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THIS POLICY IS FOR:	Staff including Agency Workers (temporary workers), Commissioners and Service Users

GOOD GOVERNANCE

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GOOD GOVERNANCE POLICY

POLICY AIM

The aim of the Governance policy of the Nursing Direct Healthcare Limited (herein after referred to as Nursing Direct) as a care provider is to;

1. Understand what the governance policy is and how the governance policy operates within Nursing Direct
2. Understand the role Staff including Agency Workers play in relation to the governance policy and what contribution Staff including Agency Workers can make to comply with the governance policy.

The above ensures that Nursing Direct can manage and govern the regulated activities that they are registered to do undertake, that these are carried out to the required standards of the regulator, setting out policies and procedures in accordance with industry best practices, as well as achieving organisational goals by application of robust governance standards in line with organisational vision mission and values, to be effective for the delivery of quality care.

The robust governance standards of Nursing Direct are maintained through operational processes and procedures by assessing, monitoring, and improving the quality and safety of the services provided including the quality-of-service users' experience.

1. PURPOSE

- 1.1 To describe what good governance means to Nursing Direct and the processes that contribute to it, including Quality Assurance.
- 1.2 To specify who has accountability and what action Nursing Direct takes to continuously improve services.
- 1.3 To meet the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014: Regulation 17 Good Governance.
- 1.4 This policy should be read in conjunction with:
 - The Quality Assurance Policy and Procedure
 - Stakeholder surveys
 - The Overarching UK GDPR Policy and Procedure
 - The Management Meetings Policy and Procedure
 - The Accident and Incident Reporting Policy and Procedure
 - Record Keeping Policy and Procedure
- 1.5 To support Nursing Direct to promote best quality care. The approaches outlined in this policy support Nursing Direct to meet safe, effective, responsive, caring, and well-led Key Lines of Enquiry/Quality Statements (KLOE) as regulatory aspects outlined by the Care Quality Commission (CQC).

2. RELEVANT LEGISLATIONS, LAWS, RULES, AND REGULATIONS

To meet the legal requirements of the regulated activities that Nursing Direct undertake, it has taken into consideration the following:

- The Care Act 2014
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- Health and Social Care Act 2008 (Registration and Regulated Activities) (Amendment) Regulations 2015
- Health and Safety at Work etc. Act 1974
- Medicines Act 1968
- General Data Protection Regulation 2016
- Data Protection Act 2018
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- UK GDPR
- Health and Care Act 2022

3. SCOPE

- 3.1 The following roles may be affected by this policy:
 - Staff including Agency Workers
 - Registered Manager
- 3.2 The following Service Users may be affected by this policy:
 - Service Users

3.3 The following stakeholders may be affected by this policy:

- Service users
- Commissioners
- External health professionals
- Local Authority
- NHS

4. OBJECTIVES

- 4.1 To demonstrate the role that Nursing Direct and its management plays in strategically leading and managing the service through good governance and continuous learning.
- 4.2 To ensure that all Staff including Agency Workers understand the systems, structures and processes in place which contribute to good governance and their role within it.
- 4.3 To ensure that evidence-based care is used to continuously improve quality through a culture of openness and transparency where lessons are learnt from audit, quality assurance, and engagement with all stakeholders.
- 4.4 To create a structure which facilitates engagement at all points of governance with Service Users.

5. POLICY

5.1 This policy and procedure applies to the delivery of the regulated activities, service types, and Service User bands as defined in the CQC Statement of Purpose – Health and Social Care Act 2008 for which Nursing Direct is registered to provide with the Care Quality Commission (CQC). This will ensure that Nursing Direct provides services that are Safe, Effective, Caring, Responsive and Well-Led in line with the CQCs published Quality Statements, regulatory framework and associated best practice guidance.

5.2 Nursing Direct is registered to provide the following regulated activities:

- Personal care
- Treatment of disease, disorder, or injury

5.3 Nursing Direct is registered to support the following service user bands:

- Caring for adults over 65 yrs
- Caring for adults under 65 yrs
- Caring for children (0 – 18 yrs)

5.4 Individualised Support

Person-centred care and support is delivered using a number of policies and procedures relevant to the service users assessed needs underpinned by the Person-Centred Care and Support Planning Policy and Procedure and other specialist policies.

