

Care First Class (UK) Limited Cherry Lodge

Inspection report

6 Manningford Road Druids Heath Birmingham West Midlands B14 5LD Date of inspection visit: 04 December 2023 05 December 2023

Date of publication: 29 January 2024

Tel: 01214305986

Ratings

Overall rating for this service

Requires Improvement 🗧

Is the service safe?	Requires Improvement 🔴
Is the service effective?	Requires Improvement 🔴
Is the service caring?	Requires Improvement 🛛 🔴
Is the service responsive?	Requires Improvement 🛛 🔴
Is the service well-led?	Requires Improvement 🛛 🗕

Summary of findings

Overall summary

About the service

Cherry Lodge is a residential care home providing regulated activities of personal care and accommodation to up to 46 people. The service provides support to older people, people living with dementia and people with mental health needs. At the time of our inspection there were 34 people using the service. Cherry Lodge accommodates people in one adapted building. The home is set out over three floors with a passenger lift available to access the first and second floors of the home.

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

The provider's systems and processes required further improvements to ensure records contained all the required information to meet people's needs. Some people's risk assessments required more detailed instructions for staff to keep them safe.

Accident and incident records were completed and monitored by the registered management however further work was required to ensure patterns and trends were identified and strategies put in place to reduce the likelihood of reoccurrence.

People were not always supported to be involved in activities that met their own individual needs or preferences.

Some medicines records were not up to date and care plan reviews were not always completed within agreed timescales.

Governance systems and processes were not always effective at monitoring the quality and safety of the service.

The provider had safeguarding systems and processes in place to keep people safe. Staff knew about the risks to people and followed the assessments to ensure they met people's needs.

People felt safe and were supported by staff who knew how to protect them from avoidable harm.

People received their medicines safely and as prescribed and were supported by sufficient numbers of staff to ensure that risk of harm was minimised.

Staff had been recruited appropriately and had received relevant training, so they were able to support people with their individual care and support needs.

Staff sought people's consent before providing care and support. People were supported to have maximum choice and control of their lives and staff supported them in the least restrictive way and in their best interests: the policies and systems in the service supported this practice.

People's individual communication needs were considered to support them to be involved in their care.

Staff spoke positively about working for the provider. They felt well supported and that they could talk to the management team at any time, feeling confident any concerns would be acted on promptly. They felt valued and happy in their role.

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

Rating at last inspection and update

The last rating for the service was inadequate (published on 24 February 2023). This service has been in Special Measures since 24 February 2023. During this inspection the provider demonstrated that improvements have been made. The service is no longer rated as inadequate overall or in any of the key questions. Therefore, this service is no longer in Special Measures.

You can read the report from our last comprehensive inspection, by selecting the 'all reports' link for Cherry Lodge on our website at www.cqc.org.uk.

Why we inspected

This inspection was carried out to follow up on action we told the provider to take at the last inspection. As a result, we undertook an unannounced comprehensive inspection. The overall rating for the service has changed from inadequate to requires improvement. This is based on the findings at this inspection.

Enforcement and Recommendations

This inspection has identified a continued breach relating to people receiving care that is centred on them and the governance systems in place to maintain oversight of the service. We will continue to monitor the improvements within the service through existing conditions we have placed on the provider's registration. This includes sending us monthly reports of actions the provider has taken to make improvements within the service.

We have made a recommendation about delivering meaningful activities to people.

Follow up

We will request an action plan from the provider to understand what they will do to improve the standards of quality and safety. We will work alongside the provider and local authority to monitor progress. We will continue to monitor information we receive about the service, which will help inform when we next inspect.

The five questions we ask about services and what we found

We always ask the following five questions of services.

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



Cherry Lodge Detailed findings

Background to this inspection

The inspection

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

As part of this inspection, we looked at the infection control and prevention measures in place. This was conducted so we can understand the preparedness of the service in preventing or managing an infection outbreak, and to identify good practice we can share with other services.

Inspection team

The inspection was carried out by 2 inspectors, 1 specialist advisor who was a nurse, and 2 Experts by Experience. An Expert by Experience is a person who has personal experience of using or caring for someone who uses this type of care service.

Service and service type

Cherry Lodge is a 'care home'. People in care homes receive accommodation and nursing or personal care as a single package under one contractual agreement. CQC regulates both the premises and the care provided, and both were looked at during this inspection.

Registered manager

This service is required to have a registered manager. A registered manager is a person who has registered with the Care Quality Commission to manage the service. This means that they and the provider are legally responsible for how the service is run and for the quality and safety of the care provided.

