InHealth Endoscopy Ealing Diagnostic Centre

Quality Report

Lovelace House
96 – 122 Uxbridge Road
London
W18 8RD
Tel: 0333 202 0300
Website: www.inhealthgroup.com

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This report describes our judgement of the quality of care at this location. It is based on a combination of what we found when we inspected and a review of all information available to CQC including information given to us from patients, the public and other organisations

Ratings

Overall rating for this location	Good
Are services safe?	Requires improvement
Are services effective?	
Are services caring?	Good
Are services responsive?	Good
Are services well-led?	Good

Mental Health Act responsibilities and Mental Capacity Act and Deprivation of Liberty Safeguards

We include our assessment of the provider's compliance with the Mental Capacity Act and, where relevant, Mental Health Act in our overall inspection of the service.

We do not give a rating for Mental Capacity Act or Mental Health Act, however we do use our findings to determine the overall rating for the service.

Summary of findings

Further information about findings in relation to the Mental Capacity Act and Mental Health Act can be found later in this report.

Summary of findings

Letter from the Chief Inspector of Hospitals

InHealth Endoscopy Ealing Diagnostic Centre is operated by InHealth Endoscopy Limited as part of a network of locations within a specialist services directorate. The service is a community clinic and provides care and treatment to patients who are medically fit and stable.

The clinic has two preparation (admission) rooms, two procedure rooms, two recovery bays and a seated discharge area with two reclining chairs. The service is commissioned by five clinical commissioning groups (CCGs) to provide direct access to colonoscopy, flexible sigmoidoscopy and gastroscopy for routine referrals from GPs. The service is co-located with the InHealth Integrated Diagnostics Centre and shares a reception team and some non-clinical space. Although all these services are operated by the same provider, they are registered separately with CQC. This means we did not inspect services not part of the endoscopy clinic. The clinic has in-house endoscope decontamination facilities and trained staff.

The service provides care and treatment to patients referred by the NHS to reduce waiting times.

We inspected this service using our comprehensive inspection methodology. We carried out an unannounced inspection on 28 February 2019.

The service had typically operated five days per week from 8am to 6pm and at the time of our inspection had started to work towards seven-day working. The service had clinical space to accommodate this and the senior team were building staff numbers to ensure expansion was carried out safely.

To get to the heart of patients' experiences of care and treatment, we ask the same five questions of all services: are they safe, effective, caring, responsive to people's needs, and well-led? Where we have a legal duty to do so we rate services' performance against each key question as outstanding, good, requires improvement or inadequate.

Throughout the inspection, we took account of what people told us and how the provider understood and complied with the Mental Capacity Act 2005.

We have not previously rated this service. We rated it as Good overall.

We found good practice:

• The service had enough staff with the right qualifications, skills, training and experience to keep people safe from avoidable harm and to provide the right care and treatment.

• Processes for safe water management were robust and ensured patient's safety. Staff had taken immediate action where routine testing indicated a risk.

• The service team acted on audits and quality evaluations to continually identify opportunities for benchmarking and improvement.

• Safety and risk management processes were clearly embedded in practice and a strict referral system meant staff saw patients only when they had enough information to provide a safe level of care.

• Staff managed all areas relating to health and safety, such as medicines management and staffing, in line with established processes and protocols. The registered manager and the unit manager ensured protocols were reviewed and updated in a timely fashion to reflect the latest national standards.

• The provider facilitated a 'just culture' that encouraged open discussion of mistakes and reporting of incidents. This included use of the duty of candour, which staff used to ensure patients were kept informed when things went wrong.

Summary of findings

• The service had a waiting list and managed this well. In the previous 12 months the service had met the standard six-week referral to treatment time (RTT) in five months.

• Governance processes included all staff and helped the team to assess the quality of the service and to drive development and improvement. The governance structure was being expanded and improved as part of a five-year development plan.

We found areas of outstanding practice:

• The provider was an early adopter of transnasal gastroscopy services, which provided a more comfortable experience for patients and reduced the need for sedation.

However, we also found the following issues that the service provider needs to improve:

•Storage arrangements for controlled drugs did not meet required standards in line with the Misuse of Drugs Act 1971.

•Although overall standards of infection control were good, there were risks in relation to how staff used the decontamination area and discrepancies between service standards and audit criteria.

We found a breach of Regulation 12, part 2 (g), of the HSCA 2008 (Regulated Activities) Regulations 2014 in relation to the safe and proper management of medicines. We told the provider that it must:

• Ensure controlled drugs are stored and managed in line with the requirements of the Misuse of Drugs Act 1971, including separate, secure storage. This must include effective audit processes.

We also told the provider that it should make some improvements, even though a regulation had not been breached, to help the service improve:

• Provide staff with the tools to monitor patients for deterioration and to respond to urgent clinical needs.

• Minimise infection control risks through effective, consistent audits and practice.

• Review safety monitoring and training to manage risks associated with major haemorrhages and sepsis.

• Store resuscitation equipment securely and provide tamper-proof storage.

• Check resuscitation equipment every day the clinic is open for service.

Professor Sir Mike Richards
Chief Inspector of Hospitals

Summary of findings

Our judgements about each of the main services

Service	Rating	Summary of each main service
Endoscopy	Good 	We rated this service as good because it was effective, caring, responsive and well-led. There were some areas the service needed to address in relation to patient safety.

Summary of findings

Contents

Good

Location name here

Services we looked at

Endoscopy.

Summary of this inspection

Background to InHealth Endoscopy Ealing Diagnostic Centre

InHealth Endoscopy Ealing Diagnostic Centre is operated by InHealth Endoscopy Limited. The service opened in 2015 and is part of an independent sector provider delivering primarily NHS commissioned services in London. It provides endoscopy services for adults and serves a diverse community from across south-east England.

The service is registered to provide one regulated activity:

- Diagnostic and screening procedures.

The service has had a registered manager in post since March 2018. This individual was also the provider's head of endoscopy operations and would rescind registration when a new unit manager achieved registration with CQC. This was on-going at the time of our inspection.

The service is co-located with the InHealth Integrated Diagnostics Centre and shares a reception team and some non-clinical space. Although this is operated by the same provider, they are registered separately with CQC. This means we did not inspect services not part of the endoscopy clinic.

We have not previously inspected this service.

Our inspection team

The team that inspected the service comprised a CQC lead inspector and a specialist adviser. The inspection team was overseen by Terri Salt, Interim Head of Hospital Inspection.

Why we carried out this inspection

We undertook a comprehensive inspection under Section 60 of the Health and Social Care Act 2008 as part of our regulatory functions.

How we carried out this inspection

To fully understand the experience of people who use services, we always ask the following five questions of every service and provider:

- Is it safe?
- Is it effective?
- Is it caring?
- Is it responsive to people's needs?
- Is it well-led?

Before the inspection visit, we reviewed information that we held about the location. During the inspection, we visited all areas in which care is provided. We spoke with nine clinical and non-clinical staff in a range of positions and levels of seniority. We reviewed policies, audits and meeting minutes. We observed the patient process from arrival to departure, looked at a sample of three patients' records and observed care being delivered.

Summary of this inspection

Information about InHealth Endoscopy Ealing Diagnostic Centre

The service is registered to provide the following regulated activity:

- Diagnostic and screening procedures

The service provides appointments from 8am to 6pm Monday to Friday with some Saturday and Sunday sessions available based on demand and availability of staff.

A refurbishment in 2018 meant the service offered expanded space with the introduction of a second procedure room and new endoscope equipment, including washer disinfectors, scopes and stack. 'Stack' refers to the mobile unit used to store equipment such as a video monitor and computer processor.

During the inspection, we visited all areas in which care is provided. We spoke with nine clinical and non-clinical staff in a range of positions and levels of seniority. We reviewed policies, audits and meeting minutes. We observed the patient process from arrival to departure, looked at a sample of five patients' records and observed care being delivered.

There were no special reviews or investigations of the service ongoing by the CQC at any time during the 12 months before this inspection.

Activity from January 2018 to February 2019:

- Colonoscopy: 2287
- Flexible sigmoidoscopy: 483
- Gastroscopy: 2079

A clinical lead, an endoscopy unit manager and deputy manager, one nurse endoscopist, four registered nurses, four healthcare support workers and two administration staff worked in the service. Five medical endoscopists and one nurse endoscopist worked in the service under practising privileges and one registered nurse provided regular cover from the provider's bank system. The service had vacancies for four registered nurses, three healthcare support workers and one administrator.

Track record on safety:

- No never events
- One clinical incident with no harm
- No serious injuries

No incidences of service-acquired Meticillin-resistant Staphylococcus aureus (MRSA),

No incidences of service-acquired Meticillin-sensitive staphylococcus aureus (MSSA)

No incidences of hospital acquired Clostridium difficile (C.diff)

No incidences of hospital acquired E-Coli

The service provides non-clinical space to other services in the provider's network and these are not included in our inspection report.

Summary of this inspection

The five questions we ask about services and what we found

We always ask the following five questions of services.

Are services safe?

Requires improvement

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

- There were risks related to infection prevention and control due to the design of the decontamination area and how staff used it.
- There were gaps in the management of some emergency equipment.
- Staff used appropriate risk assessments but there was no structured tool to help identify a deteriorating patient. There was also no major haemorrhage kit, no processes for the identification or management of sepsis and limited oxygen available.
- The service did not always follow safe standards when managing medicines. We found examples of gaps in documentation of Controlled Drugs (CDs) that had not been documented as an incident and had not been addressed by an auditor. The storage of CDs did not reflect best practice of the Misuse of Drugs Act 1971.

However, we also found areas of good practice:

- The service provided mandatory training in key skills to all staff and had 97% compliance with required completion.
- Staff understood how to protect patients from abuse and the service worked well with other agencies to do so.
- The service had suitable premises and equipment for procedures and looked after them well.
- Staff completed and updated risk assessments for each patient.
- The service had enough staff with the right qualifications, skills, training and experience to keep people safe from avoidable harm and to provide the right care and treatment.
- Staff kept detailed records of patients' care and treatment.
- The service managed patient safety incidents well, although there was limited evidence of shared learning from incidents.
- The service used safety monitoring results well.

Are services effective?

We do not currently rate effective and found the following areas of good practice:

- The service provided care and treatment based on national guidance and evidence of its effectiveness.

