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QUALITY & QUALITY ASSURANCE

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QUALITY & QUALITY ASSURANCE POLICY

POLICY AIM

This policy outlines the quality and quality assurance processes adopted by Nursing Direct Healthcare Limited (hereinafter referred to as "Nursing Direct") to maintain high standards of care in accordance with industry best practices and the regulatory requirements set by the Care Quality Commission (CQC). It supports our commitment to continual improvement and excellence in service delivery.

The aim of this policy is to outline Nursing Direct's key organisational priorities to ensure the consistent delivery of high-quality services. It sets out our commitment to identifying and addressing gaps in care where current practices fall short of regulatory standards, in line with both national and local requirements. Furthermore, this policy supports a framework for achieving continuous improvement, with a focus on delivering person-centred, high-quality care in every aspect of service provision.

1. PURPOSE

- 1.1 To set out how Nursing Direct intends to achieve continuous improvement in the services it provides, aligning with both national and local requirements, and reflecting the priorities of Nursing Direct.
- 1.2 To ensure consistent delivery of safe, effective care that results in a positive experience for Service Users.
- 1.3 To support Nursing Direct in meeting the Key Lines of Enquiry and Quality Statements, as set out by the Care Quality Commission (CQC).
- 1.4 **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 when complying with its duties:
 - The Care Act 2014
 - Equality Act 2010
 - 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
 - Human Rights Act 1998
 - The local authority social services and National Health service complaints (England) Regulations 2009
 - Management of Health and safety at work Regulations 1999
 - Mental Capacity Act 2005
 - Safeguarding of vulnerable Groups Act 2006
 - Data protection Act 2018
 - UK GDPR

2. SCOPE

- 2.1 The following roles may be affected by this policy:
 - Staff including Agency Workers
- 2.2 People Affected:
 - Service Users
- 2.3 Stakeholders Affected:
 - Family
 - Advocates
 - Commissioners
 - External health professionals
 - Local Authorities
 - NHS/ ICB

3. OBJECTIVES

- 3.1 To demonstrate a commitment to quality by ensuring robust governance processes are in place to support and meet the needs of Service Users, Staff (including Agency Workers), commissioning bodies, the Care Quality Commission (CQC), and other stakeholders.
- 3.2 To ensure continuous quality improvement emphasising that the provision of evidence based best practice underpins all activity within Nursing Direct and that its processes are benchmarked against NICE Guidelines and other best practice guidance.
- 3.3 To create a framework to identify and ensure quality at Nursing Direct that Staff including Agency Workers, service users and other stakeholders understand.
- 3.4 To ensure that Staff including Agency Workers of Nursing Direct understand the quality assurance process, roles, and responsibilities to achieve consistently good service outcomes against quality markers.
- 3.5 To ensure the availability and effective use of tools and systems to measure the progress and development of Nursing Direct and its staff, including Agency Workers, in achieving quality across all aspects of the service.

4. POLICY

- 4.1 The Registered Manager and Nominated Individual of Nursing Direct have overall management responsibility for this policy and procedure. This is in line with the Policy Management Policy and Procedure at Nursing Direct.

- 4.2 Nursing Direct aims to deliver safe, caring, efficient and high-quality care services which fully integrates quality, and performance as detailed in its vision, mission, and value statements.
- 4.3 Nursing Direct will ensure that there is effective governance in place, including assurance and auditing systems and processes. These will assess, monitor, and drive improvement in the quality and safety of the services provided, including the quality of the experience for Service Users.
- 4.4 The systems and processes will also assess, monitor, and mitigate any risks relating to the health, safety and welfare of Service Users and others. Nursing Direct is committed to ensuring that it continually evaluates and seeks to improve its governance and auditing practice.
- 4.5 Nursing Direct recognises that a quality service is one that takes account of the needs and circumstances of each Service User. A quality service ensures that care services are accessible, appropriate, safe, and effective for all including protected characteristic groups. We also believe that workplaces must be free from discrimination so that staff, including Agency Workers, can thrive and deliver excellence.
- 4.6 Nursing Direct will anticipate and be responsive to the changing needs of our diverse Service Users and the changing needs within their local community. We are committed to providing the best possible care and value the professionalism of our Staff including Agency Workers.
- 4.7 Nursing Direct definition of quality is guided by best practice frameworks, regulatory requirements (including those set by the Care Quality Commission), and relevant legislation. By defining and embedding quality across all aspects of service delivery, Nursing Direct aims to:
- Establish a shared understanding among all staff, including Agency Workers, of what constitutes high-quality care, and the actions required to achieve it, with the contribution from service users, families, and other stakeholders.
 - Enable more effective and aligned support towards achieving and maintaining high standards of care.
 - Strengthen partnerships and build on existing relationships to promote joint action and collaborative improvement.
 - Continuously improve the quality-of-care services provided.
 - Ensure measurable outcomes in care delivery, leading to consistent, high-quality services that positively impact service users, their families, and the wider community.
 - Enhance organisational efficiency and productivity by addressing challenges and mitigating risks through strategic action planning, ongoing performance evaluation, and monitoring. This process is informed by case studies, incident reporting, quality audits, surveys, and ensuring adequate resources are in place to support seamless care delivery.

