

# Mrs Alexanna Katherine Ferran de Pol

# My House

**Inspection report** 

46 Robinsway Hersham Walton-on-thames KT12 5QN Tel: 07706066241

Date of inspection visit: 4th July 2023 Date of publication: 24/08/2023

This report describes our judgement of the quality of care at this service. It is based on a combination of what we found when we inspected, information from our ongoing monitoring of data about services and information given to us from the provider, patients, the public and other organisations.

# Ratings

Overall rating for this location	Good	
Are services safe?	Good	
Are services effective?	Good	
Are services caring?	Good	
Are services responsive to people's needs?	Good	
Are services well-led?	Good	

# Summary of findings

# **Overall summary**

This was the first time we inspected the service. We rated it as good because it was safe, effective, caring, responsive, and well led:

- The midwife practitioner, additionally qualified as a lactation consultant, had training in key skills, understood how to protect babies and their parents from abuse, and managed safety well.
- Risk assessments were completed for all patients using an evidence-based standard assessment tool. The practitioner recognised risks to babies, acted on them and kept good care records.
- According to feedback we received, the practitioner treated babies and their parents with compassion and kindness, took account of their individual needs, and helped parents understand the condition. There was a high level of aftercare available to parents following the procedure.
- Parents could access the practitioner when they needed it and did not have to wait long for assessment or treatment. The practitioner provided emotional support to parents and made it easy for them to give feedback.
- The process of seeking and recording consent was thorough and included sufficient information to allow for informed decisions to be made by the parent.
- The practitioner followed national guidance and there was evidence of quality monitoring through audit.

#### However:

• The practitioner did not have a formal arrangement for safeguarding support or advice from their employing trust or local authority.

# Summary of findings

# Our judgements about each of the main services

Service Rating Summary of each main service

**Surgery**We have not previously inspected the service. We rated it as good because it was safe, effective, caring,

responsive, and well led.

# Summary of findings

# Contents

Summary of this inspection	Page	
Background to My House	5	
Information about My House	5	
Our findings from this inspection		
Overview of ratings	7	
Our findings by main service	8	

# Summary of this inspection

# **Background to My House**

The provider is a registered midwife and lactation consultant who offers private tongue-tie services to the community within Richmond, Kingston and Spelthorne local authority areas.

The service is registered with the CQC to provide the following regulated activity:

Surgical procedures

The provider is qualified to undertake frenulotomy divisions for babies up to the age of one year, however the procedure is normally done on babies aged from new-born to six months old. Divisions on older babies with teeth or other conditions of the mouth are referred to the NHS.

The provider is a sole trader and the clinician who undertakes the regulated activity. This will be the first CQC inspection since registration in 2021.

# Frenulotomy services

Some babies are born with a condition called tongue-tie, which has the medical name ankyloglossia. In this condition, the fold of skin under the tongue connecting the tongue to the bottom of the mouth is shorter than usual, which restricts movement of the tongue. This can cause problems with breastfeeding and the baby may not gain weight at the normal rate.

Some babies require a surgical intervention in order to release the tongue, which is known as a frenulotomy or frenotomy. These services may be offered by the NHS or independent healthcare professionals (such as doctors, dentists and midwives). For treatment on the NHS, patients need a referral from a health visitor, community midwife or GP. Parents can also directly seek advice from private practitioners.

Private and NHS funded frenulotomy services can be provided in people's homes, clinics or other community settings where the procedure does not necessitate the administration of general or local anaesthesia.

In this report, we use the term 'parent'. This describes the birth parent or primary carer of the baby and refers to persons who hold legal responsibility for the baby.

# How we carried out this inspection

We gave the provider short notice of the inspection date to ensure their availability for our visit. Our inspection included structured interviews with the practitioner and five parents, along with reviewing 11 patient case notes. We also checked policy, procedure, training and insurance documents along with disposal and storage arrangements for consumable items and clinical records.

You can find information about how we carry out our inspections on our website:

https://www.cqc.org.uk/what-we-do/how-we-do-our-job/what-we-do-inspection.

# Summary of this inspection

# **Areas for improvement**

Action the service MUST take is necessary to comply with its legal obligations. Action a trust SHOULD take is because it was not doing something required by a regulation but it would be disproportionate to find a breach of the regulation overall, to prevent it failing to comply with legal requirements in future, or to improve services.

## Action the service SHOULD take to improve:

• The practitioner should consider making a formal arrangement with an NHS provider or local authority to access level four safeguarding support and advice.