Summary of this inspection

- Staff gave patients enough food and drink to meet their needs after procedures and ensured patients had followed appropriate dietary guidance beforehand.
- Staff assessed and monitored patients regularly to see if they were in pain.
- Managers monitored the effectiveness of care and treatment and used the findings to improve them.
- The service made sure staff were competent for their roles.
- Staff of different kinds worked together as a team to benefit patients.
- Staff understood how and when to assess whether a patient had the capacity to make decisions about their care.
- Staff understood their roles and responsibilities under the Mental Health Act 1983 and the Mental Capacity Act 2005. Clinicians acted diligently to avoid procedures on patients who could not consent or whose mental capacity to understand their treatment was insufficient.

However, we also found the following issue that the service provider needs to improve:

- Although the service measured patient's experience of pain, the methods used for this meant staff could not correlate those patients who declined sedation with those who reported pain.

Are services caring?

Good

We rated caring as **Good** because:

- Staff cared for patients with compassion and results from the patient survey indicated consistently good standards.
- Staff provided emotional support to patients to minimise their distress.
- Staff involved patients and those close to them in decisions about their care and treatment, including for aftercare and discussing test results.

However, we also found the following issue that the service provider needs to improve:

- Staff collected comfort scores during procedures but did not analyse or act on this information on a rolling basis for future procedures.

Are services responsive?

Good

We rated responsive as **Good** because:

- The service planned and provided services in a way that met the needs of local people.
- The service took account of patients' individual needs.

Summary of this inspection

- People could access the service when they needed it and staff worked to provide highly responsive and flexible access. The service demonstrated consistent monthly improvements in referral to treatment times.
- The service treated concerns and complaints seriously, investigated them and learned lessons from the results, and shared these with all staff.

Are services well-led?

Good

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

- Managers at all levels in the service had the right skills and abilities to run a service providing high-quality sustainable care.
- The service had a vision for what it wanted to achieve and workable plans to turn it into action, which it developed with staff, patients, and stakeholders.
- Managers across the service promoted a positive culture that supported and valued staff, creating a sense of common purpose based on shared values.
- The service systematically improved service quality and safeguarded high standards of care by creating an environment for excellent clinical care to flourish.
- The service had good systems to identify risks, plan to eliminate or reduce them, and cope with both the expected and unexpected.
- The service collected, analysed, managed and used information well to support all its activities, using secure electronic systems with security safeguards.
- The service was committed to improving services by learning from when things went well or wrong, promoting training and innovation.
- The executive team used governance processes to monitor engagement with patients and referrers and acted on positive and negative comments to continually improve the service.

However, we also found the following issue that the service provider needs to improve:

- We observed a supportive working culture and staff spoke positively of the organisation but results from the most recent staff survey indicated several areas for improvement. The provider was addressing these as part of a culture of engagement at the time of our inspection.

Good

Endoscopy

Safe	Requires improvement
Effective	
Caring	Good
Responsive	Good
Well-led	Good

Are endoscopy services safe?

Requires improvement

We rated safe as **requires improvement.**

Mandatory training

The service provided mandatory training in key skills to all staff, although not everyone was up to date.

• All staff undertook a programme of fourteen mandatory training modules that reflected the needs of the service, including health and safety, fire safety, infection control, information governance, safeguarding, managing conflict, manual handling and basic life support. New staff completed mandatory training initially as part of their induction and safety orientation, which included procedures for non-clinical emergencies and cardiac arrest.

• At the time of our inspection, the team had 97% overall compliance. This included basic life support, which had overall compliance of 82%. This was below the provider's minimum standard of 90% and all staff with lapsed training had this scheduled with protected time to complete it.

• Mandatory training was delivered through a combination of online learning and practical training sessions and staff spoke positively of both. For example, all staff we spoke with said their training demonstrably contributed to improved standards and said the frequency of training helped to maintain up to date practice.

• Staff worked within an established, up to date compliance training policy that assigned accountability for maintaining training to individual staff, their line manager and the learning and development department.

Safeguarding

Staff understood how to protect patients from abuse and the service worked well with other agencies to do so. Staff had training on how to recognise and report abuse, and they knew how to apply it.

• Safeguarding children level 2 and safeguarding adults level 2 were mandatory for all staff. All staff were up to date with safeguarding training.

• Safeguarding training included identifying and responding to risk in relation to female genital mutilation, child sexual exploitation and the different types of abuse.

• A provider-level safeguarding board met biannually to review safeguarding policies and ensure organisational practice met national standards. The board used information from staff feedback and incidents to inform the raising concerns process and to set improvement goals.

• The head of endoscopy operations, who was acting as the registered manager, was the named safeguarding lead and was supported by the provider's director of clinical quality and clinical governance lead, who were named safeguarding leads in the organisation. The unit manager was the safeguarding coordinator and staff understood this structure. The provider safeguarding lead was trained to level 4.

• All staff had access to the provider's up to date safeguarding vulnerable adults policy, which provided guidance for specific circumstances, including their

responsibilities when they found evidence of suspected abuse. All staff were required to maintain a detailed understanding of the policy, which was included in the induction and refresher training every three years.

• Non-clinical staff, such as the reception team, had completed safeguarding children training level 2. This was in line with national intercollegiate guidance on child safeguarding. The service did not provide care and treatment to children although they were regularly present in the waiting area accompanying patients.

Cleanliness, infection control and hygiene

The service controlled infection risk well. Staff used equipment and control measures to protect patients, themselves and others from infection. They kept equipment and the premises visibly clean. However, there were some inconsistencies in control measures to prevent the spread of infection.

• Antibacterial hand gel was available at the main reception and we saw staff instructed people to use it. Gel dispensers were also located in the waiting room and in each clinical room. We observed consistent use of gel, hand hygiene practices and use of personal protective equipment (PPE) during our inspection. We observed staff adhere consistently to the aseptic non-touch technique (ANTT) when inserting cannulas.

• The World Health Organisation (WHO) five steps to hand hygiene were displayed at each handwashing sink and we observed staff follow these consistently.

• A registered nurse was the named infection control lead and provided support and guidance to colleagues in maintaining standards of practice.

• Each area in the clinic had an established cleaning schedule, which contracted cleaning staff adhered to each day the service was open. Staff audited cleaning standards for each area on a monthly basis. Between May 2018 and November 2018, the audits found consistent standards of cleanliness.

• Cleaning staff worked for both this service and the co-located service. The registered manager for the other service located on site carried out a monthly audit of the standards of work of this team. In January 2019, the audit found 89% compliance and found a need for improvement in the uniform standards of the cleaning team.

• There was no structured cleaning checklist for the procedure room, only a cleaning log. This meant there was limited assurance cleaning standards were consistent when carried out by different members of staff.

• Procedures were in place for the safe management of hazardous waste, including storage and disposal, in line with Department of Health and Social Care health technical memorandum (HTM) 07/07

• All staff had up to date infection control training and this was updated in line with the provider's training standards or when national guidance changed.

• Staff carried out a monthly hand hygiene audit of a sample of five episodes of care. The audit assessed standards against National Patient Safety Agency (NPSA) hand-wash technique guidance and the World Health Organisation five moments of hand hygiene guidance, which were on display throughout the unit. Between May 2018 and November 2018, the audit found full compliance and there were no noted areas for improvement.

• Staff used an electronic system to track endoscopes and decontamination. This logged each endoscope to a specific procedure and patient in line with national best practice and this information was stored and tracked digitally.

• The service had installed a vacuum packing machines to prolong the viability of decontaminated scopes as there was no storage cabinet on site. A decontamination facility was located on site and a dedicated team manually cleaned then decontaminated scopes in line with Department of Health and Social Care Health Technical Memorandum (HTM) standards 01-06 and 04-01 and the Health and Safety Executive Approved Code of Practice (ACoP) level 8.

• All staff responsible for decontamination processes had up to date competency-based training and equipment-specific cleaning training based on manufacturer guidance. Healthcare support workers (HCSWs) led the decontamination process. One HCSW was responsible for both the clean and dirty processes and we saw they used well-established processes to reduce the risk of cross-contamination. However, the clean and dirty areas were not fully segregated, which presented a risk of contamination. In addition, one procedure room did not have direct access to the dirty

utility area, which meant staff carried dirty scopes through the room. There was a partial wall marking the boundaries of the clean and dirty areas and staff used a standard operating procedure for scope movement to reduce risk. The trolley used for dirty scopes was not labelled as such, which meant there was limited assurance staff adhered to consistent practice.

• We saw it was common practice for clinical staff to enter the decontamination area as a route to move between treatment areas. This presented an infection control risk.

• The service had a good track record on infection control management and had no reported infections in the previous 12 months.

• Staff tested the water supply for bacteria daily and did not start seeing patients until they had verified the result. They sent weekly water samples to an external laboratory for more detailed testing. A bacterium had been identified in the water in October 2018 and the team had taken appropriate action. This included following manufacturer guidelines in decontaminating equipment and suspending the list until they received negative tests from the water supply.

• The service has up to date checks for Legionella. Legionella is a type of bacteria that can grow and present health risks to people through poor water supply management.

• The unit manager led the provider's uniform policy, which included a requirement that staff be bare below the elbows and without jewellery when in clinical areas.

Environment and equipment

The service had suitable premises and equipment although processes for maintenance and management were inconsistent.

• A schedule for fire safety checks and maintenance was in place, which included weekly testing of the fire alarm, emergency lighting and electrical systems. The service had designated fire wardens with training to lead an evacuation, one of whom was always on duty when the service was open.

• The provider used an annual fire safety checklist to maintain standards in accordance with the Regulatory Reform (Fire Safety) Order 2005.

• Active service and maintenance contracts were in place for all clinical equipment, which meant equipment was always ready for use. However, there had been 57 cancelled or delayed appointments because of faulty equipment in the previous 12 months. The senior team had addressed this with the procurement of new decontamination equipment.

• Resuscitation equipment was located in the clinical area and included clinical items for adults and children in an emergency. A designated member of the clinical team checked this equipment on each day the clinic was open. However, the trolley was not secured with a tamper-evident system, such as seals. This meant it was not possible for staff to quickly identify if anyone had accessed the equipment. We spoke with the registered manager about this who said a new trolley had been sourced and would be installed soon, which would provide greater assurance of security.

• Staff were required to check the contents of the resuscitation trolley on each day the service was open. We checked the documentation for this from May 2018 to October 2018. Between May 2018 and August 2018 staff had consistently carried out and documented checks. However, in September there were seven days on which staff had not documented checks although the clinic was open.

• All staff, including agency staff, were required to complete a local induction that supplemented the provider's induction. This included local procedures for emergencies and data protection and a review of the individual's skill set.

• An automatic external defibrillator was included with the resuscitation trolley and at reception, which was also equipped with a first aid kit. All staff were trained on its use and the unit manager arranged for periodic service of the equipment. An anaphylaxis kit and two epinephrine autoinjectors were in date and formed part of the emergency equipment.