All staff including Agency Workers must refer to each service users Care Plan for detailed information on how individualised support is to be provided. The service user Care Plan contains personalised instructions tailored to the service users assessed needs, preferences, and desired outcomes.

Staff including Agency Workers must:

- Follow the Care Plan in full alongside the guidance set out in this policy and procedure.
- Seek clarification from their line manager or the Registered Manager if there is any uncertainty.
- Record and report any changes in needs or preferences so Care Plans can be reviewed and updated.

5.5 Responsibilities and Representatives

It is the responsibility of both the nominated individual and the Registered Manager at Nursing Direct to ensure that:

- The organisation is managed and governed appropriately
- Suitable systems are in place to effectively assess, monitor and improve the service
- Records are completed accurately and stored safely and securely.
- That the General Data Protection Regulation (GDPR) is met

There may however be times where the Registered Manager and Nominated Individual are the same person. In order to ensure impartially, Nursing Direct may enlist an external professional such as a health and social care consultant or alternative domiciliary care provider who is registered with CQC to support the governance processes at Nursing Direct.

5.6 Nursing Direct Statement

Nursing Direct commits to providing safe, high-quality, person-centred Care supported by a clear governance structure which meets the legal responsibilities of Nursing Direct, complying with current best practice and engages and responds to its' staff including Agency Workers, Service Users, and wider stakeholders.

Nursing Direct will work with its governance framework through which it is as a care provider be accountable for, continually improving the quality-of-service provision and safeguarding a high standard of care by creating an environment in which excellence in care will flourish.

Nursing Direct adheres to three primary attributes in its governance approach:

- Recognisable high standards of care
- Transparent responsibility and accountability for those high standards
- An ethos of continuous improvement

Nursing Direct's key elements to governance are outlined below along with the operational mechanisms in use to deliver each of the elements and the expectations that are placed on Nursing Direct by the regulator and its stakeholders.

Nursing Direct will:

- Take a human rights-based approach that protects and upholds a Service User's right to privacy, dignity, choice, respect, and control
- Encourage, listen, and respond to the views of Service Users, Staff including Agency Workers and people who have an interest in Nursing Direct
- Promote a culture of openness, honesty, and transparency, fulfilling our Duty of Candour responsibilities. Our Staff including Agency Workers will be knowledgeable and confident to challenge and report risks and concerns.
- Have clearly defined roles and responsibilities to ensure accountability
- Identify risks in all areas of Nursing Direct and will act to remove or reduce these risks
- Provide measures based in good practice and legislation to quality assure and measure the effectiveness of Nursing Direct services, learning lessons and improving the service
- Analyse governance processes to identify themes and trends and take corrective action where required
- Review all governance processes to ensure that they work innovatively and effectively.
- Ensure that the UK General Data Protection Regulation (UK GDPR) is met

Nursing Direct understands it is accountable for compliance with the UK General Data Protection Regulation and will demonstrate that appropriate technical and organisational measures have been put in place to meet these requirements, which are set out in the data protection policies and procedures at Nursing Direct.

Areas of governance at Nursing Direct comply with the standards and requirements of the Information Commissioner's Office, including registration. Alongside this, policies and procedures also give a framework to compliance with both the UK General Data Protection Regulation and the Data Security Protection Toolkit.

These additional policies are the framework for good governance around which Nursing Direct manages information.

5.7 Accountabilities

Nursing Direct will:

- Have responsibility for the overall implementation of the management and governance systems at Nursing Direct
- Have responsibility for scrutinising governance systems and processes at Nursing Direct through quality assurance and audit
- Ensure continuous improvement
- Have an organisational structure in place that defines leadership and accountability
- Ensure with Nursing Direct that there is accessible engagement with Service Users and Staff including Agency Workers to ensure that their views and feedback shape the service

5.8 Management and Organisational Responsibilities

Nursing Direct's governance structure entails the coordination and execution of general governance duties, overseen by designated staff including Agency Workers to account for agreed actions. They are held accountable by the Registered Manager, who in turn reports to the Registered Provider (Nominated Individual). Each individual with assigned responsibilities is entrusted with clearly defined roles to ensure the safe, secure, and lawful use of records under their purview, overseeing all stages from creation to disposal and maintaining high standards throughout.

