 12 December 2016 by an inspector from the Care Quality Commission (CQC) and a dental specialist advisor.

During the inspection we viewed the premises, spoke with the principal dentist, registered manager, dental nurse, and receptionist. To assess the quality of care provided we looked at practice policies and protocols and other records relating to the management of the service.

All patients we spoke with commented positively about dentists, dental nurses and reception staff. They described staff as caring and friendly.

To get to the heart of patients' experiences of care and treatment, we always ask the following five questions:

Is it safe?

Is it effective?

Is it caring?

Is it responsive to people's needs?

Is it well-led?

These questions therefore formed the framework for the areas we looked at during the inspection.

Prior to the inspection we reviewed information we held about the provider.

Are services safe?

Our findings

Reporting, learning and improvement from incidents

The practice had a system for reporting significant events. We were informed that there had never been any significant events or incidents since registering with the Care Quality Commission (CQC).

The practice had systems in place to receive and disseminate information and alerts received from external organisations such as the Medicines and Healthcare products Regulatory Agency.

Records we viewed reflected that the practice had undertaken a risk assessment in relation to the Control of Substances Hazardous to Health 2002 (COSHH) Regulations. However not all substances used at the practice that had a potential risk to safety of staff, patients and others had been recorded and graded as to the risk.

Improvements were required to ensure staff had an understanding of RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, 2013) and had appropriate documents in place to record if they had a RIDDOR incident.

We discussed the Duty of Candour requirement in place on providers and the principal dentist demonstrated understanding of the requirement. [Duty of candour is a requirement under The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 on a registered person who must act in an open and transparent way with relevant persons in relation to care and treatment provided to service users in carrying on a regulated activity].

Reliable safety systems and processes (including safeguarding)

The practice had policies and procedures for safeguarding children and vulnerable adults against the risk of harm and abuse. These policies included details of how to report concerns to external agencies such as the local safeguarding team. Staff had access to a flow chart describing how to report concerns to external agencies where this was appropriate.

There was a whistleblowing policy and staff we spoke with were aware of what to do if they suspected that another member of staff's performance was unsafe or not meeting the General Dental Council standards.

The principal dentist told us that rubber dams were routinely used in root canal treatment in line with current guidance. (A rubber dam is a thin, rectangular sheet, usually latex rubber, used in dentistry to isolate the operative site from the rest of the mouth and protect the airway. Rubber dams should be used when endodontic treatment is being provided. On the rare occasions when it is not possible to use rubber dam the reasons should be recorded in the patient's dental care records giving details as to how the patient's safety was assured.

Medical emergencies

A range of emergency medicines including oxygen were available to support staff in a medical emergency. This was in line with the Resuscitation Council UK guidelines and the British National Formulary (BNF). The emergency medicines were stored securely with easy access for staff working in any of the treatment rooms. Records showed monthly checks were carried out to ensure the emergency medicines were safe to use. Medicines we saw were within their expiry date. However, one of the recommended medicine- midazolam was not available. [Buccal (oromucosal) midazolam is a medicine used to stop prolonged epileptic seizures and is given into the buccal cavity (the side of the mouth between the cheek and the gum)].

Similarly, though the practice had a range of medical emergency equipment available, however portable suction, self-inflating bag and mask were not available.

The practice also did not have an automated external defibrillator (AED) in line with Resuscitation Council UK guidance and the General Dental Council (GDC) standards for the dental team. [An AED is a portable electronic device that analyses life threatening irregularities of the heart and delivers an electrical shock to attempt to restore a normal heart rhythm].

The principal dentist sent evidence after the inspection that an AED, buccal midazolam and portable suction and self-inflating bag had been purchased immediately.

All staff had completed recent basic life support training which was updated annually. All staff were aware of where medical equipment was kept and knew how to use the medical oxygen.

Staff recruitment

Are services safe?

The practice had a recruitment policy that described the process when employing new staff. We looked at recruitment records of all staff employed at the practice and found that improvements could be made to ensure this process was consistently followed.

Checks including, criminal record checks through the Disclosure and Barring Service (DBS), detailed job descriptions, which described staff's roles and responsibilities, current professional registration certificates and personal indemnity insurance were not available on the day of inspection for some staff members. (The DBS checks identify whether a person has a criminal record or is on an official list of people barred from working in roles where they may have contact with children or adults who may be vulnerable).

Following the inspection the practice told us that availability of relevant documents such as employment references, DBS checks and proof of staff ID had been reviewed. We were sent evidence of documents that were outstanding on the day of inspection.