• Staff managed sharps in line with the Health and Safety (Sharps Instruments in Healthcare) Regulations 2013 and waste in line with Department of Health and Social Care national guidance on the management of healthcare waste. Clinical staff were required to demonstrate competence and knowledge of the provider's standards as part of their mandatory training and induction.

• The clinic was purpose-built inside an existing building. The provider had completed refurbishments using Joint Advisory Group (JAG) on gastrointestinal (GI) endoscopy environmental standards as a framework.

• The reception was shared with another service in the provider's network. The manager of each service coordinated building safety and security together and shared emergency management and evacuation plans.

• Staff adhered to an up to date control of substances hazardous to health (COSHH) policy and were assessed on their role-specific understanding of this. The team carried out an annual COSHH assessment to ensure standards remained consistent with best practice and an up to date COSHH directory was available on site.

• The senior team maintained up to date risk assessments for fire hazards, trip hazards, equipment safety and electrical safety.

• Fire safety training was part of the provider's mandatory requirement for all staff and at the time of our inspection each individual was up to date. A named fire warden was in post on each shift and had responsibility for initial evacuation of the clinic, which was part of a shared plan with the adjacent clinic and the building security team.

• Staff used an electronic system to track endoscopes and decontamination. This logged each endoscope to a specific procedure and patient in line with national best practice and this information was stored and tracked digitally.

• The service had installed a vacuum packing machine to prolong the viability of decontaminated scopes as there was no storage cabinet on site. A decontamination facility was located on site and a dedicated team manually cleaned and decontaminated scopes in line with Department of Health and Social Care Health Technical Memorandum (HTM) standards 01-06 and 04-01 and the Health and Safety Executive Approved Code of Practice (ACoP) level 8.

• The service had automated endoscopy reprocessors (AERs) and trained staff carried out a manual rinse of scopes as part of compliance with JAG standards. We observed this process, which was consistent and in line with best practice guidance. For example, staff wore personal protective equipment (PPE), sent scopes to be decontaminated through a hatch and followed track and trace procedures for each scope.

• In the seated recovery bay, a call bell was located at the entrance and not within reach of recovery chairs. The bay did not have oxygen or suction equipment. However, the unit manager had completed a risk assessment for this and staff ensured only patients who were ambulatory were accommodated in this area. Emergency equipment was located adjacent to the recovery beds, including oxygen and suction.

•We checked safety assurance logs for the plant room and water treatment tanks for the previous three months and found no gaps in recording.

• Staff carried out periodic environmental cleanliness audits and it was evident they used this process for service and standard improvement. For example, the service provided evidence of five environmental audits that had taken place between May 2018 and October 2018. The audits identified consistent standards of cleanliness and environmental maintenance, including action when standards fell short. For example, the auditor had noted there was damage to a wall caused by the movement of trolleys and had noted the timeframe for repair.

Assessing and responding to patient risk

Staff completed and updated risk assessments for each patient. They kept clear records and asked for support when necessary.

• Endoscopists triaged patients at the time of referral to ensure the clinic had the capability to safely provide care. A clinician reviewed the patient's medical history and assessed their current needs to ensure they were medically stable. They contacted the referring doctor in cases where they could not verify this information fully, which acted as a safety system to ensure patients with elevated risks were referred to more appropriate services.

• Clinical staff saw patients only after they received a medical referral and history from a referring doctor. This was part of a process to ensure safe care and meant the

consultant could establish if the service was able to provide safe and appropriate care. Patients were also required to complete a pre-procedure health assessment before staff undertook minor procedures or diagnostics.

• All staff were required to complete and maintain up to date training in basic life support, which was delivered to comply with Resuscitation Council UK (2010) guidelines. One nurse had training in immediate life support (ILS) and the unit manager had scheduled all clinical staff to complete this in 2019.

• Standard operating procedures were in place for patient transfers, including for emergency and non-emergency transfers. This included a detailed process to ensure staff followed consent guidelines and made patient's medical information available to the receiving service in an emergency. Between January 2018 and February 2019, there were no urgent or emergency transfers out of the service and 14 multidisciplinary transfers. These occurred where staff identified a need for further consultation. Patients were medically fit when attending the service and as such emergency transfers were unlikely. However, all staff demonstrated an understanding of the process.

• An endoscopist was always on site during active list times and a nurse was always on site when patients were in the recovery suite. Nurses carried out independent assessments using the ABCDE (airway, breathing, circulation, disability, exposure) tool and used an emergency procedure in the event a patient needed emergency care.

• Processes were in place for the handling of unexpected or significant results from diagnostic tests that required urgent investigation or treatment.

• The clinic did not have a major haemorrhage kit or protocol in place. This meant patients would have limited access to immediate help in the event of a major haemorrhage whilst awaiting paramedics. Staff said in the event of a major hemorrhage they would try to stabilise the patient whilst waiting for a 999 ambulance response. The provider had established a working group to review the need for such equipment and policies and the outcome was pending at the time of our inspection. In addition, the service had enough equipment to stabilise patients whilst awaiting an ambulance.

• An emergency eye wash and biohazard spillage kit were available in the clinic and staff demonstrated knowledge of how to use this. The equipment was in date and well-maintained.

• A clear and up to date protocol was in place for staff to respond to a deteriorating patient and the senior clinician leading each procedure was responsible for this. Although this meant staff were prepared to provide urgent care, they did not have access to a structured assessment tool with a defined trigger, such as an early warning score system.

• Protocols and care bundles were not in place for identifying potential sepsis and staff did not have training in this.

• The service had recently introduced a modified version of the World Health Organisation (WHO) surgical safety checklist. This reflected international best practice in clinical safety processes. However, during our observations of treatment we were not assured staff used the tool consistently. For example, staff did not document sign-in time, time out or sign-out times. Staff had not yet audited this and were in the process of establishing an audit framework. The unit manager had identified a need for more consistent use of the WHO checklist. In the November 2018 staff meeting, the team discussed gaps and inaccuracies in the completion of the time out. During our observation of a procedure all three staff involved followed the WHO checklist in full, with clear communication and documentation.

•We observed consistent use of the patient identification policy. This was in place to prevent staff carrying out treatment on the wrong patient. In the waiting room a member of staff carried out an additional identification check when a patient did not respond convincingly to their name. This avoided a potential case of mistaken identity. Staff followed a similar procedure when speaking with patients on the phone and required them to confirm key personal information.

• Clinical emergency procedures were displayed in the clinic and were based on Resuscitation Council (UK) guidelines relating to cardiopulmonary resuscitation (CPR).

• Clinicians used various forms of sedation, including controlled drugs, gas and air. Staff consistently managed all three in line with standard operating procedures and patient consent processes.

• Patients could request a chaperone in advance or on the day of their procedure. All clinical and reception staff were trained to act as chaperones and a mix of female and male staff meant the service could meet individual preferences.

Staffing

The service had enough staff with the right qualifications, skills, training and experience to keep people safe from avoidable harm and to provide the right care and treatment.

• One nurse lead endoscopist was based in the clinic and worked substantively for the provider. Six other medical and nurse endoscopists provided sessions under practising privileges. Practising privileges are arrangements with clinicians employed substantively elsewhere that enable to them to provide services for other organisations. A responsible officer registered with the General Medical Council (GMC) managed endoscopist's performance and competencies and maintained a practising privileges policy.

• Registered nurses led clinical processes and roles were well-defined. On each shift the admissions and recovery processes were led by nurses and two nurses and an endoscopist were always present in the procedure room.

• The senior team used a weekly demand and capacity meeting to establish staffing levels in line with JAG safe standards. This ensured the service planned to have the right skill mix in place for scheduled appointments based on case mix and the complexity of each case.

• The service had vacancies for four registered nurses and three HCSWs. In the previous twelve months, two registered nurses and one HCSW had left the service and the service had recruited two of each grade. The unit manager and deputy manager were both registered nurses and helped to ensure the skill mix remained appropriate for patient's safety.

• The service had developed long-term working relationships with a core group of agency nurses who were familiar with the provider and its operating standards. A permanently-employed nurse was always designated the unit manager for a shift, which ensured appropriate safety oversight.

• During active list times, a medical endoscopist was always available on-call to support the service when led by a nurse endoscopist.

•Clinical staff provided a telephone advice service for patients, which they could access if they became unwell and needed advice after a procedure.

• Between January 2018 and February 2019, 338 agency nurses covered 51 shifts, bank nurses covered 33 shifts and bank HCSWs covered 12 shifts. In the same period, sickness absence amongst nurses was 1.4% with no sickness amongst other staff grades.

• The unit manager planned staffing levels on a weekly basis in line with capacity and demand and increased staffing levels when needed.

• The clinic was part of a network operated by the same provider, which meant there was potential for staff from other clinics to provide cover during periods of short staffing.

• The service used JAG staffing guidelines to plan the appropriate skill mix of staff to safely carry out planned procedures. For example, the registered manager planned staffing based on the complexity of procedures, bowel scope and the level of sedation planned. The unit manager based staffing levels on the optimum level for patient flow in addition to safer staffing and skill mix requirements. For example, they established the need for five members of staff per clinical list in use.

•Registered nurses and HCSWs were trained to provide care in all areas of the service as part of a multi-skilled approach to delivering the service.

• The provider had established procedures in place for the recruitment of staff with the appropriate skills and experience to safely provide care. This included a disclosure barring service (DBS) check, which is used to check a person's criminal record. All staff working for the service at the time of our inspection had a DBS in place.

• Safety measures were in place to ensure agency nurses did not carry out biopsies until they had worked with the

clinic for at least four weeks and completed in-house competencies. In addition, the manager would not run a shift without a substantive nurse from the provider on site.

• In the event of unexpected short staffing, the clinician in charge of the shift used an established SOP to carry out a risk assessment to continue offering appointments. Where the skill mix or numbers of staff fell short of the required minimum to ensure patient safety, staff followed the procedure to cancel and reschedule patients.

• A dedicated reception team reported to the registered manager of the provider's service co-located with endoscopy. The team provided reception and chaperone services to endoscopy patients and were trained to standards consistent across the provider.

Records

Staff kept detailed records of patients' care and treatment. Records were clear, up-to-date and easily available to all staff providing care.

• Staff used an electronic system to record endoscopy results and to send the details to the patient's GP or referring doctor. This formed part of an individual clinical record that also contained the patient's referral information and medical history.

• Staff adhered to the Information Governance Alliance Records Management Code of Practice for Health and Social Care (2016). This meant they handled and managed records in line with best practice standards in relation to quality, security and sharing information for clinical purposes.