In this context, Nursing Direct defines high-quality, person-centred care as care that is responsive to what matters most to service users and/or their families including the service users who may not have families to support them.

4.7.1 QUALITY ASPECTS FOR SERVICE USERS;

- **Caring:** Nursing Direct approaches care provision with compassion, dignity, and respect for individuals.
- **Responsive:** Nursing Direct services adapt to diverse needs, prioritising solutions identified by individuals themselves, with professional support.
- **Safe:** Nursing Direct ensure service users are shielded from harm, neglect, and abuse. Any errors or incidents are managed through safeguarding procedures, complaints reporting, and candid communication.
- **Effectiveness:** Nursing Direct care practices aim to enhance quality of life, grounded in best practices.
- **Well-led:** Nursing Direct strive to create a positive experience through effective leadership and management.

4.7.2 QUALITY ASPECTS FOR NURSING DIRECT;

- **Well-led:** Nursing Direct have good governance and quality assurance systems and policies in place to promote a culture that is open, transparent, and committed to learning and improvement.
- **Efficiency & Productivity:** Nursing Direct have strategies in place including safer recruitment, performance management, training, and development strategies to recruit qualified, skilled, and experienced Staff including Agency Workers. Nursing Direct support Staff including Agency Workers for their continuous training and development to contribute to deliver services efficiently.
- **Sustainability:** Enhance sustainability at Nursing Direct by ensuring responsible use of resources through staff including Agency Workers, while also ensuring fair access for all.
- **Safety and Risk Management:** Nursing Direct have safety and risk management strategies and compliance systems in place alongside other processes. These include safeguarding, information governance, data protection, incident reporting and care and safety management software systems, equality and diversity, and communication.

4.8 Quality of Care includes;

Nursing Direct is committed to promoting Quality of Care by embedding it at the core of all operations, ensuring that excellence is consistently reflected across every aspect of the Nursing Direct's service delivery. In doing so, special emphasis will be given to;

- Prioritising the needs of service users by actively listening to their feedback and incorporating their input into service development.
- Promoting seamless, integrated care that is responsive and person-centred.
- Exercising a strong duty of care to benefit service users while avoiding harm.
- Using safe, affordable, and effective methods to reduce risk, death, illness, and disability, and to improve outcomes.
- Adhering to established clinical and regulatory guidelines and protocols to ensure consistent and high-quality care.
- Acting at the right time with appropriate interventions, in line with best practice, to deliver effective care.
- Aligning with commissioning bodies and industry stakeholders to ensure consistency and accountability in service delivery.
- Continually improving service standards to achieve excellence.

4.9 Quality Assurance

- Quality Assurance refers to how a service is monitored and evaluated to ensure it delivers high-quality care. It involves a planned and structured set of activities carried out consistently, with a continuous focus on improving the quality and safety of care. It involves; Focusing on the needs and expectations of service users, their families, and the community.
- Establishing clear standards and protocols to guide service delivery.
- Monitoring performance to identify gaps between current practice and expected standards.
- Addressing identified gaps regularly through continuous quality improvement.
- Applying a continuous, system-focused approach to enhance processes and outcomes.
- Using data to analyse service delivery and outcomes, and taking appropriate actions based on findings.
- Promoting teamwork in problem-solving and quality improvement initiatives.
- Using effective communication to support and enhance service delivery.

4.10 Importance of Quality

- Increased demand for effective and appropriate care
- Need for standardisation and variance control
- Cost saving measures
- Benchmarking
- Accreditation, certification and regulation

- Provider performance
- Define and meet Service User needs and expectations
- Competition and enhance marketing
- Improvements in care and services
- Recognition and strive for excellence
- Ethical considerations

4.11 **Benefits of Quality Assurance**

4.11.1 **For Service Users;**

- Good health outcomes
- Service User satisfaction
- Value for money
- Less frustration

4.11.2 **For Staff including Agency Workers:**

- Satisfaction with their contribution to work
- Better Understanding of Service User needs
- Improved Communication between Staff including Agency Workers

4.11.3 **For Nursing Direct:**

- Service User satisfaction
- Increased revenue
- Better working environment and culture
- Better reputation

4.12 **Quality Assurance Framework**

This provides quality services through meaningful engagement leading to effective outcomes for Service Users and staff including Agency Workers at Nursing Direct:

4.12.1 **Safe and Effective Practice:**

- Risk Management and adverse incidents
- Research, evidence-based practice and informed decision-making

