

# Announced Care Inspection Report 25 September 2017



## Cliffgar Dental Practice

**Type of Service: Independent Hospital (IH) – Dental Treatment, PT  
(L) Prescribed Techniques or Technologies Laser services**

**Address: 4 Newry Road, Banbridge TBT32 3HF**

**Tel No: 028 4066 2034**

**Inspector: Winifred Maguire**

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Assurance, Challenge and Improvement in Health and Social Care

It should be noted that this inspection report should not be regarded as a comprehensive review of all strengths and areas for improvement that exist in the service. The findings reported on are those which came to the attention of RQIA during the course of this inspection. The findings contained within this report do not exempt the service from their responsibility for maintaining compliance with legislation, standards and best practice.

## 1.0 What we look for



## 2.0 Profile of service

This is a registered dental practice with six registered places providing NHS and private dental treatment. The dental practice also registered to provide dental laser services however the laser is not presently in use.

### Laser equipment

Manufacturer: Biolase

Model: Epic 10

Serial Number: 640045274Z08

Laser Class: 4

Wavelength: 940nm +/- 10nm

### Laser protection advisor (LPA)

Ms Estelle Walker

### Laser protection supervisor (LPS)

Dr David Little

### Authorised users

Dr David Little  
Mr Andrew Little

### Type of treatments provided:

- Periodontal treatment designed to eradicate bacteria in the periodontal pocket and removal of diseased tissue
- Excisional and incisional procedures
- Canker sores, herpetic and aphthous ulcers of the oral mucosa
- Low level laser therapy and teeth whitening

## 3.0 Service details

<b>Registered Provider:</b> Dr David Little	<b>Registered Manager:</b> Dr David Little
<b>Person in charge at the time of inspection:</b> Dr David Little	<b>Date manager registered:</b> 21 September 2011
<b>Categories of care:</b> Independent Hospital (IH) – Dental Treatment	<b>Number of registered places:</b> 6

## 4.0 Inspection summary

An announced inspection took place on 25 September 2017 from 09.50 to 13.10.

This inspection was underpinned by The Health and Personal Social Services (Quality, Improvement and Regulation) (Northern Ireland) Order 2003; The Independent Health Care Regulations (Northern Ireland) 2005; The Regulation and Improvement Authority (Independent Health Care) (Fees and Frequency of Inspections) (Amendment) Regulations (Northern Ireland) 2011; and the Department of Health, Social Services and Public Safety (DHSSPS) Minimum Standards for Dental Care and Treatment (2011).

The inspection assessed progress with any areas for improvement identified during and since the last care inspection and to determine if the practice was delivering safe, effective and compassionate care and if the service was well led.

Examples of good practice were evidenced in all four domains. These related to patient safety in respect of staff training and development; recruitment; safeguarding; the management of medical emergencies; infection prevention and control; radiology and the environment. Other examples included health promotion, engagement to enhance the patients' experience and governance arrangements.

There were no areas requiring improvement identified

Patients who submitted questionnaire responses indicated a high level of satisfaction with the services provided in Cliffgar Dental Practice.

The findings of this report will provide the practice with the necessary information to assist them to fulfil their responsibilities, enhance practice and patients' experience.

While we assess the quality of services provided against regulations and associated DHSSPS care standards, we do not assess the quality of dentistry provided by individual dentists.

#### 4.1 Inspection outcome

	Regulations	Standards
<b>Total number of areas for improvement</b>	0	0

This inspection resulted in no areas for improvement being identified. Findings of the inspection were discussed with Mrs Lorraine Little, practice manager, as part of the inspection process and can be found in the main body of the report.

Enforcement action did not result from the findings of this inspection.

#### 4.2 Action/enforcement taken following the most recent care inspection dated 2 March 2017

Other than those actions detailed in the QIP no further actions were required to be taken following the most recent inspection on 2 March 2017.

#### 5.0 How we inspect

Prior to the inspection a range of information relevant to the practice was reviewed. This included the following records:

- notifiable events since the previous care inspection
- the registration status of the establishment
- written and verbal communication received since the previous care inspection
- the returned QIP from the previous care inspection

- the previous care inspection report
- submitted staffing information
- submitted complaints declaration

Questionnaires were provided to patients and staff prior to the inspection by the practice on behalf of RQIA. Returned completed patient and staff questionnaires were also analysed prior to the inspection.