•Staff used a picture archiving and communication system that meant records and diagnostic results were readily accessible on site and could be shared electronically with referring doctors.

• Clinical staff adhered to standards set out in the medical records policy, which the clinical quality team reviewed annually.

• The unit manager or a senior nurse audited a sample of 20 patient records per month. We looked at the audits for September 2018 and October 2018 and found staff did not use the provider's quality tool to assess records, instead providing a basic overview. In both audits staff noted some records were missing from each scanned pack but did not identify how this impacted the quality of care or records. Minutes from staff meetings also indicated a need for improved accuracy and completion of nursing notes.

• Staff stored patient records in a locked cupboard with restricted access and the nurse in charge of each shift controlled access to this area.

• We reviewed five sets of patient records and found consistent standards in line with General Medical Council (GMC) guidelines. For examples, staff had completed all records contemporaneously, clearly and legibly. Each record included a completed WHO safety checklist.

Medicines

The service did not always follow safe standards when prescribing, giving, recording and storing medicines. However, patients received the right medication at the right dose at the right time.

• The head of endoscopy operations was the named accountable officer for controlled drugs (CDs) and the unit manager was the service lead for the safe and secure handling of medicines. The regional operations manager carried out periodic audits on the management and safety of CDs.

• Systems were in place for the safe storage and disposal of medicines. This included temperature-controlled, secure storage with restricted access, although we found gaps in the safe storage of CDs.

• We reviewed the documentation for CDs held in the clinic and found consistent standards of documentation. In the three months leading to our inspection, staff had always signed when they had dispensed medicines and there was a daily record of stock checks. However, storage of CDs was not in line with national safety standards. Staff stored two types of medicine classified as section 2 under the misuse of Drugs Act 1971 alongside other medicines. A pharmacy advisor was available on-call to provide advice and guidance during service operating hours. We were not able to establish why CDs were stored improperly despite mechanisms in place that should have prevented the issue.

• A multidisciplinary medicines management group managed medicines safety at a provider level and met quarterly.

• Nurse endoscopists used patient group directions (PGDs) to administer sedatives and other medicines in line with the provider's established policy. PGDs are processes that enable staff with certain qualifications and training to administer medicines for specific conditions and under defined circumstances. All the PGDs were up to date and were due for review imminently by the provider's pharmacist.

• The unit manager was the responsible person for the safe and secure handling of medicine and audited stock monthly. They carried out a daily check of the temperature of medicine storage areas to ensure they were maintained within the safe range recommended by manufacturers. This included the fridge used to store chilled medicine. From January 2018 to November 2018 there were no gaps in recording and the storage temperature had been consistently maintained.

• Staff managed patient's prescriptions in line with guidance from the British National Formulary (BNF).

• Emergency medicine for anaphylaxis was kept on site as part of the emergency equipment and the unit manager ensured the stock was in date.

• Clinical staff undertook additional training in medicines management to help identify potential side-effects in advance and plan appropriate interventions. This included training specific to the medicines commonly used in endoscopy and strategies to counteract sedation.

• The regional operations manager or other senior staff audited CDs monthly. A spot-check in May 2018 found the authorised CD staff list to be out of date and the unit manager re-distributed the CD standard operating procedure (SOP) to all staff with a reminder to maintain up to date documentation. A repeat audit in June 2018 found the authorised user list remained out of date and not all staff knew where to find the SOP. There were no documented follow-up audits.

• During our inspection, we observed an unqualified member of staff administer a prescribed medicine to a patient unchallenged during a procedure.

Incidents

The service managed patient safety incidents well, although there was limited evidence of shared learning from incidents.

• Staff recognised incident-reporting criteria and knew how to use the reporting system. An incident and adverse event reporting system was well established, and staff demonstrated good knowledge of this. The system was evidence-based and provided staff with clear guidance on reporting responsibilities, including when external bodies needed to be informed of an event. However, we were not assured the senior team were proactive in identifying learning from near-misses, incidents and instances of non-compliance to improve safety standards. For example, staff said they always reported equipment failures as an incident but did not receive feedback or learning points afterwards.

• Between January 2018 and January 2019, the service reported 67 incidents. Of these, the unit manager classified 21 as presenting an insignificant risk, 40 as a minor risk and six as a moderate risk. The most common types of incident related to clinical or procedural delay (19%) and booking issue (15%). Other incidents were reflected in 14 different categories with no trends or themes.

• Between September 2017 and November 2018, the service reported one serious incident. This occurred when an audit of the electronic patient records system identified 623 open referrals on the system. Although no patients were harmed as a result of this, the manager identified potential for this as it meant GPs and patients were not aware of their procedure results. In 36 cases GPs had not received a copy of the report, which meant there was potential delayed treatment. The unit manager carried out a root cause analysis, which found several areas for improvement. This included a need for more robust monitoring of the electronic system, improved communication between administrative and governance teams and more consistent use of surveillance systems. The manager shared the learning and outcomes broadly with local, regional and national teams as part of a strategy to avoid future recurrences.

• A named investigator was assigned to each incident and documented key outcomes and the level of risk the incident had presented to the organisation, staff and patients. This helped the senior team to monitor on-going safety in the service and to identify trends in relation to levels of risk. All the staff we spoke with knew how to report an incident, adverse event or near miss and understood the provider's reporting criteria.

• An up to date adverse incident management policy was in place and the registered manager used this to embed an open culture of reporting incidents and discussing concerns. The policy established a 'just culture' approach to incidents, which the senior team used to ensure staff could report incidents without fear of reprisal. An adverse event (incident) reporting and management policy supplemented this and guided staff in the event an incident resulted in harm to a patient or to the team.

• A current incident-reporting policy was in place, which the senior team had reviewed within the last 12 months. This included criteria for the use of the duty of candour and as part of the process for the notification of safety incidents. We saw evidence the clinical lead adhered to the duty of candour following reportable incidents, including an SI that involved a stoma perforation.

• The registered manager coordinated learning from health and safety audits and staff feedback to lead a programme of preventative measures to reduce the risk of incidents.

• There was evidence of learning from incident investigations and outcomes. For example, one incident occurred where a clinician had left a company laptop in their car, which had been stolen. Although patient details had not been stolen, the incident highlighted a need for more consistent application of the provider's data management policy. The unit manager led this locally and reviewed each member of staff's understanding and application of the policy. Another incident resulted in the design and implementation of more detailed nurse-led care plans, which included specific actions in cases where patients reported pain and discomfort.

Safety Thermometer (or equivalent)

The service used safety monitoring results well. Staff collected safety information and shared it with staff, patients and visitors. The manager used this to improve the service.

• The unit manager carried out a quarterly health and safety checklist as part of the clinical governance lead's annual audit programme. We looked at all of the audits carried out in 2018 and saw they were thorough, with immediate action taken for any risks or deficiencies.

• The unit manager and clinical staff monitored safety daily to improve practice. For example, where patients reported pain during a procedure, clinicians reviewed records to identify potential improvements in pre-screening and discussions about sedation.

• Staff audited peripheral intravenous cannula care on a monthly basis to assess standards of practice in on-going care. Audits from August 2018 to October 2018 demonstrated consistently good practice and full compliance with established standards of care.

Are endoscopy services effective? (for example, treatment is effective)

We do not currently rate effective.

Evidence-based care and treatment

The service provided care and treatment based on national guidance and evidence of its effectiveness. Managers checked to make sure staff followed guidance.

- The team planned to achieve accreditation by the Joint Advisory Group (JAG) on gastrointestinal (GI) endoscopy. JAG accreditation means the service has been assessed and evaluated against a range of quality, safety and service best practice standards. The team had completed two global ratings scale (GRS) census reports as part of their work towards accreditation. GRS is the evaluation and quality scale used to demonstrate standards of practice and care. The service was preparing for an imminent JAG review at the time of our inspection.
- The service contributed data to the national endoscopy database, which contributed to benchmarking of standards. They started this in 2018 as part of the work towards seeking future JAG accreditation and was in its pilot phase at the time of our inspection. This meant the service was reviewing the first wave of data, which had not yet been released.
- The provider held ISO 9001:2015 accreditation for providing industry-standard clinical care. The registered manager ensured local standards of care and safety met the requirements of the accreditation, which denotes practice in line with national standards.
- We observed staff take patients' pulse readings using an oximeter probe on their finger. This did not meet NHS Improvement recommendations issued in December

2018 that pulse readings should be collected by using an ear probe. During one observation staff fitted the oximeter to patient's finger despite them wearing nail varnish, which would reduce the accuracy of the reading. Staff were unaware of this directive and the unit manager said they would review it with the senior team.

- The provider had an established system of rolling audits to benchmark standards of care internally and with national guidance. This included medicine and equipment stocktakes, washer disinfection and scope logs and the vetting of patient referrals. Staff used audits for a range of purposes. For example, some audits were used to maintain good local standards, such as fire protocols. Other audits were in place to benchmark clinical practice against national standards and guidelines, such as an audit to measure decontamination processes against those set by the Institute of Healthcare Engineering and Estate Management.
- The clinical lead reviewed the clinical outcomes of patients treated by endoscopists working under practising privileges on a weekly basis and provided feedback. Clinical and operational policies were up to date and staff delivered care and treatment in line with these. Clinical policies such as the intravenous sedation policy had a staff roles list to guide standardised practice. We observed staff followed these in practice.
- The clinical lead audited referrals quarterly to identify if they fell within National Institute of Health and Care Excellence (NICE) guidance. In May 2018 and August 2018, a sample of 20 referrals found eight were inappropriate and did not fall within NICE guidance or an appropriate alternative. The team had discussed an action plan to address areas for improvement and senior managers were actively working with clinical commissioning groups (CCGs) to achieve these. They included a need for better quality referrals and clearer communication between the provider and referring GPs.

- The service did not have a formal sedation policy, but staff followed guidance from the British Society of Gastroenterologists when treating patients under sedation.
- Staff used a clinical administrator handbook to ensure patient preparation and clinical tasks were standardised with the provider's policies.

Nutrition and hydration

Staff gave patients enough food and drink to meet their needs following procedures.

- Staff offered patients refreshments on site and the waiting room had a fresh drinking water system.
- Where staff recognised patients as being at risk of malnutrition or dehydration they offered snacks and gave advice on maintaining healthy eating.
- The recovery area included water, juice, tea, coffee and snacks. Staff ensured patients had a drink and snack before they left the clinic to address light-headedness associated with some procedures.
- The service issued patients with pre-procedure requirements for nutrition and hydration, including bowel preparation packs and instructions for fasting.

Pain relief

Staff assessed and monitored patients regularly to see if they were in pain. They supported those unable to communicate using suitable assessment tools and gave additional pain relief to ease pain.