# Our findings

# Overview of ratings

Our ratings for this location are:

, and the second	Safe	Effective	Caring	Responsive	Well-led	Overall
Surgery	Good	Good	Good	Good	Good	Good
Overall	Good	Good	Good	Good	Good	Good



We have not previously inspected the service. We rated it as good because:

# **Mandatory training**

The practitioner received and kept up to date with their mandatory training. The training was comprehensive and met the needs of patients and their parents.

The practitioner stated they were employed part-time as an NHS midwife and lactation consultant, which meant they completed annual training and professional development as part of their contract of employment.

We saw records and certificates that demonstrated full compliance with statutory and mandatory training provided through their NHS post. All were in date and relevant to the practitioner's private role.

# Safeguarding

The practitioner understood how to protect people from abuse and worked with other agencies to do so. They had training on how to recognise and report abuse and they knew how to apply it.

The practitioner received training specific for their role on how to recognise and report abuse. This included training and annual updates for safeguarding children at level three and adults at level two. The practitioner knew how to identify adults and children at risk of, or suffering, significant harm and had worked with other agencies in the past to protect them.

The practitioner could give examples of how to protect babies and parents from abuse. Parents were asked about their home safety at the time of booking and this was recorded in the notes. There were processes to ensure the parent was in attendance during the initial assessment and any subsequent frenulotomy procedure.



The practitioner knew how to make a safeguarding referral and who to inform if they had concerns. There was an up to date safeguarding policy which referenced national guidelines and contained contact details for local authority safeguarding teams. No safeguarding concerns had occurred in the last year.

The practitioner described how they had informal access to NHS and local authority resources trained to level four should they require specialist advice or support. We recommended the practitioner seek written confirmation of safeguarding support at this level to help ensure these arrangements were sustainable.

# Cleanliness, infection control and hygiene

The practitioner controlled infection risks and used recognised methods to help identify and prevent surgical site infections. The practitioner used equipment and control measures to protect babies, themselves and others from infection.

The practitioner followed infection control principles including good hand hygiene and the use of personal protective equipment (PPE). As a home visiting service, the practitioner used a grab bag to store and transport essential items for use in the procedure.

The practitioner demonstrated how procedures were carried out using aseptic techniques and appropriate personal protective equipment (PPE).

The practitioner worked effectively to prevent, identify and treat surgical site infections. The grab bag featured divider pockets and easy-clean materials. It appeared clean and contents well-organised. It contained a stock of surgical scissors, latex-free gloves, dressings and drapes. These were all 'single use' items individually packaged to preserve sterility. We saw that item packaging dates were current.

Parents said they had observed the practitioner washing their hands before and after treatment; cleaning any surfaces in use and collecting any items used for disposal.

There was a process to record surgical site infections, however, no infections had been identified or reported.

# **Environment and equipment**

# The use of equipment kept people safe. The service had enough suitable equipment to help them to safely care for patients.

We checked clinical items stored in a mobile grab bag as well as stock secured in a locked room at the location. Consumable items were stored in accordance with manufacturers' guidelines and all were in date.

The practitioner disposed of clinical waste safely. Waste was correctly separated and clinical waste disposed of appropriately. We saw a portable sharps bin in the grab bag for disposal of the single-use surgical scissors.

The provider used a clinical waste collection service and we saw evidence of documents indicating clinical waste and sharps were correctly traced through to disposal.

The practitioner explained assessment and treatment visits were always made to the family home.



### Assessing and responding to patient risk

The practitioner completed and updated risk assessments for each patient and removed or minimised risks. They knew what to do when there was an emergency.

Only babies with a functional deficit that restricted their ability to feed or use their tongue appropriately were accepted. Babies with complex medical needs or unusual oral anatomy were referred to the NHS.

The practitioner used a nationally recognised tool to assess patients and escalated potential risks appropriately. Initial risk assessments were carried out for each patient on booking. These were conducted by telephone and then reviewed at the patient's home.

The practitioner knew about and dealt with any specific risk issues. The practitioner used acceptance criteria which excluded babies over six months old and complex cases of tongue-tie. Screening questions included a full family health history and key issues such as vitamin K administration status. Mothers whose babies required a frenulotomy and who had not been given vitamin K were informed about the increased possibility of bleeding and this was indicated on the consent form.

The practitioner demonstrated the process to reduce the risk of babies moving during the procedure and to ensure they were safely cared for. This included securely swaddling the baby in their own blanket, with the parent positioned to hold the baby's head and shoulders while the frenulotomy was carried out.

The practitioner had received training in bleeding complications and followed best practice guidance from the Association of Tongue-tie Practitioners (ATP). The risk of bleeding was minimised by the health assessment prior to the procedure.

