

# Ouronyx

### **Inspection report**

20 St. James's Street London SW1A 1ES Tel: 02045421683 www.ouronyx.com

Date of inspection visit: 11 November 2022 Date of publication: 18/01/2023

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?	Requires Improvement	
Are services effective?	Good	
Are services caring?	Good	
Are services responsive to people's needs?	Good	
Are services well-led?	Good	

## Overall summary

#### This service is rated as Good overall.

The key questions are rated as:

Are services safe? – Requires improvement

Are services effective? - Good

Are services caring? - Good

Are services responsive? - Good

Are services well-led? - Good

We carried out an announced comprehensive inspection at Ouronyx on 11 November 2022 as part of our inspection programme.

The service offered hair treatments and medical botox for hyperhidrosis (excessive sweating).

This service is registered with CQC under the Health and Social Care Act 2008 in respect of some, but not all, of the services it provides. There are some exemptions from regulation by CQC which relate to particular types of regulated activities and services and these are set out in Schedule 1 and Schedule 2 of The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014. Ouronyx provides a range of non-surgical cosmetic interventions, for example, botox and fillers which are not within CQC scope of registration. Therefore, we did not inspect or report on these services.

The medical operations 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 service is run.

For reasons of safety and infection prevention and control related to the COVID-19 pandemic, we did not commission patient feedback with CQC comment cards. We spoke to two patients during this inspection and received positive feedback.

#### Our key findings were:

- Recruitment checks were not always carried out in accordance with regulations including Disclosure and Barring Service (DBS) checks.
- Risks to patients were managed well in most areas, with the exception of issues related to some emergency medicines and the calibration of medical equipment.
- Consultations were comprehensive and undertaken in a professional manner.
- Consent procedures were in place and these were in line with legal requirements.
- There was an infection prevention and control policy and procedures were in place to reduce the risk and spread of infection.
- Staff members were knowledgeable and had the experience and skills required to carry out their roles.
- Clinical records were detailed and held securely.
- The service held regular clinical governance meetings and minutes were maintained.
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## Overall summary

- The service had systems to manage and learn from incidents.
- Patients were able to access care and treatment in a timely manner.

The areas where the provider **must** make improvements as they are in breach of regulations are:

- Ensure care and treatment is provided in a safe way to patients.
- Ensure recruitment procedures are established and operated effectively to ensure only fit and proper persons are employed.

The areas where the provider **should** make improvements are:

• Implement a formal process to peer review the performance of the doctor.

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Chief Inspector of Hospitals and Interim Chief Inspector of Primary Medical Services

### Our inspection team

Our inspection team was led by a CQC lead inspector. The team included a GP specialist adviser.

### Background to Ouronyx

Ouronyx is an independent clinic in central London.

Services are provided from: 20 St. James's Street, London, SW1A 1ES. We visited this location as part of the inspection on 11 November 2022.

The service offers hair treatments which include micrografting (a type of hair regenerative minor surgical procedure used to help activate stem cells in hair follicles) by the doctor. In addition, the service offers medical botox for hyperhidrosis (excessive sweating).

The service is offering a range of aesthetic services which were out of the scope of this inspection.

The service was open to adults only.

Online services can be accessed from the practice website: www.ouronyx.com.

The clinic is open from 9am to 6pm Monday to Friday.

Ouronyx team consists of a doctor, two practitioners, a medical operations manager, a general manager, a PR manager, a business development manager, a finance director and a customer experience staff team.

The service is registered with the CQC to provide the regulated activity of treatment of disease, disorder or injury and surgical procedures.

#### How we inspected this service

Pre-inspection information was gathered and reviewed before the inspection. We spoke with a range of clinical and non-clinical staff. We looked at records related to patient assessments and the provision of care and treatment. We also reviewed documentation related to the management of the service. We reviewed patient feedback collected by the service.

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.



### Are services safe?

#### We rated safe as Requires improvement because:

- Recruitment checks were not always carried out in accordance with regulations including Disclosure and Barring Service (DBS) checks.
- Some emergency medicines were not in stock.
- The service was unable to provide documentary evidence of medical equipment calibration.