All personnel with information handling or governance responsibilities undergo suitable induction and training to fulfil their roles effectively. They are required to provide regular reports to their respective line managers, ensuring a well-defined reporting process.

Responsibilities of the Registered Manager include:

- Overall management of Nursing Direct
- Soliciting and addressing feedback from service users, staff including Agency Workers, and other stakeholders
- Delegating responsibilities and ensuring Staff including Agency Worker accountability for agreed actions.
- Establishing effective governance systems that are effective, fit for purpose, and achieve continuous improvement
- Reporting statutory notifications and escalating concerns to the nominated individual as necessary
- Ensuring compliance with regulatory and contractual requirements
- Promoting an open and transparent culture and learning environment
- Reviewing accidents, incidents, complaints, and audits to inform practice improvement
- Collating, reporting, and utilising data to assess service quality
- To act on results of audits and reviews of the service
- Seeking expert advice from health professionals
- Acting as a role model in line with codes of conduct

- Ensuring contingency measures are in place for managing absences – the Nominated Individual, alongside the Registered Manager, will ensure that contingency measures are in place for managing any short or long-term absence of the Registered Manager and where timescales dictate, due notifications to regulatory bodies will be made.
- Report via the Capacity Tracker, as per the Health and Care Act 2022

Responsibilities of Staff including Agency Workers include:

- Work within their job description, contractual terms, and conditions, and within care guidance
- Provide all care/ support services in accordance with the care plans and risk assessments as required
- Raise concerns and suggestions in a timely manner
- Identify personal learning needs.
- Follow Nursing Direct's policies and procedures.
- Work within Nursing Direct's code of conduct, staff including Agency Worker's handbook, and acting professionally, and with honesty at all times

5.9 Information Governance

Nursing Direct understands it is accountable for compliance with the UK General Data Protection Regulation and will demonstrate that appropriate technical and organisational measures have been put in place to meet these requirements, which are set out in the data protection policies and procedures at Nursing Direct.

Areas of governance at Nursing Direct comply with the standards and requirements of the Information Commissioner's Office, including registration. Alongside this, policies and procedures also give a framework to compliance with both the UK General Data Protection Regulation and the Data Security Protection Toolkit.

These additional policies are the framework for good governance around which Nursing Direct manages information.

5.10 Regulatory Inspections

Nursing Direct is regulated by Care Quality Commission and will ensure that governance systems are in place to ensure the safe and effective running of the service, in order to provide high quality Care to its Service Users.

Nursing Direct recognises how the CQC regulations are evolving, especially with the introduction of the single assessment framework focusing on what matters to people who use health and social care services and their families.

Further information on the new approach to assessment can be found on the CQC website- www.cqc.org.uk

