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GOOD GOVERNANCE

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GOOD GOVERNANCE POLICY

POLICY AIMS

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
- 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 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 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 our 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 out lined 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 we work innovatively and are effective

5.2 Training

Nursing Direct's approach to training is set out in its training policy. In accordance with this, Staff including Agency Workers are trained to provide quality care in line with the care standards and Nursing Direct's care service's policies and procedures. This policy has been based upon regulatory requirements and the industry standards.

It has been identified that all Staff including Agency Workers are required to update their skills annually through mandatory and statutory training portfolios. This process is monitored via Nursing Direct's compliance monitoring system, ensuring continuous improvement in skills and knowledge retention. This initiative-taking approach supports the consistent delivery of high-quality care services. It is also recognised that all Staff including Agency Workers bear the professional responsibility to maintain the currency of their knowledge and skills. Therefore, they are required to actively participate in regular Continuing Professional Development (CPD) activities. Staff including Agency Workers, in particular, are responsible for their own CPD, ensuring their ongoing competence and contribution to the provision of high-quality care services. The process of identifying training and development needs initiates during induction and persists through ongoing measures. This includes the identification and implementation of further training opportunities through regular supervisory sessions.

5.3 Audits

An audit is the review of quality through performance, feedback, and refinement of practice via;

- Identification of areas for improvement and action planning for further improvement i.e. through incidents, feedback, supervisions, appraisals
- Evaluation of various areas within care practice by the Quality Team i.e. Safer Recruitment Assessments for recruiting Staff including Agency Workers with the correct skillset, performance spot checks, system monitoring etc.

Highlighting specific case studies, lessons learned, and issues which come up in daily practice, using these to improve on specific, identified practice areas. Monthly or periodic management meetings serve as a platform for sharing audit findings and exchanging opinions on the implementation of improvement initiatives. These sessions facilitate discussions on how audit results can inform and enhance our practices.

5.4 Effectiveness

Effectiveness entails delivering evidence-based care to service users while optimising available resources. All Staff including Agency Workers are required to operate within established policies, guidelines, and protocols, designed with specific conditions and reasons in mind.

Nursing Direct's procedures and processes are designed to ensure that Staff including Agency Workers works in the best interest of service users, prioritising person-centred and customer-centric approaches. Monitoring occurs through observations, spot checks, and various internal management systems overseen by Nursing Direct's care support and care co-ordination teams.

Additionally, Staff including Agency Workers will receive instructions, guidance, advice, and support from the care coordinator and clinical leads as necessary to meet the needs of service users and uphold best practices.

5.5 Openness

Maintaining transparent processes that uphold individual service user confidentiality is integral to Nursing Direct's commitment to quality. Recognising this, Nursing Direct employs various mechanisms to engage service users, commissioners, and other stakeholders in identifying areas for improvement. These mechanisms include policies such as the Duty of Candour and Complaints and Compliments, which are integrated into daily practice.

Complaints are promptly communicated by appropriate authorities, fostering cooperation with service users, families, professionals, clients, local authorities, and regulators in a spirit of openness. These policies facilitate regular review of learning points and trends to enhance governance.

Furthermore, Nursing Direct cultivates a culture of openness, honesty, and transparency, fulfilling its Duty of Candour responsibilities. Our Staff including Agency Workers are equipped with the knowledge and confidence to identify, challenge, and report risks and concerns.

5.6 Information Governance and Legal Compliance

Nursing Direct's provision of high-quality care hinges on the effective management of data and information, facilitated by robust policies on confidentiality, information governance, and data management. This begins with the creation of accurate service user records, a responsibility shared by all Staff including Agency Workers. It is imperative that records are meticulously documented in adherence to Nursing Direct's confidentiality, data management/protection, and information governance policies.

Nursing Direct acknowledges its responsibility to adhere to the UK General Data Protection Regulation (GDPR) and demonstrates compliance through the implementation of appropriate technical and organisational measures outlined in our data protection policies.

Our governance framework aligns with the standards set by the Information Commissioner's Office (ICO), including registration. Additionally, our policies and procedures establish a structured approach to complying with both GDPR and the Data Security Protection Toolkit (DSP Toolkit), serving as the foundation for effective information management.