A poster informing patients that an inspection was being conducted was displayed.

During the inspection the inspector met with Dr David Little, registered person, Mrs Lorraine Little, practice manager, and one dental nurse. A tour of the some of the premises was also undertaken.

A sample of records was examined during the inspection in relation to the following areas:

- staffing
- recruitment and selection
- safeguarding
- management of medical emergencies
- infection prevention and control and decontamination
- radiography
- clinical record recording arrangements
- health promotion
- management and governance arrangements
- maintenance arrangements

Areas for improvement identified at the last care inspection were reviewed and assessment of compliance recorded as met, partially met, or not met.

The findings of the inspection were provided to the person in charge at the conclusion of the inspection.

## **6.0 The inspection**

### **6.1 Review of areas for improvement from the most recent inspection dated 2 March 2017**

The most recent inspection of the practice was an announced variation to registration care inspection. The completed QIP was returned and approved by the care inspector.

## 6.2 Review of areas for improvement from the last care inspection dated 2 March 2017

Areas for improvement from the last care inspection		
Action required to ensure compliance with The Independent Health Care Regulations (Northern Ireland) 2005		Validation of compliance
<b>Area for improvement 1</b>  <b>Ref:</b> Regulation 39 Schedule 3(3)  <b>Stated:</b> First time	The registered provider must establish a laser register in line with legislation.	<b>Met</b>
	<b>Action taken as confirmed during the inspection:</b> A laser register has been established and confirmed as part of the variation to registration approval.	
<b>Area for improvement 2</b>  <b>Ref:</b> Regulation 15 (2) b  <b>Stated:</b> First time	The registered provider must establish servicing arrangements for the laser in accordance with manufacturer's instructions.	<b>Met</b>
	<b>Action taken as confirmed during the inspection:</b> Dr Little confirmed the laser is not in use and he is making arrangements to have it serviced by the manufacturer before re-introducing the laser service.	
Action required to ensure compliance with The Minimum Standards for Dental Care and Treatment (2011)		Validation of compliance
<b>Area for improvement 1</b>  <b>Ref:</b> Standard 48.13  <b>Stated:</b> First time	Make a formal record of laser safety awareness training provided to staff not directly involved in the use of the laser.	<b>Met</b>
	<b>Action taken as confirmed during the inspection:</b> A formal record of laser safety awareness training, provided to staff not directly involved in the use of the laser, has been established and was confirmed as part of the variation to registration approval.	
<b>Area for improvement 2</b>  <b>Ref:</b> Standard 21.4  <b>Stated:</b> First time	Devise and implement cleaning schedules which outline suitable arrangements for the decontamination of laser equipment between patients including the protective eyewear.	<b>Met</b>

	<p><b>Action taken as confirmed during the inspection:</b> Cleaning schedules were in place and were confirmed as part of the variation to registration approval.</p>	
<p><b>Area for improvement 3</b></p> <p>Ref: Standard 48.6</p> <p>Stated: First time</p>	<p>Re-appoint a laser protection advisor (LPA).</p> <p><b>Action taken as confirmed during the inspection:</b> Evidence of the re-appointment of a LPA was in place.</p>	<p><b>Met</b></p>
<p><b>Area for improvement 4</b></p> <p>Ref: Standard 48</p> <p>Stated: First time</p>	<p>Arrange the LPA to re-visit the premises, update the laser documentation, review the issues highlighted in the LPA report and risk assessment. The updated laser documentation should be submitted to RQIA together with confirmation all issues within the LPA report and risk assessment have been addressed.</p> <p><b>Action taken as confirmed during the inspection:</b> The LPA carried out a site visit in March 2017 and updated the laser documentation. This was confirmed as part of the variation to registration approval. As stated previously it was confirmed the laser was no longer in use.</p>	<p><b>Met</b></p>
<p><b>Area for improvement 5</b></p> <p>Ref: Standard 48.17</p> <p>Stated: First time</p>	<p>Label the laser protective eyewear for patient and staff use.</p> <p><b>Action taken as confirmed during the inspection:</b> It was confirmed laser protective eyewear for patient and staff has been labelled as part of the variation to registration process in April 2017.</p>	<p><b>Met</b></p>

## 6.3 Inspection findings

### 6.4 Is care safe?

**Avoiding and preventing harm to patients and clients from the care, treatment and support that is intended to help them.**

#### Staffing

Six dental surgeries are in operation in this practice. Discussion with staff and a review of completed patient and staff questionnaires demonstrated that there was sufficient numbers of staff in various roles to fulfil the needs of the practice and patients.