- Staff asked patients about pain during pre-assessments, during and after treatment. They documented pain using the National Endoscopy Database (NED) scoring system and documented this in the patient's records. Staff prescribed pain relief medicine where needed and used adapted communication tools to understand the pain levels of patients with complex needs. Staff had documented pain and comfort scores in all five of the records we looked at.
- Staff established multidisciplinary pain management plans for patients with long-term, chronic pain with referring doctors.
- Sedation was available, and staff worked with patients to identify the most appropriate level and route of sedation for their individual needs and planned procedure. Where pre-assessments had found a need for communication support, staff ensured they fully understood the patient's ability to communicate pain.
- Patients had the opportunity to report on their levels of pain during procedures through an on-going patient survey. In 2018, 70% of patients said they experienced pain during their procedure. Of this group, 35% said this was mild, 33% said it was moderate and 3% said it was severe. However, only 32% of patients had opted for sedation and it was not possible to identify from the survey whether the patients who reported pain were the same patients who declined sedation.

- Staff monitored patients' nurse-reported comfort scores during each procedure as a strategy to monitor overall levels of pain during specific procedures. Between September 2018 and November 2018, 35% of patients reported moderate to severe discomfort.

Patient outcomes

Managers monitored the effectiveness of care and treatment and used the findings to improve them.

· The service provided diagnostic results immediately after screening where possible, which meant patients could consider their long-term treatment options with staff on the same day. Where results, such as histology results, required further scrutiny, they told patients when to expect these.

- All staff undertook equality and diversity and person-centred care training and there was a clear care and treatment ethos based on individualised care.
- The service's statement of purpose detailed the focus on ensuring patient outcomes consistent with current best practice guidelines and meeting expectations.
- The clinical lead reviewed the GRS scores for individual endoscopists periodically to ensure consistent standards of care and contributed this data to the national endoscopy database as a strategy to benchmark patient outcomes. Between January 2018 and February 2019, endoscopists achieved a 98% overall completion rate for caecal intubation. This was better than the minimal rate of 90% and aspirational rate of 95% set by JAG, the Association of Coloproctology of Great Britain and Ireland (ACGBI) and the British Society of Gastroenterology Endoscopy (BSGE). In the same period the polyp detection rate was 31%, which was significantly better than the national minimal standard of 15% and aspirational standard of 20% set by JAG, BSGE and ACGBI. The polyp recovery rate was 99%. There was a continuous improvement in detection rates in this period, from 21% in quarter 3 of 2018 to 40% in quarter 2 of 2019. The data reflected significant improvements in the quality and reliability of data during the period, including work with software providers to ensure data confidence.
- The provider set key performance indicators to ensure diagnostic reports were produced and shared with referring doctors in a timely manner. The unit manager audited report turnaround times and the clinic had achieved 100% report completion within 24 hours in the previous 12 months.

Competent staff

The service made sure staff were competent for their roles. Managers appraised staff's work performance and held supervision meetings with them to provide support and monitor the effectiveness of the service.

- The provider operated a competency-based induction programme for new staff and each individual was assigned a mentor for this period. Mentors assessed new staff on role-specific competencies at the end of their induction and the provider set a minimum achievement standard. Where new staff failed to meet this, mentors carried out a review of performance with the regional team to ensure the individual had additional support.
- Staff were required to successfully complete a competency-based workbook that demonstrated their knowledge and skills before they were able to practice without supervision. This system ensured staff had the time they needed to develop and demonstrate professional competencies in line with the provider's standards. All the provider's education programmes were competency-based, role-specific and structured around the clinical needs of the service.
- Clinical staff completed up to 20 competency-based training modules based on their role and responsibilities. For example, nurses completed training competencies in monitoring patients during procedures, administering medicines and providing recovery care. Healthcare support workers completed competencies progressively based on their level of experience and responsibility. Competencies were based on JAG guidance and every member of staff was up to date with their required training.
- Permanent staff provided a structured orientation and induction for bank and agency nurses, which included competency checks of their clinical knowledge cross-checked with their curriculum vitae (CV) and training certificates. This ensured competent practice was consistent regardless of the employment status of individual staff.

- All clinical staff had undergone an appraisal in the previous 12 months. Senior staff followed an established procedure to structure appraisals, which enabled each individual to reflect on their achievements and identify their planned progress in the coming year.
- Staff responsible for decontamination undertook competency training, assessments and updates with the manufacturers of the equipment they used.
- The service was in the process of increasing clinic hours and had contracted agency nurses to deliver care whilst increasing the permanent staff base.
- A qualified endoscopist led each patient list and the service required each individual to hold JAG accreditation. Both nurse and medical endoscopists provided treatment, with support and oversight from the clinical lead.
- We looked at the training and development records of four members of staff and found consistent levels of completion.
- The provider required agency nurses to complete an induction process on day one followed by a competency assessment on policies and procedures at the end of their first week.
- Staff underwent an on-going competency assessment programme to ensure they remained up to date with the latest practice standards. This included practical assessments of biopsies.
- Staff we spoke with said they were happy with the processes in place to maintain their competencies and engage in learning about new and changing practices. This included a monthly meeting to identify opportunities for learning from a range of sources, including the outcomes of incident investigations.
- A registered nurse had adopted a new link role as part of their professional development. This involved developing responsibilities in rostering and stock management.
- The unit manager encouraged healthcare support workers (HCSWs) to undertake developmental training, such as to transition from a support role to the admissions process, including cannulation.
- The senior team worked with nurses to empower them to challenge clinical colleagues during procedures. This followed an incident in which a patient alleged an endoscopist had continued a procedure despite their removal of consent.

Multidisciplinary working

Staff of different kinds worked together as a team to benefit patients. Doctors, nurses and other healthcare professionals supported each other to provide good care.

- Processes were in place to ensure staff could refer patients to secondary care services when their condition could not be fully managed in the community primary care setting.
- The provider had a dedicated referrer line as part of the patient referral centre. This meant referring professionals could obtain information on advice on the most appropriate centre for treatment and expedited appointments.
- After each procedure the endoscopist sent a summary of their findings to the referring doctor and a copy to the patient's GP, if these were not the same person.
- Staff were proactive in engaging with referring doctors when they needed more information about the patient's history. This was part of a process to only carry out procedures where they had enough information to carry out treatment safely and meant referring doctors remained involved in the process.
- The unit manager had introduced a new care coordinator role in 2018. This individual managed minor issues, calls and queries and released the manager to provide more dedicated time to the team and service.
- The clinical team was working with Clinical Commissioning Groups (CCGs) to establish a multidisciplinary point of contact in each borough. This would help the team to better coordinate care for patients with complex needs. The team was also in the process of standardising referral documentation with each CCG to address broad inconsistencies within each.

Seven-day services

- The service was equipped to offer a seven-day service from 8am to 6pm and usually offered a five-day service. The manager was gradually increasing the staff team and expanding the service towards its full seven-day capability.

Health promotion

- The provider adhered to a duty of care for patients to promote their general health and safety to minimise unnecessary risks to their health.

Good

Endoscopy

- Staff provided advice and signposting to health, wellbeing and holistic services as part of planned care and treatment. This was part of a wide-ranging service that aimed to support and empower patients to make healthier choices.

Consent and Mental Capacity Act

Staff understood how and when to assess whether a patient had the capacity to make decisions about their care. They followed the service policy and procedures when a patient could not give consent.

Staff understood their roles and responsibilities under the Mental Health Act 1983 and the Mental Capacity Act 2005. They knew how to support patients experiencing mental ill health and those who lacked the capacity to make decisions about their care.

- Clinical staff were trained in the Mental Capacity Act (2005) and assessed patients for their capacity to retain information before carrying out procedures. This was in line with the provider's policy and the unit manager provided incentives for agency staff to attend training. Where clinicians were not assured of a patient's mental capacity they cancelled the procedure and referred the patient back to their doctor.
- Clinical staff obtained and documented consent prior to each procedure and adhered to best practice guidance from the General Medical Council (2013) (GMC) for intimate procedures, including offering a chaperone. Where they identified barriers to obtaining full consent due to language understanding, staff arranged for an interpreter to assist with the process. Where patients had refused to engage with an interpreter and insisted they communicate only through a patient, staff stopped treatment in the first instance and liaised with the referring doctor.
- Staff did not accept treatment for vulnerable patients who could not consent to treatment and did not have a legal, authorised person to consent on their behalf.
- An up to date policy was in place that staff used as best practice guidance to obtain valid and informed consent. The policy was based on the principles of the Mental Health Act (1983) and the Mental Capacity Act (MCA) (2005). A separate policy provided guidance on obtaining consent from adults with reduced capacity, which included details of how to establish best interests care within the MCA.
- We observed staff use appropriate positive patient identification before they delivered care or discussed personal details and provided each patient with an identity bracelet. This was in line with the provider's consent training and included the signature of both patient and the practitioner before a procedure.
- The provider sent out specific procedure information by post to patients in advance of their appointment with a consent form for them to complete and bring with them. We observed staff review the consent procedure with patients after a positive identification and before they carried out a procedure.
- The service had a withdrawal of consent policy, which patients could act on at any time, including if they were under sedation.
- Staff had documented patient consent in all five of the records we looked at.

Are endoscopy services caring?

Good

We rated caring as **good.**

Compassionate care

Staff cared for patients with compassion. Feedback from patients confirmed that staff treated them well and with kindness.

- The service had established standards for dignity and respect, which all staff demonstrated good awareness of.
- We observed all staff spoke to patients with a caring attitude, dignity and respect, including the reception team who greeted each patient with a warm welcome This was in line with the provider's privacy and dignity policy, which established seven key standards for staff to follow. For example, one key standard was the need to respect personal boundaries and space. We saw staff adhered to this, such as when they collected patients from the waiting room and assessed whether the patient was comfortable with a formal or informal approach to being escorted and to communication.
- The clinic had received cards and notes of thanks from happy patients and their relatives and staff displayed these in the clinic.