6. PROCEDURE

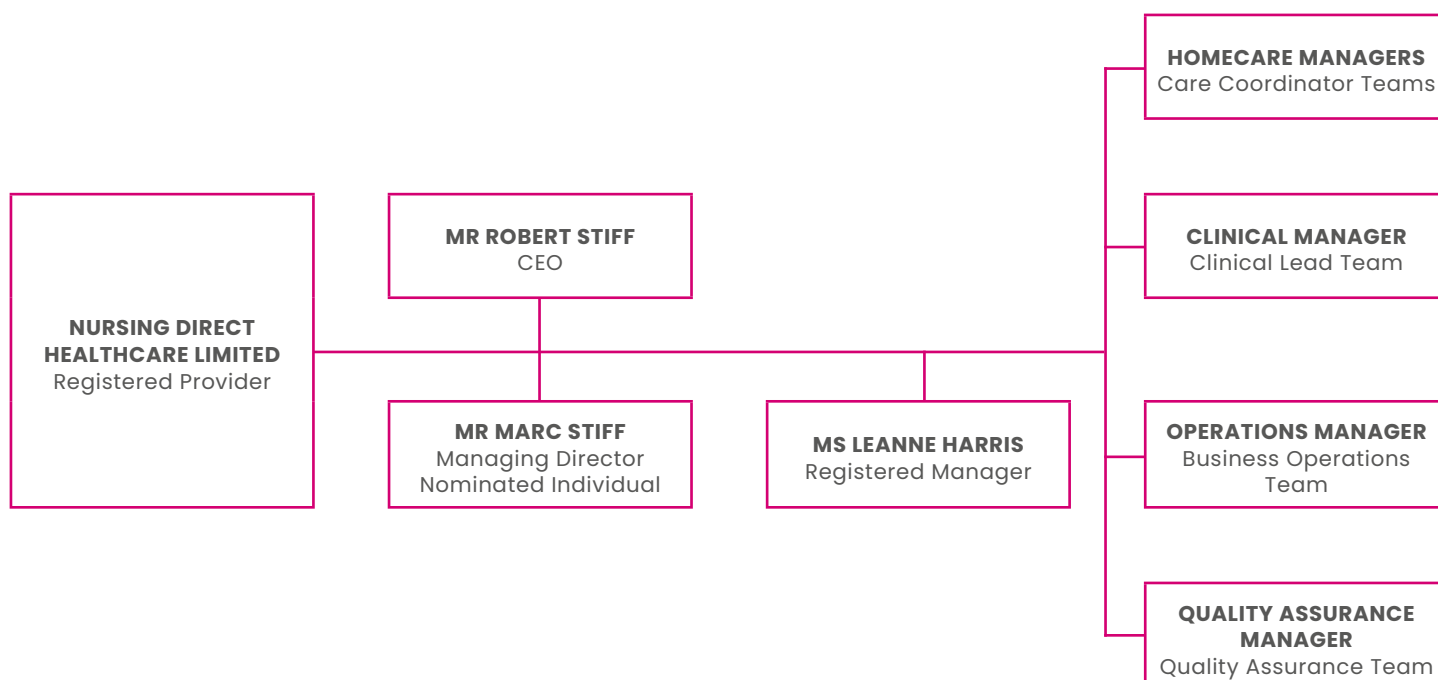
6.1 Organisational Chart

The Organisational Chart at Nursing Direct details the staffing structure within the service.

This will be maintained to reflect key lines of leadership and management within Nursing Direct, and where applicable, to demonstrate the wider management networks within Nursing Direct.

Nursing Direct will have clear reporting lines in place and staff will be aware of who their line manager is.

Nursing Direct has the following Organisational Chart in place.



Staff including Agency workers should refer to the Business Plan at Nursing Direct for further details.

6.2 Accountability

- The Registered Manager and Nominated Individual have overall management responsibility for ensuring proper governance
- Nursing Direct has; a clear, structured approach to governance. All Staff including Agency Workers have a line manager and defined accountabilities.
- Each Staff including Agency Workers are subject to supervision and annual appraisal in accordance with Nursing Direct policies and procedures
- Where there is accountability for informing external stakeholders such as regulatory bodies, the NHS and local authority, all roles and responsibilities are delegated.
- Staff including Agency Workers will ensure that they work within their own professional codes of conduct at all times and Nursing Direct will not hesitate to contact professional bodies to notify areas of proven concern within the bodies' remit
- All Staff including Agency Workers at Nursing Direct have accountability for ensuring that they work within Nursing Directs' and Local Authorities, CCG's and other service provider's safeguarding procedures, and any poor practice or failure to follow the procedures will result in disciplinary action.
- The Registered Manager will delegate to suitably skilled, trained, and experienced staff including Agency Workers some of the core management and governance duties such as supervision, appraisals, rota planning, and audits. However, the Registered Manager will maintain accountability to ensure that those delegated duties are completed to the standard expected.
- Contingency plans will be put in place in the event of the absence of the Registered Manager. Staff including Agency Workers will ensure the continuation of the service including:
 - Notifications made to the Care Quality Commission about any planned or unplanned absences of the Registered Manager from Nursing Direct that is for a continuous period of 28 days or more
 - Nursing Direct will explain how the service will be run during the period of absence and when Registered Manager returns from a significant absence

6.3 Communication

Nursing Direct's senior management team will ensure clear and transparent communication channels throughout the organisation and with all Service Users (and those legally responsible for them), Staff including Agency Workers and other stakeholders.