4.12.2 **Accessible, Flexible and Responsive Services:**

- Involvement of Service Users and staff including Agency Workers
- Integrated working

4.12.3 **Effective Communication and Information:**

- Information management
- Standards, outcomes, and audit
- Complaints and compliments

4.12.4 **Leadership and Accountability:**

- Supervision and performance appraisal
- Organisational learning and continuous professional development
- Human and financial resources
- Leadership and management

4.12.5 **Governance**

Nursing Direct will ensure that there is effective governance in place, including assurance and auditing systems and processes. These will:

- Assess, monitor, and drive improvement in the quality and safety of the services provided, including the quality of the experience for Service Users
- Assess, monitor, and mitigate any risks relating to the health, safety and welfare of Service Users and others.
- Securely maintain an accurate, complete, and contemporaneous record for each Service User of the Care and treatment provided.
- Maintain records in relation to Staff including Agency Workers and the management of care
- Seek and act on feedback from Service Users, families and relevant others on the service provided by Nursing Direct

Nursing Direct is committed to ensuring that it continually evaluates and seeks to improve its governance and auditing practice.

4.13 **Nursing Direct will deliver safe, caring, efficient and high-quality Care services which fully integrate quality, performance and governance as detailed in its vision and values to:**

- Provide care and support to Service Users and their families which is in accordance with the individual wishes of the Service User, whilst fully supporting their human rights and the principles of the Mental Capacity Act 2005
- Deliver a management style, policies and day-to-day practices that promote open communication, a culture of problem resolution rather than blame, and the involvement of all stakeholders
- Nurture a culture that is supportive of continuous improvement that is maintained by way of regular audit and review of standards of performance across the service, followed by open discussions about strengths and weaknesses, with action-planning to resolve weaknesses

4.14 **The Registered Manager Responsibilities**

4.14.1 The Registered Manager has overall responsibility for:

- Developing a culture of quality
- Ensuring there is ongoing compliance with regulatory and contractual requirements.
- Ensuring compliance with policies and procedures.
- Managing efficiently the resources of Nursing Direct and ensuring there are sufficient numbers of Staff including Agency Workers with suitable skills, experience, and knowledge to deliver safe care and maintain a high-quality service.
- Reviewing and learning from accidents, incidents (including safeguarding), complaints and sharing this learning.
- Seeking feedback from Service Users and stakeholders.
- Acting on results of audits and reviews of the service.
- Developing systems to achieve continuous improvement.
- Collation, reporting and using data to inform stakeholders of the quality of the service.
- Promoting a supportive, transparent culture where Nursing Direct can learn from any mistakes.

- Collaborative working with commissioners, Local Authorities and Clinical Commissioning Groups (CCGs).
- Staff including Agency Workers being regularly supported and supervised
- Establishing effective leadership

4.14.2 Results are analysed and used to:

- Develop action plans
- Steer the direction for quality initiatives and review of the strategy of Nursing Direct
- Form supervision, training, and performance management where necessary

This does not replace any additional, more frequent quality assurance checks that are completed as locally agreed by Nursing Direct.

4.15 Responsibilities for Quality: Service Users and Staff

4.15.1 For the Service User:

- Nursing Direct takes full responsibility for service quality, working in collaboration with professionals, service users, families, and stakeholders. The organisation actively promotes a shared vision of quality, as outlined in its policy, and is committed to delivering high-quality, safe, effective, caring, responsive, and sustainable services.
- Nursing Direct engages proactively with professionals across the system and follows national guidelines. Collaborative working with others is recognised as key to driving quality improvement.
- Nursing Direct acknowledges its pivotal role in the development and delivery of quality services by working as equal partners with commissioners and maintaining transparency around quality initiatives and improvement strategies.
- The organisation fosters openness within its quality systems and aligns practices with broader frameworks such as the Care Quality Commission (CQC) standards. Clear communication of Nursing Direct's quality values to commissioners, service users, and the wider professional network is prioritised.
- Nursing Direct recruits and supports high-quality staff, including agency workers, empowering them through professional development and effective leadership to ensure consistent, high-quality service delivery.

4.15.2 For Staff, Including Agency Workers:

- All staff, including agency workers, must have a clear understanding of what constitutes quality care and recognise their essential role in its delivery, both now and in the future.
- Staff are expected to maintain collaborative and respectful working relationships, promote diversity and inclusion, and be capable, confident, and well-equipped to provide safe, effective, and compassionate care.
- Open communication, mutual respect for each other's expertise, and effective teamwork are essential to fostering a positive work environment and ensuring efficient use of resources.
- Staff must uphold values-based care, demonstrate reliability, and engage in continuous professional development to build service user confidence and strengthen the overall workforce.

