



Care Quality Commission

To do or not to do.

Do you need to register with the CQC

Am I carrying out a Regulated Activity?

Regulation 8

Diagnostic and Screening procedures

Anyone who 'REMOVES' tissue, cells or fluids from the body for diagnostic reasons must register, and so must anyone who uses equipment to analyse those samples?

Excluded from this statement are:

Blood tests carried out by means of a pin prick test not needing to be sent for analysis

12 lead/3 lead electrocardiograph recording (ECG)

Pulse oximetry when used for spot recording

Peak expiratory flow measured by a peak flow meter

Screening or non-diagnostic spirometry

The taking of urine samples (because the sample must be removed) if it is only being dip tested on scene

Most ambulance services are exempt?

Taking into consideration the above, is your service carrying out any of these procedures! Take away those that are excluded and the answer may be you are exempt from CQC registration requirements, and therefore do not need to register for Diagnostic and Screening Procedures.

Regulation 5

Treatment of Disease, Disorder or Injury

This covers any treatment, that is for the "treatment" of a disease, disorder or injury?

It Excludes: First Aid where it is delivered :

By Health Care Professionals (Paramedics, Nurses, Doctors) in unexpected or potentially dangerous situations requiring immediate action

BY Non Health care professionals (Technicians) who are trained to deliver such treatment.

By treatment provided in a Sports Ground or Gymnasium (for people taking part in, or attending, sporting activities or events)

Treatment provided through temporary arrangements for sporting or Cultural events (such as Festivals, or Olympic and Paralympics games)

Delegation: If a Health Care Professional employed by one provider delegates a procedure to a person employed by a second provider, the provider accepting the delegated task will not be required to register, this is because the Health care professional working for one provider will not be responsible for the supervision of staff of another provider. A provider (employing staff) cannot accept vicarious responsibility for non-employees.

Administration of medicines that has been prescribed and dispensed for the person, where the person would ordinarily be able to administer the medicine but due to circumstances or where the person is unable to, and it is in the best interests for it to be administered to them it is exempt. Insulin, oral prescribed controlled drugs, and peg feeds are examples.

A situation of a Paramedic/Nurse (Health Professional) who is required to prescribe or administer medication, having knowledge or training or administrating IV drugs or drips WILL CONSTITUTE AN ACTIVITY.

However you may wish to look at delegation to a non-health care professional (see above) Continued next page

Regulation 5

Treatment of Disease, Disorder or Injury

First Aid is: The initial response to a sudden illness, condition or injury or exacerbation of an existing illness.

Restricted to the aim of either alleviating it immediately through simple procedures and/or preventing it worsening until professional medical help is available.

It may include simple non-invasive physiological monitoring techniques carried out as part of the overall first aid care and be provided by lay people or health care professionals. In the case of Health Care Professionals, they will not rely upon broader knowledge and skills developed through professional training, but will use only skills and knowledge that are reasonably expected of a person having received recognised training in first aid. They must not be prescribing, following a patient group directive, or using specialist drug administration techniques, or use specialist skills that reflect their professional training rather than first aid training?

First aid may include simple procedures for assessment that do not require a recognised professional diagnostic qualification (e.g. as a radiographer or sonographer) that are limited in their purpose to assessing the need for onward referral for treatment, including 3/12 lead ECG, automated non invasive BP Measurement, Pulse oximetry, use of a thermometer, Sphygmomanometer or Ophthalmoscope.

If you engage a Paramedic/Nurse as a Self Employed person THEY must Register, If they delegate to you then you will not be required to register, if it does not include drug protocols by a Health Care Professional Paramedic/Nurse, then no need to Register for these activities.

Regulation 10

Transport Services, Triage & Medical Advice Provided Remotely

TRANSPORT SERVICES

Services are captured by this regulated activity where they involve a vehicle that was designed for the primary purpose of transporting people who **require treatment.** This includes routine, planned patient transport **related to treatment.**

There is a proportionate and reasonable approach suggested in an Emergency, unplanned treatment in this context includes some aspects of other regulated activities on an exceptional basis. If a provider carries out a procedure unexpectedly such as Emergency tracheotomy, insertion of a chest drain or incubation, they would be considered as treatment not as a surgical procedures. Providers registering for this activity will not have to register for the regulated activity 8 Diagnostic and screening procedures, if they only carry out diagnostic procedures along with transport, 3/12 lead ECG, use of AED, Pulse Oximetry, use of a Sphygmomanometer.