#### Safety systems and processes

### The service had systems to keep people safe and safeguarded from abuse. However, some improvements were required.

- The service conducted safety risk assessments. It had appropriate safety policies, which were regularly reviewed and communicated to staff. They outlined clearly who to go to for further guidance. Staff received safety information from the service as part of their induction and refresher training. Policies were regularly reviewed and were accessible.
- The service offered healthcare services to adults only. The service had systems to safeguard vulnerable adults from abuse.
- The service worked with other agencies to support patients and protect them from neglect and abuse. Staff took steps to protect patients from abuse, neglect, harassment, discrimination and breaches of their dignity and respect.
- We noted that appropriate recruitment checks had not always been undertaken prior to employment. For example, we reviewed three staff files. We noted that the service was not following their own recruitment policy and satisfactory references (satisfactory evidence of conduct in previous employment) for one staff had not been undertaken prior to employment. Appropriate health checks (satisfactory information about any physical or mental health conditions) had not been undertaken prior to employment. One contract was not signed by the staff.
- Disclosure and Barring Service (DBS) checks were not always undertaken appropriate to the role where required. (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). For example, we noted that the general manager had not received a DBS check. Non-clinical staff who acted as chaperones were trained for the role. However, they had not received a DBS check appropriate to their role and an appropriate risk assessment was not completed. A few weeks after the inspection, the service informed us that all staff had received DBS checks appropriate to their role.
- Staff vaccination was maintained in line with current UKHSA guidance.
- All staff received up-to-date safeguarding and safety training appropriate to their role. They knew how to identify and report concerns.
- There was an effective system to manage infection prevention and control. Quarterly infection control audits were carried out. There were systems for safely managing healthcare waste.
- The service carried out a legionella risk assessment on 13 February 2021 and regular water temperature checks had been carried out. (Legionella is a term for a particular bacterium which can contaminate water systems in buildings).
- The service ensured that facilities were safe. We noted that most equipment was maintained according to the manufacturers' instructions. However, some medical equipment such as blood pressure monitors, thermometers and pulse oximeters (used for measuring the oxygen in the blood) were not calibrated in the last 12 months. A few weeks after the inspection, the service informed us that new blood pressure monitors, thermometers and pulse oximeters were purchased.
- The service carried out appropriate environmental risk assessments, which took into account the profile of people using the service and those who may be accompanying them.
- On registering with the service, a patient's identity was verbally verified. Patients were able to register with the service by verbally providing a date of birth and address. At each consultation, patients confirmed their identity face to face. They were able to pay by debit or credit card and cash.



### Are services safe?

#### **Risks to patients**

### There were systems to assess, monitor and manage risks to patient safety. However, some improvements were required.

- There were arrangements for planning and monitoring the number and mix of staff needed.
- There was an effective induction system for staff tailored to their role.
- Staff understood their responsibilities to manage emergencies and to recognise those in need of urgent medical attention. They knew how to identify and manage patients with severe infections, for example sepsis.
- The systems and arrangements for managing emergency medicines minimised risks. However, most emergency medicines were in stock except three of the medicines used to treat asthma, epileptic fit and suspected bacterial meningitis (an infection and inflammation of the fluid and membranes surrounding the brain and spinal cord). A few weeks after the inspection, the service informed us that they had reviewed and ordered missing emergency medicines.
- When there were changes to services or staff the service assessed and monitored the impact on safety.
- There were appropriate indemnity arrangements in place.
- There was suitable equipment to deal with medical emergencies which was stored appropriately and checked regularly.

#### Information to deliver safe care and treatment

#### Staff had the information they needed to deliver safe care and treatment to patients.

- Patient records were stored securely using an electronic record system. Individual care records were written and managed in a way that kept patients safe. The care records we saw showed that information needed to deliver safe care and treatment was available to relevant staff in an accessible way.
- The service had systems for sharing information with staff and other agencies to enable them to deliver safe care and treatment.
- The service had a system in place to retain medical records in line with Department of Health and Social Care (DHSC) guidance in the event that they cease trading.
- Clinicians made appropriate and timely referrals in line with protocols and up to date evidence-based guidance.

