

Cross Keys Practice

Inspection report

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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?	Good	
Are services well-led?	Good	

Overall summary

This practice is rated as Good overall.

The previous inspection was in February 2016 and the practice was rated Good.

The key questions at this inspection are rated as:

Are services safe? - Good

Are services effective? - Good

Are services caring? - Good

Are services responsive? - Good

Are services well-led? - Good

We carried out an announced comprehensive at Cross Keys Practice in Princes Risborough, Buckinghamshire on 06 June 2018. 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.

At this inspection we found:

- The practice had clear systems to manage risk so that safety incidents were less likely to happen. When incidents did happen, the practice learned from them and improved their processes.
- Staff involved and treated patients with compassion, kindness, dignity and respect.

- There was a focus on continuous learning and improvement at all levels of the organisation.
- There was a clear leadership structure and staff felt supported by management.
- The practice regularly reviewed the safety of the premises to deliver health care.
- Patients taking repeat medicines received regular review of their prescriptions.
- The practice routinely reviewed the effectiveness and appropriateness of the care it provided. It ensured that care and treatment was delivered according to evidence-based guidelines.
- Patients found the appointment system easy to use and reported that they could access care when they needed it.
- There was a strong focus on continuous learning and improvement at all levels of the organisation.

Areas were providers should make improvements:

Ensure uptake of cervical screening is reviewed and actions implemented to work toward achieving the national target.

Ensure patient satisfaction is reviewed to assess the satisfaction with nursing care.

Professor Steve Field CBE FRCP FFPH FRCGP

Chief Inspector of General Practice

Population group ratings

Older people	Good
People with long-term conditions	Good
Families, children and young people	Good
Working age people (including those recently retired and students)	Good
People whose circumstances may make them vulnerable	Good
People experiencing poor mental health (including people with dementia)	Good

Our inspection team

Our inspection team was led by a Care Quality Commission (CQC) Lead Inspector; the team included a GP specialist adviser.

Background to Cross Keys Practice

Cross Keys Practice has a patient population of approximately 14,500 patients. We carried out an announced comprehensive inspection of the practice on 06 June 2018. We visited Cross Keys Practice during this inspection. The practice was located over three registered locations and GP services were provided from one other site; Cross Keys Practice, Church Road, Chinnor, OX39 4PG. We did not visit this site as part of the inspection. Cross Keys Practice is a converted listed building with a large extension. Patient services were predominantly located on the ground floor with administration functions on the first floor. Adaptations have been made to ensure the practice is accessible for wheelchair and patients with prams and buggies and patients with limited mobility. The practice has an older population and the staff were aware of the needs of this section of the population. There were a smaller number of patients from different ethnic and cultural backgrounds.

We spoke with four patients during the inspection. We spoke with three GPs, three members of the nursing team, receptionists and administration staff. We got written feedback from four clinical and seven administration team members. There were five GP partners and five salaried GPs working at the practice. There was a mix of male and female GPs. The nursing team consisted of practice nurses, nurse practitioners and four health care assistants. Administrative and reception staff also worked at the practice.

Cross Keys Practice is a training practice. The practice has a General Medical Services (GMS) contract. The practice has opted out of providing Out of Hours services to their patients. There are arrangements in place for services to be provided when the practice is closed and these are displayed on the website.



Are services safe?

We rated the practice as good for providing safe services.

Safety systems and processes

The practice had clear systems to keep people safe and safeguarded from abuse.

- The practice had appropriate systems to safeguard children and vulnerable adults from abuse. All staff received up-to-date safeguarding and safety training appropriate to their role. Two advanced nurse practitioners had completed level two children's safeguarding training but not level three. This was rectified within 48 hours of the inspection.
- They knew how to identify and report concerns. Reports and learning from safeguarding incidents were available to staff. Staff who acted as chaperones were trained for their role and had received a Disclosure and Barring Service (DBS) check. 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.
- Staff took steps, including working with other agencies, to protect patients from abuse, neglect, harassment, discrimination and breaches of their dignity and respect.
- The practice carried out appropriate staff checks at the time of recruitment and on an ongoing basis.
- There was an effective system to manage infection prevention and control. This included annual audits for both the main practice and branch practice which resulted in site specific action logs.
- The practice had arrangements to ensure that facilities and equipment were safe and in good working order.
- Arrangements for managing waste and clinical specimens kept people safe.

