

# Viran Medical Centre

### **Quality 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 service	Requires improvement	
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?	Requires improvement	

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### Overall summary

### Letter from the Chief Inspector of General Practice

We carried out an announced comprehensive inspection at Viran Medical Centre on 14 March 2018. This inspection was carried out under Section 60 of the Health and Social Care Act 2008 as part of our regulatory functions. The inspection was planned to check whether the provider was meeting the legal requirements and regulations associated with the Health and Social Care Act 2008, to look at the overall quality of the service, and to provide a rating for the service under the Care Act 2014.

At this inspection we found:

- There were established systems in place to manage and monitor risks to patients, staff and visitors. This included risks to the building, environment, medicines management, staffing, and emergency medicines. However emergency equipment was not routinely checked.
- Some systems did not reflect the status of patients, correspondence had not been filed and pathology results were awaiting action. All of these issues were corrected within hours of the inspection ending.

- The practice routinely reviewed the quality, effectiveness and appropriateness of the care it provided. Care and treatment was delivered according to evidence-based guidelines. We saw that a number of clinical audits had been carried out.
- Staff involved and treated patients with compassion, kindness, dignity and respect.
- Staff understood their role in safeguarding vulnerable patients. They were fully aware they should go to the lead GP for safeguarding for further guidance. However some patients at risk of safeguarding had not been reviewed and monitored.
- The practice reviewed the needs of their local population and had initiated positive service improvements for patients. They implemented suggestions for improvements as a consequence of feedback from the patient participation group.
- There was evidence that innovation and service improvement was a priority among staff and leaders with evidence of strong team working and commitment to personal and professional development.

We saw several areas of outstanding practice:

- The practice had introduced 'Patient Friends' who were reception staff who were available throughout the day to review and discuss any problems from the patient's perspective and use their knowledge of the practice to find a way of resolving issues quickly.
- The practice had taken part in the Routine Enquiry into Adverse Childhood experience (REACH) feasibility project which had been carried out to investigate long term physical and mental health problems in a primary care setting. As a result staff had been trained to identify and offer support where appropriate.
- The practice had developed a Well Pathway for patients with dementia covering prevention, diagnosis, living with and supporting people and dying well, with hypertext links to local and national support organisations.

• The practice was a member of the North West Alliance Primary Care Home which aimed to improve services in communities and offer patients opportunities to maximise their health. They worked together with partner organisations in the voluntary, social care and faith sectors.

There were areas where the provider must make improvements:

• Ensure care and treatment is provided in a safe way to patients

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

• Improve engagement with patients experiencing poor mental health.

Professor Steve Field (CBE FRCP FFPH FRCGP) Chief Inspector of General Practice

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

We always ask the following five questions of services.

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?	Requires improvement	

### The six population groups and what we found

We always inspect the quality of care for these six population groups.

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

### Areas for improvement

Action the service SHOULD take to improve

Improve engagement with patients experiencing poor mental health

### **Outstanding practice**

- The practice had introduced 'Patient Friends' who were reception staff who were available throughout the day to review and discuss any problems from the patient's perspective and use their knowledge of the practice to find a way of resolving issues quickly.
- The practice had taken part in the Routine Enquiry into Adverse Childhood experience (REACH) feasibility project which had been carried out to investigate long term physical and mental health problems in a primary care setting. As a result staff had been trained to identify and offer support where appropriate.
- The practice had developed a Well Pathway for patients with dementia covering prevention, diagnosis, living with and supporting people and dying well, with hypertext links to local and national support organisations.
- The practice was a member of the North West Alliance Primary Care Home which aimed to improve services in communities and offer patients opportunities to maximise their health. They worked together with partner organisations in the voluntary, social care and faith sectors.



# Viran Medical Centre

**Detailed findings** 

### Our inspection team

Our inspection team was led by:

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

# Background to Viran Medical Centre

Viran Medical Centre is situated in a one storey porta cabin on the car park of the Tarleton Group Practice, St Mark's Square, Gorse Lane, in the village of Tarleton, Lancashire. The temporary building is owned by NHS Property Services and offers access and facilities for disabled patients and visitors.

Beacon Primary Care has been caretaking this practice since July 2017 and it is part of the West Lancashire Clinical Commissioning Group (CCG). Services are provided under an Alternative Provider Medical Services (APMS) contract with NHS England which will expire in January 2019.

The link to the practice website is www.viranmedical.org.uk.

There are 2191 patients on the practice list. The majority of patients are white British with a higher than average number of people over the age of 65, and a lower than average number of patients under the age of 18 years. The practice is in the second least deprived decile, level 9. Level one represents the highest levels of deprivation and level ten the lowest.

The practice offers appointments between 8.30am and 6.00pm every day except Wednesday when GPs are on call from 1pm until 6.30pm. Patients requiring a GP outside of normal working hours are advised to contact an external out of hour's service provider Out Of Hours West Lancashire C.I.C (OWLs).

The practice is staffed by Beacon Primary Care consisting of two GP partners, one female and one male. There are also four female and one male salaried GP, a prescribing clinical pharmacist, six female practice nurses, five nurse practitioners, four health care assistants, four phlebotomists, a practice manager, two deputy practice managers and a team of reception and administration staff. These staff work across all sites to provide comprehensive cover at all times, however a lead receptionist is based at Viran Medical Centre to provide continuity. Additionally 0.5 working time equivalent (wte) locum GP's provided regular clinical sessions.

The practice offers placements to student nurses.



### Are services safe?

### **Our findings**

We rated the practice, and all of the population groups, as requires improvement for providing safe services.

#### Safety systems and processes

The practice had systems to keep patients safe and safeguarded from abuse, however these were not always implemented effectively.