At the time of our inspection there was not a registered manager in post. A new manager had been in post for two months and had submitted an application to register. We are currently assessing this application.

Notice of inspection This inspection was unannounced.

What we did before inspection

We reviewed information we had received about the service. We sought feedback from the local authority and professionals who work with the service. We used the information the provider sent us in the provider information return. This is information providers are required to send us with key information about their service, what they do well, and improvements they plan to make. This information helps support our inspections. We used all of this information to plan our inspection.

During the inspection

We spoke with 6 people who used the service and 9 relatives about their experience of the care provided. We spoke with 9 members of staff as well as the acting manager, deputy manager, senior care workers and care workers. We spoke to the nominated individual to ask them about how they monitored the service. The nominated individual is responsible for supervising the management of the service on behalf of the provider. We used the Short Observational Framework for Inspection (SOFI). SOFI is a way of observing care to help us understand the experience of people who could not talk with us.

We reviewed a range of records. This included 8 people's care records, quality assurance records and multiple medication records. We looked at 3 staff files in relation to recruitment and staff supervision. A variety of records relating to the management of the service, including policies and procedures were reviewed.

We continued to seek clarification from the provider to validate evidence found, including information about the provider's monitoring and medicines documentation.

Is the service safe?

Our findings

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

At the last inspection we rated this key question inadequate. At this inspection the rating for this key question has changed to requires improvement. This meant some aspects of the service were not always safe and there was limited assurance about safety. There was an increased risk that people could be harmed.

Assessing risk, safety monitoring and management; Using medicines safely

At our last inspection the provider had failed to ensure safe care and treatment was being provided to people. This was a breach of Regulation 12 (Safe Care and Treatment) of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

Enough improvement had been made at this inspection and the provider was no longer in breach of regulation 12.

• Risk assessments did not always contain the most up to date information. For example, where a person had a number of falls, there had not been any consideration of patterns or trends written in the risk assessments. This did not reflect all of the actions that could have been taken to reduce the risk of further falls.

• At the last inspection we found some people who required food to be prepared to a modified texture were served food that had not been safely prepared. At this inspection we found people were served food safety and in line with their risk assessments and Speech and Language Therapy guidelines.

- At the last inspection we found systems to monitor staff practice following manual handling training required further improvement as we observed some poor practice. At this inspection we observed staff performing manual handling in an appropriate and safe manner. In addition, staff had received manual handling training and were knowledgeable about how to keep people safe.
- People had individual personal emergency evacuation plans (PEEPS) to ensure they were supported safely in the case of an emergency.
- At the last inspection we found an open sharps box people living at the home could access, which could potentially have caused injury. At this inspection, we found sharps boxes signed and dated when opened and stored in a safe place. A sharps box is a device whereby used medical equipment such as needles are disposed of.
- At this inspection we found people received their medicines safely and as prescribed. People told us they received their medicines when they needed them.
- People's care plans detailed how they preferred to take their medicines including clear protocols for medicines given 'as and when' required.
- The provider had procedures to ensure medicines were stored at the correct temperatures and managed safely.
- Staff who administered medicines had been specifically trained to do so and the management team

completed regular competency checks to ensure procedures were followed. We observed one staff member measuring a person's medication using a spoon rather than a measuring device. We raised this with the acting manager who spoke with the staff member.

• Medicine Administration Records (MAR) noted all medicines were administered correctly and medicine count records accurately recorded the total of each medicine in stock. However, some people's covert medication protocol records were out of date.

Staffing and recruitment

At our last inspection the provider had not ensured robust recruitment practices were in place. This was a breach of Regulation 19 (Fit and proper persons employed) of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

Enough improvement had been made at this inspection and the provider was no longer in breach of regulation 19.

• Staff had been recruited safely. All pre-employment checks had been carried out including reference checks from previous employers and Disclosure and Barring Service (DBS) checks. A DBS check enables a potential employer to assess a staff member's criminal history to ensure they were suitable for employment.

• Our observations during the day indicated there were enough staff on duty to support people with their care needs. People and their relatives told us there were enough staff to meet people's needs.

• The acting manager told us, "Previously there was an overreliance on agency workers. We have completed a recruitment process, and all our staff members are permanent workers. We also have a small team of bank workers who are a backup for us. This has improved the consistency within the workforce and contributed to positive outcomes for people".

Systems and processes to safeguard people from the risk of abuse

• People and their relatives explained how staff maintained people's safety. A person told us, "It's nice and I feel safe living here. I get on with all the staff"

• People were protected from potential abuse by staff who had regular safeguarding training and knew about the different types of abuse. One staff member told us, "There are different types of abuse such as physical, verbal, emotional, financial and institutional."