Monitoring health & safety and responding to risks

There was a business continuity plan that outlined the intended purpose to help the practice overcome unexpected incidents and the responsibilities and duties. The plan outlined potential problems such as loss of computer system, loss of telephone and loss of electricity. Procedures were in place to enable them to respond to each situation. Where relevant contact telephone numbers of organisations to contact were listed in the policy.

Infection control

Decontamination of dental instruments was carried out in the decontamination room. A dental nurse demonstrated to us how they processed the used instruments through to clean and ready for use again.

The process of cleaning, disinfection, inspection, sterilisation, packaging and storage of instruments however did not follow a well-defined system of zoning from dirty to clean.

Staff demonstrated that they cleaned dental instruments thoroughly; however the rinsing of instruments was not carried out correctly. Instruments were being rinsed under

a running tap and not immersed in water and rinsed thoroughly as is recommended practice. An illuminated magnification device was not being used to inspect instruments for efficacy of their cleanliness.

Following the inspection the principal dentist told us the dental nurse had been provided with additional on-line infection control training and additional checks put in place.

Staff were provided with personal protective equipment such as gloves, face masks and eye protection in line with the practice policy.

Daily, weekly and monthly records were kept of decontamination cycles and tests. We checked those records and it was evident that the equipment was in good working order and being effectively maintained.

The reception area and clinical areas of the practice were visibly clean and tidy. There were suitable arrangements in line with the Department of Health guidelines for the segregation and disposal of dental waste. The practice used an external contractor to remove dental waste from the practice and waste consignment notices were available for us to view.

There were cleaning schedules in place for cleaning the premises and equipment and cleaning records were maintained. However only one mop and bucket was being used to clean all the areas of the practice, This was rectified by the provider immediately.

There was a procedure in place for managing needle stick injuries. Records showed that all clinical staff underwent screening for Hepatitis B, were vaccinated and had proof of immunity. (People who are likely to come into contact with blood products, or are at increased risk of needle-stick injuries should receive these vaccinations to minimise risks of blood borne infections.)

However there was no sharps risk assessment in place. The principal dentist sent evidence the following day to show a sharps risk assessment had been completed.

We observed that staff wore clean uniforms and that they were aware of the proper laundering procedures to follow to minimise the risks of infections.

The dental water lines were maintained in accordance with current guidelines to prevent the growth and spread of Legionella bacteria. (Legionella is a bacterium found in the

Are services safe?

environment which can contaminate water systems in buildings) and flushing of the water lines was carried out in accordance with current guidelines and supported by a practice protocol.

Equipment and medicines

There were appropriate arrangements in place to ensure equipment was suitably maintained. Service contracts were in place for the maintenance of the autoclave and compressor. The autoclave was last serviced in November 2016. The practice had portable appliances and had carried out PAT (portable appliance testing). Appliances were last tested in January 2016.

The dentists used the British National Formulary to keep up to date about medicines. The batch numbers and expiry dates for local anaesthetics, where used were recorded in patients' dental care records.

The practice didn't have an effective system in place regarding the management and stock control of the materials used in clinical practice. We found significant amounts of out of date dental materials in two surgeries. We brought this to the attention of the principal dentist who made immediate arrangements to dispose the materials appropriately.

Radiography (X-rays)

The principal dentist was the radiation protection supervisor (RPS); however the practice didn't have an external radiation protection adviser (RPA).

An inventory of all equipment being used was present and maintenance records were up to date, with equipment last being serviced in January 2016. We also saw evidence of staff qualifications for radiation training.

We found there were suitable arrangements in place to ensure the safety of the equipment. Local rules were available folder for staff to reference if needed. Improvements could however be made to include details of staff that were trained and responsible for radiography within the practice.

X-ray audits, to assess the quality of the X-ray and to also check that they had been justified and reported on, had not being carried out.

The principal dentist sent us evidence the following day that they had now signed a contract with an external company for the services of a radiation protection advisor.

Are services effective?

(for example, treatment is effective)

Our findings

Monitoring and improving outcomes for patients

During the course of our inspection we checked a sample of dental care records to confirm the findings. We saw evidence of comprehensive assessments to establish individual patient needs. The assessment included completing a medical history, outlining medical conditions and allergies (which was reviewed at each visit), a social history recording habits such as eating and activity and an extra - and intra-oral examination. The reason for visit was documented and a full clinical assessment was completed.