- The service gathered continual feedback from patients through a satisfaction survey. Between January 2018 and October 2018, 1063 patients completed a feedback form, which reflected a 32% average response rate. The results indicated overall high standards of satisfaction with the service, including a 99% recommendation rate. For example, 93% of patients said staff respected their privacy and dignity during their procedure and in recovery and 100% agreed with this during their preparation. In addition, 97% of patients said their experience had been good or excellent. Themes from patient's written comments reflected positive experiences with staff. One patient commented, "…all the staff made me feel comfortable when I felt nervous", and another patient noted, "Very kind and helpful [staff]; [I] could not have wished for more."
- Privacy and dignity were embedded in the statement of purpose (SOP) and detailed the standard of service patients could expect, which also acted as a framework for care delivery. This included providing assistance that was discreet and dignified and ensuring private areas were available for consultation and treatment.
- Care and compassion were embedded in the service mission and values and senior staff adhered to its principles when developing and delivering the service.
- Staff demonstrated strategies to ensure patients were treated with privacy and dignity. For example, they used en-suite preparation rooms and offered patients a choice of gown or dignity shorts before their procedure. Space for private conversations was readily available and staff utilised individual recovery spaces following procedures to ensure conversations remained confidential.
- Staff used the NHS Friends and Family Test (FFT) to obtain continual feedback on patients' experience of the service. Between January 2018 and February 2019, the service achieved a response rate of 39%. Between January 2018 and February 2019, the service achieved a 99% recommendation rate. Patients commented positively on their experience with the reception team and 100% of respondents said they had been dealt with promptly and efficiently. Where patients left negative comments, the unit manager reviewed these with the team. For example, in April 2018 one patient had commented staff seemed rushed and disorganised.
- The team had adapted the FFT to provide digital access using an internet link and a QR code, which meant patients could easily access the survey using a smartphone. A paper-based survey was also available and reception staff encouraged patients to complete the version they were most comfortable with.
- In addition to on-going FFT feedback, staff surveyed a random sample of 100 patients each year to explore more in-depth themes of satisfaction and areas for improvement. The team displayed outcomes from this using a, 'You said, we did' display.
- During our inspection we observed staff delivered care in line with the provider's privacy and dignity policy. This outlined key standards for staff to follow when communicating with patients with different needs.
- Staff issued each patient with a privacy gown with ties to maintain their dignity whilst moving around clinical areas. We observed staff used sheets in the procedure room to reduce each patient's exposure and provide privacy.

Emotional support

Staff provided emotional support to patients to minimise their distress.

- Patients received diagnostic results on the same day as screening and clinical staff provided emotional support and guidance when results were upsetting or unexpected. There was a dedicated area for difficult discussions.
- We observed staff reassure and comfort patients throughout their procedure.
- Staff signposted and referred patients to counselling and psychotherapy services when they needed more structured support in dealing with a diagnosis or treatment.
- The senior team encouraged and empowered staff to deliver care with sensitivity and empathy and to adapt this to individual needs when patients needed more intensive emotional support.
- One member of staff was present during each procedure to act as an advocate for the patient. This meant they were dedicated to monitoring the needs of the patient and to providing emotional support to reduce anxiety during procedures.

Understanding and involvement of patients and those close to them

Staff involved patients and those close to them in decisions about their care and treatment.

Good

Endoscopy

- Clinical staff involved patients in care and treatment planning and discussed options and potential downsides to treatment before proceeding. This ensured patients had realistic expectations of the outcomes of their care and remained involved in on-going decision-making.
- Involving patients in their care was a key element of the service's SOP. This directed staff to provide care only when they were satisfied the patient understood the treatment plan. The directive paid attention to detail of the patient experience, such as instructing staff to establish how each patient wished to be addressed. We saw staff routinely adhered to this in practice.
- The provider was an early adopter of the NHS England 'Always Events' methodology, which enabled staff to work with patients to design services and information resources based on their individual needs.
- Staff paid attention to detail when communicating with patients and considered individual preferences. For example, staff asked patients and their relatives how they wished to be addressed and noted this so all staff communicated consistently.
- Staff used a comfort score system during procedures to ensure they understood how patients were feeling, in line with Joint Advisory Group (JAG) audit standards. Although staff documented this in patient records they did not analyse them on a rolling basis, which meant they could not provide feedback or action plans to the patient's referring doctor. After our inspection the provider told us these results were analysed on a bi-annual basis.
- Staff ensured patients were informed of the findings of procedures at each step. After a procedure the operating clinician wrote to the patient with key information and provided printed information on lifestyle changes and considerations that could help relieve their symptoms.
- The results of the 2018 patient survey, which included 977 responses, indicated staff consistently involved patients in their care and treatment although there were a number of areas for improvement. For example, 95% of patients said staff explained test results to them afterwards and 86% said they were provided with a copy of their examination reports. Of the patients who needed to wait for histology results, 81% said they understood how they would receive this. Staff flagged this during our inspection as an area for improvement and were addressing the need for more consistent communication in this area. In the survey, 97% of patients said staff introduced themselves, 89% said they had the opportunity to discuss their procedure and ask questions beforehand and 99% said the clinician provided enough information ahead of their procedure. Patients were less pleased with information in relation to delays and only 28% of patients whose appointment was late said they were given a reason for this.
- During our observations of care, we saw staff made sure patients understood the information given to them and what the procedure would involve before starting.
- Where patients had procedures under sedation, the clinical lead for the procedure explained the sedation to them. This included how it was administered, how it worked and what they could expect to feel. We observed this in practice and found staff were skilled in communicating this information to each patient's individual level of understanding and anxiety.
- Pre-treatment information and information given by the patient referral centre team instructed patents to tell staff during their procedure if they were uncomfortable or experienced pain. Staff in the service further embedded this through the consent process. This was part of a strategy to empower all patients to take the lead in their treatment and to ensure they fully understood their procedure and treatment.

Are endoscopy services responsive to people's needs?

(for example, to feedback?)

Good

We rated responsive as **good.**

Service delivery to meet the needs of local people

The service planned and provided services in a way that met the needs of local people.

- Staff were demonstrably committed to developing the service to meet the changing needs of patients. This included monitoring local, regional and national health trends to ensure the service remained viable and competitive.
- The clinical lead carried out a biannual audit of a sample of turnaround times for pathology results. The most recent audit took place in November 2018 and found the service did not meet the five-day turnaround

target as results were received in the unit only twice weekly. Staff scheduled patients into return appointments the next day to discuss results if needed. The local team carried out a twice-annual turnaround time for pathology audits results to ensure expected standards were maintained.

- Staff had established details of clinical services available locally and signposted patients where they needed specific diagnostics or treatment that could not be provided on site. This included both independent and NHS services and staff worked with patients to ensure their preferred provider could meet their specific needs.
- Senior staff monitored requests from NHS services to identify opportunities for patients on waiting lists. For example, they increased the availability of certain types of appointments in line with trends in demand.
- The senior team planned the procedure list on patient need. For example, they arranged for patients at risk of infection to be seen at the start of the session and for patients at risk of transmitting infection to be seen at the end of the list. Where patients had additional or complex needs, the service provided extended appointment times.
- Standard operating procedures were in place to enable the clinic to carry out procedures with patients who presented with an increased risk of infection.
- The service had developed a standardised referral form that required referring professionals to included information to help staff plan to meet needs. This included information on communication challenges and language needs.
- Staff modified pre- and post-procedure information for patients based on existing medical conditions, such as diabetes. Individual care pathways related to each patient's specific complaint, such as rectal bleeding and dyspepsia.

Meeting people's individual needs

The service took account of patients' individual needs.

- Staff were trained to provide individualised care that they adapted to each patient's cultural and communication needs. For example, staff recognised when some patients valued being addressed formally and when others preferred a more informal approach.
- Patients could request a male or female clinician for procedures and the service had a chaperone policy in the event they could not secure a patient's first request.
- Staff arranged for telephone interpreters to support patients who did not speak English during appointments. This meant they were assured of effective consent and safeguarding procedures where communication barriers existed and had the opportunity to facilitate effective discussions directly with patients who did not speak fluent English that related to difficult news, such as a terminal diagnosis.
- The service had access to a language interpretation service to assist patients during all stages of an appointment. This could be pre-arranged, and all staff had access to an on-demand telephone interpretation service as well as documents printed in Braille.
- The service had an up to date discrimination prevention policy that was compliant with the Equality Act (2010) and ensured staff delivered care without prejudice to protected characteristics.
- Staff proactively contacted patients two to three days after a colonoscopy. The unit manager audited the service monthly. The follow-up calls enabled staff to check if patients had any unusual symptoms or side-effects of the procedure. Where patients reported an adverse effect, staff documented the advice given to them, such as a return to the clinic or appointment with their GP.
- Staff used the electronic pathway to document information that helped them deliver tailored, individualised care. For example, staff noted where patients had needs in relation to language, hearing, sight and mobility. Where the referring doctor noted this in advance staff prepared for their appointment by offering additional support.
- The recovery bay was equipped with toilet facilities and a range of refreshments, which staff encouraged patients to have before they left the clinic. There was a dedicated quiet room reserved for discussing challenging or difficult test results.
- Staff facilitated longer sessions for patients with a hearing impairment or who were deaf, and the registered manager arranged for a British Sign Language interpreter to be present. Staff facilitated trained service dogs in the clinic and all areas were accessible by wheelchair.

- The service had a private discussion room for endoscopists to discuss bad news and for multidisciplinary meetings to take place.
- Staff provided patients with a care journey booklet that included detailed and easy-to-understand information about their care. This included photographs of each clinical area and equipment they were likely to see, with a straightforward explanation of each. The booklet included an explanation of what would happen in each area and what would happen after the procedure.
- The service provided a spacious, airy waiting area with tables, comfortable chairs, free Wi-Fi, fresh drinking water and hot drinks, magazines and a TV for patients and those accompanying them.
- All areas of the clinic were wheelchair accessible, including access directly from a car park attached to the back of the building. Accessible toilets were available with handrails and patient alarms located at different heights.
- Other services offered by the provider were based in the same building. To help patients orientate themselves, staff used colour-coded footprint stickers to direct patients through their pathway while in the clinic. This was part of a visual 'five-step patient journey' display in the service to help patients orientate themselves.
- Processes were in place to provide care and treatment for patients living with dementia or a learning disability. This included tools to help staff adapt communication so that the patient understood what was happening and to help staff be confident they had consent for the process.

Access and flow

People could access the service when they needed it. Waiting times from referral to treatment and arrangements to admit, treat and discharge patients were in line with good practice.