• The provider had safeguarding systems in place and staff had a good understanding of what to do to make sure people were protected from avoidable harm or abuse. One staff member told us, "If I saw or became aware of abuse taking place, I would report it to the management team. If I was unhappy with how it was dealt with, I would contact the safeguarding local authority team and CQC."

Preventing and controlling infection

- We were assured the provider was preventing visitors from catching and spreading infections.
- We were assured the provider was supporting people living at the service to minimise the spread of infection.
- We were assured the provider was admitting people safely to the service.
- We were assured the provider was using PPE effectively and safely.
- We were assured the provider was responding effectively to risks and signs of infection.
- We were assured the provider was promoting safety through the layout and hygiene practices of the premises.
- We were assured the provider was making sure infection outbreaks can be effectively prevented or

managed.

• We were assured the provider's infection prevention and control policy was up to date.

Visiting in care homes

• The provider was facilitating visits for people living in the home in accordance with the current guidance. The registered manager confirmed if the home experienced an infection outbreak, relatives could still visit via a telephone booking system and have temperature checks undertaken upon arrival.

Learning lessons when things go wrong

• Accident and incident records were completed and monitored by the registered management however further work was required to ensure patterns and trends are identified and strategies put in place to reduce the likelihood of reoccurrence. For example, one person who had an unwitnessed fall had a lesson learned recorded as alcohol consumption and the person not asking for assistance. There was no recorded evidence of discussions held with the person or other professionals, or of strategies put in place to reduce the risk of reoccurrence.

Is the service effective?

Our findings

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

At the last inspection we rated this key question as requires improvement. At this inspection the rating for this key question has remained requires improvement. This meant the effectiveness of people's care, treatment and support did not always achieve good outcomes or was inconsistent.

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

At our last inspection people had not been appropriately supported under the Mental Capacity Act (2005). This was a breach of Regulation 11 (Need for consent) of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

Enough improvement had been made at this inspection and the provider was no longer in breach of regulation 11.

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

People can only be deprived of their liberty to receive care and treatment when this is in their best interests and legally authorised under the MCA. In care homes, and some hospitals, this is usually through MCA application procedures called the Deprivation of Liberty Safeguards (DoLS).

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

• At the last inspection we found people were unlawfully restricted and there was a blanket restriction across the home, preventing all people from going out. We found the service had CCTV in use in communal areas of the home and people had not been consulted to ensure they consented to the use of CCTV in their home.

• At this inspection we found people had access to key codes and could leave and return to the home as they wished. A CCTV consultation had been conducted with people, their relatives and advocates to ensure people had consented to the use of CCTV.

• We found the provider had sent Deprivation of Liberty Safeguards (DoLS) authorisation requests for people who lacked capacity and for some of these were waiting for applications to be authorised by the local authority.

• We found when required people had a mental capacity assessment. Best interest meeting decisions were recorded with the name and role of people involved in the decision process. Relatives we spoke with confirmed they were involved in best interest decisions.

• Staff had received training in the MCA and had some basic knowledge of the Act. People were asked for their consent before they received any care and treatment. For example, before assisting people with personal care. Staff involved people in decisions about their care and acted in accordance with their wishes.

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

• People and their relatives told us the service worked very closely with other agencies and health professionals to meet people's specific needs. One relative told us, "They call the nurse or if it is more serious, they call the doctor attached to the home."

• Care plans were regularly reviewed to identify any changes in care or support required. Staff were knowledgeable about people's health conditions and needs. Staff told us changes to people's health and well-being were communicated effectively.

Adapting service, design, and decoration to meet people's needs

• Parts of the home had been decorated in line with current good practice around dementia care to engage people. However, this was not used effectively in practice. For example, a sign displayed what day it was and what the weather was like, however we saw this was one day out of date which would disorientate, rather than inform people.

- The home was clean and tidy.
- The premises provided people with choices about where they spent their time.
- People's bedrooms were decorated and furnished to meet their personal tastes and preferences, for example having family photographs and artwork.

Assessing people's needs and choices; delivering care in line with standards, guidance and the law

- People were assessed before they used the service to ensure their needs and preferences could be met.
- Assessments of people's diverse needs were discussed prior to using the service. These included religion and sexuality.
- Assessments were used to formulate a plan of care. This provided staff with the information they needed to meet the person's needs and preferences.