There was a policy and a process to deal with bleeding and other complications if they arose. We also noted this aspect had been included in the provider risk register.

Parents we spoke with confirmed the potential risks and complications were explained to them before the procedure. The most common risk identified was bleeding immediately post procedure.

### **Staffing**

The practitioner had the right qualifications, skills, training and experience to keep babies safe from avoidable harm and to provide the right care and treatment.

We saw evidence of training and professional qualifications held by the practitioner relevant to this role.

No other staff were employed in the service nor were bank or agency staff used.

#### Records

Detailed records of patients' care and treatment were kept safe. Records were clear, up to date, stored securely and easily accessible.



Patient notes were comprehensive and could be accessed easily. We checked a sample of 11 recent records and found all to be accurate and complete. The practitioner explained how the personal child health record book (called the 'red book') was updated during the appointment and parents we spoke with confirmed this.

Records were stored and archived securely. The practitioner was the data controller registered with the Information Commissioner's Office (ICO) and had processes to ensure records remained safe and complied with regulations in the event the business ceased.

We saw records stored in a locked room at the location.

#### **Medicines**

The service did not use medicines.

### **Incidents**

There was a system to ensure patient safety incidents were managed well. The practitioner recognised and reported incidents and near misses. All incidents were investigated. If things went wrong, there was a process for the practitioner to follow and to apologise to parents.

There had been one re-attachment and one prolonged bleeding episode in the last year. The practitioner described how each incident had been managed and the experience used to help learning and ongoing development of the assessment documentation.

The practitioner had active contacts with NHS neonatal and infant feeding services and utilised their NHS employment to get information on national patient safety incidents relevant to the service. The practitioner also obtained safety updates through their membership in the Association of Tongue-tie Practitioners (ATP).

The practitioner understood their obligation under Duty of Candour (DoC). This statutory duty, under the Health and Social Care Act (Regulated Activities Regulations 2014) requires providers of health and social care services to notify babies (or other relevant persons) of certain safety incidents and provide them with reasonable support.



We have not previously inspected the service. We rated it as good because:

### **Evidence-based care and treatment**

The service provided care and treatment based on national guidance and evidence-based practice. The practitioner ensured they followed up to date guidance.



The practitioner followed up-to-date policies to plan and deliver high quality care according to best practice and national guidance. The practitioner had a range of policies and protocols to support the delivery of services. The practitioner followed best practice guidance including National Institute for Health and Clinical Excellence (NICE) IPG 149, guidance for division of ankyloglossia (tongue-tie) for breastfeeding, 2005.

The practitioner used the assessment decision making tool, Hazelbaker Assessment Tool for Lingual Frenulum Function (HATLFF) to assess for tongue-tie and determine whether a division was required. This enabled the practitioner to exclude other causes of feeding difficulty, such as oral thrush.

The practitioner was a member of the Association of Tongue-tie Practitioners (ATP) which met bi-monthly to discuss guidance updates and new ideas or techniques. The practitioner participated in an audit conducted by the ATP to measure the outcomes of frenulotomy and used this data to help inform parents when obtaining consent for treatment.

### **Nutrition & hydration**

## The service provided specialist advice on feeding and hydration techniques.

Mothers and babies had a feeding assessment prior to any procedure being carried out.

Parents confirmed information on different feeding techniques was provided along with discussion about alternatives for both breast and bottle-fed babies.

After the procedure, babies were encouraged to feed to help assess the effectiveness of the procedure.

### Pain relief

## The practitioner assessed and monitored babies regularly to see if they were in pain.

Babies were observed during the procedure and immediately afterwards and were encouraged to feed as soon as possible in order to calm and reassure them.

No medicines for pain relief were given by the practitioner, however babies over three months old could be given pain relief by their parent prior to their appointment if they felt this was required.

Information on pain during the procedure was given to parents and discussed during initial assessments and again prior to the procedure being carried out.

The practitioner described the use of distraction techniques to help pacify crying babies and gave appropriate support to parents. Parents we spoke with confirmed this.

#### **Patient outcomes**

The practitioner monitored the effectiveness of care and treatment. They used the findings to make improvements and achieved good outcomes for patients.

There were no national audits relevant to this service.



However, as a member of the Association of Tongue-tie Practitioners (ATP), the practitioner submitted data for collation on number of bleeds, infection rates or redivisions performed.

# **Competent staff**

## The practitioner made sure they were competent for their role.

The practitioner was experienced, qualified and had the right skills and knowledge to meet the needs of patients. They had attended a recognised frenulotomy training course and had evidence of competency in carrying out procedures. Prior to starting the business, the practitioner explained they had worked in two NHS frenulotomy clinics for several years and had progressed to senior leadership roles in both clinics.