Information will be appropriate, accessible, timely and provided in a format which meets the needs of the recipient.

The website of Nursing Direct and its internal IT systems will be kept up to date with the latest information for the service.

6.4 Involvement of Service Users, their Representatives and those Legally Responsible

- In order to ensure governance is effective and holistic, Service Users will be involved in determining the quality, timeliness and level of support provided, and inform the results of any governance processes.
- Any new or changing aspect of the service will be subject to Service User engagement which will be sought through a range of different participation methods giving the time and resources for meaningful communication and feedback
- Nursing Direct will listen to Service Users and will make the changes needed after analysing the information. Specifically, Nursing Direct will ensure:
 - Systems, such as surveys, will be used to gain Service User views at least annually
 - Any changes made will be fed back to the Service User and recognition given to their views
 - This process is central to the concept of 'person-centred care' and continuous improvement.
- Nursing Direct will work to the Accessible Information Standards to ensure equality for the people who use its services
- Nursing Direct has an accessible complaints policy in place, and any complaints will be dealt with on both an individual basis and reviewed as a collective for trends and patterns

6.5 Involvement of Staff including Agency Workers at Nursing Direct and Relevant Agencies and Bodies

- As well as Service Users, Nursing Direct will meet and engage with stakeholders to consult, gain feedback and comment on the service and any changes to it
- Formal and informal feedback will be recorded, analysed, and used to make necessary improvements
- Nursing Direct will ensure that all stakeholders receive feedback on their input

6.6 Quality Assurance and Audit

The Registered Manager is responsible for overall quality assurance within Nursing Direct.

The quality assurance processes of Nursing Direct self-assess the service to check that acceptable standards are met and exceeded. Those standards are based on best practice, legislative and regulatory requirements, and the input of Service Users.

The Quality Assurance team will report the results of quality assurance to senior leadership including the nominated individual, for overall scrutiny and decision making, and will undertake audits in areas including health and safety, medication management, infection control, care planning, safeguarding and environmental management as detailed further in the Quality and Quality Assurance Policy and Procedure at Nursing Direct.

The Registered Manager will undertake reviews and monitor systems and processes to identify where quality or safety issues are being compromised and will respond appropriately and without delay. This will be done by:

- Using best practice, including NICE guidelines and CQC regulations to benchmark standards and performance
- Listening and including the views of the Service User
- Putting in place an audit cycle and review themes, trends, and risks from an operational management level.
- Working with an ethos of continuous improvement, Nursing Direct values for development in any problem areas identified

Details of the quality assurance and audit processes can be found within the Quality and Quality Assurance Policy and Procedure of Nursing Direct.

6.7 Risk Management

Nursing Direct Healthcare Limited understands that risk management is about minimising risks to Service Users by:

- Identifying what can and does go wrong during Care
- Understanding the factors that influence this
- Learning lessons from any adverse events
- Ensuring that action is taken to prevent recurrence
- Putting systems in place to reduce or eliminate risks
- Ensuring that the health and wellbeing of Service Users is continuously monitored and any concerns escalated
- Within Nursing Direct, risk will be managed by:
 - Assessing risks during a pre-service assessment with Service Users as well as ongoing assessments of Service Users' health and wellbeing
 - Having clear procedures regarding highlighting and reporting concerns. Staff including Agency Workers should refer to Raising Concerns, Freedom to Speak up and Whistleblowing Policy and Procedure at Nursing Direct Healthcare Limited
 - Ensuring that records are accurate, factual, and appropriately stored
 - Reviewing complaints, accidents, and incidents, near misses, safeguarding and whistleblowing concerns
 - Actively learning from mistakes by reviewing every incident or near miss, when it arises, investigating why it happened, how it happened, who was involved and create an action plan that will be followed to stop it happening again. The review of all incidents will be analysed to identify themes or trends so that this will also evidence whether Nursing Direct is learning from incidents.