Staff support: induction, training, skills and experience

- Relatives were confident staff had the skills and knowledge to meet people's needs. One relative told us, "I think there is enough staff, I see regular staff."
- Staff were positive about the provider's training programme. A member of staff said, "The training has improved, there is a schedule in place."
- New staff had completed an induction programme which involved training and shadowing more experienced staff members.

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

- People were supported by staff to maintain nutrition and hydration.
- People had choice and access to sufficient food and drink throughout the day, food was well presented, and people told us they enjoyed it.
- People's feedback about the food was sought regularly by staff asking people and making observations. One person told us, "The food is very good. I like my food and I can't fault it."

Is the service caring?

Our findings

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

At our last inspection we rated this key question inadequate. At this inspection the rating has changed to requires improvement. This meant people did not always feel well-supported, cared for or treated with dignity and respect.

Ensuring people are well treated and supported; respecting equality and diversity; Respecting and promoting people's privacy, dignity and independence.

At our last inspection people were not consistently supported to receive support in a caring and dignified manner and have their privacy respected. This was a breach of Regulation 10 (Dignity and respect) of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

Enough improvement had been made at this inspection and the provider was no longer in breach of regulation 10.

• We found improvements were still required in relation to how staff supported people. For example, we observed most people living at the home spent the majority of their day seated in one communal area. We also found some people were not always asked if they wanted to take part in the activity offered to them. Some people had not always been supported to access activities of interest or receive care based on their preferences. We found some care records had not included reference to people's interests or hobbies.

We recommend the provider considers current guidance on delivering meaningful activities to people in care homes that promotes their health and mental wellbeing.

• At the last inspection we found some staff were not consistently supporting people in a caring or empathic manner.

• At this inspection we found people were supported by staff who treated them with kindness and respect. One person told us, "I like it here. They can't look after me at home but here they are very kind and patient. It makes a lot of difference. There are no problems at all." We observed kind and caring interactions between staff and people.

- Staff told us how they preserved people's dignity whilst providing personal care. This included placing a towel over people whilst they had a wash.
- Staff enjoyed their role in supporting people. One staff member told us, "We try and create a caring environment, this is their home, everyone is treated with dignity and respect."
- People's care plans contained information about their wishes and preferences and there was consideration of people's diverse needs.
- We saw the service had received thank you notes and cards from relatives, thanking staff for their care.
- We saw people were dressed comfortably and well presented.

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

• People, relatives and staff told us how people were supported to make choices regarding their daily life, this included clothing, meals, personal belongings and how people wanted their support to be delivered. One person told us, "It's nice and I feel safe living here. I get on with all the staff. I can go to bed and get up when I want." A relative told us "[Name of person] likes to do some things for themselves, the carers allow them to shower on their own in their ensuite."

Is the service responsive?

Our findings

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

At our last inspection we rated this key question inadequate. At this inspection the rating has changed to requires improvement. This meant people's needs were not always met.

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

At our last inspection people had not been involved in planning or reviewing their care or received care that was based on their preferences. This was a breach of Regulation 9 (Person Centred Care) of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

Not enough improvement had been made at this inspection and the provider was still in breach of regulation 9.

• At the last inspection we found the provider had not invited people and their loved ones to take part in care assessments or reviews. Records we sampled confirmed a lack of people's 'voice', views and decisions about their care.

- At this inspection we found reviews of care inconsistent, some people and their relatives were involved in review meetings and some people did not receive a review.
- Some care plan reviews were not completed within the timescales set out in people's care plans.

• Agreed actions from some peoples' review meetings had not taken place. For example, one person's review recorded stated the person and relative had requested more activities to be conducted in line with the person's interests and hobbies. It was agreed this would be actioned however there was no recorded evidence this had been completed, and the next scheduled review was not completed.

Some people had not been involved in planning or reviewing their care or received care that was based on their preferences. This was a breach of Regulation 9 (Person Centred Care) of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

Meeting people's communication needs

Since 2016 all organisations that provide publicly funded adult social care are legally required to follow the Accessible Information Standard. The Accessible Information Standard tells organisations what they have to do to help ensure people with a disability or sensory loss, and in some circumstances, their carers, get information in a way they can understand it. It also says that people should get the support they need in relation to communication.

- Care plans contained information about people's communication needs. This meant staff could support people to express their needs and views where the person experienced difficulties.
- Documentation could be produced in accessible formats, such as pictorial and large print for people who required this.

Improving care quality in response to complaints or concerns

• Relatives knew how to make complaints; and felt confident these would be listened to and acted upon in an open way.

