

Announced Care Inspection Report

14 January 2020



Abrade Tattoo Removal

Type of Service: Independent Hospital (IH) – Cosmetic Laser Service

Address: c/o Belfast City Skinworks, 21 Oxford Street, Belfast BT1 3LA

Tel No: 07873 270 531

Inspector: Norma Munn

www.rqia.org.uk

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

Abrade Tattoo Removal is registered as an Independent Hospital (IH) with the following category of care: Prescribed techniques or prescribed technology: establishments using Class 3B or Class 4 lasers. This inspection focused solely on those treatments using a laser machine that fall within regulated activity and the category of care for which the establishment is registered with RQIA.

Laser equipment:

- Manufacturer: ADL
- Model: Sapphire II
- Serial Number: S2120811249
- Laser Class: Class 4
- Wavelength: 532nm and 1064nm

Laser protection advisor (LPA):

- Ms Anna Bass (Lasernet)

Laser protection supervisor (LPS):

- Mr Anthony O'Neill

Medical support services:

- Dr Paul Myers (Lasernet)

Authorised operators:

- Mr Anthony O'Neill
- Mr David Marshall

Types of treatment provided:

- Laser Tattoo Removal

3.0 Service details

Organisation/Registered Provider: Mr Anthony O'Neill	Registered Manager: Mr Anthony O'Neill
Person in charge at the time of inspection: Mr Anthony O'Neill	Date manager registered: 5 August 2015
Categories of care: Independent Hospital (IH) PT(L) Prescribed techniques or prescribed technology: establishments using Class 3B or Class 4 lasers	

4.0 Inspection summary

An announced inspection took place on 14 January 2020 from 13.50 to 15.40.

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 (DoH) Minimum Care Standards for Independent Healthcare Establishments (July 2014).

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

Examples of good practice were evidence in all four domains. These included the arrangements for staffing, the management of medical emergencies, infection prevention and control, information provision, the care pathway, the management and governance and maintenance arrangements.

One area requiring improvement has been identified in relation to staff training.

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

4.1 Inspection outcome

	Regulations	Standards
Total number of areas for improvement	1	0

Details of the Quality Improvement Plan (QIP) were discussed with Mr Anthony O'Neill, registered person, as part of the inspection process. The timescales for completion commence from the date of inspection.

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

4.2 Action/enforcement taken following the most recent care inspection dated 24 January 2019

No further actions were required to be taken following the most recent inspection on 24 January 2019.

5.0 How we inspect

Prior to the inspection a range of information relevant to the service 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 previous care inspection report

Questionnaires were provided to clients prior to the inspection by the establishment on behalf of RQIA. No completed client questionnaires were returned.

RQIA invited staff to complete an electronic questionnaire prior to the inspection. No completed staff questionnaires were returned.

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

During the inspection the inspector met with Mr O'Neill, registered person.

The following records were examined during the inspection:

- staffing
- recruitment and selection
- safeguarding
- laser safety
- management of medical emergencies
- infection prevention and control
- information provision
- care pathway
- management and governance arrangements
- maintenance arrangements

The findings of the inspection were provided to Mr O'Neill at the conclusion of the inspection.

6.0 The inspection

6.1 Review of areas for improvement from the most recent inspection dated 24 January 2019

The most recent inspection of the establishment was an announced care inspection. There were no areas for improvement made as a result of the last care inspection.

6.2 Inspection findings

6.3 Is care safe?

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

Staffing

Discussion with Mr O'Neill, confirmed that there is sufficient staff in the various roles to fulfil the needs of the establishment and clients. There are two authorised operators providing laser tattoo removal services in the establishment.

Mr O'Neill confirmed that laser treatments are only carried out by authorised operators. A register of authorised operators for the laser was maintained and kept up to date.

No new staff have been recruited since the previous inspection; however, Mr O'Neill confirmed that any new staff recruited would be provided with induction training.

A review of training records evidenced that both authorised operators had received up to date training in application training for the equipment in use, and infection prevention and control. However, the authorised operators had not received refresher training in Core of Knowledge, fire safety awareness and safeguarding adults at risk of harm in keeping with the RQIA training guidance.