Risks to patients

There were adequate systems to assess, monitor and manage risks to patient safety.

 Arrangements were in place for planning and monitoring the number and mix of staff needed to meet patients' needs, including planning for holidays, sickness, busy periods and epidemics.

- There was an effective induction system for temporary staff tailored to their role.
- All staff were suitably trained in emergency procedures.
- Staff understood their responsibilities to manage emergencies on the premises and to recognise those in need of urgent medical attention. Clinicians knew how to identify and manage patients with severe infections including sepsis.
- When there were changes to services or staff the practice assessed and monitored the impact on safety.

Information to deliver safe care and treatment

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

- The care records we saw showed that information needed to deliver safe care and treatment was available to staff. There was an effective GP buddy system and a documented approach to managing test results and other workflow correspondence.
- The practice had systems for sharing information with staff and other agencies to enable them to deliver safe care and treatment.
- Clinicians made timely referrals in line with protocols.

Appropriate and safe use of medicines

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

- The systems for managing and storing medicines, including vaccines, medical gases, emergency medicines and equipment, minimised risks.
- Staff prescribed, administered or supplied medicines to patients and gave advice on medicines in line with current national and local guidance, for example use of the Bucks Formulary. The Bucks Formulary is local prescribing guidance maintained by the formulary team of Buckinghamshire Healthcare NHS Trust in collaboration with NHS Buckinghamshire Medicines Management Team.
- The practice had reviewed its antibiotic prescribing and taken action to support good antimicrobial stewardship in line with local and national guidance.



Are services safe?

• Patients' health was monitored in relation to the use of medicines and followed up on appropriately. Patients were involved in regular reviews of their medicines.

Track record on safety

The practice had a good track record on safety.

• There were comprehensive risk assessments in relation to safety issues. The practice monitored and reviewed activity. This helped it to understand risks and gave a clear, accurate and current picture of safety that led to safety improvements.

Lessons learned and improvements made

The practice learned and made improvements when things went wrong.

- Staff understood their duty to raise concerns and report incidents and near misses. Leaders and managers supported them when they did so.
- · There were adequate systems for reviewing and investigating when things went wrong. The practice learned and shared lessons, identified themes and took action to improve safety in the practice.
- The practice acted on and learned from external safety events as well as patient and medicine safety alerts.

Please refer to the Evidence Tables for further information.



Are services effective?

We rated the practice and all of the population groups as good for providing effective services overall.

(Please note: Any Quality and Outcomes Framework (QOF) data relates to 2016/17. QOF is a system intended to improve the quality of general practice and reward good practice.)

Effective needs assessment, care and treatment

The practice had systems to keep clinicians up to date with current evidence-based practice. We saw that clinicians assessed needs and delivered care and treatment in line with current legislation, standards and guidance supported by clear clinical pathways and protocols.

- Patients' immediate and ongoing needs were fully assessed. This included their clinical needs and their mental and physical wellbeing.
- We saw no evidence of discrimination when making care and treatment decisions.
- Staff used appropriate tools to assess the level of pain in patients.
- Staff advised patients what to do if their condition got worse and where to seek further help and support.

Older people:

- The practice held personal lists of their patients which ensured continuity of care. GPs confirmed they knew their patients and were able to offer appropriate advice and care accordingly.
- Older patients who are frail or may be vulnerable received a full assessment of their physical, mental and social needs. The practice used an appropriate tool to identify patients aged 65 and over who were living with moderate or severe frailty. Those identified as being frail had a clinical review including a review of medication.
- Patients aged over 75 were invited for a health check. If necessary they were referred to other services such as voluntary services and supported by an appropriate care plan. Over a 12 month period the practice had offered 179 patients a health check. 175 of these checks had been carried out.
- The practice followed up on older patients discharged from hospital. It ensured that their care plans and prescriptions were updated to reflect any extra or changed needs.
- Staff had appropriate knowledge of treating older people including their psychological, mental and communication needs.