4.16 View of Quality

In practice, staff including Agency Workers at Nursing Direct deliver care that is:

4.16.1 SAFE:

- Delivered in a way that avoids harm to Service Users from Care that is intended to provide.
- Continuously reduces risk, empowers, supports, and enables Service Users to make safe choices and protects Service Users from harm, neglect, abuse, and breaches of their human rights.
- Ensures improvements are made when problems occur.

4.16.2 EFFECTIVE:

- Informed by consistent and up to date high quality training, guidelines, and evidence
- Designed to improve the health and wellbeing of a population and address inequalities through prevention and by addressing the wider determinants of health.
- Delivered in a way that enables continuous quality improvements based on research, evidence, benchmarking, and clinical audit.

4.16.3 POSITIVE EXPERIENCE:

- **Responsive and personalised** - shaped by what matters to Service Users, their preferences, and strengths; empowers Service Users to make informed decisions and design their own Care; coordinated; inclusive and equitable.
- **Caring** - delivered with compassion, dignity, and mutual respect.

4.16.4 WELL-LED:

- Driven by collective and compassionate leadership, which champions a shared vision, values, and learning.
- Delivered by accountable organisations and systems with proportionate governance.
- Driven by continual promotion of a just and inclusive culture, allowing organisations to learn rather than blame.

4.16.5 SUSTAINABLY RESOURCED:

- Focused on delivering optimum outcomes within available finances
- Reduces the negative impact on public health and the environment

4.16.6 EQUITABLE:

- Committed to understanding and reducing variations and inequalities
- Ensuring that everybody has access to high-quality care and outcomes

4.17 Person-Centred Care

Nursing Direct recognises that a quality service is one that understands the needs and circumstances of each Service User, because they are supported to give their views and express their wishes in every aspect of their Care from design through to delivery. Nursing Direct will ensure full-Service User engagement in all elements of the service and will ensure best interest decisions are made if a Service User is assessed as lacking capacity, consulting with the Service User's representatives, family and assigned professionals.

Nursing Direct is dedicated to providing a quality service that ensures Care is accessible, appropriate, safe, and effective for all in the local community, and that this includes protected characteristic groups. Nursing Direct will ensure that the workplace is free from discrimination so that Staff including Agency Workers can thrive and deliver excellence.

4.18 Anticipate Change

Nursing Direct will anticipate and be responsive to the regulatory frameworks, the changing needs of its diverse Service Users and the changing needs within its local area, working in partnership to understand the present and future needs.

Nursing Direct is committed to providing the best possible Service User Care and values the professionalism of its Staff including Agency Workers.

4.19 Resources

Nursing Direct will ensure that necessary resources are available to effectively monitor key performance indicators. This data will be used to inform management decisions which support the delivery of quality services, ongoing quality improvement and business planning decisions.

4.20 Areas of Responsibility

Within Nursing Direct, key individuals with the appropriate skills, experience and knowledge will be identified to have responsibility for the following:

- Implementation of quality procedures and systems
- Meeting legal, regulatory, and contractual compliance
- Auditing of the service;
- Collation of data and information to monitor performance against agreed quality standards.
- Listening and responding to Service Users' concerns, feedback, and views
- Listening and responding to concerns raised by Staff including Agency Workers at Nursing Direct and other key stakeholders.

5. PROCEDURE

5.1 Delivering Quality Care: The Seven Steps

These seven steps can help improve the quality of care at Nursing Direct (gov.uk 2019).

1. SETTING CLEAR DIRECTION AND PRIORITIES:

- Based on evidence including the views of Service Users, their families and Staff including Agency Workers

2. BRINGING CLARITY TO QUALITY:

- Setting clear standards for what high quality Care looks like
- Based on what matters to Service Users and communities

3. MEASURING AND PUBLISHING QUALITY:

- Measuring what matters to Service Users at Nursing Direct
- Monitoring quality and safety consistently
- Sharing information in a timely and transparent way
- Using data effectively to inform improvement and decision-making

4. RECOGNISING AND REWARDING QUALITY AND LEARNING:

- Recognising, celebrating, and sharing outstanding health and Care
- Learning from others and helping others learn
- Recognising when things have not gone well

5. MAINTAINING AND IMPROVING QUALITY:

- Working together to maintain quality, reduce risk and protecting Service Users from harm
- Building capability for improvement:
- By improving leadership, management, professional and institutional culture, skills, and behaviours to assure quality and sustain improvement
- Supporting Staff including Agency Workers development and wellbeing

6. BUILDING CAPABILITY FOR IMPROVEMENT:

- By improving leadership, management, professional and institutional culture, skills and behaviours to assure quality and sustain improvement
- Supporting staff development and wellbeing

7. STAYING AHEAD:

- By adopting innovation, embedding research and monitoring Care and outcomes
- To provide progressive, high-quality Care

5.2 Developing a Quality Assurance Framework

The framework at Nursing Direct must be developed specifically to reflect the service's operational needs and areas requiring improvement.

