

# Optalis Limited

## **Inspection report**

The Old Forge 45-47 Peach Street Wokingham Berkshire RG40 1XJ

Tel: 01189778600 Website: www.optalis.org Date of inspection visit: 30 September 2019 02 October 2019

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Ratings

## Overall rating for this service

Requires Improvement

Is the service safe?	<b>Requires Improvement</b>	
Is the service effective?	Good	
Is the service caring?	Good	
Is the service responsive?	Good	
Is the service well-led?	<b>Requires Improvement</b>	

# Summary of findings

## Overall summary

#### About the service

START is a home care service that provides a social and personal care provision to people living in their own homes. The service specifically provides short term care and support to people for a maximum of six weeks, following people's stay in hospital. The service aims to reable people to live a fulfilled life, as they had done prior to their hospitalisation. However, it is acknowledged that at times people may be unable to regain or retain some of their skills. The service also offers an assessment service, whereby people are assessed to determine what level of support or care provision would be most suitable for them moving forward.

Not everyone who used the service received the regulated activity of personal care. CQC only inspects where people receive personal care. This is help with tasks related to personal hygiene and eating. Where they do we also consider any wider social care provided. At the time of the inspection fifteen people were receiving the regulated activity.

People's experience of using this service and what we found

The provider did not have robust governance documentation in place to ensure effective systems to monitor the service. This meant that inconsistencies in care documents was not picked up and led to the potential for incorrect care being delivered, especially if a new staff member was asked to support a person. The service was operating without a registered manager for six months. Management advised a new manager had been appointed, however the CQC had not yet received an application of registration.

People generally received safe care and treatment. People did on occasions receive additional support than agreed and documented with medicines that could lead to a potential risk of harm. Information was not always correctly recorded, however, there was no evidence of that this caused harm to people. Risks were recorded and measures to mitigate these documented. However, there was not always clear evidence that risks had been reviewed. Staff were able to identify and were committed to report any signs of abuse. The provider had a robust and safe recruitment process that was followed when employing staff.

People were supported to have maximum choice and control of their lives and staff supported them in the least restrictive way possible. Policies and systems in the service supported this practice. Communication with people was clear and specific to meet their needs. The service promoted choice and independence aiming to empower people as much as possible. People had a clear directive of reablement. Staff worked closely with professionals to ensure people were able to achieve their goals and retain independence and skills.

People reported positive relationships with staff who clearly treated them with kindness, compassion and dignity. There was an acknowledgement of need to develop strong professional relationships as people were supported for a maximum of six weeks by the service. Staff consistently treated people with respect and maintained their privacy in their homes. People's differences and diversities were welcomed. Where

possible the service ensured staff were matched to work with people who shared similar interests and life experiences. This included communication methods and language. People fed back that care was entirely person-centred and in line with their requirements. It was acknowledged that care plans were not always detailed or reflective of people's care needs.

Staff received a comprehensive induction and access to the provider's mandatory training before working with people independently. Supervision support and competency checks were completed to ensure people were supported effectively by knowledgeable and suitable staff. Training was continually updated in line with people's needs and reflected changes in best practice.

#### Rating at last inspection

This service was last inspected on 13 March 2017 and was rated good. The report was published on 05 April 2017.

#### Why we inspected

This was a planned comprehensive inspection.

#### Enforcement

We have identified breaches in relation to Regulation 17 (Good Governance) of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 of the at this inspection.

Please see the action we have told the provider to take at the end of this report.

#### Follow up

We will continue to monitor information we receive about the service until we return to visit as per our reinspection programme. If we receive any concerning information we may inspect sooner.

For more details, please see the full report which is on the CQC website at www.cqc.org.uk

## The five questions we ask about services and what we found

We always ask the following five questions of services.

Is the service safe?	Requires Improvement 🗕
The service was not always safe.	
Details are in our safe findings below.	
Is the service effective?	Good ●
The service was effective.	
Details are in our effective findings below.	
Is the service caring?	Good ●
The service was caring.	
Details are in our caring findings below.	
Is the service responsive?	Good •
The service was responsive.	
Details are in our responsive findings below.	
Is the service well-led?	Requires Improvement 😑
The service was not always well-led.	
Details are in our well-led findings below.	