#### Safe and appropriate use of medicines

#### The service had reliable systems for appropriate and safe handling of medicines.

- The service offered hair treatments which included micrografting (a type of hair regenerative minor surgical procedure used to help activate stem cells in hair follicles) by the doctor. In addition, the service offered medical botox for hyperhidrosis (excessive sweating).
- The service was offering a range of aesthetic services which were out of the scope of this inspection.
- The service informed us they rarely prescribed any medicines including antibiotics. They did not treat acute or long term conditions. The service had issued five prescriptions in the last 12 months and carried out prescribing audit to review this
- The service had some antibiotics and antihistamines in stock used to treat skin infections or torelieve symptoms of allergic reactions. These medicines were checked regularly and regular audits were carried out to monitor their use.
- The service did not prescribe Schedule 2 and 3 controlled drugs (medicines that have the highest level of control due to their risk of misuse and dependence). Neither did they prescribe schedule 4 or 5 controlled drugs.

#### Track record on safety and incidents



### Are services safe?

#### The service had a good safety record.

- The premises was well maintained and the facilities were excellent. There were comprehensive risk assessments in relation to safety issues.
- The service had an up to date fire risk assessment (13 February 2021) in place and they were carrying out regular fire safety checks.
- We noted that the safety of electrical portable equipment was assessed at the premises to ensure they were safe to
- The fire extinguishers were serviced annually.
- The fire drills were carried out.
- The service monitored and reviewed activity. This helped it to understand risks and gave a clear, accurate and current picture that led to safety improvements.

#### Lessons learned and improvements made

#### The service learned and made improvements when things went wrong.

- There was a system for recording and acting on incidents or significant events. Staff we spoke with demonstrated their understanding to raise concerns and report incidents and near misses.
- There were adequate systems for reviewing and investigating when things went wrong. The service learned and shared lessons identified themes and took action to improve safety in the service. For example, the service investigated a skin allergic reaction incident after topical anaesthetic treatment. They removed the cream and the patient was monitored for mild redness on the forehead. The service reminded all staff to carry out a patch test before the treatment to reduce the chances of any allergic reaction.
- The service was aware of and complied with the requirements of the Duty of Candour. The service encouraged a culture of openness and honesty. The service had systems in place for knowing about notifiable safety incidents.

When there were unexpected or unintended safety incidents:

- The service gave affected people reasonable support, truthful information and a verbal and written apology.
- They kept written records of verbal interactions as well as written correspondence.
- The service acted on and learned from external safety events as well as patient and medicine safety alerts. The service had an effective mechanism in place to disseminate alerts to all members of the team.



### Are services effective?

#### We rated effective as Good because:

#### Effective needs assessment, care and treatment

The provider had systems to keep clinicians up to date with current evidence based guidance and standards such as the National Institute for Health and Care Excellence (NICE) and the British Association of Dermatologists (BAD) best practice guidelines.

- The service offered hair treatments provided by the doctor.
- The service ensured that all patients must be seen face to face by the doctor for their initial consultation. All patients were asked to complete a medical history form prior to the appointment which was reviewed during one hour consultation. During the consultation, scalp and hair photos were taken and sent to the trichology laboratory for analysis to decide whether it was appropriate to carry out the treatment. The assessments were tailored according to information on each patient and included their clinical needs and their mental and physical wellbeing.
- Following the evaluation of results, the service offered hair treatments which included micrografting (a type of hair regenerative minor surgical procedure used to help activate stem cells in hair follicles).
- Clinicians had enough information to make or confirm a diagnosis.
- We saw no evidence of discrimination when making care and treatment decisions.
- Arrangements were in place to deal with repeat patients.
- Staff assessed and managed patients' pain where appropriate.