Induction programme templates were in place relevant to specific roles and responsibilities. A sample of three evidenced that induction programmes had been completed when new staff joined the practice.

Procedures were in place for appraising staff performance and staff confirmed that appraisals had taken place. Staff confirmed that they felt supported and involved in discussions about their personal development. A review of a sample of three evidenced that appraisals had been completed an annual basis. There was a system in place to ensure that all staff receive appropriate training to fulfil the duties of their role.

A review of records confirmed that a robust system was in place to review the General Dental Council (GDC) registration status and professional indemnity of all clinical staff.

#### Recruitment and selection

A review of the submitted staffing information and discussion with Mrs Little confirmed that three staff had been recruited since the previous inspection. A review of the personnel files for these staff demonstrated that most of the relevant information as outlined in Schedule 2 of The Independent Health Care Regulations (Northern Ireland) 2005 has been sought and retained, with the exception of the criminal conviction declaration. Advice was provided on this matter and following inspection Mrs Little confirmed that the new staff had completed a criminal conviction declaration and it had been incorporated into the recruitment process.

There was a recruitment policy and procedure available. The policy was comprehensive and reflected best practice guidance.

#### Safeguarding

Staff were aware of the types and indicators of abuse and the actions to be taken in the event of a safeguarding issue being identified, including who the nominated safeguarding lead was.

Review of records demonstrated that all staff had received training in safeguarding children and adults as outlined in the Minimum Standards for Dental Care and Treatment 2011. It was confirmed that the safeguarding lead has completed formal training in safeguarding adults in keeping with the Northern Ireland Adult Safeguarding Partnership (NIASP) training strategy (revised 2016).



Policies and procedures were in place for the safeguarding and protection of adults and children at risk of harm. The policies included the types and indicators of abuse and distinct referral pathways in the event of a safeguarding issue arising with an adult or child. The relevant contact details for onward referral to the local Health and Social Care Trust should a safeguarding issue arise were included. Following the inspection the adult safeguarding policy was amended to fully reflect recent guidance and submitted to RQIA.

It was confirmed that copies of the regional policy entitled 'Co-operating to safeguard children and young people in Northern Ireland' (March 2016) and the regional guidance document entitled 'Adult Safeguarding Prevention and Protection in Partnership' (July 2015) were both available for staff reference.

### **Management of medical emergencies**

A review of medical emergency arrangements evidenced that emergency medicines were provided in keeping with the British National Formulary (BNF), and that emergency equipment as recommended by the Resuscitation Council (UK) guidelines was retained. A robust system was in place to ensure that emergency medicines and equipment do not exceed their expiry date. There was an identified individual with responsibility for checking emergency medicines and equipment.

Review of training records and discussion with staff confirmed that the management of medical emergencies is included in the induction programme and training is updated on an annual basis in keeping with best practice guidance.

Discussion with staff demonstrated that they have a good understanding of the actions to be taken in the event of a medical emergency and the location of medical emergency medicines and equipment.

The policy for the management of medical emergencies reflected best practice guidance. Protocols were available for staff reference outlining the local procedure for dealing with the various medical emergencies.

### **Infection prevention control and decontamination procedures**

Clinical and decontamination areas were tidy and uncluttered and work surfaces were intact and easy to clean. Fixtures, fittings, dental chairs and equipment were free from damage, dust and visible dirt. Staff were observed to be adhering to best practice in terms of the uniform and hand hygiene policies.

Discussion with staff demonstrated that they had an understanding of infection prevention and control policies and procedures and were aware of their roles and responsibilities. Staff confirmed that they have received training in infection prevention and control and decontamination in keeping with best practice. Training records were available for inspection.

There was a nominated lead with responsibility for infection control and decontamination.

A decontamination room separate from patient treatment areas and dedicated to the decontamination process was available. Appropriate equipment, including two washer disinfectors and six steam sterilisers (one of which was out of use) have been provided to meet the practice requirements. A review of documentation evidenced that equipment used in

the decontamination process has been appropriately validated. A review of equipment logbooks evidenced that periodic tests are undertaken and recorded in keeping with Health Technical Memorandum (HTM) 01-05 Decontamination in primary care dental practices.