START

## **Detailed findings**

## Background to this inspection

#### The inspection

We carried out this inspection under Section 60 of the Health and Social Care Act 2008 (the Act) as part of our regulatory functions. We checked whether the provider was meeting the legal requirements and regulations associated with the Act. We looked at the overall quality of the service and provided a rating for the service under the Care Act 2014.

#### Inspection team

The inspection was completed by one inspector, for both the site visit (30 September 2019) and the telephone consultations (02 October 2019) completed with professionals thereafter.

#### Service and service type

This service is a domiciliary care agency. It provides personal care to people living in their own homes as part of six-week reablement or / and assessment period. The service aims to reable people to live as they had done prior to a period of hospitalisation or assesses peoples' needs moving forward.

The service should have a manager registered with the Care Quality Commission. This means that they and the provider are legally responsible for how the service is run and for the quality and safety of the care provided. The service has been without a registered manager since April 2019. Whilst a new manager was appointed, they resigned prior to completion of the registration process. We were informed a second manager had been appointed who was to take on the role of registered manager in December 2019.

#### Notice of inspection

We gave the service 48 hours' notice of the inspection. This was because it is a small service and we needed to be sure that the provider or (registered) manager would be in the office to support the inspection.

#### What we did before the inspection

We used the information the provider sent us in the provider information return, reviewing this prior to the inspection. This is information providers are required to send us with key information about their service, what they do well, and improvements they plan to make. This information helps support our inspections. In addition, we reviewed the notifications received from the provider. The law requires providers to send us

notifications about certain events that happen during the running of a service. We spoke with the local authority and safeguarding team seeking their feedback on the service. We used all of this information to plan our inspection.

#### During the inspection

We used written evidence of feedback from people who used the service and their relatives to help determine the success of the service. We spoke with seven members of staff including the Nominated Individual, head of regulated activities, a peripatetic manager from another service who was supporting, two care staff, a member of the quality and governance team and senior management from Occupational Therapy.

We reviewed a range of records. This included four peoples' care records and medication records. We looked at six staff files in relation to recruitment and staff supervision. A variety of records relating to the management of the service, including governance documentation were reviewed.

#### After the inspection

We continued to seek clarification from the provider to validate evidence found, and considered documentation that had been provided following discussions that had taken place during the on-site visit. We spoke with professionals to gain feedback.

## Is the service safe?

# Our findings

Safe – this means we looked for evidence that people were protected from abuse and avoidable harm.

At the last inspection this key question was rated as good. At this inspection this key question changed to requires improvement. This meant people were not always safe and protected from avoidable harm.

#### Assessing risk, safety monitoring and management

• Changing risks to people's needs were not always documented as required in care plans or risk assessments, to illustrate the reasons why decisions were made. Although staff were verbally able to explain changing risks to people and management strategies to keep people safe. It was recognised that given the service's short period of support, and goal to reable people, changes to risks may occur frequently therefore documentation may not always be reflective of people's changing needs. We found the lack of accurate documentation did not put people at risk, however improvement was needed to ensure all records were an accurate reflection of people's current risk.

• Risks related to people's environment were recorded in care plans and were available for staff to read. Consideration was given to external and internal premises, location of people's homes and lone working.

• The provider had a business continuity plan in place outlining systems ensuring the service could continue to offer people care and support in the event of an untoward incident. This included details of who and how the service would be offered.

#### Staffing and recruitment

• The provider used robust recruitment checks and processes to ensure only staff suitable for the role were employed. This included, police checks, character checks and employment history.

• We did note that one staff member's file had a health-related risk assessment in place. However, we noted there was no evidence that the risk had been reviewed since being written. We discussed this with management, who acknowledged that the lack of evidence would suggest no review had taken place. However, as the staff member had recently been promoted health would have been looked at again as part of the new job specification. Management did acknowledge the need for accurate documentation. We have looked at this in more detail within well-led.

• There were sufficient staff to provide individualised support to people.

#### Systems and processes to safeguard people from the risk of abuse

• Feedback from people clearly indicated that they felt safe with the support the staff provided following their period of hospitalisation. Relatives reiterated this point, highlighting how they felt people were "in safe hands".

• Staff were able to describe different types of abuse, and able to establish the reporting protocol if they thought any person was at risk. Staff further advised they would not hesitate to blow the whistle if they felt the provider had failed to meet their duty in keeping people safe.

