

InHealth Reporting Limited

# InHealth Reporting

## Inspection report

InHealth Reporting 40-44  
Newman Street  
London  
W1T 1QD  
Tel: 02081385486  
[www.inhealthgroup.com](http://www.inhealthgroup.com)

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This report describes our judgement of the quality of care at this service. It is based on a combination of what we found when we inspected, information from our ongoing monitoring of data about services and information given to us from the provider, patients, the public and other organisations.

## Ratings

### Overall rating for this location

Requires Improvement



Are services safe?

Requires Improvement



Are services effective?

Inspected but not rated



Are services responsive to people's needs?

Insufficient evidence to rate



Are services well-led?

Requires Improvement



# Summary of findings

## Overall summary

This was the first inspection for InHealth Reporting. We rated it as requires improvement because:


- The service did not have enough staff to provide a safe service.
- The referring organisations did not always receive their reports within the agreed time frame.
- The mitigations in place regarding risk to the service were not always effective.
- Development of the service's governance process was required to ensure they were safe and effective.

However,

- Staff had training in key skills, understood how to identify abuse, and managed safety well. Staff assessed risks, acted on them and kept good records. The service managed safety incidents well and learned lessons from them. Staff collected safety information and used it to improve the service.
- The provider had systems to ensure reporting radiologists who provided services had appropriate equipment installed.
- Managers monitored the effectiveness of the service and made sure clinical staff were competent. There were escalation processes for unexpected and significant findings. Staff worked well together for the benefit of patients and had access to good information.
- Referring organisations could access the service when they needed it.
- Leaders ran services well using reliable information systems and supported staff to develop their skills. Staff understood the service's vision and values, and how to apply them in their work. Staff felt respected, supported and valued. Staff were clear about their roles and accountabilities. The service engaged well with their referring organisations and all staff were committed to improving services continually.

# Summary of findings

## Our judgements about each of the main services

Service	Rating	Summary of each main service
Diagnostic imaging	Requires Improvement 	This is the first time we have rated this service. We rated it as requires improvement. See the summary above for details

# Summary of findings

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# Summary of this inspection

## Background to InHealth Reporting

InHealth Reporting is operated by InHealth Reporting Limited, providing teleradiology services for referring organisations who undertake this work on behalf of the NHS and independent providers including reviewing and reporting; computerised tomography (CT) and magnetic resonance imaging (MRI) images. The location's referring organisations are a mix of NHS and independent health scanning services.

The service also provide radiographers to undertake plain film reporting for other providers, which is outside the scope of this inspection.

Teleradiology is the transmission of patients' radiological images between different locations to provide a primary report, expert second opinion or clinical review. The service has no direct contact with patients and does not provide direct patient care. The service reported on images for adults only. At the time of the inspection there was a nominated individual in place, but the service did not have a registered manager. A newly appointed member of staff was in the process of completing their application to become registered manager but at the time of the inspection this had not been submitted to the commission.

The service is registered to carry out the following regulated activities: Diagnostic and screening procedures.

The location had not been inspected since its registration on 10 November 2020 and this was the first time the service had been inspected and rated. We inspected the service using the Diagnostic Imaging core reporting service, teleradiology framework.

## How we carried out this inspection

We inspected this service using our comprehensive inspection methodology. We carried out a short notice inspection on 18 May 2022. During the inspection we visited the registered office location and met with one director, the service manager, the quality and governance lead and two members of the operations team.

Following the inspection, between 19 and 23 May 2022, we conducted telephone interviews with staff. We spoke with one reporting radiologist, one reporting radiographer and the clinical director.

You can find information about how we carry out our inspections on our website: <https://www.cqc.org.uk/what-we-do/how-we-do-our-job/what-we-do-inspection>.

## Areas for improvement

### Action the service **MUST** take to improve:

- The service must ensure the action plan developed to clear the backlog of scans is delivered within the defined timescales documented in the action plan.
- The service must ensure there is safe, suitable and effective governance processes for the management of their third-party contracts.

### Actions the service **SHOULD** take to improve:

## Summary of this inspection

- The service should recruit sufficient staff to enable the service to meet the key performance indicators agreed between the provider and referring organisations.