#### **Monitoring care and treatment**

#### The service was involved in quality improvement activity.

- There was evidence of quality improvement activity. For example, the service carried out a comprehensive record keeping audit monthly to ensure effective monitoring and assessment of the quality of the service.
- The service carried out a consent form audit to ensure consent was taken in a timely manner.
- Clinical governance meetings were held regularly and random clinical records were reviewed and discussed during the meeting and minutes were maintained.
- The doctor rarely prescribed any medicines. However, some medicines were kept in stock which were dispensed if required and regular prescribing audits were completed to monitor their use.
- Pre-appointment and post-appointment questionnaires were completed by the patients to measure the effectiveness of the treatment offered.
- We found the service was following up on the trichology results and had an effective monitoring system in place to ensure that all abnormal results were managed in a timely manner and saved in the patient's records.

#### **Effective staffing**

#### Staff had the skills, knowledge and experience to carry out their roles.

- All staff were appropriately qualified. The service had an induction programme for all newly appointed staff.
- The doctor was registered with the General Medical Council (GMC) the medical professionals' regulatory body with a license to practice.
- The service had kept evidence of doctors' professional qualifications in their staff files.
- The doctors had a current responsible officer. (All doctors working in the United Kingdom are required to have a responsible officer in place and required to follow a process of appraisal and revalidation to ensure their fitness to practice). The doctors were following the required appraisal and revalidation processes.



### Are services effective?

- The service understood the learning needs of staff and provided protected learning time and training to meet them. Up to date records of skills, qualifications and training were maintained. Staff were encouraged and given opportunities to develop.
- Staff had received training relevant to their role and received an appraisal within the last 12 months.

#### Coordinating patient care and information sharing

#### Staff worked together, and worked well with other organisations, to deliver effective care and treatment.

- Patients received coordinated and person-centred care. If a patient needed further examination they were directed to an appropriate agency; signposted to their own GP or to their nearest A&E department.
- Before providing treatment, doctors at the service ensured they had adequate knowledge of the patient's health, any relevant test results and their medical history.
- When a patient contacted the service, they were asked if the details of their consultation could be shared with their NHS GP. If the patient did not agree to the service of sharing information with their GP, then in case of an emergency the provider discussed this again with the patient to seek their consent. Where patients agreed to share their information, we saw evidence of letters sent to their registered GP in line with GMC guidance.
- Patient information was shared appropriately (this included when patients moved to other professional services), and
  the information needed to plan and deliver care and treatment was available to relevant staff in a timely and
  accessible way. There were clear and effective arrangements for following up on people who had been referred to
  other services.

#### Supporting patients to live healthier lives

### Staff were consistent and proactive in empowering patients, and supporting them to manage their own health and maximise their independence.

- Where appropriate, staff gave people advice so they could self-care.
- Risk factors were identified, highlighted to patients and where appropriate highlighted to their normal care provider for additional support.
- Where patients needs could not be met by the service, staff redirected them to the appropriate service for their needs.

#### Consent to care and treatment

#### The service obtained consent to care and treatment in line with legislation and guidance.

- Staff understood the requirements of legislation and guidance when considering consent and decision making.
- Staff supported patients to make decisions. Where appropriate, they assessed and recorded a patient's mental capacity to make a decision.
- The service monitored the process for seeking consent appropriately.



## Are services caring?

#### We rated caring as Good because:

#### Kindness, respect and compassion

#### Staff treated patients with kindness, respect and compassion.

- For reasons of safety and infection prevention and control related to the COVID-19 pandemic, we did not commission patient feedback with CQC comment cards. We spoke with two patients over the telephone during this inspection.
- The service sought feedback on the quality of clinical care patients received.
- Feedback from patients was positive about the way staff treat people.
- We reviewed patient feedback available online (social media) which was positive.
- Staff understood patients' personal, cultural, social and religious needs. They displayed an understanding and non-judgmental attitude to all patients.
- The service gave patients timely support and information.

#### Involvement in decisions about care and treatment

#### Staff helped patients to be involved in decisions about care and treatment.

- Interpretation services were available for patients who did not have English as a first language.
- The service gave patients clear information to help them make informed choices including information on the clinic's website. The information included details of the scope of services offered and information on fees.
- We saw that diagnostic procedures were personalised and patient specific which indicated patients were involved in decisions about care and treatment.
- Feedback suggested that patients felt diagnosis were explained clearly to them.
- The service had comprehensive patient information leaflets available explaining the diagnostic procedures and what to expect.