The most recent training in basic life support was dated 28 April 2017 which stated on the certificate that the training was valid for three years. However, the laser protection advisor (LPA) recommended that basic life support training was to be updated. The LPA had also recommended that authorised operators update their Core of Knowledge training.

Mr O'Neill was advised to ensure that all authorised operators undertake mandatory training as recommended by their LPA and in keeping with RQIA guidance. An area for improvement against the regulations has been made.

Mr O'Neill confirmed that all other staff employed at the establishment, but not directly involved in the use of the laser equipment, had received laser safety awareness training.

Recruitment and selection

There have been no authorised operators recruited since the previous inspection. During discussion Mr O'Neill confirmed that should staff be recruited in the future robust systems and processes have been developed to ensure that all recruitment documentation as outlined in Schedule 2 of The Independent Health Care Regulations (Northern Ireland) 2005 would be sought and retained for inspection.

A recruitment policy and procedure was in place which was comprehensive and reflected best practice guidance.

Safeguarding

It was confirmed that laser services are not provided to persons under the age of 18 years.

Mr O'Neill was aware of the types and indicators of abuse and the actions to be taken in the event of a safeguarding issue being identified.

Review of records demonstrated that both the authorised operators in the establishment had received training in safeguarding adults during August 2017. The training had not been updated as outlined in RQIA training guidance. As previously identified an area for improvement has been made in respect of authorised operators training.

A policy and procedure was in place for the safeguarding and protection of adults. The policy included the types and indicators of abuse and distinct referral pathways in the event of a safeguarding issue arising. The relevant contact details for onward referral to the local Health and Social Care Trust should a safeguarding issue arise were included.

It was confirmed that a copy of the regional guidance document entitled 'Adult Safeguarding Prevention and Protection in Partnership' (July 2015) was available for staff reference.

Laser safety

A laser safety file was in place which contained all of the relevant information in relation to laser equipment.

There was written confirmation of the appointment and duties of a certified laser protection advisor (LPA) which is reviewed on an annual basis. The service level agreement between the establishment and the LPA was reviewed and this expires on 30 March 2020.

Laser procedures are carried out by trained operators in accordance with medical treatment protocols produced by Dr Paul Myers on 31 March 2019. Systems are in place to review the medical treatment protocols on an annual basis. The medical treatment protocols contained the relevant information pertaining to the treatments being provided.

Up to date local rules were in place which have been developed by the LPA. The local rules contained the relevant information pertaining to the laser equipment being used.

The establishment's LPA completed a risk assessment of the premises during June 2019. Mr O'Neill confirmed that recommendations made by the LPA had not yet been addressed. The recommendations made were in relation to updating training in Core of Knowledge and basic life support. Mr O'Neill was advised to address all recommendations made by the LPA. As previously identified an area for improvement has been made in respect of authorised operators training.

Mr O'Neill as the laser protection supervisor (LPS) has overall responsibility for safety during laser treatments and a list of authorised operators is maintained. Authorised operators have signed to state that they have read and understood the local rules and medical treatment protocols.

When the laser equipment is in use, the safety of all persons in the controlled area is the responsibility of the LPS.

The environment in which the laser equipment is used was found to be safe and controlled to protect other persons while treatment is in progress. The door to the treatment room is locked when the laser equipment is in use but can be opened from the outside in the event of an emergency.

The laser equipment is operated using a key. Arrangements are in place for the safe custody of the laser key when not in use. Protective eyewear is available for the client and operator as outlined in the local rules.

The controlled area is clearly defined and not used for other purposes, or as access to areas, when treatment is being carried out. Laser safety warning signs are displayed when the laser equipment is in use and removed when not in use.

The establishment has a laser register which is completed every time the equipment is operated and includes:

- the name of the person treated
- the date
- the operator
- the treatment given
- the precise exposure
- any accident or adverse incident

There are arrangements in place to service and maintain the laser equipment in line with the manufacturer's guidance. The most recent service report of 21 August 2019 was reviewed as part of the inspection process.