• People and relatives told us they felt able to raise any concerns and could approach the registered manager directly. We saw complaints had been received and responded to in a timely manner.

End of life care and support

• People who were at the end of their life had an end of life care plan so their wishes and beliefs would be known and respected by staff.

Is the service well-led?

Our findings

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

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

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

At our last inspection the provider did not have robust systems and processes to assess and monitor the quality and safety of the service. This was a breach of Regulation 17 of the Health and Social Care Act 2008 (Regulated Activities).

Not enough improvement had been made at this inspection and the provider was still in breach of regulation 17.

• At the last inspection we found governance systems and processes were not effective at monitoring the quality and safety of the service. At this inspection, we found improvements were still required. For example, one person on two occasions had a fall, staff members found the person on the floor only because they were performing other care tasks and happened to find the person. The person did not suffer any injuries, however, no additional preventative measures were put in place, such as increased night checks or exploring why the sensor alarm in place did not alert staff.

• Audits were completed on care and medicines records, however we found improvements were required to ensure records contained all the required information to ensure people's needs were met. For example, one person's covert medication protocol was out of date and there were not clear instructions on how to add the medication to food and drink items. Staff were aware of the correct medication to be administered however new staff members or agency workers would have benefited from having all the required information recorded in people's care records.

• Systems and processes did not always support an effective level of lessons learnt. This meant opportunities to reflect on an incident and put in place measures to reduce the risk of reoccurrence were missed. We raised these issues with the acting manager, and they confirmed these issues would be addressed after the inspection.

• At the last inspection we found systems to ensure accurate records were available in relation to the support people needed in the event of a fire were not effective. At this inspection we found improvements has been made and accurate records were in place in relation to people's support needs in the event of a fire.

• At the last inspection we found systems to monitor the DoLS process were not effective. At this inspection we found improvements had been made. There were systems in place to monitor and manage the

applications and approvals for DoLS.

• At the last inspection we found numerous examples where basic care plans were not in place. At this inspection we found people had care plans and risk assessments in place.

• In relation to systems and processes we found some improvements had been made however further improvement was required to demonstrate consistent good practice over time. We will check this during our next planned inspection.

Systems were not robust enough to demonstrate effective monitoring of the quality and safety of the service. This was a breach of Regulation 17 (Good Governance) of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

- People were supported by staff who were motivated to carry out their role.
- Staff received regular supervisions where they had the opportunity to discuss their role and performance.
- Staff were aware how to raise a concern and told us they would do if the need arose.

• In accordance with their legal responsibilities, the provider had informed us about significant events which occurred at the service within required timescales.

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

• People and their relatives spoke positively about the care they received and of the way the service was run.

• One relative said, "I think it is run ok, I go up every week and it seems fine." Another relative told us, "I am impressed with the consistent staff [name of person] has come to know."

• All staff were committed to providing people with a high standard of care which was tailored to their needs and preferences.

How the provider understands and acts on the duty of candour, which is their legal responsibility to be open and honest with people when something goes wrong

- The acting manager understood the duty of candour and was open and honest about where the service needed to improve.
- The provider promoted an ethos of openness and transparency which had been adopted by all staff.

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

• The registered manager confirmed feedback was obtained from relatives using structured telephone calls, surveys and questionnaires. We reviewed the results from the last survey and the feedback received was positive.

- People's views were sought daily when receiving support.
- There were regular meetings for staff and their views were encouraged. Staff told us they felt valued, and their views were respected. One staff member told us, "We have team meetings, it gives us an opportunity to put ideas forward and discuss how improvements are made."

Continuous learning and improving care

- The acting manager spent time working with staff to identify areas that may need improvement.
- The acting manager ensured they always kept up to date with changing guidance. The management team ensured staff adhered to current guidance and best practice by carrying out spot checks on their practice. They also ensured policies had been updated to reflect these changes.
- Staff had completed training and they have access to continued learning so they had the skills to meet

people's needs.

Working in partnership with others

• We found the provider was working in partnership with people's relatives, health professionals, local authority departments and various groups and services within the community to ensure that people were supported appropriately.

This section is primarily information for the provider

Action we have told the provider to take

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

Regulated activity	Regulation
Accommodation for persons who require nursing or personal care	Regulation 9 HSCA RA Regulations 2014 Person- centred care
	People had not been involved in planning or reviewing their care or received care that was based on their preferences.
Regulated activity	Regulation
Regulated activity Accommodation for persons who require nursing or personal care	Regulation Regulation 17 HSCA RA Regulations 2014 Good governance