- The practice conducted safety risk assessments. It had a suite of safety policies which were regularly reviewed and communicated to staff. Staff received safety information for the practice as part of their induction and refresher training.
- The practice had some systems to safeguard children and vulnerable adults from abuse. Policies were regularly reviewed and were accessible to all staff. However we saw no evidence of a policy regarding children who did not attend appointments at the practice. Staff were fully aware they should go to the lead GP for safeguarding for further guidance. The GP held monthly clinical meetings at which safeguarding was a standard item and health visitors and school nurses were invited as appropriate to share information. A vulnerable patient template had been introduced by Beacon Primary Care to identify and record details of any patient at risk. A safeguarding audit had been done to monitor patients who were vulnerable including those subject to Deprivation of Liberty Safeguards (DOLS).
- We saw that the administrative team were expected to review all correspondence relating to patients under the age of 18 years and follow an established workflow process sending any concerns to the lead GP for review and any further action. However some letters had not been coded or filed and there was no audit of letters. routinely filed by administrative staff. There was evidence of failure to review and update coding for example we noted two patients who had died recently had not been removed from the system. These were updated immediately. Also four entries on the safeguarding register of children in need had not been reviewed since 2014 and records of five looked after children did not state parental responsibility.

- All staff received up-to-date safeguarding and safety training appropriate to their role. They knew how to identify and report concerns.
- The practice carried out staff checks, including checks of professional registration where relevant, on recruitment and on an ongoing basis. Disclosure and Barring Service (DBS) checks were undertaken 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).
- Staff who acted as chaperones were trained for the role and had received a DBS check.
- The head of nursing was the infection prevention and control (IPC) lead and we saw that the practice looked clean and hygienic and regular "walkarounds" were done to monitor conditions. On the day of the inspection there was no evidence that an IPC audit had been carried out. Within two working days of the inspection an IPC audit had been completed and an action plan implemented.
- The practice ensured that facilities were safe, however the defibrillator unit was located at the Tarleton Group Practice (across the car park) and Viran staff kept no log to check this or the emergency oxygen supply was maintained. There were systems for safely managing healthcare waste. We saw evidence of a range of health and safety risk assessments such as fire and legionella which were reviewed annually.

#### **Risks to patients**

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

- There were arrangements for planning and monitoring the number and mix of staff needed.
- There was an effective induction system for temporary staff tailored to their role.
- 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, for example, sepsis.
- · When there were changes to services or staff the practice assessed and monitored the impact on safety.



### Are services safe?

#### Information to deliver safe care and treatment

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

- 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. A proactive care template had been
  introduced to ensure safe care for patients who were
  vulnerable or frail.
- The practice had a workflow process including systems for sharing information with staff and other agencies to enable them to deliver safe care and treatment.
   However in practise we saw that the system was not routinely monitored and some letters had not been coded or filed.
- Referral letters included all of the necessary information and urgent referrals were made in a timely fashion and monitored to ensure that patient appointments were made.
- The nursing staff used a monitoring system to ensure patients discharged from hospital were followed up and worked jointly with the practice pharmacist and medicines management lead to ensure patients received the medicines prescribed.

#### Safe and appropriate use of medicines

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

- The systems for managing medicines were monitored by the practice pharmacist, including vaccines, medical gases and emergency medicines. The practice had appropriate equipment to respond to any emergencies including emergency medicines in each clinical room and in reception. The practice kept prescription stationery securely and monitored its use.
- Alerts were received by the GPs and the pharmacist who
  reviewed them and e-mailed appropriate staff to take
  action. However staff could not state how they
  confirmed when any action was taken and felt the
  system could be improved. It was clarified that any
  medicine alerts were actioned by the clinical
  pharmacist and medicines management team.

 The practice had audited prescribing of drugs used for inflammatory disease and opiate based drugs (pain killers) to ensure regular reviews were carried out. Patients' health was monitored to ensure medicines were being used safely and followed up on appropriately. The practice involved patients in regular reviews of their medicines. Personal emergency kits were overseen by the medicines management team.

#### Track record on safety

The practice had a good safety record.

- 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 that led to safety improvements.

#### Lessons learned and improvements made

The practice learned and made improvements when things went wrong.

- There was a comprehensive system for recording and acting on significant events and incidents. Staff understood their duty to raise concerns and report incidents and near misses. Leaders and managers supported them when they did so.
- There were systems for reviewing and investigating when things went wrong. The practice learned and shared lessons at practice meetings, identified themes and took action to improve safety in the practice. We saw a positive culture in the practice for reporting and learning from medicines incidents and errors. Incidents were logged efficiently and then reviewed promptly. Staff were trained to report and rate each incident according to the level of potential risk involved. This helped make sure appropriate actions were taken to minimise the chance of similar errors occurring again. For example one of the nurses we spoke with described a patient who reacted badly to an increase in his anti-depressant medicine due to his alcohol related problems. The nurse had learnt to check alcohol consumption when antidepressant dosages were under review.



# Are services safe?

 The practice learned from external safety events as well as patient and medicine safety alerts. Warnings issued by the Medicines and Healthcare products Regulation Agency (MHRA) were checked by the pharmacist who took necessary action to identify any patients at risk.



(for example, treatment is effective)

### **Our findings**

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

#### Effective needs assessment, care and treatment

The practice had effective 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' needs were fully assessed. This included their clinical needs and their mental and physical wellbeing.
- Prescribing data for the practice for 01/01/2017 to 30/03/2017 showed that the average daily quantity of Hypnotics prescribed per Specific Therapeutic group was lower than local and national averages; 0.22, compared to 0.8 locally and 0.9 nationally. (This data is used nationally to analyse practice prescribing and Hypnotics are drugs primarily used to induce sleep.)
- Similar data for the prescribing of antibacterial prescription items showed that practice prescribing was lower than local and national levels; 0.02 compared to 0.88 locally and 0.98 nationally.
- Data for the prescribing of antibacterial prescription items that were Cephalosporin's or Quinolones showed that practice prescribing was higher than local and national levels; 25.5% compared to 9.6% locally and 8.9% nationally. However this figure had dropped to 9.1% by December 2017 when Beacon Primary Care had taken responsibility for management.
- We saw no evidence of discrimination when making care and treatment decisions.
- Staff advised patients what to do if their condition got worse and where to seek further help and support.
- The duty GP was expected to review all blood test results to ensure they were appropriately followed up. However on the day of the inspection we saw that 124 results were outstanding, some since 26th February. The lead partner confirmed these were all actioned and completed on the day of inspection.