The basic steps (Skills for Care 2024) are:

5.2.1 Set Standards:

- This explains what you want to achieve, it could be based on specific improvements or the wider vision and aims of Nursing Direct
- It should be underpinned by your organisational values and take into account national practice standards, relevant legislation and regulatory standards
- Quality assurance is everyone's responsibility, outline how different roles can implement these outcomes and/or standards and communicate this with your staff, including Agency Workers, for example:
 - All staff including Agency Workers are responsible for upholding high quality practice standards
 - Clinical Leads are responsible for ensuring staff, including Agency Workers, deliver care and support that meets these standards
 - Managers are responsible for making sure that quality assurance activities happen regularly and for sharing the findings with their teams
 - Managers are responsible for ensuring learning from quality assurance activities is embedded in the learning and development of all staff including Agency Workers

5.2.2 Monitor and Measure Quality:

Collect information to monitor and measure quality in different ways:

- Audit tools
- Care Plan audits
- Care Quality Commission inspection reports
- Workforce data (benchmarking against other organisations, using tools such as the Adult Social Care Workforce Data Set)
- Complaints Verbal feedback Interviews Meetings
- Focus groups
- Surveys – paper and online
- Comments books Supervisions
- Incident and accident reviews Observations – internal and external

Involve lots of different people in quality assurance activities to get a holistic view of performance, including:

- Service Users, their families, friends and advocates
- Other professionals, such as social workers and district nurses
- Staff including Agency Workers
- The public
- Care Quality Commission inspectors
- Board members and trustees

5.2.3 **Analyse Findings:**

When you've measured quality, you should benchmark your findings against your desired outcomes and/or standards.

If any of your activities don't meet the desired standards, you should put action plans in place to improve them.

5.2.4 **Take Action:**

- Share this learning with everyone involved, and use it to make meaningful changes and improvements
- Update your original action plan or write a new one for further improvements
- This learning should make links to key areas of your service, such as:
 - Learning and development Supervision
 - Complaints and compliments process Workforce planning
 - Workforce development Commissioning
 - Care Plans
 - Service and business plans Improvement/action plans

5.3 **Quality Framework**

The quality framework at Nursing Direct must reflect an approach that is person-centred, intelligent, supportive and proportionate. Nursing Direct will ensure they embed a quality framework that includes:

- Ensuring a person-centred approach to the Care of each Service User
- Enabling the Service Users to set their personal objectives and have full involvement in the review process
- Supporting Service Users to fully contribute to the quality assurance framework wherever possible
- Clearly defined quality objectives that are specific, measurable, achievable and time-sensitive
- Setting targets that are focused on meeting the needs of Service Users, Nursing Direct and other stakeholders
- Quality standards setting out what good care practice looks like
- Quality monitoring that is inclusive, supportive, intelligent and proportionate and based on informed action rather than scheduled inspection
- Service Users and staff, including Agency Workers, actively involved through regular opportunities for feedback and information sharing
- The governance review and oversight arrangements are clearly set out to demonstrate that Nursing Direct is discharging its responsibilities
- An organisational structure that identifies who provides vision and direction within Nursing Direct
- An implemented, up-to-date suite of policies and procedures that are evidence-based, reflect best practice and the needs of Nursing Direct, and dovetail with any contractual requirements
- A robust business plan that details the strategic priorities for the next five years Personal development plans, supervision and appraisal systems for staff, including Agency Workers, to ensure that they have the relevant skills, knowledge and expertise
- The use of effective communication tools to minimise any internal or external communication barriers
- An active internal and external audit process with outcomes feeding back into the quality cycle
- Infrastructure and resources that can support delivery of aims and strategic priorities
- Building positive relationships with partners and others working in the sector to enable sharing of experiences and resources, to pool expertise and work in partnership for the best interests of Service Users
- A means of evaluating all activity on a continuous basis and using feedback gained to inform the development of services

5.4 **Care Quality Commission**

The Care Quality Commission provide a regulatory regime of standards for Care services, and these should form the foundation of the quality expectations at Nursing Direct:

- The five key questions and quality statements are used to inspect whether regulated health and social care services are safe, effective, caring, responsive and well-led, and provide a baseline for good and outstanding care
- By using the five key questions and quality statements, the Registered Manager can assess whether Nursing Direct meets the required quality standards, identify what to improve and plan improvements to meet the standards

5.5 **Leadership**

The Registered Manager will improve quality through leadership and governance by:

- Establishing effective leadership at Nursing Direct.
- Creating governance processes to identify and address quality issues.
- Adopting a consistent and systematic approach to quality improvement.
- Developing systems to identify and implement evidence-based interventions, innovations and technologies, adapting these to local needs.
- Seeking professional advice promptly to identify and make any required improvements
- Promptly sharing relevant information on incidents or risks with relevant bodies.