Management of emergencies

As discussed both authorised operators had evidence of training in basic life support which was dated 28 April 2017 and valid for three years however, the LPA recommended that this training was to be updated. As previously identified an area for improvement has been made in respect of authorised operators training.

Mr O'Neill confirmed he was aware what action to take in the event of a medical emergency.

There was a resuscitation policy in place.

Infection prevention and control and decontamination procedures

The treatment room was clean and clutter free. Discussion with Mr O'Neill evidenced that appropriate procedures were in place for the decontamination of equipment between use. Hand washing facilities were available and adequate supplies of personal protective equipment (PPE) were provided. As discussed previously, both authorised operators have up to date training in infection prevention and control.

Environment

The premises were maintained to a good standard of maintenance and décor. Cleaning schedules for the establishment were in place.

Observations made evidenced that a carbon dioxide (CO₂) fire extinguisher is available which has been serviced within the last year.

Mr O'Neill demonstrated that he was aware of the action to take in the event of a fire. A review of records evidenced that the most recent date fire safety awareness training had been undertaken in respect of both authorised operators was during September 2018. The training had not been updated as outlined in RQIA training guidance. As previously identified an area for improvement has been made in respect of authorised operators training.

Areas of good practice

There were examples of good practice found throughout the inspection in relation to management of emergencies, infection prevention and control, and the environment.

Areas for improvement

All authorised operators should undertake mandatory training in keeping with RQIA guidance and as recommended by the LPA.

	Regulations	Standards
Areas for improvement	1	0

6.5 Is care effective?

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

Care pathway

Clients are provided with an initial consultation to discuss their treatment and any concerns they may have. Written information is provided to the client pre and post treatment which outlines the treatment provided, any risks, complications and expected outcomes. The establishment has a list of fees available for each laser procedure.

Fees for treatments are agreed during the initial consultation and may vary depending on the type of treatment provided and the individual requirements of the client.

During the initial consultation, clients are asked to complete a health questionnaire. There are systems in place to contact the client's general practitioner, with their consent, for further information if necessary.

Two client care records were reviewed. There is an accurate and up to date treatment record for every client which includes:

- client details
- medical history
- signed consent form
- skin assessment (where appropriate)
- patch test (where appropriate)
- record of treatment delivered including number of shots and fluence settings (where appropriate)

Observations made evidenced that client records are securely stored. A policy and procedure is available which includes the creation, storage, recording, retention and disposal of records and data protection.

Mr O'Neill confirmed that clients have the right to apply for access to their clinical records in accordance with the General Data Protection Regulations May 2018 and where appropriate Information Commissioners Office (ICO) regulations and Freedom of Information legislation.

The establishment is registered with the ICO.

Audits

Mr O'Neill confirmed that arrangements were in place to monitor, audit and review the effectiveness and quality of care delivered to clients at appropriate intervals. Mr O'Neill confirmed that if required an action plan is developed and embedded into practice to address any shortfalls identified during the audit process.

Communication

As discussed, there is written information for clients that provides a clear explanation of any treatment and includes effects, side-effects, risks, complications and expected outcomes. Information is jargon free, accurate, accessible, up-to-date and includes the cost of the treatment.

Areas of good practice

There were examples of good practice found in relation to the management of clinical records, and ensuring effective communication between clients and staff.

Areas for improvement

No areas for improvement were identified during the inspection.

	Regulations	Standards
Areas for improvement	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 with decision making

Mr O'Neill confirmed that clients are treated with dignity and respect. The consultation and treatment is provided in a private room with the client and authorised operator present. Information is provided to the client in verbal and written form at the initial consultation and subsequent treatment sessions to allow the client to make choices about their care and treatment and provide informed consent.

Appropriate measures are in place to maintain client confidentiality and observations made evidenced that client care records were stored securely.

Recent client satisfaction surveys had not been carried out by the establishment. Mr O'Neill has agreed to review feedback and comments from his facebook page and any returned client satisfaction questionnaires and ensure that the results of these are collated to provide a summary report which is made available to clients and other interested parties. He has agreed to develop an action plan to inform and improve services provided, if appropriate.