If you are providing this service for an Insurance Company, Government Department, Repatriation Service, or you are predominately conveying patients home after treatment, it is outside of the scope of registration.

The important aspect is TREATMENT and conveying for TREATMENT, if you are not conveying for treatment, and are undertaking only First Aid treatment, You may well find that you do not need to register. If you only undertake unexpected and not planned treatment, then you may not need to register.

If you are carrying out a Regulated Activity

Then you will have to comply with the COC Requirements.

What will you have to undertake to provide outcomes?

Outcome 1 (Regulation 17)

Respecting and Involving people who use the service

- People understand the choices they have that are related to their care, treatment and support, so that they may make decisions
- People feel comfortable when expressing decisions about their care treatment and support
- The patients modesty is protected while receiving intimate personal care
- The service provider has a user friendly method of allowing users of the service to make suggestions, or raise concerns, or complaints.

NAPAS Professional has a template for services to use in order to obtain and record both consumer satisfaction and to record concerns or complaints.

NAPAS Professional also provides an Independent Complaints and investigation procedure, together with an in vehicle notice

If you are carrying out a Regulated Activity

Then you will have to comply with the COC Requirements.

Outcome 2 (Regulation 18) Consent to care and treatment.

- The service has appropriate Patient Report Forms that include a section for refused treatment
- The service must have a policy whereby the patient can be fully informed of the treatment and the right to refuse, or change their minds even during the treatment, even after they have given consent.

Outcome 4 (Regulation 9) Care & Welfare of people using service.

- Whenever possible the patient should have all their needs cared for including the considered less important ones.
- Care or treatment should not conflict with religious beliefs, and staff should be suitably trained to this effect
- Patients should receive appropriate care and treatment based on best practice and updated methods
- Children who use the services, are fully informed of their care and treatment and support, able to take part in decisions to the fullest extent, asked if they agree for parents to be involved in the decisions, and able to benefit from an environment that is appropriate to their age and needs.
- Analysis of diagnostic results and assessments are undertaken by qualified staff following relevant guidelines, they will be explained and discussed with the patient in a way that they will understand and which allows them to choose about the care. treatment or support given

If you are carrying out a Regulated Activity

Then you will have to comply with the CQC Requirements.

What will you have to undertake to provide outcomes

Outcome 5 (Regulation 14)

Meeting Nutritional Needs

- All vehicles should carry bottled water to meet with any patients dehydrated condition.
- When undertaking any journey involving more than 3 hours, the NAPAS Professional policy is to include a 40 minute stop every three hours, scheduled to be at an appropriate service area or hospital with the facilities for (a) toileting the patient, and the crew, (b) obtaining both refreshment and food for the patient and crew as may be required or requested.
- The European driving directive indicates a 20 minute break every 3 hours for drivers, the above policy allows for each crew to partake, as well as for a member of the crew to alternate in seeing to the patients individual needs and requirements.

Outcome 6 (Regulation 24)

Cooperating with other providers.

- A verbal and written (if required) handover of patients should be made or obtained to/from all other Health Professionals or carers, so that all the aspects of a patients condition during transportation have been assessed and appropriate support is given at each stage.

If you are carrying out a Regulated Activity

Then you will have to comply with the CQC Requirements.

What will you have to undertake to provide outcomes?

Outcome 7 (Regulation 11) Safeguarding people who use services from abuse

- NAPAS Professional is an umbrella body for CRB Checks, they also issue the written decision of staff being employed, this is available for NHS and CQC inspection, and complies with the data protection Act, and all other aspects of confidentiality
- The NAPAS Written Policy for recruitment of Ex-Offenders, and Destruction procedures are available paperwork for registration. All staff including supervisory subject to enhanced CRB Checks
- NAPAS Professional Advice on Local Protection and Safeguarding Vulnerable Adults and Children and Compliance with "NO Secrets" National Guidance through County Council Social

Outcome 8 (Regulation 12) Cleanliness and Infection Control

- Staff are uniformed, and cleanliness controls are in place, including appropriate staff training
- NAPAS Professional have a 10 point cleaning plane, and have arrangements for deep cleaning through agencies
- NAPAS Professional can supply hard copies of the D of H Code of practice on prevention and control of infections related guidance. With additional copies of policies.