5.6 **Staff including Agency Workers**

All staff, including Agency Workers, should have a clear understanding of what quality is and of their important role in helping to deliver high-quality care at Nursing Direct. Nursing Direct will promote a culture that is open, honest, transparent, safe and caring.

Nursing Direct will ensure that:

- The right people are recruited for the right job so that they contribute and perform well in their functions well to achieve organisational goals.
- All pre-employment checks are undertaken, and documents are held in line with Data Protection requirements.
- Staff, including Agency Workers, are given the opportunity to take part in surveys that are anonymised, collated and used to determine trends
- Processes support a person-centred culture that actively encourages Service Users, their family and staff, including Agency Workers, to report their concerns
- Whistleblowing and safeguarding policies and procedures are widely publicised and link to the procedures
- A learning culture is promoted, with audit and investigation outcomes being disseminated to staff, including Agency Workers, so that lessons can be learnt and measures put in place to ensure that incidents do not arise again
- Any identified actions required as a result of audits will be implemented in a timely manner
- All staff, including Agency Workers, have regular supervisions
- Regular staff, including Agency Workers, meetings take place

5.7 Culture

5.7.1 Nursing Direct has a workplace culture that is conducive to improvement:

- Recruitment will be values-based and robust, to ensure the right people are recruited for the right job. Staff, including Agency Workers, can refer to the Recruitment Policy and Procedure at Nursing Direct.
- There is a formal induction process for all staff, including Agency Workers, to ensure that they are provided with the skills and knowledge to gain competence to fulfil their roles. Staff, including Agency Workers, should refer to the Induction and Onboarding Policy and Procedure at Nursing Direct.
- Staff, including Agency Workers, are well trained in their designated practice areas to ensure they are knowledgeable, skilled, and fit for work, enabling them to perform competently and contribute effectively to performance goals.
- Building improvement skills and knowledge at every level
- Recognising the importance of creating a workplace culture conducive to improvement
- Giving everyone a voice
- Flattening hierarchies and ensuring that all staff, including Agency Workers, have the time, space, permission, encouragement and skills to collaborate on planning and delivering improvement
- Bringing staff, including Agency Workers, Service Users and families together to improve and redesign the way that care is provided
- Staff, including Agency Workers, participate in surveys designed to measure engagement, motivation, commitment, and empowerment.
- Whistleblowing and Safeguarding Policies and Procedures are clearly communicated and aligned with the procedures of commissioning bodies.
- Organisational processes promote a person-centred, fair-blame culture that encourages Service Users, their families, and staff, including Agency Workers, to report concerns without fear.
- A culture of continuous learning is actively fostered, with audit and investigation outcomes shared transparently to inform improvements and reduce the risk of recurrence.
- Actions identified through audits are implemented promptly and supportively to strengthen service quality and safety.

5.7.2 Closed Cultures

- CQC defines a closed culture as 'a poor culture that can lead to harm, including human rights breaches such as abuse'. In these services, people are more likely to be at risk of deliberate or unintentional harm.
- Any service that delivers care can have a closed culture.
- The good governance, quality and quality assurance policies and procedures at Nursing Direct identify processes such as spot checks and audits to reinforce compliance with CQC regulations and safeguarding legislation.
- The audit and monitoring approaches at Nursing Direct systematically review operational practice, focusing on transparency and accountability across the organisation at all levels.
- Spot checks offer real-time insight, swiftly identifying potential issues, while audits provide comprehensive evaluations ensuring compliance with standards and best practice.
- Through these methods, closed cultures, characterised by opacity or non-compliance, are swiftly detected and addressed.
- By aligning with regulations and safeguarding requirements, Nursing Direct ethical standards, prioritises transparency, addresses poor practice and provides an inclusive and safe environment for all Service Users and staff, including Agency Workers.

5.8 Delivering Person-centred Care

Nursing Direct and staff including Agency Workers, must always ensure that Service Users have the accessible opportunity to make a full and meaningful contribution to any and all aspects of their care. Where this is not possible due to a lack of capacity, decisions will always be made in the Service User's best interest.

- Nursing Direct will ensure that all care is centred around the individual needs, preferences, and goals of each Service User.
- Nursing Direct must ensure that Service Users know how to raise concerns, share their views and how to get involved with shaping service delivery.
- Nursing Direct will listen and respond, documenting any action taken
- Nursing Direct will audit the consistency and reliability of care and take remedial action where required
- Nursing Direct will undertake observations on staff, including Agency Workers, to witness care delivery, at a frequency agreed by Nursing Direct

Staff including Agency Workers should refer to the Supporting Personal Care Policy and Procedure at Nursing Direct.