Areas of good practice

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

Areas for improvement

No areas for improvement were identified during the inspection.

	Regulations	Standards
Areas for improvement	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

There was a clear organisational structure within the establishment and Mr O'Neill, who is an authorised operator, was able to describe his role and responsibilities. The second authorised operator was not available to speak with at the time of the inspection.

Where the entity operating the establishment is a corporate body or partnership or an individual owner who is not in day to day management of the establishment, Regulation 26 unannounced quality monitoring visits must be undertaken and documented every six months.

Mr O'Neill is in day to day charge of the practice, therefore Regulation 26 unannounced quality monitoring visits do not apply.

Policies and procedures were available for staff reference. Observations made confirmed that policies and procedures were indexed, dated and systematically reviewed on a three yearly basis.

There was a complaints policy and procedure in place which was in accordance with legislation and DoH guidance on complaints handling. Clients and/or their representatives were made aware of how to make a complaint by way of information on display in the establishment. Mr O'Neill was knowledgeable about how to respond to complaints.

Mr O'Neill confirmed that there have been no complaints made since the previous inspection. Mr O'Neill confirmed that arrangements were in place to effectively manage complaints from clients, their representatives or any other interested party.

Mr O'Neill confirmed that 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 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.

A whistleblowing/raising concerns policy was available.

Mr O'Neill demonstrated a clear understanding of his role and responsibility in accordance with legislation. Mr O'Neill confirmed that the statement of purpose and client'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.

Areas of good practice

There were examples of good practice found throughout the inspection 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.

	Regulations	Standards
Areas for improvement	0	0

6.8 Equality data

Equality data

The arrangements in place in relation to the equality of opportunity for clients and the importance of staff being aware of equality legislation and recognising and responding to the diverse needs of clients was discussed with Mr O'Neill.

6.9 Client and staff views

No clients and no staff submitted questionnaire responses to RQIA.

7.0 Quality improvement plan

The area for improvement identified during this inspection is detailed in the QIP. Details of the QIP were discussed with Mr O'Neill, registered person as part of the inspection process. The timescales commence from the date of inspection.

The registered provider/manager should note that if the action outlined in the QIP is not taken to comply with regulations and standards this may lead to further enforcement action including possible prosecution for offences. It is the responsibility of the registered provider to ensure that all areas for improvement identified within the QIP are addressed within the specified timescales.

Matters to be addressed as a result of this inspection are set in the context of the current registration of the establishment. The registration is not transferable so that in the event of any future application to alter, extend or to sell the premises RQIA would apply standards current at the time of that application.

7.1 Areas for improvement

Areas for improvement have been identified where action is required to ensure compliance with The Independent Health Care Regulations (Northern Ireland) 2005 and The Regulation and Improvement Authority (Independent Health Care) (Fees and Frequency of Inspections) (Amendment) Regulations (Northern Ireland) 2011 and the Department of Health (DOH) Minimum Care Standards for Healthcare Establishments (July 2014).

7.2 Actions to be taken by the service

The QIP should be completed and detail the actions taken to address the area for improvement identified. The registered provider should confirm that these actions have been completed and return the completed QIP via Web Portal for assessment by the inspector.

Quality Improvement Plan	
Action required to ensure compliance with The Independent Health Care Regulations (Northern Ireland) 2005	
Area for improvement 1 Ref: Regulation 18 (2) Stated: First time To be completed by: 14 February 2020	The registered person shall ensure that all authorised operators undertake training as recommended by the laser protection advisor (LPA) and in keeping with RQIA guidance. Ref: 6.1 Response by registered person detailing the actions taken: <p>COMPLETED A O'Neill 22/9/20</p>

Please ensure this document is completed in full and returned via Web Portal



The Regulation and Quality Improvement Authority
9th Floor
Riverside Tower
5 Lanyon Place
BELFAST
BT1 3BT

Tel 028 9536 1111
Email info@rqia.org.uk
Web www.rqia.org.uk
 [@RQIANews](https://twitter.com/RQIANews)