Nursing Direct adopts a 'no-blame' approach, fostering an environment where all staff including Agency Workers are encouraged to openly discuss and disclose any incidents that may have occurred or posed a risk of harm. Insights gained from incidents are logged, monitored, and reviewed through systems like Radar, with findings shared and discussed across relevant teams. Actions identified are also tracked and monitored until compliance is achieved.

Our commitment extends to ensuring that all Staff including Agency Workers are knowledgeable and confident in identifying and reporting risks and concerns. We proactively identify risks across all areas of operations within Nursing Direct and take prompt action to either remove or mitigate them.

Within Nursing Direct, we will manage risk by:

- Reviewing complaints, accidents, and incidents, near misses, safeguarding and whistleblowing concerns
- Actively learning from mistakes by reviewing every incident or near miss, when it arises, investigating why it happened, how it happened, who was involved and create an action plan that we will follow to stop it happening again. The review of all incidents will be analysed to identify themes or trends so that this will also evidence whether Nursing Direct is learning from incidents.

6.8 Staff including Agency Worker Management

- Staff including Agency Workers will be supervised in line with the Supervision Policy and Procedure and this will be recorded and evidenced.
- The supervisions will contain relevant discussions about specific issues of concern, will inform the governance process, and identify best practice and areas that need to be redressed.
- Staff including Agency Workers will be encouraged to share views and opinions which will influence care planning and the development of ways of working.
- Staff including Agency Workers with accountability for particular areas of work will be informed of these responsibilities and provided with tools and guidance to ensure that they deliver the identified oversight responsibility.
- Role-specific codes of conduct will be used as a means of monitoring performance and staff including Agency Worker standards as agreed within contracts.
- Spot checks and competencies are carried out at time to time for performance and quality improvement

6.9 Continuing Professional Development

- Staff including Agency Workers skills will be regularly reviewed and where additional training is required, this will be identified and provided.
- Opportunities will be provided to widen skills, understanding and knowledge.
- This will increase the ability of the staff including Agency Workers, and ultimately, Nursing Direct, to provide effective, timely and responsive support.
- Where incidents arise, a root cause analysis will assess whether training needs to be reviewed.

6.10 Remediating Underperformance

- Any shortfalls in Care provision will be identified through systems of review.
- If an issue was the result of poor performance by Staff including Agency Workers it will be addressed either through supervision, additional training, disciplinary procedures, temporary deactivation, dismissal, or permanent deactivation from the database.
- If there are implications for Staff including Agency Workers, these will be addressed through training, supervisions, or team meetings
- Risk assessments, Care Plans, and ways of working will be revisited and updated to reassess the issues and develop more robust processes
- External resources may be identified to assist with the delivery of training or to provide guidance on improving practice

- Nursing Direct will ensure that its Staff including Agency Workers are aware of key policies and procedures such as Whistleblowing, Safeguarding, Accident, and Incident Reporting and that they adhere to these policies.
- All staff including Agency Workers have a responsibility for staying up to date with all Nursing Direct policies and procedures.

6.11 **Record Keeping and Personal Information**

Nursing Direct will securely keep and maintain accurate, complete, and detailed records of Service Users and any information relating to the planning and delivery of care and treatment (including policies and procedures, audits, and government arrangements) to ensure a clear and transparent audit of Service User care and support and identified needs, wishes and consent.

Where a Service User is assessed as lacking capacity, full details of the process and subsequent decisions will be recorded in full.

Complete records will also be kept of staff including Agency Workers including their suitability for the post through recruitment, training and continual development, commendation, and disciplinary actions.

All information is kept in line with data protection law and disposed of when justified retention needs have ended, in adherence with the UK General Data Protection Regulations 7 Principles of:

1. Lawfulness, fairness, and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality (security)
7. Accountability

All information will be kept securely and accessible only by authorised persons.