Health promotion & prevention

The dentist we spoke with said they provided patients with advice to improve and maintain good oral health, including advice and support relating to diet, alcohol and tobacco consumption. Patients told us that they were well informed about the beneficial use of fluoride paste and the ill-effects of smoking on oral health.

The dentist we spoke with was aware of and was using the Department of Health publication - 'Delivering Better Oral Health; a toolkit for prevention' which is an evidence based toolkit used by dental teams for the prevention of dental disease in a primary and secondary care setting.

The dentist and hygienist provided advice to patients about the prevention of decay and gum disease including advice on tooth brushing technique and oral hygiene products. Information leaflets on oral health were available.

Staffing

Clinical staff had current registration with their professional body - the General Dental Council. There was evidence that the staff were up to date with their continuing professional development requirements, and working through their five year cycle. [The GDC require all dentists to carry out at least 250 hours of CPD every five years and dental nurses must carry out 150 hours every five years].

The dentist and dental nurses told us that they worked well as a team. There were ongoing training and development

opportunities available and the staff felt supported. Records showed that staff had undertaken training in areas including basic life support, infection control and safeguarding children and vulnerable adults.

The practice did not have a formal system for appraising staff performance and records showed that appraisals had not taken place.

Working with other services

The practice had systems in place to refer patients to alternative practices or specialists, if the treatment required was not provided by the practice. The practice referred patients for secondary (hospital) care when necessary, for example, for assessment or treatment by oral surgeons.

Referral letters contained detailed information regarding the patient's medical and dental history and a copy of the patients' referral was kept in the dental records.

The dentist explained the system and route they would follow for urgent referrals if they detected any un-explained lesion during the examination of a patient's soft tissues to rule out the possibility of oral cancer.

Consent to care and treatment

The practice had policies and procedures in place for obtaining patients' consent to treatment and staff were aware of and followed these. Staff told us that they ensured patients were given sufficient information about their proposed treatment to enable them to give informed consent. We were told how staff discussed treatment options with their patients including the risks and intended benefits of each option.

Patients told us the dentists were good at explaining their treatment and answering questions, they felt fully informed about their treatment and they were given time to consider their options before giving their consent to treatment

Though the training records of staff showed that they had not undertaken any formal training, staff we spoke with on the day of the inspection could demonstrate an understanding of their responsibilities under the Mental Capacity Act 2005 (MCA). (MCA provides a legal framework for health and care professionals to act and make decisions on behalf of adults who lack the capacity to make particular decisions for themselves).

Are services caring?

Our findings

Respect, dignity, compassion & empathy

Patients we spoke with commented positively about dentists, dental nurse and reception staff. They described staff as caring and friendly. Patients said that dentists listened to them and answered any questions regarding their dental care and treatment. They said that dentists and dental nurses understood their concerns and fears.

We reviewed the results of the NHS Friends and Family Test which is a feedback tool that supports the fundamental principle that people who use NHS services should have the opportunity to provide feedback on their experience. We found that all patients who had responded to the test said that they would be 'extremely likely' or 'likely' to recommend the dental practice to their family and friends. A number of these patients commented positively about how they were treated by staff.

However, results of the survey were not being submitted to the NHS portal.

We observed staff interacting with patients before and after their treatment and speaking with patients on the telephone. They were polite and friendly and this was also reflected in comments made by patients.

A data protection and confidentiality policy was in place of which staff were aware. This covered disclosure of and the secure handling of patient information. We observed the interaction between staff and patients and found that confidentiality was being maintained. Dental care records were held securely.

Involvement in decisions about care and treatment

The practice provided patients with information to enable them to make informed choices about their dental treatment. Patients were informed about the range of treatments available during consultations.

Patients commented they felt involved in their treatment and it was fully explained to them.

Patients we spoke with say that these options were discussed with them and that their consent to treatment was sought.

Are services responsive to people's needs?

(for example, to feedback?)

Our findings

Responding to and meeting patients' needs

The staff we spoke with were aware of the needs of the local population and aimed to deliver a flexible service to meet these needs.

The practice had an appropriate appointments system that responded to the needs of their patients. Emergency and non-routine appointments were available every day and fitted in as add-ons to scheduled appointments. If a patient had a dental emergency, the practice made efforts to see them as soon as possible or within 24 hours.

Patients we spoke with told us they had flexibility and choice to arrange appointments in line with other commitments.

