HUMBERSIDE LMCs

The professional voice of general practice

CQC Guidance on DBS Checks and Significant Event Analysis

Contracts and Regulations

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Disclosure and Barring Service (DBS) checks in general practice

The CQC has issued the following guidance.

Practices need to have safe recruitment procedures and need to be in line with the national policy on criminal record checks. Practices need to have:

- A process in place for undertaking criminal record checks at the appropriate level for staff who are eligible for them.
- Determined which staff are eligible for which checks. This should include assessing the different responsibilities and activities of roles to determine if staff are eligible for a DBS check and to what level.
- When carrying out this assessment, practices must remember that the eligibility for checks and the level of that check depends on the roles and responsibilities of the job – not the individual being recruited. Eligibility is based on the level of contact staff have with patients, particularly children and vulnerable adults.

The basic pragmatic guidance is that clinical staff require a DBS check. GPs will have had criminal records checks done as part of their performers list checks. In some cases, practices may use these checks rather than obtaining an additional DBS check when the GP begins working for the provider. In such cases the provider should be able to provide sufficient evidence of seeking appropriate assurances from NHS England that a check has been undertaken. For non-clinical staff, there is no blanket requirement for all reception or administrative staff to have DBS checks.

Access to medical records alone does not mean that staff are eligible for a DBS check. Therefore, practices should **not** normally be found to be breaching a regulation solely on the basis that '*non-clinical staff have not had DBS checks*'. If staff have not had a DBS check, the practice needs to have done their own assessment to give a clear rationale as to why they have decided not to carry out DBS checks. A good example of where non-clinical staff may be eligible for a DBS check is reception staff who also carry out chaperone duties, for example look after a baby of child while the mother is being examined by a GP or nurse.

Remember, CQC does not decide who is eligible for a DBS check or not. If practices are unsure about who is eligible for a check or not they can contact the Disclosure and Barring Service.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/342088/DBS_guide_to_eligibility_v5.pdf

CQC Guidance on DBS Checks and Significant Event Analysis

Significant Event Analysis (SEA)

The CQC issued the following guidance.

Practices should be able to demonstrate a team based learning environment. Significant event analysis can be used to show quality improvement in the safety domain of the CQC GP inspection.

Agreed principles for SEA requirements for GP practice inspections
The NPSA's definition of a significant event analysis (SEA) is as follows:

"A process in which individual episodes (when there has been a significant occurrence either beneficial or deleterious) are analysed in a systematic and detailed way to ascertain what can be learnt about the overall quality of care, and to indicate any changes that might lead to future improvements."

Significant events can be very wide-ranging and can reflect good as well as poor practice.

- Significant event audit is an important part of revalidation. A GP's revalidation portfolio will be expected to contain two SEAs per year, this equates to 10 SEAs per five year revalidation cycle.
- In line with revalidation there should be a minimum of two SEAs per practice with a focus on quality improvement. If a practice has done no SEAs, it is likely that there is a cause for concern and should be investigated further.
- SEAs should act as a learning process for the whole practice, individual SEAs can be shared between members of staff including GPs. The focus of the SEA is that learning is disseminated within the practice.
- A practice that we would rate as 'Good' ensures that the learning involves the whole team and becomes embedded in everyday practice. 'Good' is linked to the impact and learning resulting from the SEA.

What is a significant event analysis?
Significant events can be very wide-ranging and can reflect **good** as well as **poor** practice. Examples could include new cancer diagnoses, coping with a staffing crisis, complaints or compliments received by the practice, breaches of confidentiality, a sudden unexpected death or hospitalisation, an unsent referral letter or a prescribing error.

SEAs are a qualitative process describing: What happened and why? How could things have been different? What can we learn from what happened? What needs to change?

Aims of SEA:

- To identify events in individual cases that have been critical (beneficial or detrimental to the outcome) and to improve the quality of patient care from the lessons learnt.

- To instigate a culture of openness, not individual blame or self-criticism, and reflective learning.
- To enable team building and support following stressful episodes.
- To enable identification of good practice, as well as suboptimal.
- To be a useful tool for team and individual continuing professional development, identifying group and individual learning needs.
- To share SEA between teams within the NHS where adverse events occur at the 'overlap' or in shared domains of clinical responsibility, e.g. out-of-hours (OOH), discharge problems.

What are the processes involved in a SEA?

On an inspection, an inspector will be looking at the seven steps involved in an SEA:

- All staff should be aware of and be able to prioritise a significant event.
- Information gathering – There should be evidence of information gathering; this will include factual information on the event from personal testimonies, written records and other healthcare documentation. For more complex events, more in-depth analysis will be required.
- Facilitated team-based meeting should have occurred to discuss, investigate and analyse events.
- There should be evidence of the team meeting regularly for the purpose of SEAs Analysis of the Significant Event including - What happened and why? How could things have been different? What can we learn from what happened? Is change required and if so what needs to change?
- Agree, implement and monitor change. There are no fixed end-points; outcomes should be revisited and the implementation and success of any agreed changes monitored at pre-set intervals.
- Written records, all the processes of the SEAs should be written up to form a report. The SEA report is a written record of how effectively the significant event was analysed.
- Report, share, review. The SEA should be shared with all members involved in the significant event.

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