#### **Privacy and Dignity**

#### The service respected patients' privacy and dignity.

- Staff recognised the importance of people's dignity and respect.
- Staff knew that if patients wanted to discuss sensitive issues or appeared distressed they could offer them a private room to discuss their needs.



## Are services responsive to people's needs?

#### We rated responsive as Good because:

#### Responding to and meeting people's needs

### The service organised and delivered services to meet patients' needs. It took account of patient needs and preferences.

- Patients' individual needs and preferences were central to the planning and delivery of tailored services. Services were flexible, provided choice and ensured continuity of care, for example, evening appointments were available for patients who were unable to attend the practice during normal working hours.
- The facilities and premises were appropriate for the services delivered.
- The practice made reasonable adjustments when patients found it hard to access services.
- The provider offered consultations to anyone who requested and paid the appropriate fee and did not discriminate against anyone.
- The service website was well designed, clear and simple to use featuring regularly updated information. The website included arrangements for dealing with complaints, information regarding access to the service, consultation and treatment fees and chaperone policy.
- They provided services to patients with an ethos of providing individualised care and treatment, considering and respecting the wishes of its patients.

#### Timely access to the service

### Patients were able to access care and treatment from the service within an appropriate timescale for their needs.

- Patients had timely access to initial assessment, test results, diagnosis and treatment.
- Waiting times, delays and cancellations were minimal and managed appropriately.
- Patients with the most urgent needs had their care and treatment prioritised.
- Patients reported that the appointment system was easy to use. Patients could access the service in a timely way by making their appointment over the telephone or in person.
- Appointments were available between 9am to 6pm Monday to Friday.
- Referrals and transfers to other services were undertaken in a timely way.
- This service was not an emergency service. Patients who had a medical emergency were advised to ask for immediate medical help via 999 or if more appropriate to contact their own GP or NHS 111.
- The patient feedback we received confirmed they had the flexibility and choice to arrange appointments in line with other commitments.

#### Listening and learning from concerns and complaints

#### The service had a system in place for handling complaints and concerns.

- Information about how to make a complaint or raise concerns was available. The service had not received any formal complaints in the last 12 months.
- The service had a complaint policy and procedures in place. The policy contained appropriate timescales for dealing with the complaint. There was a designated responsible person to handle all complaints.
- The service informed patients of any further action that may be available to them should they not be satisfied with the response to their complaint. The complaints policy included information of the complainant's right to escalate the complaint to the Independent Sector Complaints Adjudication Services (ISCAS).



### Are services well-led?

#### We rated well-led as Good because:

#### Leadership capacity and capability

#### Leaders had the capacity and skills to deliver high-quality, sustainable care.

- Leaders were knowledgeable about issues and priorities relating to the quality and future of services. They understood the challenges and were addressing them.
- Leaders at all levels were visible and approachable. They worked closely with staff and others to make sure they prioritised compassionate and inclusive leadership.
- The provider had effective processes to develop leadership capacity and skills, including planning for the future leadership of the service.

#### Vision and strategy

## The service had a clear vision and credible strategy to deliver high quality care and promote good outcomes for patients.

- There was a clear vision and set of values. The service had a realistic strategy and supporting business plans to achieve priorities.
- The service developed its vision, values and strategy jointly with staff.
- Staff were aware of and understood the vision, values and strategy and their role in achieving them
- The service monitored the progress against the delivery of the strategy.