We ensure that all policies, practice procedures, and operational aspects are in compliance with relevant laws, such as the Human Rights Act, Data Protection Act, and other civil and criminal statutes, including the Crime and Disorder Act and the Protection of Children's Act. These policies facilitate controlled and appropriate sharing of patient information while adhering to legislation like the Health and Social Care Act and GDPR, with strict enforcement of confidentiality laws in the event of data breaches to protect individual service users.

Furthermore, compliance measures, including Right to Work checks, Criminal Records and Disclosure and Barring Service checks, and Safer Recruitment Assessments (SRA), are undertaken before recruiting any Staff including Agency Worker, primarily to ensure the safety of service users. Nursing Direct is committed to protecting service users, Staff including Agency Workers, partners, and the company from illegal or damaging actions that may affect our reputation or goodwill.

Our approach emphasises measures based on best practices and legislation to assure quality and effectiveness in Nursing Direct's services, facilitating ongoing learning and improvement.

5.7 Accountabilities - Nursing Direct will:

- 5.7.1 Have responsibility for scrutinising governance systems and processes at Nursing Direct through quality assurance and audit
- 5.7.2 Ensure continuous improvement
- 5.7.3 Have an organisational structure in place that defines leadership and accountability
- 5.7.4 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, such as the Registered Manager, Care Coordinators, and Clinical Leads. Delegated responsibilities are held accountable by the Registered Manager, who in turn reports to the Registered Provider (Nominated Individual or Service Lead). 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 line manager, ensuring a well-defined reporting process.

The implementation of governance principles is the responsibility of designated individuals, who provide leadership and advice, promote high-quality care, maintain awareness among team members, handle complaints and significant events, and initiate and review local audits as needed.

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
- Establishing effective governance systems for continuous improvement
- Reporting statutory notifications and escalating concerns 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
- 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.
- Report via the Capacity Tracker, as per the Health and Care Act 2022

Responsibilities of Staff including Agency Workers include:

- Adhering to job descriptions and codes of conduct
- Delivering care as planned
- Promptly raising concerns and suggestions
- Identifying personal learning needs
- Following policies and procedures
- Acting as role models in line with codes of conduct.

Responsibilities of Staff including Agency Workers include:

- Work within their job description, terms, and conditions, and within care guidance
- Provide all support services in accordance with the JD in the contract
- Raise concerns and suggestions in a timely manner
- Identify personal learning needs.
- Follow Nursing Direct’s policy and procedure.
- Work within Nursing Direct’s code of conduct, Staff including Agency Worker handbook, and acting professionally, and with honesty at all times