- Staff training in safeguarding was up to date and refreshed as required by the provider.
- The management team had reported all safeguarding concerns to the local authority and CQC as

required.

Using medicines safely

• Whilst medicines were managed safely, and people were not at risk, we noted that staff were completing additional tasks associated with medicine management than recorded in the written care plan. This appeared to be linked with poor documentation and recording of risks as changes were noted. For example, a person's ability to administer using a NOMAD pack (this is where medicines are contained in a pack broken down by time medicines are due or by day). We have looked at this in more detail within well-led.

• However, medicine administration records (MARs) indicated people were being supported to safely take their medicines.

• The incident data base recorded 13 incidents of medicine errors since the last inspection. However, no serious harm had come to people as result of these. Errors included, administering medicine from the wrong day within the NOMAD pack, medicines declined not correctly recorded on medicine administration records (MARs) and medicines being found wrapped up in tissue.

• Staff received training in medicine management with competency checks completed to ensure staff safely administered medicines. Where concerns were noted, this was discussed, and appropriate action taken, including retraining.

• Medicine audits were completed monthly. We found that two audits were completed in August 2019, with the first inspection score of 81.82% compliance (09 August 2019) and the second 66.67% compliance (12 August 2019). It was noted that a running theme in both the audits was staff not entering correct codes on MARs where medicines were not taken, specifically referring to "as required medicines" and failure to enter details as required in the additional comments section. The second audit also noted staff were not correctly recording date / time of medicine management. These issues were discussed in team meetings subsequently. The September audit had not been completed at the time of the inspection therefore we were unable to determine if this remained an ongoing concern.

Preventing and controlling infection

- The provider ensured that both staff and people were protected from the risk of infection.
- Staff used protective equipment such as gloves and aprons when giving care and support in people's homes.
- Staff received training and were encouraged to read the provider's infection control policy that outlined preventative measures to manage and control the risk of infection.

Learning lessons when things go wrong

- Accidents and incidents were monitored to prevent the possibility of reoccurrences.
- We saw evidence of a comprehensive data system that recorded incidents, including information such as who required being notified, time of incident, staff working, whether the incident occurred prior to staff attending. This information was used to inform trends analysis.
- •These were reviewed and used to learn from. The management discussed incidents and accidents in team meetings to establish how incidents could be learnt from.

## Is the service effective?

# Our findings

Effective – this means we looked for evidence that people's care, treatment and support achieved good outcomes and promoted a good quality of life, based on best available evidence.

At the last inspection this key question was rated as good. At this inspection this key question has remained the same. This meant people's outcomes were consistently good, and people's feedback confirmed this.

Assessing people's needs and choices; delivering care in line with standards, guidance and the law
The management ensured people's needs and choices were accurately provided by care staff who knew

them well. It was acknowledged that information was not always updated as required in the written care plans. However, staff added additional information to the "comments section" of the "Staffplan". This is an IT programme used by staff when attending calls. Information is accessible on a handheld device allowing staff to enter details of support offered and delivered to people and additional information of use. Management acknowledged that information was not retained centrally, with staff expected to read information retained on two additional databases, to help inform the care.

• As a result care plans were not always an accurate reflection of people's changing needs. Although people did receive support in line with their changing needs, hence this was a documentation issue rather than implementation. We have looked at this in more detail within the well-led section of the report.

Staff support: induction, training, skills and experience

• All new staff were given a comprehensive induction prior to commencing lone working. This included the provider's mandatory training and shadow shifts, until staff were confident and competent to commence lone working.

• Staff who had no experience of working in care settings completed the Care Certificate in addition to the induction process. This is a set of 15 standards that define the knowledge, skills and behaviour that is expected of someone working in health and social care. Competency checks were completed to ensure staff had a thorough comprehension of what was expected of them, and how to work with people.

• We noted that training was reflective of people's needs, and therefore person centred. Staff reiterated this point advising that if a person had been assessed as requiring specific support, management liaised with the specific department and training was arranged promptly. We were told by one staff, "I definitely have the skills to complete my job safely."

• Supervisions were completed with staff on a rota system. These allowed staff and management to discuss all areas of working practice as well as areas that may need further development. Annual appraisals were arranged for staff who had been in employment for 12 months. Staff reported this to be a beneficial way to learn and share ideas with management.