If you are carrying out a Regulated Activity

Then you will have to comply with the COC Requirements.

Outcome 9 (Regulation 13) Management of Medicines

- NAPAS Group Protocols and Doctors directions (Red Book) ensures that Paramedic & Technician drugs are available (where applicable) in accordance with The Medicines Act. Ensure that medicines for medical emergencies are accessible in tamper evident packaging for quick administration
- Appropriate updates are undertaken through JCAL and other International registry bodies as are accessed for advance warnings on unsuitability or changes of use
- Ensure that patient safety alerts, rapid response reports and patient safety recommendations disseminated by the National Patient Safety Agency and which require action are acted upon within agreed timescales.

Outcome 10 (Regulation 15) Safety and suitability of premises

- Copies of MOTs , Servicing records for Ambulances, together with varied methods of access to the vehicle.
- Building that the public have access to are appropriately safe for all to enter, work, or reside.
- Vehicles must be insured for the Transport of Persons for reward, Both Buildings and Vehicles and all parts of premises must be insured for Employer Liability
- Vehicles are operated in line with legalisation and maintained in accordance with manufactures recommendations through appropriate garage facilities, and records are kept of servicing and repairs

If you are carrying out a Regulated Activity

Then you will have to comply with the COC Requirements.

What will you have to undertake to provide outcomes?

Outcome 11 (Regulation 16) Safety, availability and suitability of equipment.

- NAPAS Professional Code of Practice provides an essential ambulance equipment list
- Through the likes of j-pen equipment calibrations and testing can be undertaken to protect patients
- The NAPAS Professional Code of Practice written Health & Safety Policy contributes to patients and staff safety
- NAPAS Professional has daily/weekly vehicle and equipment templates for Ambulance Operators
- NAPAS Professional has template sheets for patient lifting and handling training and use of such equipment
- Emergency medical equipment is available for use as quickly as possible and is tamper proof

Outcome 12 (Regulation 21) Requirements relating to workers

- NAPAS Professionals Code of Practice includes a whistle blower policy, in that all staff may raise concerns of bad employer practice with NAPAS Direct
- NAPAS Professionals Code of Practice encourages staff to develop by both training and experience, developed through working with suitably qualified staff

If you are carrying out a Regulated Activity

Then you will have to comply with the COC Requirements.

What will you have to undertake to provide outcomes?

Outcome 13 (Regulation 22) Staffing

- NAPAS Code of Practice requires All trainee staff have to work with suitably qualified ambulance staff, whilst classed as intermediate Technicians until they receive post proficiency qualification.
- NAPAS Professional Code of Practice compliance ensures that clients should always have suitably qualified staff, based on the information provided by the patient or others
- NAPAS Professional have training templates for training undertaken, and are engaging with an International training organisation to develop a core acceptable international qualification Training together with on-line access for continuing professional development

Outcome 14 (Regulation 23) Supporting Workers

- Where ever possible NAPAS Professionals Policy is for all structured training for qualifications, (other than induction training) it is recommended it be undertaken either out of house, so that suitable assessments of the staff attributes are conducted in an un-biased nature, or that the training is independently assessed so that the eventual qualifications can be verifiable.
- Registered Healthcare Professional are able to demonstrate that they are able to continue to meet registration requirements

If you are carrying out a Regulated Activity

Then you will have to comply with the COC Requirements.

What will you have to undertake to provide outcomes?