# Our findings

## Overview of ratings

Our ratings for this location are:

	Safe	Effective	Caring	Responsive	Well-led	Overall
Diagnostic imaging	Requires Improvement	Inspected but not rated	Not inspected	Insufficient evidence to rate	Requires Improvement	Requires Improvement
Overall	Requires Improvement	Inspected but not rated	Not inspected	Insufficient evidence to rate	Requires Improvement	Requires Improvement

# Diagnostic imaging

Safe	Requires Improvement 
Effective	Inspected but not rated 
Responsive	Insufficient evidence to rate 
Well-led	Requires Improvement 

## Are Diagnostic imaging safe?

Requires Improvement 

This is the first time we have rated safe. We rated it as requires improvement.

### Mandatory training

**The service provided mandatory training in key skills to all staff and made sure everyone completed it.**

Staff received and kept up to date with their mandatory training. The mandatory training programme was provided through e-learning to staff who were permanently employed by the service. Topics included, but were not limited to, equality, diversity and inclusion; infection prevention control; mental health; safeguarding; lone working; and fire safety.

Managers monitored mandatory training and alerted staff when they needed to update their training.

All reporting radiologists were employed under practising privileges and completed mandatory training at their substantive employer in the NHS. Evidence of training was provided to the service for sign off during their onboarding process and was reviewed annually. This information was included on the training dashboard and monitored. We saw evidence that all clinical staff had completed their mandatory training.

### Safeguarding

**Staff had training on how to recognise and report abuse and they knew how to apply it.**

Staff knew how to identify adults at risk of, or suffering, significant harm and worked with other agencies to protect them.

Staff knew how to access the safeguarding policies, how to make a safeguarding referral and who to inform if they had concerns. Radiologists had an established process if they identified or suspected non-accidental injuries in a scan, including an urgent notification to the referrer and escalation through the local procedure, which included reporting to CQC.

All reporting radiologists and senior staff had completed safeguarding adults, level two training, in line with the Royal College of Nursing intercollegiate document on safeguarding. We saw evidence of safeguarding training completion for the radiologists and operations staff.



# Diagnostic imaging

## Cleanliness, infection control and hygiene

The provider did not see patients and patients did not visit the premises due to the nature of the service provided. The service did not provide onsite reporting services and all reporting staff worked remotely from home.

At the office location, government COVID-19 guidelines were followed, and hand sanitiser was available.

## Environment and equipment

**The equipment was suitable for the reporting of imaging services and there were processes in place to maintain equipment remotely.**

The service provided staff with suitable equipment to work remotely from home. All reporting staff received information technology (IT) equipment supplied by the provider and furniture upon request. Staff completed a visual display unit (VDU) risk assessment and the health and safety module, part of the mandatory training covered workstation set up.

Radiologists were provided with monitors in line with recommendations from the Royal College of Radiologists. Monitors were automatically calibrated, and quality parameters assessed using quality assurance software.

## Assessing and responding to patient risk

**Staff identified and quickly acted upon risks identified when reviewing patient scans.**

The service did not provide direct scanning or diagnostic services to patients and compliance with medical exposure of ionising radiation regulations was the responsibility of the referring organisation.

The service only provided the diagnostic reports of patients' images and therefore only completed part of the medical pathway for the patient.

An urgent findings pathway was in place to alert the referring organisation of unexpected or significant findings from diagnostic reports. Unexpected, significant or urgent findings identified by the radiologist were escalated to the office staff who forwarded the information to the appropriate referring organisation by telephone and e-mail, the use of both telephone calls then following up with an email ensure that the unexpected or significant finding was alerted to the referrer. Operations staff were available in the service from 8am to 10pm, six days a week.

The referrer could contact the reporting radiologist to discuss any report findings or queries when required, the contact was managed by the office team.

The service had an established process to request previous imaging or further relevant clinical history for the patient from the referrer if the reporting radiologist required further information prior to reporting the images.

The service ensured reporting radiologists were only given referrals in modalities that they were qualified to report and within their field of expertise.

The service had a process in place if there was a delay in the scan being reported. Staff would communicate with the referring service to flag any delay and breach in the key performance indicator (KPI). The service had experienced difficulty with a third-party provider who had been reporting scans for them which resulted in a back log of unreported scans. This resulted in over 2000 scans missing their reporting KPI. An action plan had been developed to rectify this back log. All referrers had been kept informed and all scans which had breached the reporting KPI were classified as non-urgent scans.