 GPs were clinical leads for specific health conditions such as dermatology, gynaecology, child health and mental health. GPs were supported by members of the nursing team who also had clinical leadership roles for specific areas.

#### Older people:

- Older patients who were frail or vulnerable received a full assessment of their physical, mental and social needs. Those identified as being frail had a clinical review including a review of medication. The practice was making progress in building a full frailty register since taking over management in July 2017.
- Patients aged over 75 received opportunistic health checks. If necessary they were referred to other services such as voluntary services and supported by an appropriate care plan.
- Where appropriate whole team visiting (including a GP, nurse and pharmacist) allowed increased contact with the housebound elderly.
- 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.
- We saw no evidence of alerts on patient records to indicate a Do Not Attempt Resuscitation form had been completed and no system as to how this information might be shared.
- There was one care home in the area which the practice supported and it was provided with regular telephone advice and support. Weekly ward rounds had recently been established for patients registered there. The practice pharmacist also visited regularly to review patients' medications especially after discharge from hospital. Practice staff had developed an enhanced health framework for patients in care homes including access to telemedicine advice. All of these initiatives had reduced the high demand for individual home visits.

#### People with long-term conditions:

 Patients with long-term conditions had a structured annual review in the month of their birthday to check their health and medicines needs were being met.
 These reviews were run by a Health Care Assistant (HCA) with a supervising nurse so patients experienced a one



### (for example, treatment is effective)

stop shop with prescribing and nurse input on the day. For patients with the most complex needs, the GPs worked with other health and care professionals to deliver a coordinated package of care and reviews were done early to allow time to modify their treatment regimes.

- Staff who were responsible for reviews of patients with long term conditions had received specific training. One nurse had attended training in hypertension, chronic kidney disease and pill checks, a health care assistant had attended training on anti-coagulation, health checks and blood tests. Nurses had also been trained in the initiation of insulin which prevented patients from having to be referred to secondary care when insulin initiation or change of insulin was needed.
- Blood measurements for diabetic patients (IFCC-HbA1c of 64mmol/mol or less in the preceding 12 months) showed that 79% of patients had well controlled a blood sugar level which was comparable with the clinical commissioning group (CCG) average of 81% and national average of 79.5%. Insulin reviews were done in house and enhanced diabetes care delivered.
- The percentage of patients with hypertension (high blood pressure) in whom the last blood pressure reading (measured in the preceding 12 months) was 150/90 mmHg or less was 75%, which was lower than the CCG average of 86% and the national average of 83%.

Families, children and young people:

- Childhood immunisations were carried out in line with the national childhood vaccination programme. Uptake rates for the vaccines given were above the target percentage of 90% for all four indicators.
- Practice staff had received triage training to recognise sepsis and there was a prompt on patient records to remind clinicians to identify potential symptoms when seeing patients. One nurse had attended a course on "assessment of the sick child" and others were scheduled to do so.
- The practice had arrangements to identify and review the treatment of newly pregnant women on long-term medicines and pertussis vaccination was available.
- Appointments out of school hours were available.

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

- Talk and treat calls were taken from 8am in the morning each day and until 8.30pm one night per week to allow working people to access advice and help.
- The practice's uptake for cervical screening was 76%, which was below the 80% coverage target for the national screening programme. The practice had taken comprehensive action to improve this by making contact with patients by telephone to check the addresses on record, sending out up to three invitations to those who do not attend, 8 weeks apart, to encourage the patient to make an appointment and taking on additional nursing staff to offer appointments for smears. The practice were aware of a vulnerable group of ladies with mental health and learning disabilities who did not engage. These patients were invited for a general review with a nurse who was a smear taker, and whilst they were having the review, the nurse requested consent for the procedure.
- 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. For example a cerebrovascular disease programme had been established for patients who were at risk of stroke.
- A full range of health promotion and screening which reflected the needs for this age group was available. For example, Meningitis ACWY immunisation for new students.

People whose circumstances make them vulnerable:

- The practice had appointed a GP partner as a lead for vulnerable patients.
- End of life care was delivered in a coordinated way which took into account the needs of those whose circumstances may make them vulnerable. Following recent training the practice nurses regarded cancer survivorship as a long term condition, they used an enhanced cancer template and staff felt palliative care meetings were better informed. The staff ensured that a wide range of information was made available to patients and their families and they were signposted to appropriate services. Protocols for the prescribing of



### (for example, treatment is effective)

anticipatory medicines ensured correct dosage and record keeping including the district nurse drug authorisation form. GPs had not met with community staff such as district nurses to discuss palliative care for patients at the end of life since July 2017.

- The practice had a follow up policy for any patients who did not attend hospital appointments.
- The practice held a register of patients living in vulnerable circumstances including those with a learning disability.