5.9 Service User Care Plan

Nursing Direct must ensure that all Care Plans for Service Users:

- Are complete, legible, indelible, accurate and up to date, with no undue delays in adding and filing information, as far as is reasonable. This includes results of tests, correspondence and changes to Care Plans
- Include an accurate record of all decisions taken in relation to care and treatment and make reference to discussions with Service Users, their families and those lawfully acting on their behalf. This includes consent records and advance decisions to refuse treatment
- Are reviewed when needs change, when there is an incident, concern or near miss, and then at least quarterly thereafter. This includes Risk Assessments.
- Are accessible to authorised people in order to deliver Service User's care and treatment to meet their needs and keeps them safe
- Are created, amended, stored and destroyed in line with current legislation and nationally recognised guidance
- Are kept securely at all times and only accessed or securely destroyed by authorised people

Staff, including Agency Workers, should refer to the Person-Centred Care and Support Planning Policy and Procedure at Nursing Direct.

5.10 Policies and Procedures

The Registered Manager must:

- Have responsibility for ensuring that staff, including Agency Workers, can access policies and procedures online via the Nursing Direct website or the OneTouch Mobile App. These will be made available to ensure that a consistently high-quality standard of care is delivered
- Review the policies and procedures and ensure that they meet the needs of Nursing Direct, and make amendments where required to meet local policy requirements
- Ensure that the policies and procedures are implemented and embedded within Nursing Direct, and undertake regular compliance audits
- Keep up to date with any local policy or best practice changes and ensure these changes are cascaded to staff, including Agency Workers
- Utilise mock inspection toolkits to support any audits

5.11 Guidance, NICE Advice and Quality Standards

Nursing Direct can be confident that it is providing the best quality care if they use NICE guidelines. NICE guidelines will provide evidence-based recommendations to help improve practice and quality.

5.12 Training

The Registered Manager must make sure that all staff, including Agency Workers, are properly trained and supported by implementing the following measures:

- A training matrix is in place and they undergo training needs analysis
- Training and development are given high priority and they have a requirement to attend
- Their achievements are tracked
- Training and development are given high priority for all staff, including Agency Workers at Nursing Direct to ensure a knowledgeable and competent workforce
- An environment is created where they are committed to developing and changing practice and systems in light of research, good practice and evidence-based care
- A review of training materials alongside any published policies and procedures to ensure consistency and ensure that they dovetail, where necessary
- A review of training as part of root cause analysis and lessons learnt when things go wrong.
- Ensure that mechanisms are put in place to ensure that any gaps in training are closed
- Priority must be given to training and personal and professional development, with the need to attend mandatory training emphasised

5.13 Quality Improvement

5.13.1 INCLUDES:

- Identifying the quality issue
- Understanding the issue from a range of perspectives, with an emphasis on using and interpreting data
- Developing a theory of change
- Identifying and testing potential solutions, using data to measure the impact of each test, and gradually refining the solution to the problem
- Implementing the solution and ensuring that the intervention is sustained as part of standard practice

5.13.2 Findings from audits will highlight areas for improvement and what is working well. Results will be analysed and used to:

- Develop action plans to improve practice
- Steer the direction for quality initiatives and review of the strategic priorities and strategies of Nursing Direct
- Inform supervisions, training, and performance management where necessary.

Any individual concerns identified will be addressed by Nursing Direct through the appropriate policies and procedures.

Nursing Direct will report through Nursing Direct governance structures to ensure that system-wide improvements can be made where trends are identified through audits.

5.14 Audits

5.14.1 The Registered Manager or delegated other will undertake regular monthly quality control audits and reviews of the service as dictated by the quality framework. These service reviews will include the following:

- Financial transactions
- Health and safety
- Accidents and incidents
- Safeguarding
- Compliments, concerns, and complaints
- Service User and staff feedback
- Infection control
- Care and safety performance, e.g. care documentation, medicine management, nutrition, skin integrity
- Maintenance Observations
- Data Protection

Thematic audits and national audits will be used to provide focused reviews of quality. Best practice standards will also be applied.

5.14.2 External Audits:

Nursing Direct should maintain external audits to ensure quality, including:

- Health and safety
- Care audits
- Quality audits

Auditing and monitoring compliance needs to generate action plans which facilitate change and improvement as well as a culture of continuous improvement at Nursing Direct.

5.15 Good Governance

Nursing Direct recognises that Good Governance is relevant within the business and will ensure a culture of continuous improvement. Staff, including Agency Workers, should refer to the Good Governance Policy and Procedure at Nursing Direct.

5.16 Seeking Feedback

5.16.1 Nursing Direct will actively seek feedback from Service Users and their families about their experience of Nursing Direct and the quality of care they receive at Nursing Direct.

5.16.2 Nursing Direct will actively seek views from a wide range of external stakeholders about their experience and the quality of care provided by Nursing Direct. This should include staff including Agency Workers, visiting professionals, local groups, commissioners etc.

5.16.3 Nursing Direct will seek feedback by the regular use of satisfaction surveys, Service User meetings and family meetings.

5.16.4 Nursing Direct will evidence that they have reviewed, responded, and taken action to address any issues from any feedback, in order to make improvements. Nursing Direct will consider, implement and evaluate improvements.