# Diagnostic imaging

## Staffing

**The service did not have enough staff with the right qualifications, skills, and experience to meet the imaging reporting needs of the patients.**

Radiologists working for the service did so under practising privileges alongside their substantive NHS role. As part of their contract with the service radiologists were not allowed to work during rostered NHS hours and working hours must include rest breaks.

The service had a rostering system that ensured the radiologist's availability in advance. Work was allocated to the radiologists through the system. The service worked with a number of third-party reporting companies to support them with the number of scans that required reporting whilst they recruited more radiologists to the service.

The service was recruiting radiologists at the time of the inspection to meet the rising demand and allow the service to eventually provide all reporting in-house and not rely on contracts with third party reporting services. At the present time the service had 12 reporting radiologists employed under practising privileges. The service also had contracts with three third party organisations who undertook approximately half of all scan reporting done by the service per week. The service planned to recruit enough radiologists to have sufficient capacity to undertake all scan reporting internally. There was no firm timeline for when they would be in this position due to the nationally recognised difficulty with recruitment of radiologists.

The service monitored staff sickness rates and had very low levels of staff sickness in the year May 2021 to May 2022.

## Records

**Staff provided detailed records of patients' diagnostic assessments. Records were clear, up to date, stored securely and easily available to required staff.**

The provider received, stored and handled referrals in line with its data protection policy which assured confidentiality. All radiologists used a remote login system to access patient information and images to read and report scans.

The referring organisation only sent images for reporting electronically and reports were returned using the secure online electronic systems. Therefore, staff did not need to manually email reports over reducing the risk of missed emails or delays in receiving results due to staff absence at the referring organisations. The service had an established process to request further clinical information or prior images from the referrer if required.

Radiologists could only access images assigned to them to maintain patient confidentiality.

## Medicines

**The service did not store or administer medicines.**

The service did not store or administer medicines as it did not have any direct face to face contact with patients.

## Incidents

**The service managed patient safety incidents well. Staff recognised incidents and reported them appropriately. Managers investigated incidents and shared lessons learned with the whole team and the wider service.**

## Diagnostic imaging

There was a system and process in place to report, investigate, and learn from incidents. The service used an electronic reporting system which all staff had access to. Staff we spoke with knew what incidents to report and how to report them. Staff told us they were encouraged to report incidents and felt confident to do so.

The service reported nine incidents between May 2021 and May 2022, which included complaints and discrepancies. Whilst the service had reported the lack of capacity as an incident they had not reported the backlog of over 2000 scans as an incident.

The provider had a duty of candour policy which staff could access. The duty of candour is a regulatory duty that relates to openness and transparency and requires providers of health and social care services to notify patients (or other relevant persons) of certain notifiable safety incidents and provide reasonable support to that person, under Regulation 20 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014. A notifiable safety incident includes

any incident that could result in, or appears to have resulted in, the death of the person using the service or severe, moderate or prolonged psychological harm.

In the event of a discrepancy with a report being identified by the referrer, the service had a policy and process to investigate any identified discrepancy and if appropriate an addendum to the original report could be issued. A reporting discrepancy occurred when a retrospective review, or subsequent information about a patient outcome, led to an opinion different from that expressed in the original report. The service provided examples of where discrepancies have been identified and learning had been implemented as a result.

### Are Diagnostic imaging effective?

Inspected but not rated 

We do not rate effective for teleradiology services.

#### **Evidence-based care and treatment**

**The service provided diagnostic reporting services based on national guidance.**

Policies and procedures were reviewed and updated in line with best practice. Policies referenced appropriate national guidance to ensure they were in line with current legislation, standards and evidence-based guidance.

There was a system in place to ensure policies and standard operating procedures were up-to-date and reflected national guidance. All six of the provider's policies reviewed, were within their review date.

All staff, including reporting radiologists, had remote access to the service's policies and protocols. This meant all staff had access to the policies and procedures regardless of where they were working from.

#### **Nutrition and hydration**

The service did not have any direct face to face contact with patients.

#### **Pain relief**

The service did not have any direct face to face contact with patients.

# Diagnostic imaging

## Patient outcomes

**Managers monitored the effectiveness of reporting and used the findings to improve the service.**

The service had an effective system to regularly assess and monitor the quality of its services, ensuring patient outcomes were monitored and measured, through audits.