- The service operated as a community clinic and provided care to patients whose needs were within the scope of the service. Clinical staff carried out triage of referrals to ensure the clinic could meet their needs ahead of attendance.
- The service operated to a standard six-week referral to treatment time (RTT) and the electronic booking system managed this automatically. Clinicians reviewed each referral to ensure patients with urgent needs were prioritised and scheduled extended clinic times to meet patient needs. The service performed variably in this RTT measure. Between January 2018 and February 2019, the service met the RTT target in five months and breached it in seven months. The service had breached the target for the four consecutive months leading to our inspection. In this period, the service reported 258 breaches and average RTT times as follows:
- Gastroscopy: 29 days
- Flexible sigmoidoscopy: 32 days
- Colonoscopy: 31 days
- In each month, the service demonstrated a significant reduction in breaches remaining at the end of each month. Between July 2018 and January 2019, the service started each month with an average of 33 patients breaching the RTT and ended the month with an average of 11 patients.
- Where a patient was unable to attend within six weeks of their referral, staff returned them to their referring doctor.
- The provider had a centralised electronic patient referral system and a dedicated centre team that coordinated bookings.
- In February 2019 there were 378 patients waiting for an examination or procedure. This was within the limits of the service to meet RTTs and a centralised team coordinated appointments to minimise waiting times.
- Between November 2018 and November 2019, the service cancelled 100 appointments for non-clinical reasons, of which 57 were due to equipment failure. This was a double-booking due to an administrative error and there was no impact on care. In the same period there were no treatment delays.
- Patients accessed the service on referral from their GP or another medical practitioner. Appointments were on a pre-booked basis only and patients could typically access the service within three to six weeks of referral. Staff planned the service to be responsive without delays for assessment or treatment and they saw patients with urgent needs on a same-day basis.
- Two recovery beds and two recliner chairs were available with nurse supervision. However, there was no physical separation between the beds and chairs, meant it was not always possible to provide single-sex recovery space. Staff were aware of the limitations of the environment and managed patient movement through the care pathway to ensure privacy and dignity was promoted at all times.

- The registered manager, operations support manager and regional operations manager carried out a weekly capacity and demand meeting to review waiting times and referral to treatment (RTT) times. From November 2017 to November 2018 the service was compliant with the RTT standard of six weeks in 10 months.
- The service sent a reminder text message or called each patient three days ahead of their appointment to confirm attendance. Reception staff maintained an up to date information board in the waiting room that included delays to specific lists and the reason(s) for these.
- List sizes were capped at 12 points, as identified by Joint Advisory Group (JAG) standards, and pre-booked appointment lengths varied from 15 minutes to 30 minutes depending on the case mix and staffing of the shift. The patient referral centre provided oversight of lists and the clinical lead and registered manager could adjust this based on demands and resources.
- The provider had a dedicated patient referral centre (PRC), which managed an electronic referral system that enabled GPs to submit requests in a consistent format in addition to NHS referral systems. The service accepted referrals from GPs in five different CCGs, not all of whom had engaged with this system. The senior team were working with CCGs to improve this.
- Between January 2018 and February 2019, the DNA rate was 4%. Patients cancelled 4% of appointments and the service cancelled 2% of appointments.
- The service had a target of triaging 99% of referrals within 24 hours of receipt. Between August 2018 and January 2019, the service achieved 94%. In the same period the service achieved 100% compliance with the provider target of contacting all patients within five days of accepting their referral.

Learning from complaints and concerns

The service treated concerns and complaints seriously, investigated them and learned lessons from the results, and shared these with all staff.

- The service had an established complaints policy that was displayed in the waiting area and was readily available on the website. All staff were trained in use of the complaints procedure and could signpost patients to the appropriate process to follow. The unit manager offered to meet with complainants and staff used this as a strategy to deescalate concerns and issues when they occurred. The service set an initial acknowledgement time of 48 hours and a full response and resolution time of 20 working days from the date of receipt. The manager had met these standards in each complaint received in the service.
- The director of clinical quality maintained oversight of the complaints policy, which included guidelines for escalating a complaint to adjudicators and external independent investigators if a complaint had not been resolved internally.
- Between November 2017 and November 2018, the service recorded 13 formal complaints in the tracking system, of which 10 were upheld. The unit managed assessed each for clinical risk. They classified eight complaints as insignificant risks, three as minor and one as a moderate risk. One complaint was unclassified at the time of our inspection. In the same period the service reported 900 compliments. The registered manager reviewed compliments to identify themes, which had included the quality of care and the knowledge of staff.
- The service had responded quickly to each complaint, apologised and provided a full and appropriate response. The unit manager had fulfilled the target response times, including acknowledgement within three working days and a completed investigation and formal response within 20 working days.
- Five complaints related to the short-notice cancellation of appointments due to equipment failure. The service had installed new equipment to address these issues and there had been no subsequent cancellations or complaints relating to equipment. The remaining complaints related to nine different areas of concern and the service addressed each one. For example, one patient was booked into an urgent appointment but did not receive a preparation pack. The service had implemented a new procedure as a result whereby patients could collect a pack from the clinic or from their GP ahead of an urgent appointment. Where a patient had made a complaint about communication with staff, the manager had invited them back to the clinic for a discussion with the staff members concerned to help them improve from the feedback.
- A complaints and compliance manager led corporate governance in relation to complaints and maintained an overview of local complaints and the outcome as part of the provider-level process.

- All staff completed customer care and complaints training as part of their mandatory package.
- Staff said they learned about complaints and learning points during safety huddles.

Are endoscopy services well-led?

Good

We rated well-led as **good.**

Leadership

Managers at all levels in the service had the right skills and abilities to run a service providing high-quality sustainable care.

- A clinical lead, regional operations manager and endoscopy unit manager formed a triumvirate leadership team. The provider's medical director was accountable for clinical care. The manager and deputy manager worked clinically and provided leadership for the nursing and healthcare support worker teams. The established leadership structure meant staff always had a point of contact for support or escalation.
- Staff spoke positively about leadership and said the registered manager and regional manager were accessible and supportive. Two members of staff said they felt supported by the senior team and said they were approachable.
- The provider medical director led clinical supervision and professional leadership processes and maintained clinical oversight of all endoscopists. The provider's medical director provided support to the clinical lead and the senior clinic team were accountable to the executive team through an established leadership support structure.
- The provider organised services into directorates and endoscopy was based in the specialised services directorate.
- All staff we spoke with were positive about local and provider-level leadership. They said the manager was supportive and accessible and they had regular communication with the senior leadership team.

Vision and strategy

The service had a vision for what it wanted to achieve and workable plans to turn it into action, which it developed with staff and patients.

- The service had a well-established vision and strategy that formed part of the statement of purpose. This was credible, had been developed by permanent members of the provider team and established the standards of quality the service aimed to achieve. Part of the standard required staff to ensure the patient was always the focus of their activity and to ensure they continually sought feedback.
- There was a robust and realistic strategy to deliver the service's priorities and to ensure care was sustainable. For example, the operating strategy included planning for consistent staffing levels and capacity management in line with trends and planning in the local health economy.
- All staff we spoke with had good knowledge of the service's core values and understood their role in achieving them. The core values centred on providing a high-quality service with rapid access and results.
- The provider reviewed the vision and strategy annually and updated it in line with service achievements and challenges and the needs in the local population.
- The provider had an established clinical quality strategy with a goal completion date of 2020. This incorporated the service philosophy and outlined the ambitions of the service for development and growth. The local team had developed a philosophy of care based on patient's needs and delivered care within this.
- The service was actively part of the provider's five-year clinical quality strategy, which included four key priorities centred within quality improvement activities. The strategy was designed to apply to all services within the provider's network, including community endoscopy services provided from this location.

Culture

Managers across the service promoted a positive culture that supported and valued staff, creating a sense of common purpose based on shared values.

- Staff delivered care and treatment to meet the overarching mission of the provider; to ensure patients had access to reduced waiting times, timely diagnoses and improved care experience.
- Care services were underpinned by a quality policy that detailed the objectives of the organisation and its

commitment to professional standards and to meeting patient's expectations. Staff spoke positively of this, which demonstrably contributed to their motivation and the standard of care they delivered.
- The service had adopted professional values and teamwork competencies based on best practice standards from Joint Advisory Group (JAG). All clinical staff had completed this although the service did not offer it to the administration team.
- The manager or shift leader facilitated a daily huddle to review the plan for the day and identify any challenges or issues. Staff documented the safety huddles, which ensured tracking of issues that occurred over more than one day.

Governance

The service systematically improved service quality and safeguarded high standards of care by creating an environment for excellent clinical care to flourish.

- Staff used an overarching clinical governance framework to provide assurance of service quality in line with the provider's targets. The registered manager and clinical quality team in the provider led the application of the framework through a governance committee structure, with oversight from the director of clinical quality.
- A medical director for endoscopy and director of clinical quality maintained oversight of local governance and integrated this with the rest of the provider through a corporate management structure.
- The registered manager, regional manager and clinical lead shared responsibility for governance, including clinical governance, at the location. They contributed to a weekly corporate clinical governance meeting and reviewed complaints, litigation and incidents across the provider's services. The manager shared themes and learning with the wider organisation to contribute to work at an organisational level to prevent recurrences.
- Staff worked within an established clinical governance framework with oversight and accountability monitored by the risk and governance committee, the clinical quality subcommittee and specialist groups relevant to the service. The clinical quality subcommittee produced a quarterly report based on 12 key indicators in the service, including performance, feedback and staff development.
- The risk and governance committee led governance processes at provider level and staff from this clinic represented the service. The committee worked to a 'board to floor' principle that meant the group shared issues and safety concerns directly with all staff as a strategy to share risks and identify solutions.
- The clinical quality subcommittee produced a quarterly report based on 12 key indicators in the service, including performance, feedback and staff development. These groups and processes operated at provider-level and included the local service and those in the group.
- The governance committee structure enabled seven specialist groups to contribute to the governance framework and ensure they shared information and learning to support quality monitoring and improvement. These included medicines management group and the water safety group. Each group had a standardised agenda for meetings and produced an attendance log and minutes for each meeting.
- The manager attended a monthly regional meeting with colleagues from other services in the clinic's network. This enabled the manager to compare safety and operational performance with similar clinics and discuss good practice and opportunities for development.
- A team administration staff worked in the service with support from the provider's central teams. This team supported day to day administration, operations and non-clinical governance. The team also supported data collection and audit administration for the clinical team.
- The whole clinic team joined a bi-annual governance meeting, called a quality circle meeting. The team used this to discuss overall performance as well as the track record on global ratings scale (GRS) scores as they worked towards achieving JAG accreditation. We reviewed the minutes from the most recent meeting and saw it included a range of staff, who used the opportunity to plan service improvements. For example, following the meeting in May 2018, the service added a choice of sedation check to the World Health Organisation safety checklist.
- The registered manager maintained a comprehensive local record of third-party contacts of organisations responsible for the maintenance and upkeep of specific equipment and provision of services. The clinic was based in rented premises and facilities, recycling, cleaning and water quality were handled by different

organisations. Records held by the manager meant staff had easy access to points of contact in the event of an equipment or service failure and formed part of consistent local governance processes.
- The provider had reviewed organisational governance and committee structures in 2018 as part of a five-year clinical quality strategy. This resulted in increased oversight from the central teams through an expanded committee system. This included a safeguarding board and a management of doctors group.