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

- In conjunction with the World Health Organisation, NHSE and LCFT the practice had been funded to undertake a project entitled Routine Enquiry into Adverse Childhood experience (REACH) which had trained staff to identify patients who were at much greater risk of suicide.
- The practice specifically considered the physical health needs of patients with poor mental health and those living with dementia. For example the percentage of patients experiencing poor mental health who had received discussion and advice about alcohol consumption was 53% of those registered with the practice; CCG average 91%; national average 91% and the percentage of patients experiencing poor mental health who had received discussion and advice about smoking cessation at the practice 62%; CCG 96%; national 96%.
- Beacon Primary Care had developed a single, all service referral form for mental health and a Well Pathway for patients with dementia covering prevention, diagnosis, living with and supporting people and dying well, with hypertext links to local and national support organisations. This had been introduced for use at Viran Medical Centre.
- The practice supported the local CCG mental health awareness sessions in summer 2017 with GPs, nurses, health care assistants, the pharmacist and administrative staff all in attendance.
- The GPs supported a nursing home where people were diagnosed with dementia. Independent Mental Capacity Advocates (IMCAs) were involved whenever appropriate.

#### Monitoring care and treatment

The practice had a well-established comprehensive programme of quality improvement activity and routinely reviewed the effectiveness and appropriateness of the care provided.

The practice pharmacist worked with members of the CCG pharmacy team to ensure that practice prescribing was carried out in line with local and national recommended guidelines.

A range of audits had been completed prescribing of contraceptives, anti- inflammatory medication and pain killers. Audits undertaken had led to improvements in clinical practice for example an audit of the use of anti-inflammatory medicines led to a ten-fold reduction in their usage during 2017/18 (0.42 in April-June reduced to 0.04 in October-December). Given the potential risks to patients of high dosage leading to kidney problems this represented not only cost savings but also improved quality of care.

The practice had a work flow system; however it did not consistently capture and validate information from the records of patients. However patients with long term conditions who had a number of medicines on repeat prescription had no greater than 6 repeat issues available to them, before the said medication was reviewed by a GP. This ensured any patient reaching 6 months without a medication review would be seen by a GP before the prescription was processed again. We saw that some medicine reviews were taking place and were recorded on the system at another Beacon Primary Care site but were not recorded on the Viran system.

The most recent published Quality Outcome Framework (QOF) results were 80.5% of the total number of points available compared with the CCG average of 97.6% and national average of 96.5%. The overall exception reporting rate was 4.3% which compared with a CCG average of 7.4% and a national average of 10.1%. (QOF is a system intended to improve the quality of general practice and reward good practice. Exception reporting is the removal of patients from QOF calculations where, for example, the patients decline or do not respond to invitations to attend a review of their condition or when a medicine is not appropriate.)

The practice used information about care and treatment to make improvements. For example good practice to support people with mental health problems was led by one of the

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### (for example, treatment is effective)

partner GPs. In 2016/17 the practice had lower than average engagement with this group of patients however the new provider placed considerable emphasis on identification of mental health issues. Following a bid for funding to West Lancs CCG a new Advanced Nurse Practitioner was being recruited who would specialise in mental health."

The practice pharmacist carried out medicines audits to check practice prescribing and adherence to best practice guidelines.

#### **Effective staffing**

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

- Retention of the administrative and reception had been poor however Beacon Primary Care had successfully staffed Viran medical Centre and integrated the teams. The team across Beacon Primary Care met monthly to discuss the effectiveness of systems, complaints and concerns and where systems required improvement. Staff commented they enjoyed working in the new team and felt supported.
- The practice provided all staff with ongoing support.
   This included an induction process and buddying, one-to-one meetings, annual appraisals for all staff, coaching and mentoring, clinical supervision and support for revalidation.
- The induction process for healthcare assistants included the requirements of the Care Certificate.
- 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. For example, the health care assistants had been trained in reviews of patients with diabetes and respiratory disease carried out under the supervision of nurses.
- Practice staff used a competence matrix with administrative and nursing staff to plot key skills, determine career progression and standardise pay scales across the practices.

- Monthly study days were held for all staff and topics were guided by requests and needs identified.
- All staff had attended REACH training in order to raise awareness of mental health across the practice. Many staff had also attended mental health up-skilling training over the summer of 2017.
- There was a formal system to audit clinical decision making and non-medical prescribing for clinicians working in advanced roles and staff felt well supported .They told us the GP partners were very accessible for advice when they were seeing patients."
- There were clinical meetings including GPs and nursing staff on a monthly basis, however the regular locum GPs did not attend these. Nursing staff met as a team at the beginning of the monthly study days to discuss complex cases, cascade new initiatives, review access to appointments and learn together from complaints and grievances.

#### **Coordinating care and treatment**

Staff worked together 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, services and organisations, were involved in assessing, planning and delivering care and treatment.
- The practice ensured that end of life care was delivered in a coordinated way which took into account 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.

 Beacon Primary Care was a member of the North West Alliance Primary Care Home which aimed to improve services in communities and offer patients opportunities to maximise their health. Viran Medical Centre staff were a part of this in initiative. They worked together with partner organisations in the voluntary, social care and faith sectors. They had attended an event which had decided that the group's first project should be establishing healthcare navigation to enable staff to use the many services appropriately and effectively.



### (for example, treatment is effective)

- 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.
- Staff encouraged and supported patients to be involved in monitoring and managing their health. The practice provided specialist care in diabetes and was able to refer patients who had been identified as at risk of developing diabetes to a national diabetes prevention and management programme. A diabetes prevention programme targeted patients with fluctuating glucose levels.
- The practice encouraged patients to attend national cancer screening programmes. We saw that 61% of invited patients had undertaken bowel screening compared to the CCG average of 56% and 54% nationally.

- 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 and 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. A detailed consent form had been produced by practice staff for patients undergoing minor surgery at one of the Beacon Primary Care sites to raise patient awareness of the interventions proposed and ensure their understanding.
- Clinicians supported patients to make decisions. Where appropriate, they assessed and recorded a patient's mental capacity to make a decision.