People with long-term conditions:

- Patients with long-term conditions had a structured annual review to check their health and medicines needs were being met. For patients with the most complex needs, the GP worked with other health and care professionals to deliver a coordinated package of care.
- Staff who were responsible for reviews of patients with long term conditions had received specific training. This training aligned to the care and support approach, known as Primary Care Development Scheme (PCDS) which was introduced by the local CCG for the care of many long-term conditions.
- GPs followed up patients who had received treatment in hospital or through out of hours services for an acute exacerbation of asthma.
- The practice had arrangements for adults with newly diagnosed cardiovascular disease including the offer of high-intensity statins for secondary prevention, people with suspected hypertension were offered ambulatory blood pressure monitoring and patients with atrial fibrillation were assessed for stroke risk and treated as appropriate.
- The practice was able to demonstrate how they identified patients with commonly undiagnosed conditions, for example diabetes, chronic obstructive pulmonary disease (COPD), atrial fibrillation and hypertension).
- There was a higher than local and national average exception reporting for Diabetes indicators within QOF data for the year 2016 – 2017. The unvalidated data provided by the practice under the PCDS scheme showed that the practice had met the target for the year 2017 – 2018 and were on track to meet the target for this current year.

Families, children and young people:

 Childhood immunisations were carried out in line with the national childhood vaccination programme. Uptake rates for the vaccines given met the target percentage of 90% or above, in three of the four vaccination indicators and were above the target in one of the indicators. We saw the practice had a proactive, planned approach which increased the uptake of vaccinations.



Are services effective?

- The practice had arrangements to identify and review the treatment of newly pregnant women on long-term medicines. These patients were provided with advice and post-natal support in accordance with best practice guidance.
- The practice had arrangements for following up failed attendance of children's appointments following an appointment in secondary care or for immunisation.

Working age people (including those recently retired and students):

- The practice's uptake for cervical screening was 78%, which although in line with the local CCG average (76%) and national average (72%), was below the 80% coverage target for the national screening programme.
- The practices' uptake for breast and bowel cancer screening was above the local and national average.
- The practice had systems to inform eligible patients to have the meningitis vaccine, for example before attending university for the first time.
- Patients had access to appropriate health assessments and checks including NHS checks for patients aged 40-74. There was appropriate follow-up on the outcome of health assessments and checks where abnormalities or risk factors were identified.

People whose circumstances make them vulnerable:

- End of life care was delivered in a coordinated way which considered the needs of those whose circumstances may make them vulnerable.
- The practice held a register of patients living in vulnerable circumstances including those with a learning disability. The practice had taken responsibility for covering the local homeless accommodation and registered the patients at the practice.
- The practice had a system for vaccinating patients with an underlying medical condition according to the recommended schedule.
- There were 49 patients on the Learning Disabilities register; all 49 had been invited for an annual health check. We saw 17 of the 49 (34%) had attended a health check, and the remaining patients had been contacted on the telephone on further occasions inviting them to attend a health check.
- There were 272 patients identified as carers which was 2% of the practice population.

People experiencing poor mental health (including people with dementia):

- The practice assessed and monitored the physical health of people with mental illness, severe mental illness, and personality disorder by providing access to health checks, interventions for physical activity, obesity, diabetes, heart disease, cancer and access to 'stop smoking' services. There was a system for following up patients who failed to attend for administration of long term medication.
- When patients were assessed to be at risk of suicide or self-harm the practice had arrangements in place to help them to remain safe.
- The practice's performance on mental health quality indicators was above local and national averages.
- Patients at risk of dementia were identified and offered an assessment to detect possible signs of dementia.
 When dementia was suspected there was an appropriate referral for diagnosis.

Monitoring care and treatment

The practice had a comprehensive programme of quality improvement activity and routinely reviewed the effectiveness and appropriateness of the care provided. Where appropriate, clinicians took part in local and national improvement initiatives.