Managing risks, issues and performance

The service had good systems to identify risks, plan to eliminate or reduce them, and cope with both the expected and unexpected.

- The provider used a five-step quality assurance process to standardise how they identified and measured quality in the service. This included using quality monitoring reviews and continuous quality improvement in addition to performance based on feedback, audit and patient outcomes.
- The service focused on patient experience and staff measured care and feedback using national benchmarks, including the National Institute for Health and Care Excellence (NICE) quality standards for experience.
- The registered manager maintained oversight of all risks to the service using a risk register, which the senior provider team monitored as part of organisational governance. The provider used a combined corporate, functional and local risk register to track all risks, including those relating to more than one clinic in their network. Corporate risks referred to those from across the specialised services directorate and functional risks referred to risks that involved multiple units in the network.
- At the time of our inspection there were nine on-going risks related specifically to this location, each of which had a risk rating and information on mitigation. The manager used risk assessment criteria to identify likelihood and severity and documented mitigating strategies. The clinical quality team maintained oversight of risks at location and provider level and ensured those that applied to all clinics were managed consistently. For example, the team added a risk relating to the safe use of oxygen cylinders following a national safety alert.
- Staff used an electronic risk management system to record and store the risk register, incidents, complaints and related data. This included guidance on the use of the duty of candour, although nurses we spoke with said they had never head of this. Risks with a high score, which measured severity and probability, were added to a service-wide functional risk register and the risk and governance committee reviewed these quarterly.
- The service had recently resolved one risk on the register that had presented a risk to staff through insufficient air exchange filtration in the decontamination room based on national standards. The unit manager had arranged for new filters to be installed and had provided air filter masks for staff.
- An up to date risk management policy was in place and staff had access to this in hard copy and on the intranet. The risk policy clearly explained the responsibilities of staff based on their role and established how staff used intelligence to make decisions about clinical risk. Risk management had a specific governance structure and the provider embedded a risk 'appetite' in the service that meant staff had the ability to develop the service without taking risks in patient health. The risk management policy was based on national evidence of best practice and it demonstrably underpinned practice.
- A risk and governance lead was in post in the provider and worked with a health and safety advisor to monitor risks reported by the clinic. They worked with the registered manager to ensure risk assessments were fit for purpose and accurately reflected the risk.
- The clinic team held a weekly demand and capacity meeting to review the number and types of referral and to review the efficiency of used appointment slots.
- The service followed the provider's strategy of using the international 'Six Sigma' techniques to improve processes and achieve a continual process of quality improvement.
- The service had an emergency reduced staffing procedure, which provided the manager with guidance on risk management and service delivery in the event of unexpected or sustained staffing shortages.
- The provider monitored NHS Friends and Family Test results in all their clinics and shared results with each individual service as part of a performance and quality benchmarking process. Staff analysed narrative comments from the FFT as part of on-going work to achieve patient satisfaction.

- The clinic team monitored RTTs, report turnaround times and reporting audits as key indicators of performance and service quality.
- The registered manager carried out an annual healthcare quality audit as part of the service quality plan led by the clinical governance lead.
- The provider maintained a corporate business continuity plan that would enable staff to coordinate care and communication remotely with patients and to arrange alternative care in the event the premises were uninhabitable.
- The provider used a monthly clinical governance report to monitor risks, safety and performance. We reviewed the reports from April 2018 to October 2018 and found reports clearly scrutinised areas of performance such as risks, incidents, significant events, compliments and complaints. The executive team used this process to monitor engagement with patients and referrers and acted on positive and negative comments to continually improve the service.
- Four staff meetings between July 2018 and November 2018 indicated a need for improvements in the quality of nursing care. This included on-going concerns with documentation and patient records and notes in two meetings that nurses would risk their registration with the Nursing and Midwifery Council if they did not improve standards. The meeting minutes did not provide further details.
- The unit manager used a scorecard to monitor monthly performance, including waiting times, NHS Friends and Family Test results and safety markers. In addition, nurses met every three months as part of a clinical performance meeting schedule.

Managing information

The service collected, analysed, managed and used information well to support all its activities, using secure electronic systems with security safeguards.

- Systems were in place to ensure the secure handling, storage and destruction of confidential records. The service managed this in line with the European General Data Protection Regulation (GDPR) 2016/679.
- Staff adhered to the Information Governance Alliance Records Management Code of Practice for Health and Social Care (2016), which ensured disclosure of patient information was restricted to clinical purposes and retention and disposal methods were in line with national guidance. In addition, staff worked within a confidentiality policy that was based on national legislation to ensure they protected data and private information in line with national requirements.
- Staff accessed an intranet system to maintain up to date awareness of care and treatment standards across the organisation. This included an average of 10,000 patient feedback and data items per month, which the team used to standardise and improve care.
- All staff completed information governance and GDPR training as part of their mandatory modules.
- The provider had reviewed how staff applied the data protection and information management policies following a data breach when a clinician's laptop had been stolen from an off-site location.

Engagement

The service engaged well with patients, staff, the public and local organisations to plan and manage appropriate services and collaborated with partner organisations effectively.

- The service acted on feedback from patients and visitors. For example, an independent external organisation analysed feedback on patient comment cards and advised the local team on themes and trends to help them improve the service. The manager used a 'you said, we did' display to demonstrate to patients how they acted on feedback. For example, they listed the names of staff on duty and the status of each clinic following feedback. During our inspection staff regularly updated the status of each clinic by listing delay times and including a clear, simple reason for this.
- Staff contributed to an annual survey that the provider used to develop service improvement plans in the local service and across the organisation.
- The team facilitated a monthly staff endoscopy user group meeting to maintain continual engagement as part of a quality and service plan.
- The service worked closely with other clinics in the provider's network and new staff were required to spend time working at another site as part of their induction. This helped to build relationships between clinic teams and meant staff were prepared to provide cover in other clinics when colleagues were on holiday or unwell.
- The provider had carried out a staff survey and released the results in December 2017. This demonstrated overall better engagement between staff and senior colleagues

than the provider's average. For example, this location's engagement score was 70% compared with the provider average of 71%. Specific results in the survey indicated staff felt variably about working there. For example, 100% of staff said they were be happy for a friend or relative to have treatment in the service and 100% said they knew what was expected of them at work. However, only 67% felt poor performance was well-managed and only 33% said someone regularly talked to them about progress and development. In addition, 83% of staff said they had received praise or thanks for their work in the previous seven days but only 67% said there was someone at work who cared about them as a person. The senior team prepared an action plan to address the survey responses, which had resulted in improved engagement. This included an annual away day, more frequent contact with managers and a monthly staff lunch. All the staff we spoke with said they were happy with working conditions and support.

- As a result of the staff survey, the provider had introduced clearer development pathways for nurses as well as an assistant practitioner role.
- The provider had involved staff, stakeholders and patients in the development of the five-year clinical quality strategy and in the priorities for improvement in 2018/19. This included more consistent engagement through surveys and easier access to feedback processes.
- The unit manager held monthly staff meetings with the whole team. We looked at the minutes for meetings from July 2018 to November 2018 and saw they had been well-attended by staff from a range of different roles. Staff had documented actions to suggestions and challenges and it was evident meetings led to improved practice and patient experience.
- The unit manager had worked with the provider's IT department to implement more intensive support following challenges with the implementation of new systems. This improved support for clinicians and demonstrated the flexibility of the provider's specialist teams in working together to sustain the service.
- Staff acted on patient feedback to improve the service. For example, one patient had received contradictory bowel preparation instructions from the patient referral centre (PRC) and the endoscopist on the day of their procedure. The unit manager addressed this by reviewing communications with the patient and improving the care pathway.

Learning, continuous improvement and innovation

The service was committed to improving services by learning from when things went well or wrong, promoting training, research and innovation.

- The provider encouraged staff to enrol on a leadership and development programme that enabled them to develop and progress in the organisation. This included the opportunity to spend time shadowing existing senior staff and gaining experience in other clinics in the provider's network.
- The provider was an early adopter of transnasal gastroscopy services, which provided a more comfortable experience for patients and reduced the need for sedation. Staff received positive feedback from patients about this procedure who appreciated being able to talk and breathe normally during the procedure.
- The local business plan projected growth in patient numbers until September 2019, which staff worked towards as part of clinical quality improvement and service development work. The senior team planned to achieve this through an improved programme of educational sessions for GPs and other medical referrers.
- At the time of our inspection, the service was preparing to introduce new patient information leaflets, printed in a range of commonly-spoken languages, to improve bowel preparation. The patient referral centre would receive a stock of the leaflets to send out with appointment information and the communications team planned to update the service website to reflect the improved range of information. The team planned for this initiative to reduce missed or wasted appointments and was based on their learning of such instances to date.
- The unit previously reported a poor track record of cancellations due to endoscope decontamination washer failure. As a result, the senior team arranged for the refurbishment of the decontamination facility, including the installation of two new endoscope washers. The senior team reported a significant reduction in appointment cancellations as a result.

Good

Endoscopy

- The senior team was leading a business case to recruit more clinical staff to offer a permanent seven-day service. This formed part of a long-term plan to reduce waiting times and bring the service into compliance with referral to treatment time targets.
- The local team was working with the patient referral centre (PRC) and another endoscopy service in the provider's network to streamline triage processes. This would enable the PRC team to triage all patients ahead of an appointment and arrange for the prescription of preparation packs to reduce the need for the local team to lead, which would reduce administration team and give patients a smoother process.

Outstanding practice and areas for improvement

Outstanding practice

The provider was an early adopter of transnasal gastroscopy services, which provided a more comfortable experience for patients and reduced the need for sedation. This clinic had adopted the practice and provided the service as an option for appropriate patients.

Areas for improvement

Action the provider MUST take to improve

- Ensure controlled drugs are stored and managed in line with the requirements of the Misuse of Drugs Act 1971, including separate, secure storage. This must include effective audit processes.

Action the provider SHOULD take to improve

- Provide staff with the tools to monitor patients for deterioration and to respond to urgent clinical needs.
- Minimise infection control risks through effective, consistent audits and practice.
- Review safety monitoring and training to manage risks associated with major haemorrhages and sepsis.
- Store resuscitation equipment securely and provide tamper-proof storage.
- Check resuscitation equipment every day the clinic is open for service.

This section is primarily information for the provider

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	Regulation 12 HSCA (RA) Regulations 2014 Safe care and treatment Controlled drugs were stored in the same area as other medicines despite governance and pharmacist-led controls in place that should have prevented this.