Outcome 16 (Regulation 10)

Assessing and Monitoring the quality of service provision

- NAPAS Professionals have a written policy concerning Concerns, Complaints and also Consumer satisfaction. NAPAS Policy is that members use these to identify and address issues of individual or collective concern, and as a means to rectify complaints in order to improve services that are provided by all

Outcome 17 (Regulation 19)

Complaints

- See outcome 16 above, if any complaint cannot be rectified or is not rectified at members level, or if the client/patient wishes to they may refer matters directly to NAPAS Professional, whereby an independent investigation may be undertaken through this Regulatory body.
- Matters involving a claim for damages have to be referred to the appropriate insurance provider, as only they may deal with these matters, however the member service, and NAPAS Professional will assist as a matter of duty to ensure that all the relevant facts are provided in a timely manner

If you are carrying out a Regulated Activity

Then you will have to comply with the CQC Requirements.

What will you have to undertake to provide outcomes?

Outcome 21 (Regulation 20)

Records

- In accordance with National Policy NAPAS Professional Services comply with the Data Protection Act 1998, The Department of Health's Records Management, The NHS Code of practice and NAPAS Professionals Code of Practice, in that any healthcare records are kept or disposed off in accordance with these policies,
- That they are kept confidential at all times, that they may only be seen by another person whom is engaged in the treatment of the patient, that they will never be disclosed to any other persons, without the persons express permission, or only to those that have legal authority

Outcome 25 (Regulation 7)

Registered person Training

- It is NAPAS Professional Code of Practice policy that owners of services should have the relevant training and practice in Ambulance Aid, or that they have appropriate support of staff whom have such training, and that they also have an appointed Medical Director to whom they may seek advice on any matters that they may need advice. These services are also available via NAPAS Professional for Registered member services. (CV should be Available)

If you are carrying out a Regulated Activity

Then you will have to comply with the CQC Requirements.

What will you have to undertake to provide outcomes?

These relate to Registration

Outcome 3 (Regulation 19)

Fees: These are a matter for the member and CQC

Outcome 15 (Regulation 12)

Statement of Purpose: these are a matter for the member and CQC

Outcome 18 (Regulation 16)

Notification of death of a person who uses the service

Outcome 19 (Regulation 19)

Notification of death or unauthorised absence of a person who is detained or liable to be detained under the Mental Health Act 1983

Outcome 20 (Regulation 18)

Notification of other incidents

- Allegations of abuse to either children or Vulnerable Adults must be reported to local multi-protection units available via County/Borough Councils Social Services. Staff dismissed for such are reportable via NAPAS to the CRB

Outcome 22 (Regulation 4)

Requirements where the service provider is an individual or partnership

If you are carrying out a Regulated Activity

Then you will have to comply with the CQC Requirements.

What will you have to undertake to provide outcomes?

These relate to Registration

Outcome 23 (Regulation 5)

Requirement where the service provider is a body other than a partnership

Outcome 24 (Regulation 6)

Requirements relating to registered managers (CV should be Available)

Outcome 26 (Regulation 13)

Financial Position

- NAPAS Professional policy is to ensure that Managers, Directors, Partners and Sole Traders are of good character, they shall declare if they have ever been in such capacity, entered into Bankruptcy, Winding up Proceedings, Administration, or Voluntary Arrangements of any Company or service, or been cautioned, convicted or warned concerning any professional misconduct, or that he/she has not fulfilled obligations to pay social security contributions, or payment of taxes within any Countries jurisdiction.

Outcome 27 (Regulation 14)

Notification—Notice of Absence

Outcome 28 (Regulation 14)

Notifications—Notice of Changes

If you are carrying out a Regulated Activity

Then you will have to comply with the COC Requirements.

What will you have to undertake to provide outcomes?

There are a number of items that relate directly to Ambulance Operators. **Clinical Care Protocols**

- Standard (Universal) Infection control precautions (NHS Policy Available)
- Aseptic technique (policy available from NAPAS)
- Safe handling and disposal of sharps (Policy Available)
- Prevention of occupational exposure to blood borne viruses (BBVs) including prevention of sharps injury (Policy Available)
- Management of occupational exposure to BBVs and post exposure prophylaxis (Policy Available)
- Disinfection Policy (Policy Available)
- Reporting all to the Health Protection Agency outbreaks of MRSA and C-Diff that have occurred in Ambulances.