#### **Culture**

#### The service had a culture of high-quality sustainable care.

- Staff felt respected, supported and valued. They were proud to work for the service.
- The service focused on the needs of patients.
- Leaders and managers acted on behaviour and performance inconsistent with the vision and values.
- Openness, honesty and transparency were demonstrated when responding to incidents and complaints. The provider was aware of and had systems to ensure compliance with the requirements of the duty of candour.
- Staff told us they could raise concerns and were encouraged to do so. They had confidence that these would be addressed.
- There were processes for providing all staff with the development they need. This included appraisal and career development conversations. All staff received regular annual appraisals in the last year. Staff were supported to meet the requirements of professional revalidation where necessary. Clinical staff were considered valued members of the team. They were given protected time for professional development and evaluation of their clinical work.
- There was a strong emphasis on the safety and well-being of all staff.
- The service actively promoted equality and diversity. It identified and addressed the causes of any workforce inequality. Staff had received equality and diversity training. Staff felt they were treated equally.
- There were positive relationships between staff and teams.

#### **Governance arrangements**

There were clear responsibilities, roles and systems of accountability to support good governance and management. However, some improvements were required.



### Are services well-led?

- Leaders had established proper policies, procedures and activities to ensure safety. However, we found that they were not always operating as intended. For example, we found gaps in recruitment checks, which was not in line with the service policies.
- Structures, processes and systems to support good governance promoted interactive and co-ordinated person-centred care.
- Staff were clear on their roles and accountabilities

#### Managing risks, issues and performance

### There were processes in place for managing risks, issues and performance. However, some improvements were required.

- There were arrangements for identifying, recording and managing risks, issues and implementing mitigating actions. However, monitoring of some specific areas required improvement, such as emergency medicines and calibration of medical equipment.
- There was no formal peer review system in place for the doctor. However, random clinical records were reviewed during clinical governance meetings.
- Leaders had oversight of safety alerts and incidents.
- There was clear evidence of action to change services to improve quality.
- The provider had plans in place and had trained staff for major incidents.

#### **Appropriate and accurate information**

#### The service acted on appropriate and accurate information.

- Quality and operational information was used to ensure and improve performance. Performance information was combined with the views of patients.
- Quality and sustainability were discussed in relevant meetings where all staff had sufficient access to information.
- The service used performance information which was reported and monitored and management and staff were held to account.
- The information used to monitor performance and the delivery of quality care was accurate and useful. There were plans to address any identified weaknesses.
- There were robust arrangements in line with data security standards for the availability, integrity and confidentiality of patient identifiable data, records and data management systems.
- The service was registered with the Information Commissioner's Office (ICO).

#### Engagement with patients, the public, staff and external partners

#### The service involved patients, staff and external partners to support high-quality sustainable services.

- The service encouraged and heard the views and concerns from the patients and staff and acted on them to shape services and culture. The service requested patients to complete pre-appointment and post-appointment questionnaires which were reviewed quarterly. This was highly positive about the quality of service patients received.
- Staff could describe to us the systems in place to give feedback. We saw evidence of feedback opportunities for staff and how the findings were fed back to staff. We also saw staff engagement in responding to these findings.
- The service was transparent, collaborative and open with stakeholders about performance.

#### **Continuous improvement and innovation**



## Are services well-led?

#### There were evidence of systems and processes for learning, continuous improvement and innovation.

- There was a focus on continuous learning and improvement.
- The service made use of internal and external reviews of incidents. Learning was shared and used to make improvements.
- Leaders and managers encouraged staff to take time out to review individual and team objectives, processes and performance.
- There were systems to support improvement and innovation work. For example, the service informed us they were using the latest modern medical equipment to carry out hair treatments.

## 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
Surgical procedures  Treatment of disease, disorder or injury	Regulation 12 HSCA (RA) Regulations 2014 Safe care and treatment  How the regulation was not being met:
	The provider had not done all that was reasonably practicable to mitigate risks to the health and safety of service users receiving care and treatment. In particular, we found:
	<ul> <li>Some emergency medicines were not in stock.</li> <li>The service was unable to provide documentary evidence of medical equipment calibration.</li> </ul>
	This was in breach of Regulation 12 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

### Regulated activity

Surgical procedures

Treatment of disease, disorder or injury

### Regulation

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

#### How the regulation was not being met:

The registered person had not ensured that all the information specified in Schedule 3 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 was available for each person employed.

In particular, we found:

 Recruitment checks were not always carried out in accordance with regulations including Disclosure and Barring Service (DBS) checks.

This was in breach of Regulation 19 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.