During discussions with staff in relation to the decontamination process, it was mentioned that occasionally dental instruments such as probes and dental mirrors are manually washed and then placed in the steam steriliser. The matter was brought to the attention of Mrs Little, who confirmed she would immediately ensure this practice ceased and all dental instruments are put through the washer disinfectant as part of a validated decontamination process. Following the inspection it was confirmed all staff had received update training on the decontamination process and staff had been informed all practice decontamination procedures must be strictly adhered to.

It was confirmed that the practice continues to audit compliance with HTM 01-05 using the Infection Prevention Society (IPS) audit tool. The most recent IPS audit was completed during September 2017.

A range of policies and procedures were in place in relation to decontamination and infection prevention and control.

## **Radiography**

The practice has six surgeries, each of which has an intra-oral x-ray machine. In addition there is a cone beam computerised tomogram machine (CBCT), which is located in a separate room.

A dedicated radiation protection file containing the relevant local rules, employer's procedures and other additional information was retained. A review of the file confirmed that staff have been authorised by the radiation protection supervisor (RPS) for their relevant duties and have received local training in relation to these duties. It was evidenced that all measures are taken to optimise dose exposure. This included the use of rectangular collimation and x-ray audits.

A copy of the local rules was on display near each x-ray machine and appropriate staff had signed to confirm that they had read and understood these. Staff spoken with demonstrated sound knowledge of the local rules and associated practice.

The radiation protection advisor (RPA) completes a quality assurance check every three years. Review of the report of the most recent visit by the RPA demonstrated that the recommendations made have been addressed.

The x-ray equipment has been serviced and maintained in accordance with manufacturer's instructions.

Quality assurance systems and processes were in place to ensure that all matters relating to x-rays reflect legislative and best practice guidance.

## **Environment**

The environment was maintained to a good standard of maintenance and décor.

Detailed cleaning schedules were in place for all areas which were signed on completion. A colour coded cleaning system was in place.

Arrangements are in place for maintaining the environment.

A legionella risk assessment has been undertaken and water temperatures are monitored and recorded as recommended.

A fire risk assessment had been undertaken and staff confirmed fire training and fire drills had been completed. Staff demonstrated that they were aware of the action to take in the event of a fire. The fire - fighting equipment had been serviced in June 2017 and the fire alarms and emergency lighting had been inspected in August 2017. A gas safety inspection had taken place on 13 September 2017.

A written scheme of examination of pressure vessels was in place dated 26 April 2017.

It was confirmed that robust arrangements are in place for the management of prescription pads/forms and that written security policies are in place to reduce the risk of prescription theft and misuse.

### **Patient and staff views**

Sixteen patients submitted questionnaire responses to RQIA. All indicated that they felt safe and protected from harm. Fifteen patients indicated that they were very satisfied with this aspect of care and one indicated that they were satisfied. Comments provided included the following:

- “Very good in every respect.”
- “Excellent staff, helpful, exemplary dental care.”
- “Being going to the same place for years never changes - always helpful.”
- “Always very friendly and helpful.”
- “In the 25 years that I have been a patient of Cliffgar Dental practice, I have never encountered anything than the highest professional standards.”
- “Safety is paramount.”

Eighteen staff submitted questionnaire responses. All indicated that they felt that patients are safe and protected from harm. Seventeen staff indicated that they were very satisfied with this aspect of care and one indicated that they were satisfied. Staff spoken with during the inspection concurred with this. Comments provided included the following:

- “I am new and my staff induction was excellent. Lorraine is a fantastic manager who is easily talked to and very easy to approach.”
- “Staff induction and appraisal are in place.”

### **Areas of good practice**

There were examples of good practice found in relation to staff recruitment; induction; training; appraisal; safeguarding; management of medical emergencies; infection prevention control and decontamination procedures; radiology and the environment.

## Areas for improvement

No areas for improvement were identified during the inspection.

	Regulations	Standards
<b>Total number of areas for improvement</b>	0	0

### 6.5 Is care effective?

**The right care, at the right time in the right place with the best outcome.**

## Clinical records

Staff confirmed that clinical records are updated contemporaneously during each patient's treatment session in accordance with best practice.