In addition, the practitioner had updated their skills through recently qualifying as a lactation consultant.

The practitioner identified any training needs and took the time and opportunity to develop their skills and knowledge. They attended regular meetings with other tongue tie practitioners and worked with professionals to ensure their practice was continually updated.

There were no appraisal systems available as the practitioner was a sole trader. They described peer support and practice discussions with NHS and ATP colleagues. The practitioner kept a log of reflective learning and met with their Nursing and Midwifery Council (NMC) mentor for their revalidation.

## **Multidisciplinary working**

# The practitioner worked with other healthcare professionals to benefit babies and their parents. They supported each other to provide good care.

The practitioner worked across health care disciplines and with other agencies when required to care for patients. The practitioner described how they shared information, with the consent of the parent, with the parent's GP or local NHS specialist feeding teams, infant feeding specialists and health visitors.

The practitioner also identified other ATP practitioners in the locality to accommodate patients requiring access to a service at times they might be unavailable.

### Seven-day services

## Key services were available, by arrangement, throughout the week.

Parents told us how the practitioner quickly responded to enquiries and provided appointments, including over weekends, by mutual agreement.

During periods of leave, parents were signposted to the directory of practitioners on the ATP website.

Parents confirmed that the practitioner was available for telephone after-care advice and follow up appointments.

### **Health Promotion**



## Patients received practical support and advice to help their babies develop healthily.

We received positive feedback from parents who described how the practitioner gave advice and support towards promoting healthy lifestyles. Parents were signposted to other services and provided with information on local feeding and breastfeeding support groups.

## Consent, Consent, Mental Capacity act and Deprivation of Liberty Safeguards

# The practitioner supported parents to make informed decisions about their babies' care and treatment. The practitioner followed national guidance to gain parents and legal guardians' consent.

The practitioner followed national guidance to gain consent from parents for their babies' care and treatment. The practitioner was aware of the consent process and could describe instances where consent would not be valid.

Due to the nature of the service, the provider was not required to treat patients in their best interests, or to carry out mental capacity assessments. In circumstances where a baby's birth was not yet registered and a birth certificate was not available, the provider required sight of the personal child health record (PCHR), also known as the 'red book', as proof of identification. The practitioner described how the information in the book corresponded to the baby being seen.

Consent was clearly recorded in the patients' records. Patients records showed consent forms were always completed by the primary caregiver.

The practitioner understood the relevant consent and decision-making requirements of legislation and guidance, including the Mental Health Act, Mental Capacity Act 2005 and the Children Acts 1989 and 2004 and they knew who to contact for advice.



We have not previously inspected the service. We rated it as good because:

### **Compassionate care**

We spoke with parents who confirmed the practitioner treated babies with compassion and kindness, respected their privacy and dignity, and took account of their individual needs.

There were no appointments on the day of our inspection, so we were unable to observe interactions between the practitioner and patient. Following our visit, we arranged with the practitioner to seek consent from parents who had recently attended for us to interview them over the telephone.

We selected a random sample of people from the list and spoke with five parents. Without exception, they described the level of care and support provided to them and their baby in very positive terms. The practitioner was particularly commended for her ongoing support after the procedure, which included a follow-up visit.



We also reviewed comments made about the practitioner in feedback linked to the My House website. These were positive.

### **Emotional support**

## The practitioner provided emotional support to parents and primary carers to minimise their distress.

Although we were unable to observe interactions between the practitioner and patient, the parents we spoke with confirmed they received emotional support and advice when required. We heard how the practitioner's behaviour and advice made them feel confident and supported.

Parents also described how the practitioner followed strict infection control guidelines which also promoted their confidence in the safety of the service and reduced their anxiety.

### Understanding and involvement of parents or primary carers and those close to them

# The practitioner supported mothers or primary carers to understand their babies' condition and make decisions about their care and treatment.

Parents told us they had been communicated with clearly and had their questions resolved in ways they could easily understand. Appointment visits were unhurried and long enough to accommodate questions and discussions about treatment options.

Telephone and messaging support was freely available following the procedure. We saw telephone contact details were included on the discharge instructions for parents to ring should they have any concerns. This was also offered out of hours for parents to call should this be necessary. Details of local support groups were also provided.

Parents told us they were informed of the fees charged for the service at the booking stage and the information they received was clear and unambiguous.



We have not previously inspected the service. We rated it as good because:

### Service delivery to meet the needs of local people

The practitioner responded and provided care in a way that met the needs of local people. The service also worked with others in the wider system and local organisations to provide care.