# Are services caring?

### **Our findings**

# We rated the practice, and all of the population groups, as good for caring.

#### Kindness, respect and compassion

Staff treated patients with kindness, respect and compassion. For example:

- Staff understood patients' personal, cultural, social and religious needs. All staff had trained in understanding equality and diversity.
- Alternative means of communication were available to patients such as text and email. Translation services and extended appointment duration were offered and the practice had facilities for patients with a hearing loss.
- The practice gave patients timely support and information.
- Members of the reception team had been identified as Patient Friends due to their strong people skills and whenever possible they dealt with concerns and first stage complaints from patients.
- 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.
- Prescriptions were delivered to and samples collected from the house-bound.
- We received 27 patient Care Quality Commission comment cards completed by patients. All of the cards we received were positive about the service improvements experienced with the new building and the kindness of staff. One patient expressed concerns about privacy in the reception area and being overheard in consulting rooms. Results of the NHS Friends and Family Test for June 2017-March 2018 indicated that 98% of patients would recommend the practice.

Results from the July 2017 annual national GP patient survey showed patients felt they were treated with compassion, dignity and respect. A total of 227 surveys were sent out and 100 were returned. This represented about 4.6% of the practice population. The practice was generally above others for its satisfaction scores on consultations with GPs and nurses. For example:

- 100% of patients who responded said the GP was good at listening to them compared with the clinical commissioning group (CCG) average of 88% and the national average of 89%.
- 96% of patients who responded said the GP gave them enough time; CCG 73%; national average 86%.
- 100% of patients who responded said they had confidence and trust in the last GP they saw; CCG 95%; national average 95.5%.
- 96% of patients who responded said the last GP they spoke to was good at treating them with care and concern; CCG 85%; national average 85.5%.
- 96% of patients who responded said the nurse was good at listening to them; (CCG) 93%; national average 91%.
- 97% of patients who responded said the nurse gave them enough time; CCG 88%; national average 92%.
- 100% of patients who responded said they had confidence and trust in the last nurse they saw; CCG 97%; national average 97%.
- 92% of patients who responded said the last nurse they spoke to was good at treating them with care and concern; CCG 92%; national average 91%.
- 97% of patients who responded said they found the receptionists at the practice helpful; CCG 86%; national average 87%.

Patients we spoke with commented on the friendly, helpful staff even at times of high demand.

NHS Commissioners worked in conjunction with the patient participation group (PPG) to carry out a consultation regarding the future provision of Viran Medical Centre following the termination of the previous contract due to ongoing issues with the lease of the building. This included 411 questionnaires received by post or online, 22 phone calls and 3 emails. A report commissioned by NHS England and the local CCG in June 2017 described the listening exercise following which a decision was taken to seek an interim provider and relocate the practice to the unit in the car park at Tarleton Health Centre. The contract was awarded in late May 2017 and services commenced in July 2017. Most patients (69%) were unhappy about the relocation of the practice and change of provider however patients specifically requested more support for specialist



## Are services caring?

conditions, improvements to the telephone system and no increase in travel distance to the practice due to poor public transport links. The former two criteria have been met by Beacon Primary Care but the relocation of the premises has meant there is no longer a GP surgery in Hesketh Bank. A number of patients registered lived in Tarleton and had not been affected. Additionally a dedicated phone line has been provided for all patients to order repeat prescriptions thereby taking pressure off the call centre handling appointment requests.

#### Involvement in decisions about care and treatment

Staff helped patients be involved in decisions about their care and were aware of the Accessible Information Standard (a requirement to make sure that patients and their carers can access and understand the information they are given):

- Interpretation services were available for patients who did not have English as a first language.
- Staff communicated with patients in a way that they
  could understand, for example, communication aids
  and easy read materials were available. Staff were
  alerted to patients with visual or hearing difficulties by
  means of alerts on patient clinical records.
- 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.

The practice proactively identified patients who were carers by discussing their caring roles during consultations and health checks and using posters in waiting areas asking them to inform the practice of their role. The practice's computer system alerted GPs if a patient was also a carer. The practice had identified 30 patients as carers (1.4% of the practice list).

 Newly identified carers were identified by staff through opportunistic appointments when a carer's template

- was completed. They were offered an annual health check to assess their needs and a self- help advice leaflet signposting them to access support of various kinds. With their permission they were referred to a carer support organisation. Annual flu vaccination was also available.
- Staff told us that if families had experienced bereavement, their usual GP contacted them or sent them a sympathy card. This call was either followed by a patient consultation at a flexible time and location to meet the family's needs and by giving them advice on how to find a support service.

Results from the national GP patient survey showed patients responded positively to questions about their involvement in planning and making decisions about their care and treatment. Results were higher than local and national averages:

- 97% of patients who responded said the last GP they saw was good at involving them in decisions about their care; CCG 81.5%; national average 82%.
- 93% of patients who responded said the last nurse they saw was good at explaining tests and treatments; CCG 90%; national average 90%.
- 93% of patients who responded said the last nurse they saw was good at involving them in decisions about their care; CCG 87%; national average 85%.

#### **Privacy and dignity**

The practice respected and promoted patients' privacy and dignity.

- Staff recognised the importance of patients' dignity and respect.
- The practice complied with the Data Protection Act 1998.



(for example, to feedback?)