Supporting people to eat and drink enough to maintain a balanced diet

- Staff supported people to eat and drink enough to maintain a healthy diet. Drinks and snacks were left in reach for people where care calls were spaced out during the day.
- If people needed help with food or drink preparation this was recorded in their care plans, and support was provided accordingly to people's wishes.

Staff working with other agencies to provide consistent, effective, timely care; supporting people to live healthier lives, access healthcare services and support

- The service worked very well with other agencies to ensure the needs of people were met.
- Where applicable staff monitored people to detect changes in their health and liaised with the relevant professional bodies and relatives to ensure appropriate care was sought.

• The provider ensured that where required call times were amended to work around any scheduled appointments. If necessary, additional support and calls were put into place when people or professionals deemed this a requirement. Staff were provided additional training by professionals that was reflective of people's needs.

Ensuring consent to care and treatment in line with law and guidance

The Mental Capacity Act 2005 (MCA) provides a legal framework for making particular decisions on behalf of people who may lack the mental capacity to do so for themselves. The Act requires that, as far as possible, people make their own decisions and are helped to do so when needed. When they lack mental capacity to take particular decisions, any made on their behalf must be in their best interests and as least restrictive as possible.

People can only be deprived of their liberty to receive care and treatment when this is in their best interests and legally authorised under the MCA.

We checked whether the service was working within the principles of the MCA, and whether any conditions on authorisations to deprive a person of their liberty had the appropriate legal authority and were being met. We found the service was working within the principle of the MCA.

• Management confirmed that all staff had received training in the MCA as this formed part of the provider's mandatory training. We spoke with staff and asked them how they ensured the principles of the MCA were put into practice. We were provided examples of how decisions about daily living were discussed with people prior to support being given. If a person declined, or requested a call later, where possible this was accommodated.

• Care plans very clearly recorded the need for people to make decisions independently where possible. Each section commenced with a paragraph reinforcing the importance of people making choices for themselves.

• Where people were unable to make decisions for themselves and required a person who had legal responsibility to make decisions, appropriate documentation was in place in their care plan to illustrate this. This ensured the provider was able to demonstrate who had legal accountability to act on the person's behalf.

## Is the service caring?

# Our findings

Caring – this means we looked for evidence that the service involved people and treated them with compassion, kindness, dignity and respect.

At the last inspection this key question was rated as good. At this inspection this key question has remained the same. This meant people were supported and treated with dignity and respect; and involved as partners in their care.

Ensuring people are well treated and supported; respecting equality and diversity

- We saw evidence that people were very well treated by staff, who were respectful and kind when supporting them. Relatives reinforced this point stating, "... the patience and encouragement given to [name] allowed her to reach her goal." Another relative stated, "The team are very kind and professional." One person reported, "I would like to say a massive thank you to all the staff for their kindness, help and support, encouraging me all the way."
- Staff reinforced the need to ensure that people were relaxed when they commenced working with them. This point was reiterated with one person stating, "I was initially a little reluctant, but they made me so comfortable... thank you!"
- Staff spoke of the need to develop a caring relationship with "clients" [people], that enabled them to trust staff who support them. One member of staff said, "We are only with some clients for six weeks, therefore must form a relationship and rapport from the onset." One person said, "The carers were warm, professional, caring, polite and highly skilled."
- The provider reinforced in training and practice the importance of respecting people's diversity. Equality was a crucial part of training and seen as fundamental when supporting people, specifically given the short length of interaction the service had, and the long-term benefits people experienced.
- The provider reinforced that equality and diversity also included the need of all inclusivity for staff too, irrespective of their culture, creed, sexuality or disability. This was reinforced in meetings and perceived as a fundamental component of care.
- Where possible the service aimed to pair staff and people who had similar interests and skills. For one person this was of specific importance as English was not their first language. The management paired the person with a staff member who was fluent in the person's preferred language. There was notable improvement in the person's ability to engage in reablement work with staff. The person understood why staff were trying to motivate them to complete tasks that were a little more difficult now, although were completed independently before.

Supporting people to express their views and be involved in making decisions about their care

- People were encouraged to make decisions about their care and support on a daily basis according to management and comments added in the IT system used by care staff when attending calls.
- The service's aim is to enable people to regain and maintain their independence, therefore staff worked with people to ensure treatment and support was conducive with this. For example, one person and their relative reported, "The improvement that has been made in two weeks after discharge has been amazing...