Appointment slots for home visits were flexible and could be rearranged if necessary. Urgent requests could often be accommodated at short notice. None of the parents we spoke with had to wait more than a day or so for an appointment.

### Meeting people's individual needs



The service was inclusive and took account of patients' individual needs and preferences. The practitioner made reasonable adjustments to help patients access services.

The service did not treat any patients with complex needs. The practitioner described how they would ask permission from the parent to seek support from their GP or health visitor if they had concerns about their ability to provide the right support during treatment.

The practitioner used a variety of information leaflets available in English and knew how to obtain translation support, if this should become apparent during the initial booking and assessment discussion.

#### Access and flow

### People could access the practitioner when they needed it and received the right care promptly.

There were no waiting lists for the frenulotomy service and parents told us they could book an appointment as soon as they required it.

The practitioner explained any last minute cancellation by the service rarely occurred and only due to an emergency situation, such as ill health. Where a cancellation was necessary, parents were offered dates for rebooking as soon as possible, or if required they were provided with details of alternative tongue-tie practitioners in the region.

Parents said they were able to rearrange an appointment if required.

### **Learning from complaints and concerns**

It was easy for people to give feedback and raise concerns about care received. The practitioner had a complaints policy outlining how it treated concerns and complaints seriously, investigated them and shared lessons learned with other professionals.

Parents and primary carers knew how to complain or raise concerns. The practitioner's website had a feedback link that parents could use to leave comments and feedback.

The practitioner had a complaints policy and parents were provided with details of how to contact the CQC should they wish to do so. The practitioner described their process for handling and investigating formal complaints which followed their policy. The complaints policy outlined how the complaint would be handled and included timescales of when the complainant would get a final response.

There had been no formal complaints received in the last year.



We have not previously inspected the service. We rated it as good because:



### Leadership

The registered manager had the skills and abilities to run the service. They understood and managed the priorities and issues the service faced. They were available and approachable for patients.

The service was operated by the practitioner as a sole trader. The practitioner retained currency with their professional role through their part-time employment as a midwife in the NHS.

They took an active membership role in the Association of Tongue-tie Practitioners (ATP) and engaged with others to promote the interests of practitioners.

### Vision and Strategy

The practitioner had a vision for what it wanted to achieve and a strategy to turn it into action, developed with all relevant stakeholders. The vision and strategy were focused on sustainability of services.

The vision and strategy were focused on customer care and quality of services. The practitioner took opportunities to provide other services such as infant feeding advice in order to develop the business and improve sustainability. These activities are not regulated by the CQC.

#### **Culture**

The practitioner focused on the needs of patients receiving care and promoted equality and diversity in their daily work. The service had an open culture where parents could raise concerns without fear.

The practitioner promoted a culture which supported women, their partners and their baby's health irrespective of cultural background or belief. Responses from parents was positive and indicated the practitioner was engaged with customers and respectful of their needs and differences.

The practitioner had in-date indemnity insurance.

The practitioner was aware of their responsibility to report statutory notifications to CQC. There had been no incidents requiring a statutory notification since the business commenced.

Policies were current and appropriate for the service.

## Management of risk and performance

Risks were identified and actions to reduce their impact were listed on the provider's risk register. These included plans to cope with unexpected events.

There was a risk register in place, which contained the risks identified by the registered manger which could have an effect on the service.

Risks listed included patient risks as well as business risks. The practitioner had a lone working policy and described how they assessed risks for personal safety and the home environment where procedure was carried out.



Eight risks were listed and these had mitigations in place and had review dates set.

### **Information Management**

The practitioner collected data and analysed it to help improve their service. The information systems were secure. There was a process to submit notifications to external organisations as required.

All patient information held by the practitioner was stored in paper form.

The practitioner updated the personal child health record at the time of the visit and permission was sought to share post-procedure summary letters directly with the family GP.

The practitioner had a data protection policy which included data retention periods and disposal methods.

Anonymised audit information was collated on paper and stored in folders until it could be transmitted to the ATP auditing lead.

# **Engagement**

The practitioner engaged with patients, the public and local organisations to manage their service. They collaborated with partner organisations to help improve services for patients.

The provider's website contained limited information about the condition of tongue-tie, the procedure and advice on baby feeding.

All parents were encouraged to provide feedback on the care they had received.

# Learning, continuous improvement and innovation

The registered manager was committed to continual learning and to improving their service. They understood the skills required to make improvements and they shared information for research and to innovate future services.

The practitioner encouraged feedback to help ensure the service was meeting the needs of their patients.

The practitioner had oversight of the service's risks and understood the challenge of risks in terms of quality, improvements, and performance.