# **Our findings**

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

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

The practice organised and delivered services to meet patients' needs. It took account of patient needs and preferences. Staff understood the needs of its population and tailored services in response to those needs. For example:

- Appointments were available from 8.30am until 6.00pm every day except Wednesday when GPs were on call after 1pm.
- Receptionists had received training in symptoms which they should urgently respond to either by escalation to a clinician or by calling "999".
- Online access was promoted via posters in the waiting room, by reception staff on the telephone and on the practice website. This had led to an increase in patient online uptake.
- A talk and treat telephone consultation service was offered where patients booked a call back with a clinician. The patients' concerns were identified in that call and 50% required no further treatment. The call might result in a face-to-face appointment with an appropriate member of staff and the urgency of the intervention required was built into this assessment.
- The practice had created reasonable adjustments when patients found it hard to access services. For example home visits were available for patients with mobility problems, this included health checks and flu vaccination. Also walk in sessions were available at every day at one of the sites in the Beacon Primary Care group.
- There was no hearing loop fitted in the reception area with which to support patients with a hearing loss.
   Likewise we saw that patients who were hearing impaired or housebound were not systematically coded and there were no alerts on records.
- Consultation appointments with GPs could be extended to any length of time according to the needs of the

- patient in order to discuss complex concerns, prescriptions could be delivered to patients' homes and flu vaccines and health checks could be carried out on home visits.
- The practice staff used easy read information for patients with difficulties in reading including a leaflet to explain the information kept in care records.
- Care and treatment for patients with multiple long-term conditions and patients approaching the end of life was coordinated with other services and directly accessible from practice staff.
- A dietician held a monthly clinic at the practice so patients did not need to travel out of the locality.
- Beacon Primary Care were members of the North West Health Alliance which placed emphasis on collaborative, innovative care within the community, and Viran Medical Centre also benefitted from this. The GP partners and staff worked with a variety of community based providers to offer local, holistic care.
- Self-care leaflets were in use by practice staff to help patients to maintain healthy lifestyles and keep their condition stable.

#### Older people:

- 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 offered home visits, telephone
  consultations and weekly telephone calls to care homes
  to determine if a GP visit was required. Each care home
  had an allocated GP who maintained regular telephone
  contact at their respective homes and undertook weekly
  ward rounds when required, and medication reviews
  were carried out by the practice pharmacist. An
  enhanced health framework ensured a comprehensive
  assessment, shared care planning multidisciplinary
  support and structured risk assessment.
- Patients with complex needs were offered longer appointments.

#### 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. Multiple conditions were reviewed at one appointment and consultation times were flexible to meet each patient's specific needs.



(for example, to feedback?)

 The practice had introduced an enhanced service to diabetic patients. This involved both the GP and the practice nurse specialist in diabetes initiating and managing insulin and referring patients to the diabetic education programme which was run locally. Patients had no need to go to the local hospitals in Ormskirk or Southport unless their needs were very complex.

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. Records we looked at confirmed this. All children and young people identified by staff as at risk were identified to the lead GP for safeguarding, discussed at the next clinical meeting and the details updated on an online tracker.
- All parents or guardians calling with concerns about a child under the age of five years were offered a same day appointment and children aged 5-18years could access a same day appointment when necessary. The practice ensured that appointments were always available after 3pm each day to accommodate children who had become ill while at school.
- A midwife held a clinic at the practice once a week.

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.
- Talk and treat was available 8am until 6pm during the week and 8.30pm on Wednesday which enabled patients to call from their workplace. Face to face appointments were available from 8.30am and until 6pm at Viran Medical Centre.
- Patients could book appointments and order repeat prescriptions online.
- Telephone GP consultations were available which supported patients who were unable to attend the practice during normal working hours.

People whose circumstances make them vulnerable:

- The practice held a register of patients living in vulnerable circumstances including static travellers and those with a learning disability.
- Patients with complex needs were offered longer appointments.
- There were monthly meetings with other health and social care professionals to discuss the care and treatment of vulnerable patients. Staff placed emphasis on responding to patients' wishes, for example producing an advanced care plan detailing where they wished to die. Each patient was assessed according to their needs for support and a clinician was identified to take responsibility for this.
- Patients who had been discharged from hospital were followed up by the pharmacist and nursing staff who ensured that their medicines were reviewed and that a follow up appointment with a clinician was offered. If the patient did not attend their appointment further contact was made.

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

- There was a named GP lead for mental health. Staff
  interviewed had a good understanding of how to
  support patients with mental health needs. Patients
  with mental health problems got an extended
  appointment slot to give them time to discuss their
  concerns.
- Staff described how the practice supported families where older parents with dementia could no longer live independently by working jointly with social services.
- The practice signposted patients to support groups, voluntary and community organizations.
- Practice staff generated local contacts personalised for each patient either for general support or in a crisis scenario.

#### Timely access to the service

Patients were able to access care and treatment from the practice within an acceptable 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 as appropriately as possible. There was a



(for example, to feedback?)

two week wait for non-urgent appointments which were triaged by GPs by telephone. After these calls 50% of patients did not need a face-to-face appointment. Practice staff were well aware that patients were not always happy with this delay; however the process prioritised those most urgently in need of care and ensured the most appropriate management.

• Practice staff told us that some patients did not feel the appointment system was easy to use due to the volume of calls. A recent change to ordering medicines online only was reducing the calls to the practice.

Results from the July 2017 annual national GP patient survey which was carried out prior to the input of the new provider showed that patients' satisfaction with how they could access care and treatment was variable but in the main comparable with local and national averages.

- 72% of patients who responded were satisfied with the practice's opening hours which was comparable with the clinical commissioning group (CCG) average of 75% and the national average of 80%.
- 82% of patients who responded said they could get through easily to the practice by phone; CCG – 71%; national average - 71%.
- 76% of patients who responded said that the last time they wanted to speak to a GP or nurse they were able to get an appointment; CCG - 74%; national average 76%.
- 72% of patients who responded said their last appointment was convenient; CCG 79%; national average 81%.
- 62% of patients who responded described their experience of making an appointment as good; CCG 71%; national average 73%.
- 97% of patients who responded find the reception staff helpful; CCG -83%;national average 87%
- 52% of patients who responded said they don't normally have to wait too long to be seen; CCG 56%; national average 58%.

Beacon Care were not providing this service at the time of the survey but were well aware that some of these results indicated low satisfaction with access to appointments at Viran Medical Centre. The patients we spoke with during the inspection and the comments cards completed indicated that appointments were now more easily available and staff were helpful in assisting them to book. They said the staff were friendly and helpful and were a great team. Multiple types of access were available including online, talk and treat and booked appointments. On the day of inspection appointments were available the same day to see clinicians face to face.