5.17 Complaints, Suggestions and Compliments

Staff including Agency Workers should refer to the Complaints, Suggestions and Compliments Policy at Nursing Direct.

5.18 Other Records

Nursing Direct will ensure that all records relating to staff including Agency Workers at Nursing Direct:

- Are created, amended, stored and destroyed in accordance with current legislation and guidance
 - Include information relevant to the employment of staff, including Agency Workers, in their role including information relating to the requirements under Regulations 4 to 7 and Regulation 19 of this part (part 3) of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014. This applies to all staff including Agency Workers. Nursing Direct must observe data protection legislation about the retention of confidential personal information
 - Protect the confidentiality of Service Users and follow the Data Protection Act 2018
- 5.19 **Continuous Improvement Plan**
- Nursing Direct will have a continuous improvement plan for quality improvement.
 - This plan will be based on industry best practice standards as well as feedback from staff including Agency Workers, Service Users and external stakeholders.
 - The improvement plan is a 'live' document which is regularly reviewed, amended and added to.
 - This plan reflects Nursing Direct's commitment to continuous improvement of quality at Nursing Direct.
- 5.20 **Nursing Direct Healthcare Limited**
- Nursing Direct will maintain overall responsibility for its quality assurance systems and processes, ensuring they are subject to regular scrutiny.
- 5.21 **Communication Systems**
- Nursing Direct will ensure there are effective communication systems in place to ensure that Service Users, staff including Agency Workers and other relevant individuals with an interest in Nursing Direct, are aware of the quality results and actions required at Nursing Direct.
- 5.22 **Corporate Social Responsibility**
- Nursing Direct is a socially responsible business and recognises the active role it can play in helping to build happier and healthier communities. Nursing Direct will do this by:
- Ensuring ethical purchasing with due diligence carried out for supply chains
 - Adhering to equality, diversity and human rights, as well as anti-oppressive laws such as modern slavery and human trafficking laws as part of the purchasing strategy
 - Complying with local waste reduction and recycling requirements
 - Striving to be a responsible neighbour in the community by ensuring the safety and security of the premises of Nursing Direct
 - Finding and investing in technological solutions where possible, such as low energy lighting systems, that can help to use energy resources more efficiently

6. DEFINITIONS

6.1 Staff including Agency Workers

6.1.1 Staff

Denotes the employees of Nursing Direct Healthcare Limited.

6.1.2 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.

6.2 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.

6.3 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.

6.4 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.

6.5 Person-Centred Care

An approach where the person using care and support is at the centre of the way care is planned and delivered. It is based around their individual needs, preferences, and priorities. It treats people as an equal partner, and puts into practice the principle of 'no decision about me without me' - (GOV.UK: Adult Social Care, Quality Matters)

6.6 Quality

Quality refers to the level of excellence and effectiveness in delivering care and support services to individuals in their homes, in line with best industry standards and the requirements set by the Care Quality Commission (CQC). It is shaped and guided by Service Users, their families, relatives, advocates, representatives, and associated professionals.

6.7 Policy

A policy is a deliberate system of principles to guide decisions and achieve rational outcomes. A policy is a statement of intent, and is implemented as a procedure or protocol


6.8 Quality Framework

A quality framework defines all aspects of practice in alignment with regulations, legislation, evidence-based standards, and best practices. It provides a practical structure for the organisation, setting out clear expectations across quality domains. The framework serves as a single system for evaluating, managing, and improving service quality, ensuring it is fit for purpose and responsive to the needs and expectations of Service Users, with a strong focus on their safety and wellbeing.

OUTSTANDING PRACTICE

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

- Nursing Direct subscribes to quality marks and initiatives to raise quality standards and takes part in national audits relevant to its service. It embeds any recommendations from the outcome of these
- Staff including Agency Workers have access to a range of best practice resources and have a competent understanding of quality and quality assurance
- Nursing Direct seeks feedback from stakeholders at every opportunity to mold the service around the needs of the Service User
- Nursing Direct has a culture of learning, reflecting, and reviewing of processes to ensure they remain fit for their purpose and are the most effective and efficient that they can be
- Nursing Direct reviews practice to ensure that policies, procedures, and audits are embedded and part of daily working practice
- Systems are in place to measure quality assurance and actions are completed in a timely manner which demonstrates embedment and sustainability
- Nursing Direct utilises mock inspection toolkits to identify where quality and compliance can be improved. Corrective action is taken as necessary and is documented
- Nursing Direct has a culture of learning, reflecting and reviewing of processes to ensure they remain fit for their purpose and are the most effective and efficient that they can be

COMPLETED DATE:	01/07/2025
SIGN OFF DATE:	01/07/2025
REVIEW DATE:	01/07/2026
SIGNED:	 Marc Stiff – Group Managing Director