It was confirmed that routine dental examinations include a review of medical history, a check for gum disease and oral cancers and that treatment plans are developed in consultation with patients. It was confirmed that patients are informed about the cost of treatments, choices and options.

Manual records are maintained. Appropriate systems and processes were in place for the management of records and maintaining patient confidentiality.

Policies were available in relation to records management, data protection and confidentiality and consent. The records management policy includes the arrangements in regards to the creation, storage, recording, retention and disposal of records and data protection. The policy is in keeping with legislation and best practice guidance.

The practice is registered with the Information Commissioner's Office (ICO) and a Freedom of Information Publication Scheme has been established.

## Health promotion

The practice has a strategy for the promotion of oral health and hygiene. A range of health promotion information leaflets was available in the waiting area and the surgeries. Staff confirmed that oral health is actively promoted on an individual level with patients during their consultations.

## Audits

There were arrangements in place to monitor, audit and review the effectiveness and quality of care delivered to patients at appropriate intervals which included:

- x-ray quality grading
- x-ray justification and clinical evaluation recording
- IPS HTM 01-05 compliance
- clinical records

**Communication**

It was confirmed that arrangements are in place for onward referral in respect of specialist treatments. A policy and procedure and template referral letters have been established.

Staff meetings are held on a monthly basis to discuss clinical and practice management issues. Review of documentation demonstrated that minutes of staff meetings are retained. Staff spoken with confirmed that meetings also facilitated informal in house training sessions.

Staff confirmed that there are good working relationships and there is an open and transparent culture within the practice.

A breaking bad news policy in respect of dentistry was in place.

**Patient and staff views**

All patients who submitted questionnaire responses indicated that they get the right care, at the right time and with the best outcome for them. Fourteen patients indicated that they were very satisfied with this aspect of care and two indicated that they were satisfied. Comments provided included the following:

- “All staff friendly and approachable.”
- “I have had always had the good fortune to have David Little care for my dental treatment over the years and at no stage could I fault his care and attention. Excellent standards.”
- “Yes one time I had a lump on my tongue and my dentist acted immediately (was benign).”

All submitted staff questionnaire responses indicated that they felt that patients get the right care, at the right time and with the best outcome for them. Sixteen staff indicated that they were very satisfied with this aspect of care and two indicated that they were satisfied. Staff spoken with during the inspection concurred with this. The following comment was provided:

- “Clinical records are maintained in keeping with professional codes of practice. Great care is taken to provide patients with the care and respect they deserve.”

**Areas of good practice**

There were examples of good practice found in relation to the management of clinical records, the range and quality of audits, health promotion strategies and ensuring effective communication between patients and staff.

**Areas for improvement**

No areas for improvement were identified during the inspection.

	Regulations	Standards
<b>Total number of areas for improvement</b>	0	0

## 6.6 Is care compassionate?

**Patients and clients are treated with dignity and respect and should be fully involved in decisions affecting their treatment, care and support.**

### Dignity, respect and involvement in decision making

Staff demonstrated a good understanding of the core values of privacy, dignity, respect and patient choice. Staff confirmed that if they needed to speak privately with a patient that arrangements are provided to ensure the patient's privacy is respected. Staff were observed to converse with patients and conduct telephone enquiries in a professional and confidential manner.

The importance of emotional support needed when delivering care to patients who were very nervous or fearful of dental treatment was clear.

It was confirmed that treatment options, including the risks and benefits, were discussed with each patient. This ensured patients understood what treatment is available to them and can make an informed choice. Staff demonstrated how consent would be obtained.

The practice undertakes patient satisfaction surveys on an annual basis. Review of the most recent patient satisfaction report demonstrated that the practice pro-actively seeks the views of patients about the quality of treatment and other services provided. Patient feedback whether constructive or critical, is used by the practice to improve, as appropriate. The practice also has a suggestion box in the waiting area.

A policy and procedure was in place in relation to confidentiality which included the arrangements for respecting patient's privacy, dignity and providing compassionate care and treatment.

### Patient and staff views

All patients who submitted questionnaire responses indicated that they are treated with dignity and respect and are involved in decision making affecting their care. Fourteen patients indicated that they were very satisfied with this aspect of care and two indicated that they were satisfied. Comments provided included the following:

- "All members of the professional and administrative staff at this practice are always courteous, helpful, caring and considerate."
- "Always treated respectfully. The dentists make you feel at ease, in what can be a stressful appointment, as I am a nervous patient."
- "Yes treated very well."