The service demonstrated a continuous, proactive approach to improving the standards of radiology reporting. It had a policy and process to investigate any discrepancy identified. These discrepancies could be identified either through the service's routine peer review of 5% of reports or by a request from the referring organisation. This system ensured discrepancies and learning opportunities were identified. All radiologists were made aware of the discrepancy process flow chart during their induction. Discrepancy reports were documented in meeting minutes we reviewed.

The service had agreed reporting key performance indicators (KPIs). These KPIs were that urgent scans would be reported within 24 hours and routine scans within 48 hours. At the time of the inspection, the service was experiencing difficulty meeting the KPI for routine scans and had a backlog of over 2000 scans. This backlog was a result of the service not having the capacity to manage the workload following a third-party company, who supported the service, ending their contract with the provider.

An action plan was provided to demonstrate how and when the backlog would be cleared. Progress implementing the action plan was being monitored and communicated to all referrers. Daily reviews and priority identification of the outstanding scans were being undertaken by the service management.

## Competent staff

**The service made sure staff were competent for their roles. Managers appraised staff's work performance to provide support and development.**

Staff were experienced, qualified and had the right skills and knowledge to meet the needs of the service. All the radiologists who reported for the service were registered with the General Medical Council (GMC). The service reviewed each radiologist's license to practice annually. At the time of our inspection, the service demonstrated 100% compliance with employment and qualification checks for all radiologists.

All new staff had a full induction tailored to their role before they started work, we saw evidence of this in the 12 staff files we reviewed.

Managers supported operations staff to develop through yearly, constructive appraisals of their work. Radiologists were not able to work unless they had completed an annual appraisal. Those staff working under practising privileges were required to provide evidence of an external appraisal.

There was evidence of Disclosure and Barring Service (DBS) checks for staff. In addition, each radiologist was required to submit evidence of indemnity cover.

Operations staff had the opportunity to discuss training needs with their line manager and were supported to develop their skills and knowledge.

When requested the service was unable to provide data relating to the review of subcontractor's staff including appraisals, training, DBS checks and induction.

# Diagnostic imaging

## Multidisciplinary working

**Staff worked together and supported each other as a team to provide good care.**

Due to the nature of the service staff worked remotely with limited contact with each other. Radiologists were not expected to join referring clinician's multidisciplinary team meetings (MDT).

However, the radiologist we spoke with said that they were able to contact the operations team and the service managers and raise any issues or concerns with them.

Currently, radiologists spoke with the referring clinician on an ad hoc basis if requested by the referring organisation or if they had a concern about an image and required more information.

## Seven-day services

**The service did not provide a seven-day teleradiology service**

The operations staff worked seven days per week from 8am to 10pm. However, the radiologist we spoke with confirmed they often worked evenings and weekends which fitted in with their substantive roles.

## Health promotion

The service did not have any direct face to face contact with patients.

## Consent, Mental Capacity Act and Deprivation of Liberty Safeguards

The service did not have any direct face to face contact or deliver any direct patient care.

## Are Diagnostic imaging responsive?

Insufficient evidence to rate 

**We inspected responsive but there was insufficient evidence to rate.**

## Service delivery to meet the needs of local people

**Services were not always planned in a way that met the needs of their referring organisations.**

The service did not see patients and patients did not visit the premises due to the nature of the service provided. However, they reported images on behalf of referring organisations. The service could not always meet the needs of the referring organisations and not always meet the agreed KPIs.

Radiologists worked flexibly and reviewed images out of hours.

## Meeting people's individual needs

The service did not see patients and patients did not visit the premises due to the nature of the service provided.

## Access and flow

**Referring organisations could access the service when they needed it as outlined in their individual contract.**

## Diagnostic imaging

The service was not involved in making care and treatment decisions. The service's radiologists provided a report to support the patient's diagnosis and ultimately their treatment and care plan.

The provider had service level agreements (SLA) in place with agreed key performance indicators (KPIs) for each referring organisation. The service was in breach of one of the KPIs with their referring organisations due to the backlog of scans awaiting reporting. The 24-hour KPI for urgent scans was being met. However, the 48-hour KPI for non-urgent scans was not always met.

The service had a business continuity plan in place should their IT infrastructure fail. They had access to a point of contact for each referring organisation who they would call in the event of disruption to the service.