- The overall QOF score for the practice was in line with the local CCG and national averages whilst the practice's QOF exception reporting was below the national averages.
- The practice used information about care and treatment to make improvements.
- The practice was actively involved in quality improvement activity. Where appropriate, clinicians took part in local and national improvement initiatives.
- The practice was working with the CCG and introduced a care and support approach, known as PCDS, for the care of many long-term conditions and was a significant shift away from QOF reporting.

Effective staffing

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



Are services effective?

- Staff had appropriate knowledge for their role, for example, to carry out reviews for people with long term conditions, older people and people requiring contraceptive reviews.
- Staff whose role included immunisation and taking samples for the cervical screening programme had received specific training and could demonstrate how they stayed up to date.
- The practice understood the learning needs of staff and provided protected 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.
- The practice provided staff with ongoing support. This
 included an induction process, one-to-one meetings,
 appraisals, coaching and mentoring, clinical supervision
 and support for revalidation. The practice ensured the
 competence of staff employed in advanced roles by
 audit of their clinical decision making, including
 non-medical prescribing.
- There was a clear approach for supporting and managing staff when their performance was poor or variable.

Coordinating care and treatment

Staff worked and with other health and social care professionals to deliver effective care and treatment.

- We saw records that showed that all appropriate staff, including those in different teams and organisations, were involved in assessing, planning and delivering care and treatment.
- The practice shared clear and accurate information with relevant professionals when deciding care delivery for people with long term conditions and when coordinating healthcare for care home residents. The shared information with, and liaised, with community services, social services and carers for housebound patients and with health visitors and community services for children who have relocated into the local area.
- Patients received coordinated and person-centred care.
 This included when they moved between services, when

- they were referred, or after they were discharged from hospital. The practice worked with patients to develop personal care plans that were shared with relevant agencies.
- The practice ensured that end of life care was delivered in a coordinated way which considered the needs of different patients, including those who may be vulnerable because of their circumstances.

Helping patients to live healthier lives

Staff were consistent and proactive in helping patients to live healthier lives.

- The practice identified patients who may be in need of extra support and directed them to relevant services.
 This included patients in the last 12 months of their lives, patients at risk of developing a long-term condition and carers.
- The practice supported local and national priorities and initiatives to improve the population's health, for example, stop smoking campaigns, reduce alcohol consumption schemes, healthy sexual relationships and tackling adult and child obesity.
- Staff encouraged and supported patients to be involved in monitoring and managing their own health, for example through social prescribing schemes.
- Staff discussed changes to care or treatment with patients and their carers as necessary.
- The practice supported national priorities and initiatives to improve the population's health, for example, stop smoking campaigns, tackling obesity.

Consent to care and treatment

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

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

Please refer to the Evidence Tables for further information.



Are services caring?

We rated the practice as good for caring. Kindness, respect and compassion

Staff treated patients with kindness, respect and compassion.

- Staff understood the variety of patients' personal, cultural, social and religious needs within the local area.
- The practice gave patients timely support and information.
- Feedback from patients was positive about the elements of care the practice provided. The Care Quality Commission (CQC) comment cards, written patient testimonials we received and all four of the patients we spoke with were positive about the elements of care they had experienced. Patients comments highlighted during appointments they felt the staff were helpful, caring and treated them with dignity and respect.
- Following the inspection, we received feedback from two local care and nursing homes which the practice provides GP services to. Feedback was positive regarding the services received.
- Results from the July 2017 annual national GP patient survey showed patients felt they were treated with compassion, dignity and respect. The practice was comparable with others both locally and nationally for its satisfaction scores on consultations with GPs but were lower for nurses.
- The practice had employed two advanced nurse practitioners and had identified a lead practice nurse to provide structure to the nursing services. Monitoring of staff ability and attitude was undertaken by the practice.
- The practice had not undertaken any further satisfaction surveys so were unable to evidence whether the changes had impacted on patient's satisfaction with the nursing care.