When discharged [named] had restricted mobility, but now walking with assistance." Another person reported, "The hospital taught me to walk again, and you [staff/the service] have taught me to live again."

• The provider used a system of regular reviews and quality assurance calls to check people were happy with the care and support they received. The management liaised with people and their relatives to ensure staff were supporting people in the way they wanted, and they were enabled to make decisions about their care per call.

Respecting and promoting people's privacy, dignity and independence

- We saw clear evidence that people were supported to maintain their independence and encouraged to complete tasks that they were able to do independently.
- Staff understood the importance of making people feel comfortable in their own homes, especially as they visited. They further were able to describe how people's privacy was protected. One staff member said, "We are visitors in people's homes, and need to respect their space at all times."
- The provider held people's confidential information securely both on the electronic and paper recording systems used by staff.

## Is the service responsive?

# Our findings

Responsive – this means we looked for evidence that the service met people's needs.

At the last inspection this key question was rated as good. At this inspection this key question has remained the same. This meant people's needs were met through good organisation and delivery.

Planning personalised care to ensure people have choice and control and to meet their needs and preferences

• Care was delivered in accordance to people's wishes. Although it was noted that care plans were not always kept up to date or reflective of how people were to be supported. For example, we noted on one care plan the goal was recorded as "reaching baseline, where I was before." However, no further information was offered on what skills had been lost and what or how these were to be acquired. We did note that staff used several sources of information, including three separate databases as well as a hand-written care plan. Therefore, information was not stored universally. Staff advised that they spoke with people at length prior and during calls to make certain they were working towards people's goals. They discussed how people completed tasks previously, with the aim that skills taught would reable them to work to the same level.

#### Meeting people's communication needs

Since 2016 onwards all organisations that provide publicly funded adult social care are legally required to follow the Accessible Information Standard (AIS). The standard was introduced to make sure people are given information in a way they can understand. The standard applies to all people with a disability, impairment or sensory loss and in some circumstances to their carers.

• The provider ensured the service complied with the AIS. A policy detailed the importance of information being provided to people in a format that was comprehendible and accessible to them, was signed as being read and understood by all care staff.

• For one person who found communicating in English more difficult than their native language, staff who were fluent in the person's chosen language were paired to support them. This was found to vastly improve their experience of the service.

Supporting people to develop and maintain relationships to avoid social isolation; support to follow interests and to take part in activities that are socially and culturally relevant to them

- The service encouraged community and social integration. Staff aimed to help people establish their lifestyles as actively as possible prior to hospital admissions.
- Staff worked alongside assisting professionals or activities that had been arranged to ensure people were able to reap the benefits of both the service and reintegration into the community.

Improving care quality in response to complaints or concerns

• The provider had a comprehensive complaints policy that outlined what action should be taken if a complaint was received.

People and their relatives were further provided with a leaflet detailing how to complain and raise any

concerns related to the service, and what action the service would take once a complaint was received. We saw that complaints were appropriately investigated, and outcomes noted, reported back to the complainant and used as a learning tool to prevent similar occurrences where possible.

• The service had received two complaints since the last inspection. These were dealt with in accordance with policy and learning was used to improve the service.

End of life care and support

• The service does not support people on end of life care, as the service provides short term care and support to reable people to live independently or as skilled as they were prior to an admission to hospital.

## Is the service well-led?

# Our findings

Well-Led – this means we looked for evidence that service leadership, management and governance assured high-quality, person-centred care; supported learning and innovation; and promoted an open, fair culture.

At the last inspection this key question was rated as good. At this inspection this key question has changed to requires improvement. This meant the service management and leadership was inconsistent. Leaders and the culture they created did not always support the delivery of high-quality, person-centred care.