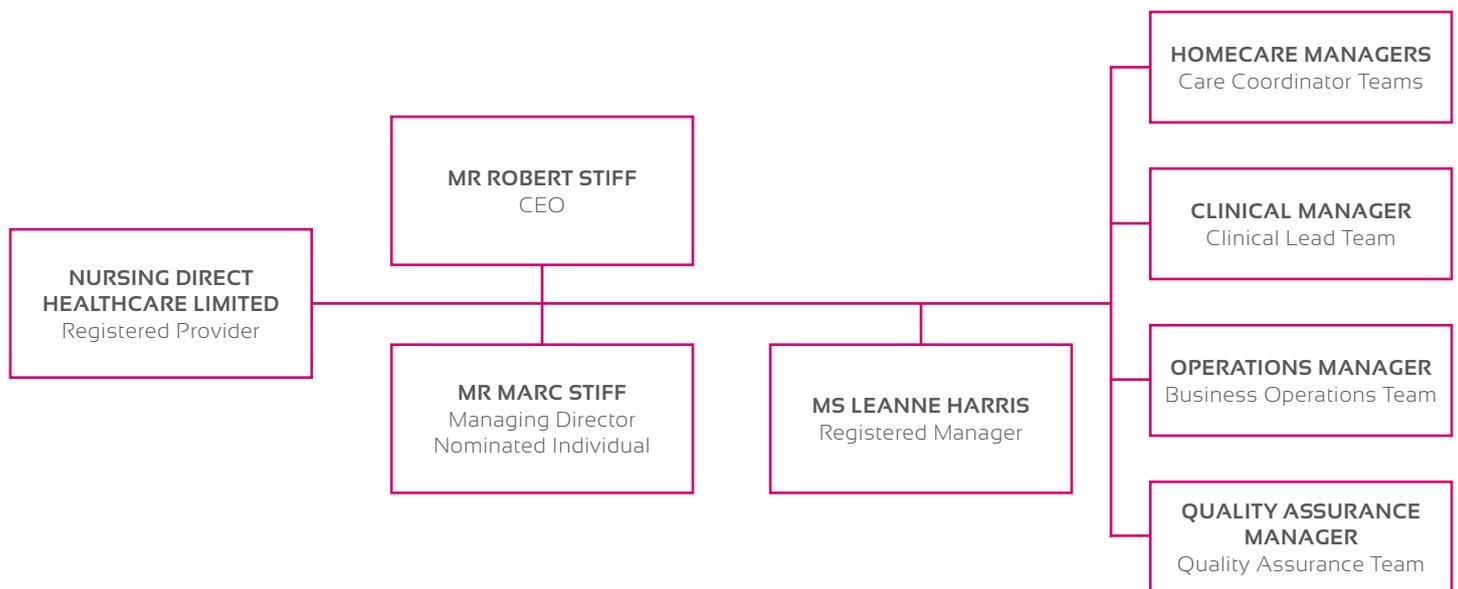
5.9 Regulatory Inspections

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.

6. PROCEDURE

6.1 Organisational Chart

Nursing Direct has the following Organisational Chart in place.



6.2 Accountability

- 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 linked to 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 documented
- Staff including Agency Workers will ensure that they work within their own professional codes of conduct at all times and Nursing 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 Direct and Local Authorities, CCG’s and other service users 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 Worker, some of the core management and governance duties such as supervision, appraisals, rota planning and audits. However, the Registered Manager will maintain accountability for ensuring that those delegated duties are completed to the standard expected.

6.3 Communication

Nursing Direct’s senior leadership 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

- Nursing Direct will support all Service Users' meaningful involvement and will ensure they are not discriminated against because of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation
- Nursing Direct will listen to Service Users and will make the changes needed after analysing the information
- 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
- 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

6.5 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 to senior leadership, the results of quality assurance for overall scrutiny and decision making, undertaking audits in all required areas of the business.

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.

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

6.6 Risk Management

Risks to service users, Staff including Agency Workers, and the organisation are effectively managed through a comprehensive array of policies, risk assessment measures, and strategies. This includes:

- Individualised risk assessments and care planning for service users
- Business risk mitigation measures
- Safety protocols such as safeguarding procedures, infection control policy, confidentiality policy, health and safety policy, and equality and diversity policy.

Furthermore, risks are minimised through robust governance practices, including:

- Ongoing learning and development initiatives
- Rigorous audits and quality assurance processes
- Effective approaches to learning from critical incidents, near misses, and medication errors, guided by evidence-based practices.
- 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

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 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

6.7 Staff including Agency Worker Management

- Staff including Agency Workers will be supervised in line with the Quality and Quality Assurance Policy, 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 in 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.

6.8 Continuing Professional Development

- Staff including Agency Worker 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, Nursing Direct, to provide effective, timely and responsive support.
- Where incidents arise, a root cause analysis will assess whether training needs to be reviewed.

6.9 Remedying 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 or dismissal or deactivation from the Staff including Agency Worker 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 Nursing Direct policies and procedures

6.10 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:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

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

6.11 Evaluation

The senior management team at Nursing Direct will evaluate this policy and procedure annually, utilising stakeholder feedback, quality assurance and monitoring.

Where information becomes known which requires change before this point, Nursing Direct will make changes and distribute the updated policy when the changes are required.

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

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

7.8 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

7.9 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

7.10 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)

8. OUTSTANDING PRACTICE

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

- Nursing Direct uses best practice resources to inform development and evidence that governance drives improvement
- There is an up-to-date organisational chart in place, and this is accessible for Staff including Agency Workers and Service Users
- Staff including Agency Workers undertake delegated duties on the direction of the Registered Manager
- External organisations are involved in governance structures at Nursing Direct
- All Staff including Agency Workers are aware of who their direct line manager is and their roles and responsibilities
- Accountability and responsibility for governance is 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
- Where mistakes or errors are identified through governance processes, they are addressed in a timely manner, and they do not reoccur
- Nursing Direct consistently uses root cause analysis following any incidents, including safeguarding incidents, to understand lessons learnt and prevent issues arising again

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