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(for example, to feedback?)

- Consultation appointments with GPs could be extended to 20 minutes to discuss complex concerns, prescriptions could be delivered to patients' homes and flu vaccines and health checks could be carried out on home visits.
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(for example, to feedback?)

#### 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.

- Information about how to make a complaint or raise concerns was available and it was easy to do. Staff treated patients who made complaints compassionately. Patient Friends dealt with concerns and complaints at the first stage and advised patients about the process if they wished to formalise the issue. We saw that 70% of complaints were resolved after contact with a Patient Friend.
- The complaint policy and procedures were in line with recognised guidance. Four complaints were received in the last year. We reviewed all of these complaints and

- found that they were satisfactorily handled in a timely way. All complainants received an apology for their experience and were offered the opportunity to join the patient participation group (PPG).
- Spot checks were undertaken to ensure staff were able to respond to complaints and locate the appropriate forms.

The practice learned lessons from individual concerns and complaints and also from an annual thematic analysis and review of trends. It acted as a result to improve the ongoing quality of care. For example, when a patient complained a request for a prescription had been rejected without explanation a policy was produced by the clinical pharmacist about the procedure in such cases to ensure that patients were advised appropriately. The policy was disseminated to all staff. These concerns were discussed at practice meetings and decisions regarding actions were minuted.

#### **Requires improvement**

## Are services well-led?



(for example, are they well-managed and do senior leaders listen, learn and take appropriate action)

# **Our findings**

We rated the practice, and all of the population groups, as requires improvement for providing a well-led service.

#### Leadership capacity and capability

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

- Leaders at all levels demonstrated high levels of experience, capacity and capability needed to deliver good and sustainable care.
- They were knowledgeable about issues and priorities relating to the quality and future of services. They understood the challenges and were addressing them. The GP partners had been instrumental in expanding the North West (NW) Alliance which focussed on locality-wide health improvements in collaboration with the voluntary sector.
- Leaders at all levels were visible and approachable.
   They worked closely with staff and others to make sure they prioritised compassionate and inclusive leadership.
   Staff reported a positive, happy atmosphere and easy access to advice and support.
- The practice had effective processes to develop leadership capacity and skills, including the appointment of a lead receptionist who worked at the practice to provide continuity and leadership. There was a commitment to developing the staff team with a view to increasing the practice's expertise to meet future challenges. We spoke with nursing students on placement at the practice which encouraged recruitment in the future. They felt that they had learnt a lot from the placement about medicines and specific conditions and said nothing was too much trouble for staff.

#### Vision and strategy

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

 Beacon Primary Care offered a clear vision and set of values. The practice charter was care, compassion, competence, communication, courage and commitment. Staff "worked with people in a new

- partnership, offering and engaging with people in making choices about their health and care". The practice leaders met every week to discuss performance, finance and service strategy.
- 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, for example working with the North West Alliance and making partnerships with community organisations.
- Beacon Primary Care were not able to produce a business development plan due to the temporary nature of the medical services contract. However progress with performance and quality improvements were discussed with the Patient Participation Group (PPG) and at practice meetings and a newsletter updated patients and the local community.

#### **Culture**

The practice had a culture of providing open, friendly care and going the extra mile to provide support.

- There were high levels of staff satisfaction despite a challenging working environment and staff stated they felt respected, supported, valued and could voice their views and ideas at meetings and with leaders. They were proud to work in the practice, described a family atmosphere with positive relationships between staff teams and felt that there was good teamwork. We saw that a number of the staff had worked for the practice for many years.
- We saw that the practice focussed on the needs of patients. All monthly clinical staff meetings were minuted with detailed actions to improve the quality of care for patients.
- Leaders and managers acted on behaviour and performance which was inconsistent with the vision and values. They communicated an inspiring, shared purpose and motivated staff to succeed.
- Openness, honesty and transparency were demonstrated when responding to incidents and complaints. Patients were offered apologies wherever

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appropriate and were invited to the practice to discuss any outstanding concerns. The provider was aware of and had systems to ensure compliance with the requirements of the duty of candour. For example, holding regular meetings to share events and complaints and to learn from what took place and offering apologies to patients who made genuine complaints.

- Staff we spoke with told us they were able to raise concerns and were encouraged to do so. They had confidence that these would be addressed. Staff told us they got good and immediate support if patients became distressed or angry and the practice manager's door was open to staff queries and concerns.
- There were processes for providing all staff with the development they needed. This included appraisal and career development conversations. All staff received regular annual appraisals in the last year which were clearly documented. Staff were supported to meet the requirements of professional revalidation where necessary.
- The practice used a competence matrix with administrative and nursing staff to plot key skills, determine career progression and standardise pay scales across the practices.
- Clinical staff, including nurses were considered valued members of the practice team. They were given protected time for professional development and evaluation of their clinical work. All clinical staff had time set aside for administration and group supervision. All surgery staff were able to train together at professional development sessions on a monthly basis.
- There was a strong emphasis on the safety and well-being of all staff .Staff were all involved in a summer party at one of the partner's homes, birthdays were marked with cards and presents and a Christmas meal helped to bond the team. The recent REACH project had highlighted issues for some staff and appropriate support was provided.
- There was strong collaboration, team-working and support across all functions and a common focus on improving quality and sustainability of care and people's experiences.

 The practice 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.

#### **Governance arrangements**

There were responsibilities, roles and systems of accountability to support good governance and management however these were not always effective or fully embedded.