Managers and staff being clear about their roles, and understanding quality performance, risks and regulatory requirements

- The provider had developed a number of audits related to the service. Specifically care documentation, risk assessments, supervision records, medicines and staff files. The audits aimed to highlight any issues found and what action was to be taken.
- We found that audits were not sufficient in gathering a clear oversight of the operations. This therefore meant that errors went unnoticed or unrecorded. The predominant reason for this was the point at which audits were completed. For example, management advised that all care files were audited once care had been completed. This meant that missing information went unnoticed until after the case had been closed. We saw evidence of this in three of the four files we reviewed. Information was not accurately recorded on how care was to be delivered. Goals were not clearly defined. Where changes to care occurred, these were not recorded with a clear rationale as to why, especially when support was increasing rather than decreasing as time progressed.
- We discussed this point with senior care staff and management, who acknowledged that information was clearly missing. It was raised during the inspection that information pertaining to people was stored and utilised from four separate sources. We discussed the logistics of this, given some calls were only 30 minutes. Management acknowledged that this was evidently not the most logical method to ensure that care plans were representative of support offered.
- It was clear that the audits had failed to pick up this point. Some of the other audits were completed every six months or annually. This meant that as a result of the time lapse between audits issues went unnoticed.

We however found no evidence that people had been harmed as a result of poor documentation and time lapse between audits. Nevertheless, systems were not robust enough to demonstrate clear oversight of operations. This placed people at the risk of harm. This was a breach of regulation 17 (Good Governance) of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

• The service had been operating without a registered manager, since April 2019. We were advised that one person had been appointed, however prior to completing their registration with the CQC they had resigned. The service had now recruited a new person to take on this role. They are due to take over registered manager responsibility from December 2019. The CQC have not yet received an application form.

• The service nevertheless continues to be supported by a strong senior management team.

How the provider understands and acts on the duty of candour, which is their legal responsibility to be open

and honest with people when something goes wrong

- The provider had a policy in place relating to duty of candour and the importance of transparency when investigating something that goes wrong.
- The management team were able to reflect on when this policy may be required, providing clear examples of the protocol that would be followed.

Engaging and involving people using the service, the public and staff, fully considering their equality characteristics

• The provider sought regular feedback from people to identify ways to improve the service. Quality surveys were also sent out to stakeholders, staff, professionals and relatives. Feedback was used to formulate an action plan. The service created a "we listened" newsletter which addressed the changes implemented following the surveys.

• In addition staff were supported and encouraged to feedback about people's care and the service provided as well as consider new training opportunities through regular team meetings and supervisions.

Promoting a positive culture that is person-centred, open, inclusive and empowering, which achieves good outcomes for people

- Staff had experienced inconsistency in management over recent months. However, acknowledged that changes implemented by the team as a whole had been positive. Staff felt that dynamics were stronger, and they were being given the skills to learn and improve their practice and the experience of people. The management and staff were committed to delivering high quality, person centred care which met people's specific needs.
- Feedback illustrated staff were approachable, open and delivered personalised care and support in the way people wanted.
- Staff reported the management was supportive, open and approachable.

Continuous learning and improving care

- The service assessed all accidents, incidents and falls to ensure they could implement measures to mitigate the potential of a similar occurrence. Where it was recognised that this may prevent a person's independence, consideration was given on how to manage this most effectively. For example, using equipment to enable a person whilst maintaining their independence.
- The provider and manager used quality assurance audits, to seek feedback on how the service could be improved from stakeholders, people, staff and families. This was developed into an action plan that was then circulated to the relevant teams to ensure the actions were met.

• The peripatetic manager was supported by a head of services who ensured the service had all the necessary skills to facilitate and improve care delivery, although acknowledged the provider had failed to ensure compliance with regulations. This included authorising additional training that supported staff to care for people better.

Working in partnership with others

• The service worked well with external professionals. Advice was sought as and when required ensuring people's changing needs were met as soon as possible. We saw evidence of excellent working with occupational therapists (OT) and physiotherapists. One member of staff reported, "We are given the skills and knowledge to be an add on arm for OTs and physios".

Feedback from professionals who worked alongside care and support staff was very positive. We were told, "It is an excellent service. The staff truly make a difference to people's lives and needs." Another professional commented, "Can't fault them. Exceptional work and partnership working."

## Action we have told the provider to take

The table below shows where regulations were not being met and we have asked the provider to send us a report that says what action they are going to take.We will check that this action is taken by the provider.

Regulated activity	Regulation
Personal care	Regulation 17 HSCA RA Regulations 2014 Good governance
	How the regulation was not being met: The provider did not have effective systems or processes established or operated to ensure compliance with the regulations.
	Regulation 17(1)(2)(b)(c). Good Governance, Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.