### Learning from complaints and concerns

**The service had processes in place to treat concerns and complaints seriously, investigated them and learned lessons from the results.**

The service had procedures in place regarding complaints, comments and suggestions. The complaint's policy included response times for acknowledging receipt of complaints and how to handle complaints with referring organisations.

There had been three complaints recorded by the service during the time from March 2022, when the service commenced to the inspection date.

The senior team discussed the content and outcomes of complaints in a variety of meetings, including governance and team meetings. Senior staff reviewed the outcomes of complaints identifying learning, training and development opportunities for staff which were discussed at team meetings.

## Are Diagnostic imaging well-led?

This was the first time we had rated well-led. We rated it as requires improvement.

### Leadership

**The service manager had the skills and abilities to run the service. They understood and were working to manage the priorities and issues the service faced. They were visible and approachable for the staff.**

The new manager of the service had a clinical and radiology management background. They understood the challenges in the wider healthcare system and how their service could help improve access to timely reporting of scans.

The service manager who had day to day operational responsibility had only joined the service two weeks prior to the inspection. They were in the process of applying to be the registered manager for the service. There was a clear management structure with defined lines of responsibility and accountability.

Senior leaders understood the challenges the service were facing with regards to the backlog of scans and the challenges facing the business as it continued to grow. They acknowledged maintaining quality was a challenge and this was continually monitored. Also attracting and retaining radiologists was a concern, as it was nationally across the sector.

# Diagnostic imaging

All staff we spoke with were positive about the senior leaders, stating they were available and approachable. Leaders and the team met regularly to maintain good working relationships, share learning and ensure effective lines of communication.

## Vision and Strategy

**The service had a vision, mission and values for what it wanted to achieve.**

The provider had a clear vision, which was to become the “most valued and preferred provider”. The service’s mission was to “to be the best radiology reporting partner to NHS Trusts. Deliver consistently high-quality reporting for patients.”

Their values were “trust, care, passion and fresh thinking”. The service’s vision and mission were developed with involvement of staff.

Staff we spoke with knew and understood the vision, values and objectives for their service, and their role in achieving them.

## Culture

**Managers promoted a positive culture that supported and valued staff, creating a sense of common purpose based on shared values. The service had an open culture where staff could raise concerns without fear.**

The radiologist we spoke with praised the service and the leaders and felt supported to raise concerns. They told us that the manager and leaders were open and approachable. The radiologist described a supportive culture in which mistakes or discrepancies were used as opportunities for learning.

The operations staff we spoke with were positive about working for the organisation. They described good relationships with the senior leaders and a working culture that valued their input.

The service used a range of strategies to drive a positive culture in which senior leaders wanted the team to feel proud to work for the organisation. This included an environment in which staff were encouraged to openly suggest improved or new ways of working.

The culture encouraged openness and honesty at all levels. Staff were encouraged to provide feedback and raise concerns without fear of reprisal. Processes and procedures were in place to meet the duty of candour.

## Governance

**The service did not always operate effective governance processes. Staff were clear about their roles and accountabilities and had opportunities to meet, discuss and learn from the performance of the service.**

The service could not provide when requested evidence of assurance of safe, suitable and effective governance process for the management of subcontractors.

The service did not notify the CQC regarding the issues they were experiencing which resulted in a back log of scans.

The manager was the designated quality and governance manager. The roles and responsibilities were clearly defined and contributed to consistent practice.

The service audited all discrepancies, turnaround times, incidents and complaints as part of the governance process.

# Diagnostic imaging

The business continuity plan detailed preventative and recovery controls to maintain service levels with the minimum of down time in the event of system failure, however this had not been as effective as described which resulted in the back log of scans the service was experiencing at the time of the inspection.

The radiologist we spoke with was clear about their role and understood who they were accountable for and to whom and confirmed the leaders had effective oversight of the system.

The service had effective electronic systems in place to monitor staff's training, appraisals, indemnity insurance and revalidation were effective. On inspection we saw an electronic record of monitoring this process which showed the service was 100% compliant with all requirements.

The service had systems and processes to confirm and review the radiologist's General Medical Council (GMC) qualification and 5 year continuing professional development (CPD) cycle. There was evidence of Disclosure and Barring Service (DBS) checks and safeguarding training completion for staff employed by the service.

Policies and procedures were reviewed and updated, in line with national guidance, and were carried out in a timely manner.