6.12 **Evaluation**

- The nominated individual and the Registered Manager will evaluate this policy and procedure annually, utilising stakeholder feedback, quality assurance, and monitoring.
- Where information comes to light that requires change before this point, the nominated individual and the Registered Manager will make changes and distribute the updated policy when the changes are required.
- In circumstances where the nominated individual and the Registered Manager are the same person Nursing Direct may enlist an external professional such as a health and social care consultant or alternative domiciliary care provider who is registered with CQC to support with the evaluation of governance processes.

7. **DEFINITIONS**

7.1 **Staff including Agency Workers**

7.1.1 **Staff**

Denotes the employees of Nursing Direct Healthcare Limited.

7.1.2 **Agency Workers**

Refers to individuals who are contracted with Nursdoc Limited or another employment business as an Agency Worker (temporary worker) provided to Nursing Direct Healthcare Limited to perform care services under the direction of Nursing Direct.

7.2 **Nursing Direct**

Nursing Direct, also known as Nursing Direct Healthcare Limited, is the entity regulated by the CQC (Care Quality Commission) and responsible for the care service provision, contracted to provide homecare services to service users in their homes, in placements, essential healthcare facilities and in the community.

7.3 **Nursdoc Limited**

As the sister company to Nursing Direct Healthcare Limited, Nursdoc Limited acts as an employment business, specialising in providing staffing solutions to the healthcare sector.

7.4 **CQC (Care Quality Commission)**

CQC throughout this policy, the term "CQC" refers to the Care Quality Commission (CQC) which is the independent regulator of health and social care in England.

7.5 **Governance**

A framework through which organisations are accountable for continually improving the quality of their services and safeguarding high standards of care by creating an environment in which excellence in care will flourish

7.6 **Root Cause Analysis**

A method of problem-solving used for identifying the root causes of faults or problems. It is a useful tool following safeguarding incidents, complaints, accidents, near misses or any other incidents that cause concern

7.7 Information Governance

- **Data Security and Protection Toolkit**

The Data Security and Protection Toolkit is an online self-assessment tool that allows organisations to measure their performance against the National Data Guardian's 10 data security standards

- **UK General Data Protection Regulation (UK GDPR)**

UK GDPR has replaced previous data protection rules and has brought up to date the laws that protect the use of individuals' personal information

- **Information Commissioner's Office**

The UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals

7.8 Accessible Information Standard

From 1st August 2016 onwards, all organisations that provide NHS care and/or publicly funded adult social care are legally required to follow the Accessible Information Standard. The Standard sets out a specific, consistent approach to identifying, recording, flagging, sharing, and meeting the information and communication support needs of patients, Service Users, carers and parents with a disability, impairment, or sensory loss – (NHS England)

7.9 Organisational Structure

A system used to define how leadership is structured within an organisation which identifies each job, its function and where and who it reports

8. OUTSTANDING PRACTICE

To be "outstanding" in this policy area you could provide evidence that:

- There is a current organisational chart in place, and this is accessible for staff including Agency Workers and Service Users
- All staff including Agency Workers are aware of who their direct line manager is and their roles and responsibilities
- Staff including Agency Workers undertake delegated duties on the direction of the Registered Manager
- Accountability and responsibility for governance are widely known, and people are actively seeking responsibility
- Service improvements can be directly attributed to the governance processes
- Nursing Direct has evidence of being exceptionally open and transparent in the area of governance
- External organisations are involved in governance structures at Nursing Direct
- Where mistakes or errors are identified through governance processes, they are addressed in a timely manner, and they do not reoccur
- Nursing Direct consistently carries out analysis following any incidents, including safeguarding incidents, to understand lessons learnt and prevent issues arising again
- Nursing Direct uses best practice resources to inform development and evidence that governance drives improvement

COMPLETED DATE:	25.11.2025
SIGN OFF DATE:	25.11.2025
REVIEW DATE:	25.11.2026
SIGNED:	 Marc Stiff – Group Managing Director