Tackling inequity and promoting equality

The practice had equality and diversity and disability policies to support staff in understanding and meeting the needs of patients. Staff told us they treated everybody equally and welcomed patients from many different backgrounds, cultures and religions. Staff members told us that extra time was planned for patients who were particularly nervous or anxious and for children. Staff we spoke with explained to us how they supported patients with additional needs such as a learning disability. They ensured patients were supported by their carer and that there was sufficient time to explain fully the care and treatment they were providing in a way the patient understood.

The practice had access to language line, which would help the staff to translate if required.

Access to the service

The practice staffing consists of a principal dentist, two dentists, one dental nurse, one hygienist, practice manager/registered manager and a receptionist/nurse.

Patients who contacted the dental practice outside of its opening hours were advised how to access emergency dental services; details were available on the practice answer phone and were displayed in the waiting room.

Staff told us that where treatment was urgent patients would be seen on the same day, where possible.

Concerns & complaints

The practice had a complaints policy which provided staff with clear guidance about how to handle a complaint. Patients were provided with information, which explained how they could make complaints and how these would be dealt with and responded to. Patients were also advised how they could escalate their concerns should they remain dissatisfied with the outcome of their complaint or if they felt their concerns were not dealt with fairly. This information was displayed in the practice waiting room.

We looked at the practice procedure for acknowledging, recording, investigating and responding to complaints, concerns and suggestions made by patients. We found there was an effective system in place which helped ensure a timely response. The principal dentist told us that the practice had received no complaints within the last 12 months.

Are services well-led?

Our findings

Governance arrangements

The provider did not have effective governance arrangements at the practice. We reviewed the practice policies and saw that they were limited; those that were available were generic policies with little adaptation to the practice and had not been reviewed.

There were limited arrangements for identifying, recording and managing risks through the use of risk assessments, audits, and monitoring tools. For example, there had been no infection control audit. It's recommended that infection control audits are completed every six months in order to monitor the effectiveness of infection control protocols with a view to keeping staff and patients safe. There had also not been an audit of X-rays and dental care records. This meant that systems for identifying potential problems and concerns were not robust.

Leadership, openness and transparency

Staff told us there was an open culture at the practice and they felt valued and well supported. They reported the dentists were very approachable and available for advice where needed. The dental nurse who we spoke with told us they had good support to carry out their individual roles within the practice.

Learning and improvement

The practice did not have a formalised system of learning and improvement.

There was no evidence that practice meetings took place. The practice had no formal mechanisms to share learning.

Practice seeks and acts on feedback from its patients, the public and staff

The practice gave patients the opportunity to complete the NHS Friends and Family Test, to allow patients to provide feedback on the services provided. However these were not submitted to the NHS.

Requirement notices

Action we have told the provider to take

The table below shows the legal requirements that were not being met. The provider must send CQC a report that says what action they are going to take to meet these requirements.

Regulated activity	Regulation
Treatment of disease, disorder or injury	<p>Regulation 17 HSCA (RA) Regulations 2014 Good governance</p> <p>The registered person did not have effective systems in place to ensure that the regulated activities at Putney Dental Surgery were compliant with the requirements of Regulations 4 to 20A of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.</p> <p>How the regulation was not being met:</p> <ul style="list-style-type: none">• The registered provider had not ensured all recommended medicines and life-saving equipment were readily available.• The registered provider had not ensured that infection control protocols were always being followed in line with recommended national guidance.• The registered provider had not ensured that all the specified information relating to persons employed at the practice was obtained and appropriately recorded.• The registered provider had not ensured that governance systems were effective. The practice had not carried out audits in key areas, such as radiography. The practice had carried out limited risk assessments to safeguard the health and safety of staff and patients.• The provider did not have systems to enable them to assess, monitor and improve the quality and safety of the services provided in the carrying on of the regulated activity.• The provider did not have systems to enable them to assess, monitor and mitigate the risks relating to the health, safety and welfare of service users and others who may be at risk which arise from the carrying on of the regulated activity

This section is primarily information for the provider

Requirement notices

- ensure that their audit and governance systems were effective.

Regulation 17 (1)

Regulated activity

Treatment of disease, disorder or injury

Regulation

Regulation 19 HSCA (RA) Regulations 2014 Fit and proper persons employed

- The provider did not have an appropriate process for assessing and checking that people had the competence, skills and experience required to undertake the role. These processes must be followed in all cases and relevant records kept.
- The provider did not have an effective recruitment procedure in place to assess the suitability of staff for their role. Not all the specified information (Schedule 3) relating to persons employed at the practice was obtained.

Regulation 19 (1) , (2) (a), (3)