All submitted staff questionnaire responses indicated that they felt that patients are treated with dignity and respect and are involved in decision making affecting their care. Fourteen staff indicated that they were very satisfied with this aspect of care and four indicated that they were satisfied. Staff spoken with during the inspection concurred with this. The following comment was provided:

- “A patient survey is carried out annually and a suggestion box is placed in the waiting room. We welcome feedback from patients and staff.”

### Areas of good practice

There were examples of good practice found in relation to maintaining patient confidentiality, ensuring the core values of privacy and dignity were upheld and providing the relevant information to allow patients to make informed choices.

### Areas for improvement

No areas for improvement were identified during the inspection.

	Regulations	Standards
<b>Total number of areas for improvement</b>	0	0

### 6.7 Is the service well led?

**Effective leadership, management and governance which creates a culture focused on the needs and experience of service users in order to deliver safe, effective and compassionate care.**

### Management and governance arrangements

There was a clear organisational structure within the practice and staff were able to describe their roles and responsibilities and were aware of who to speak to if they had a concern. Staff confirmed that there were good working relationships and that management were responsive to any suggestions or concerns raised.

Mrs Little is the nominated individual with overall responsibility for the day to day management of the practice and she ensures Dr Little is fully informed in relation to the operation of the practice.

Policies and procedures were available for staff reference. Observations made confirmed that policies and procedures were indexed, dated and systematically reviewed on annual yearly basis. Staff spoken with were aware of the policies and how to access them.

Arrangements were in place to review risk assessments.

A copy of the complaints procedure was displayed in the practice. Staff demonstrated a good awareness of complaints management. A complaints questionnaire was forwarded by RQIA to the practice for completion. The returned questionnaire indicated that no complaints have been received for the period 1 April 2016 to 31 March 2017.

A system was in place to ensure that notifiable events were investigated and reported to RQIA or other relevant bodies as appropriate. A system was also in place to ensure that urgent communications, safety alerts and notices are reviewed and where appropriate, made available to key staff in a timely manner.

It was confirmed that arrangements were in place to monitor, audit and review the effectiveness and quality of care delivered to patients at appropriate intervals. If required an action plan is developed and embedded into practice to address any shortfalls identified during the audit process.

A whistleblowing/raising concerns policy was available. Discussion with staff confirmed that they were aware of who to contact if they had a concern.

Dr Little demonstrated a clear understanding of his role and responsibility in accordance with legislation. Information requested by RQIA has been submitted within specified timeframes. It was confirmed that the statement of purpose and patient's guide are kept under review, revised and updated when necessary and available on request.

The RQIA certificate of registration was up to date and displayed appropriately. Observation of insurance documentation confirmed that current insurance policies were in place.

### **Patient and staff views**

All patients who submitted questionnaire responses indicated that they felt that the service is well led. Thirteen patients indicated that they were very satisfied with this aspect of the service and three indicated that they were satisfied. Comments provided included the following:

- “Very well managed.”
- “Nice staff.”
- “Highly effective management. Approachable and will go the extra mile.”
- “All aspects of booking and treatment well managed.”
- “I consider my dentists to be the best dentists. The service is excellent.”
- “Very busy practice, but well run and organised. Always seen in a timely way in an emergency.”
- “Dr Little has a good relationship with his staff and everyone appears to be well motivated and happy. He sets high standards and expects the same in return.”

All submitted staff questionnaire responses indicated that they felt that the service is well led. Fifteen staff indicated that they were very satisfied with this aspect of the service and three indicated that they were satisfied. Staff spoken with during the inspection concurred with this. Comments provided included the following:

- “The practice manager is very approachable and helpful.”
- “Every effort is made to assure the practice meets current legislation, all policies and procedures are accessible. All staff are treated with respect.”

### **Areas of good practice**

There were examples of good practice found in relation to governance arrangements, management of complaints and incidents, quality improvement and maintaining good working relationships.

### **Areas for improvement**

No areas for improvement were identified during the inspection.



	<b>Regulations</b>	<b>Standards</b>
<b>Total number of areas for improvement</b>	0	0

**7.0 Quality improvement plan**

There were no areas for improvement identified during this inspection, and a QIP is not required or included, as part of this inspection report.



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