## Management of risk, issues and performance

**Leaders and teams worked to use systems to manage performance effectively. They did not always identify and escalate relevant risks and issues and identify actions to effectively reduce their impact.**

The service had a business continuity plan which looked at the effects of disruption on services, systems and business processes caused by service interruptions and failures. The plan detailed the arrangements which covered three main business areas which included; service continuity, information management and technology and major incidents however, the mitigations put in place were not effective which resulted in a backlog of scans which required reporting.

Clinical governance systems were focused on identifying and managing risk and performance. The service had a peer review programme as part of this structure, which involved internal quality checks on up to 5% of radiology reports each month.

Whilst the service had a risk register in place, which identified the risks to the service relating to subcontracted reporting provider, the mitigations put in place were not effective to lessen the risk which resulted in the backlog of scans developing.

The service had a process to manage and widely share learning from adverse events, incidents, discrepancies or errors that might have or had occurred.

Data collection using a number of dashboards was used to monitor performance and identify areas of improvement. Areas monitored included the number of discrepancies identified and missed KPIs. Performance was monitored at the various weekly and monthly governance meetings.

The service provided reports in line with the Royal College of Radiologist (RCR) guidance: 'Standards for the provision of teleradiology within the United Kingdom' (December 2016), which meant that patients could be confident that even though their examinations were not being reported within the referrer organisation, it was being completed to the same standard and with comparable security.



# Diagnostic imaging

The service was accredited by United Kingdom Accreditation Service (UKAS) achieving accreditation in Quality Standard for Imaging (QSI) in March 2022. QSI sets a national quality criteria for services to assess performance against and is independently reviewed every four years.

The manager told us that the service had appropriate insurance in place to cover all relevant insurable risks to ensure it was protected from financial loss, equipment failure or malfunction.

## Information Management

**The service collected reliable data and analysed it. The information systems were integrated and secure. Data or notifications were submitted to external organisations as required.**

There was a Data Protection Policy in place, which was aligned with relevant legislation, including General Data Protection Regulations (GDPR) 2016/679. We saw evidence of a GDPR policy, which was last reviewed in July 2020. The service was compliant with GDPR 2016/679.

Information governance (IG) is the way organisations 'process' or handle information. It covers personal information relating to patients/service users, employees and corporate information. All transfer of data was encrypted or sent via a secure network between the referrer organisation and the service.

The service had established protocols for dealing with missing information in scan referrals. The office team contacted the referring organisation and ensured the information was provided. This ensured radiologists completed reports only when they had enough information to do so accurately and safely.

The service worked with an external company who provided remote IT support 24 hours a day 6 days per week. Staff we spoke with told us they had accessed support when required and IT issues were resolved quickly.

The service submitted statutory notifications to the Care Quality Commission as required.

Appropriate access and security safeguards protected the provider's radiology information system and picture archiving and communication system.

## Engagement

**The service engaged well with staff and referring organisations to plan and manage services.**

The service used a wide range of methods to ensure all staff remained up to date with the organisation. This meant staff who worked remotely received consistent information. Staff told us they were kept updated through regular team meetings and email communication.

Staff told us that managers were approachable and that they felt comfortable to raise any concerns with them.

The service engaged with referring organisations, throughout their contract to obtain feedback on the service and identify opportunities for improvement.

## Learning, continuous improvement and innovation

**All staff were committed to continually learning and improving services. They had a good understanding of quality improvement methods and the skills to use them. Leaders encouraged innovation.**

## Diagnostic imaging

There was a focus on continuous improvement and quality. Leaders were responsive to any concerns raised and performance issues and sought to learn from them and improve services.

Clinical governance meetings had a structured agenda which allowed the whole team to share learning from incidents, present interesting cases, offer ongoing training and discuss new innovations and techniques.

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

Diagnostic and screening procedures

#### Regulation

Regulation 12 CQC (Registration) Regulations 2009  
Statement of purpose

The service did not have enough staff to provide a safe service.

The referring organisations did not always receive their reports within the agreed time frame.

#### Regulated activity

Diagnostic and screening procedures

#### Regulation

Regulation 17 HSCA (RA) Regulations 2014 Good governance

The mitigations in place regarding risk to the service were not always effective.

Development of the service's governance process was required to ensure they were safe and effective.