- Structures, processes and systems to support good governance and management were in place but not always effective. The management team met weekly to oversee the management of partnerships, joint working arrangements and shared services which promoted interactive and co-ordinated person-centred care. Every month GPs, nurses, the pharmacist, data coordinator and representatives from the district nursing team met at Beacon Primary Care to share knowledge about patients, discuss concerns and identify improvements needed.
- Beacon Primary Care began caretaking Viran Medical Centre in July 2017 so a number of systems were not yet fully embedded to ensure safety. Additionally the operating contract prevented merger of the patient systems which led to barriers with integration of processes.

#### Managing risks, issues and performance

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

- There was a process to identify, understand, monitor and address current and future risks including risks to patient safety. However we saw no evidence that emergency equipment was routinely checked. On the day of inspection pathology test results were outstanding, some for over two weeks without action.
- The practice had developed a safeguarding system with a lead GP including regular clinical meetings with practice and community staff. We found that review of correspondence, including that relating to patients at risk of safeguarding was inconsistent and a spreadsheet to capture information about vulnerable patients had not been updated.

#### **Requires improvement**

## Are services well-led?



# (for example, are they well-managed and do senior leaders listen, learn and take appropriate action)

- The practice had processes to manage current and future performance. Practice leaders had oversight of Medicines and Healthcare products Regulatory Agency (MHRA) alerts, incidents, and complaints. The practice had employed a full time clinical pharmacist who had, with the medicines management and reception teams reviewed the prescription system and updated it to improve patient safety, ease of making requests, speed and efficiency of processing orders and substantially reduced prescribing costs.
- 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.
- A recent event had been attended by care home staff, practice staff, a Consultant in elderly care and community nurses in order to prioritise the next steps in improving the service to care homes. This included a dedicated weekly session from the consultant, further improvements in IT links for nursing home access to the practice patient records and consideration of co-employment of staff.
- The practice had plans in place and had trained staff for major incidents.
- The practice implemented ongoing service developments and where efficiency changes were made this was with leadership 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. Performance information was combined with the views of patients. For example staff carried out a weekly audit of access rates with reference to nationally recognised good practice relative to list size.
- Quality and sustainability were discussed in weekly management meetings and monthly meetings with clinical staff and we saw formal minutes of these meetings.
- 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 found to be out of date at Viran medical Centre although updated at the main Beacon Primary Care site. There were plans to address identified weaknesses.
- The practice submitted data or notifications to external organisations as required andshared information with trusted partners in order to support decision making and ensure continuity of care. However there was no system to share completed Do not Attempt Resuscitation forms with the ambulance service, hospital or out of hour's service.
- 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.

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

There were high levels of constructive engagement with staff and people who used services, including all equality groups. Rigorous and constructive challenge from people who use services, the public and stakeholders was welcomed and seen as an important way of holding services to account. Services were developed with the full participation of those who used them, staff and external partners as equal partners. For example:-

- There were regular Patient Participation Group (PPG) meetings, NHS Choices feedback received consistent responses, Friends and Family Test (FFT) responses were monitored and staff attended clinical commissioning group (CCG) and locality meetings. A PPG representative told us practice staff were well represented at PPG meetings with GPs and one of the deputy practice managers was in regular attendance. They stated the group had a meaningful dialogue with practice staff and were pleased with the improved access to appointments both by telephone and face to face.
- Staff ideas were listened to and implemented, for example the lead nurse suggested that long term annual reviews were done in the month of the patient's birthday.
- The service takes a leadership role in its health system to identify and proactively address challenges. For example, the NW Health Alliance Primary Care Home

# Are services well-led?

### **Requires improvement**



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was a partnership with two other practices in Southport in order to combine the experience and good practice of staff. It aimed to improve services and access by working together with organisations in the voluntary, health and social care sector. The first joint project to develop healthcare navigation had just commenced.

- Joint training sessions were held for nursing homes, practice staff and community partners. These events were held in the local community to help staff become aware of the activities available for local people.
- The service was transparent, collaborative and open with stakeholders about performance including sharing lessons learnt from serious events and the recording system they had adopted.

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

There were embedded systems and processes for learning, continuous improvement and innovation.

 There was a focus on continuous learning and improvement at all levels within the practice, this included development of protocols following serious

- events, improving administrative systems after complaints, responding to data in relation to prescribing and an ongoing review of how to offer better access to appointments.
- The practice was committed to working with other practices participating in NW Alliance and CCG forums. This demonstrated a clear, systematic and proactive approach to embedding new and more sustainable models of care. This sharing of work enabled staff to compare their performance with that of similar surgeries in the area and share learning with a view to improving outcomes. The Primary Care Home was in the process of developing a healthcare navigation programme to help hard to reach groups.
- The practice developed a single, all service referral form for mental health which had been shared with the CCG as was a Well Pathway for dementia template.
- A GP partner sat on the CCG Council of Members and the other partner was a GP specialist lead. The practice manager and practice nurses attended regular CCG forums. The practice head of nursing attended the CCG medicines management team meeting in order to share updates and safety concerns with the practice. This meant staff were kept up to date with new initiatives.

# 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
Diagnostic and screening procedures  Family planning services	Regulation 12 HSCA (RA) Regulations 2014 Safe care and treatment
Maternity and midwifery services	How the regulation was not being met:
Treatment of disease, disorder or injury	There were not sufficient systems or processes in place that enabled the registered person to assess, monitor and mitigate the risks relating to the health, safety and welfare of service users and others who may be at risk. In particular:
	People who were safeguarded were not monitored regularly
	Systems did not reflect the status of patients or trigger follow up of children who did not attend appointments
	Patient records did not indicate when a Do Not Attempt to Resuscitate form had been completed and there was no system to share this information with other agencies
	People who were at the end of life were not discussed with the multidisciplinary team
	Correspondence dealt with by administrative staff was not audited to ensure GPs had all relevant information
	There were delays in responding to blood test results
	There were no logs to monitor the maintenance of emergency equipment
	Regulation 12