Involvement in decisions about care and treatment

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

- There was an awareness of the Accessible Information Standard and we saw the systems the practice had embedded ensured that people who had a disability, impairment or sensory loss received information that they can easily read, understand and get support so they can communicate effectively with the practice.
- The Accessible Information Standard is a requirement to make sure that patients and their carers can access and understand the information that they are given.
- Staff communicated with people in a way that they could understand, for example, easy read materials were available.
- Practice staff helped patients and their carers find further information and access community and advocacy services. They helped them ask questions about their care and treatment.
- There was a Carers Champion and the practice proactively identified carers and supported them.
- The annual national GP patient survey showed patients felt they were involved in decisions about their care and treatment.

Privacy and dignity

The practice respected respect patients' privacy and dignity.

- Reception staff knew that if patients wanted to discuss sensitive issues or appeared distressed they could offer them a private room to discuss their needs.
- Staff recognised the importance of people's dignity and respect. They challenged and recorded behaviour that fell short of this.

Please refer to the Evidence Tables for further information.



Are services responsive to people's needs?

We rated the practice, and all of the population groups, as good for providing responsive services.

Responding to and meeting people's needs

The practice organised and strived to deliver services to meet patients' needs. It took account of patient needs and preferences.

- The practice understood the needs of its population and tailored services in response to those needs. This included the growing and ageing population, the increase in long term conditions prevalence and the subsequent increased demand on primary care services.
- Telephone consultations were available which supported patients who were unable to attend the practice during normal working hours.
- The facilities and premises were appropriate for the services delivered.
- The practice provided care coordination for patients who are more vulnerable or who have complex needs. This included support to access services both within and outside the practice. Feedback regarding access and responsiveness from some of the care and nursing homes advised of effective coordination of care and treatment
- Care and treatment for patients with multiple long-term conditions and patients approaching the end of life was coordinated with other services.

Older people:

- The practice was responsive to the needs of older patients, and offered home visits and urgent appointments for those with enhanced needs.
- All patients had a named GP who supported them in whatever setting they lived, whether it was at home or in a care home or supported living scheme.
- The practice flagged patients who were unable to attend the practice to ensure reception staff were aware a home visit was required whilst booking appointments. This meant the patient did not have to justify a home visit request at each appointment.
- There was a medicines delivery service for housebound patients

People with long-term conditions:

- Patients with a long-term condition received an annual review to check their health and medicines needs were being appropriately met.
- The practice held regular meetings with the local nursing team to discuss and manage the needs of patients with complex medical issues.

Families, children and young people:

- We found there were systems to identify and follow up children living in disadvantaged circumstances and who were at risk, for example, children and young people who had a high number of accident and emergency (A&E) attendances.
- Parents or guardians calling with concerns about a child, were offered a same day appointment when necessary.

Working age people (including those recently retired and students):

 The needs of this population group had been identified and the practice had adjusted the services it offered to ensure these were accessible, flexible and offered continuity of care. For example, extended opening hours and Saturday appointments.

People whose circumstances make them vulnerable:

 The practice held a register of patients living in vulnerable circumstances including homeless people, people living at the local women's refuge, travellers and those with a learning disability. The practice offered these patients longer appointments, if required.

People experiencing poor mental health (including people with dementia):

- Staff interviewed had a good understanding of how to support patients with mental health needs and those patients living with dementia.
- The practice regularly worked with multi-disciplinary teams in the case management of patients experiencing poor mental health, including those with dementia.

Timely access to care and treatment

Patient feedback from a variety of sources indicated they were able to access care and treatment from the practice within an acceptable timescale for their needs.



Are services responsive to people's needs?

- The practice ensured patients with the most urgent needs had their care and treatment prioritised.
- 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.
- Furthermore, results from the national GP patient survey showed that patient's satisfaction with how they could access care and treatment was lower when comparable to local and national averages.
- Extended hours were available during different mornings, evenings and Saturdays.

Listening and learning from concerns and complaints

The practice took complaints and concerns seriously and responded to them appropriately to improve the quality of care. This included responding to feedback on the NHS Choices website.

- Information about how to make a complaint or raise concerns was available. Staff treated patients who made complaints compassionately.
- The complaint policy and procedures were in line with recognised guidance. There was an annual review of complaints and feedback was discussed during weekly and monthly meetings.
- The annual review of complaints also included a review of learning and action points from the previous year's review to ensure continued adherence.
- We saw the practice learned lessons from individual concerns and complaints and from analysis of trends and patterns.

Please refer to the Evidence Tables for further information.



Are services well-led?

We rated the practice as good for providing a well-led service.

Leadership capacity and capability

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

- Leaders were knowledgeable about local and national 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 practice had effective processes to develop leadership capacity and skills, including planning for the future leadership of the practice.

Vision and strategy

The practice had a clear vision and credible strategy to deliver high quality, sustainable care.

- There was a clear vision and set of values. The practice
 had a realistic strategy and supporting business plans to
 achieve priorities. The practice developed its vision,
 values and strategy jointly with patients, staff and
 external partners.
- Staff were aware of and understood the vision, values and strategy and their role in achieving them.
- The strategy was in line with health and social priorities across the region. The practice planned its services to meet the needs of the practice population.
- The practice monitored progress against delivery of the strategy.

Culture

The practice had a culture of high-quality sustainable care.

- Staff stated they felt respected, supported and valued.
 Despite great pressure and an increase on demand, staff said they were proud to work in the practice.
- 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 we spoke with told us there was an open door, no blame policy and 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 practice 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 practice actively promoted equality and diversity. Staff had received equality and diversity training. Staff felt they were treated equally.
- The practice focused on the needs of patients.
- 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.

- Structures, processes and systems to support good governance and management were clearly set out, understood and effective. The governance and management of partnerships, joint working arrangements and shared services promoted interactive and co-ordinated person-centred care.
- Staff were clear on their roles and accountabilities including in respect of safeguarding and infection prevention and control
- Practice leaders had established proper policies, procedures and activities to ensure safety and assured themselves that they were operating as intended.

Managing risks, issues and performance

There were clear and effective processes for managing risks, issues and performance.

 There was an effective, process to identify, understand, monitor and address current and future risks including risks to patient safety.



Are services well-led?

- The practice had processes to manage current and future performance. Performance of employed clinical staff could be demonstrated through audit of their consultations, prescribing and referral decisions.
 Practice leaders had oversight of national and local safety alerts, incidents, and complaints.
- Clinical audit had a positive impact on quality of care and outcomes for patients. There was clear evidence of action to change practice to improve quality.
- The practice had plans in place and had trained staff for major incidents.
- The practice implemented service developments and where efficiency changes were made this was with input from clinicians to understand their impact on the quality of care.

Appropriate and accurate information

The practice acted on appropriate and accurate information.

- Quality and operational information was used to ensure and improve performance.
- Quality and sustainability were discussed in relevant meetings where all staff had sufficient access to information.
- The practice 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.
- The practice used information technology systems to monitor and improve the quality of care.
- The practice submitted data or notifications to external organisations as required.
- There were clear arrangements in line with data security standards for the availability, integrity and confidentiality of patient identifiable data, records and data management systems. Data protection training occurred internally for most staff and staff had undertaken additional reading in line with the implementation of the General Data Protection Regulation (GDPR) in May 2018.

• The practice manager had reviewed all parts of the GDPR requirements and had made appropriate changes to the practice policy on communication with patients.

Engagement with patients, the public, staff and external partners

The practice strived to involve patients, staff and external partners to support high-quality sustainable services.

- A full and diverse range of patients', staff and external partners' views and concerns were encouraged, heard and acted on to shape services and culture. There was an active patient participation group.
- The practice was in the process of working with the patient participation group (PPG) to gather feedback from patients on the quality of services provided.
- The service was transparent, collaborative and open with stakeholders about performance.

Continuous improvement and innovation

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

- Leaders and managers encouraged staff to take time out to review individual and team objectives, processes and performance.
- There was a focus on continuous learning and improvement.
- Staff knew about improvement methods and had the skills to use them.
- The practice made use of internal and external reviews of incidents and complaints. 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.

Please refer to the Evidence Tables for further information.