

Support with answering the Transitional Monitoring App (TMA) framework questions

This guidance supports the cross-sector Transitional Regulatory Approach (TRA) Guidance and provides sector-specific supporting information.

This guidance covers:

- Dental
- GP
- Urgent Care/111/OOHs
- Independent Health

Unless otherwise specified, all prompts and guidance are applicable to all sub-sectors.

REMEMBER: the main way we will gather information from providers is through the conversation we have with them when working through the questions in the TMA. **Inspectors should not routinely ask for additional information/evidence or request all of the information suggested in the examples.** Inspectors should apply professional judgement to identify the information they need to sufficiently assess the risk level of each KLOE.

Planning

Check the information we already hold about services when completing the planning tool (e.g. whistleblowing information stored in CRM) **beginning with the Intelligence dashboard you can access through the TMA.** Also consider information from external sources, such as other stakeholders and healthcare professionals.

The table below shows potential areas of discussion against the questions in the TMA. There is no need to ask all the prompting questions – inspectors should use their judgement to determine which questions are relevant to the provider and what information supports them to answer the overarching question. For example, independent healthcare services can vary greatly, with some offering a wide range of services compared to others that provide minimal services. Also, some services can be very small and lack the infrastructure and resources of NHS services. Therefore, some issues can impact them disproportionately compared to larger

services, for example staffing issues and access. Conversations should be structured as inspectors see fit; this may mean, for example, covering the Well-led discussion questions first.

The medicines optimisation team are available to support inspectors in their assessment of question S.4: “How does the provider ensure the proper and safe use of medicines, where the service is responsible?” Where an inspector is unsure or concerned about the answers a provider is giving regarding medicines, the team can provide advice and training, or support conversations with the provider. Please e-mail medicines.enquiries@cqc.org.uk with any queries.

Overarching question (displayed in tool) and prompts	Additional information
<p>S1: How do systems, processes and practices keep people safe and safeguarded from abuse?</p> <ul style="list-style-type: none"> • <i>How do you ensure staff recognise safeguarding issues for adults, children and other vulnerable people, and take appropriate action?</i> • <i>How do you ensure the management of any safeguarding concerns do not discriminate people and that their human rights are protected?</i> • <i>What arrangements do you have in place to respond to medical emergencies?</i> <p>Note: Remember to consider whether it is necessary and appropriate to notify other bodies (or share relevant information with them) about incidents or risks CQC has identified that may be relevant to the exercise of their functions, for instance HSE of health and safety risks to workers.</p>	<p><i>Examples of additional information may include:</i></p> <ul style="list-style-type: none"> • <i>Actions taken as a result of recent reports, and learning shared</i> • <i>Records of training</i> • <i>Safeguarding policies/records</i>
<p>S1. Additional prompts for sub-sectors</p> <p>GP: <i>Where you have moved to remote consultations (telephone and video consultations), how do you identify vulnerable people or people who might be digitally excluded because of communication barriers (for example, because of a disability or poverty)?</i></p>	
<p>S2: How are risks to people assessed, and their safety monitored and managed, so they are supported to stay safe?</p> <p>Infection control</p>	<p><i>Examples of additional information may include:</i></p> <ul style="list-style-type: none"> • <i>IPC policies/procedures</i>

- *What changes have been made to infection control arrangements to protect staff and patients using the service?*
- *How do you ensure staff have the appropriate time for donning/doffing and cleaning between seeing patients? **(Not relevant to Online services)***
- *When was your last audit of IPC/ PPE/ the environment and facilities? What did it tell you and what actions have you taken?*

Safety systems and risks to people

- *What actions have you taken in the last six months as a result of learning from serious incidents to ensure people are kept safe?*
- *How are patients in need of urgent care and treatment identified, prioritised and protected from discrimination?*
- *How do you recognise and manage the deteriorating patient? **(Not relevant to Online services)***
- *How do you ensure appropriate staffing levels and skill mix to cope with demand? e.g. weekends, bank holidays, seasonal pressures, epidemics*

- *IPC audits/action plans*
- *Relevant risk assessments*
- *Sedation policies/training records (dental)*
- *Records/information relating to sedation (dental)*

S2. Additional prompts for sub-sectors

Dental: *Does the service provide conscious sedation? If yes, how do you ensure that risks are assessed, monitored and managed in order that sedation is delivered in a safe and effective way, in line with published standards?*

Dental: *How are you managing clinical capacity to provide safe oral health treatment and support?*

GP: *How are you assessing risks to staff employed through the PCN?*

GP: *how are patients in need of a face to face appointment identified and managed?*

GP/ Urgent Care: *What systems are in place to support staff to work remotely where this is appropriate and required?*

Urgent Care: *How are you managing demand safely to avoid long queues where patients walk-in?*

NHS 111: *Are staff clear about the arrangements for diverting calls? Do staff have the appropriate technology to support this process?*

Urgent care/ NHS 111: *If you have had to relocate any part of the service, how have you managed the impact on staff/ equipment/ communicating changes to people who use the service?*

<p>NHS 111: <i>If hotdesking, what arrangements are in place to ensure staff are adhering to IPC guidance and have access to appropriate cleaning materials (wipes for computer station)?</i> Note PPE for NHS 111 can include: headsets, alcohol wipes (NHS 111)</p>	
<p>S3: Do staff have all the information they need to deliver safe care and treatment to people?</p> <ul style="list-style-type: none"> • <i>How are clinical records managed to ensure safe care and treatment?</i> • <i>How are referrals to and from other providers managed? (Not Online)</i> 	
<p>S4: How does the provider ensure the proper and safe use of medicines, where the service is responsible?</p> <ul style="list-style-type: none"> • <i>Have you made any changes to your approach to medicines management? (e.g. in relation to repeat prescribing, ongoing monitoring requirements for high risk medicines)</i> <ul style="list-style-type: none"> ○ <i>If so, what and how has this impacted care?</i> • <i>How are people's medicines reconciled, in line with current national guidance, when transferring between locations or changing levels of care?</i> 	
<p>S4. Additional prompts for sub-sectors</p> <p>Dental/GP: <i>Have you made any changes to antimicrobial prescribing? If so, how has this impacted care?</i></p>	
<p>E1: Are people's needs assessed and care and treatment delivered in line with current legislation, standards and evidence-based guidance to achieve effective outcomes?</p> <ul style="list-style-type: none"> • <i>How are you identifying, cascading and keeping up to date with changes in clinical guidance?</i> 	

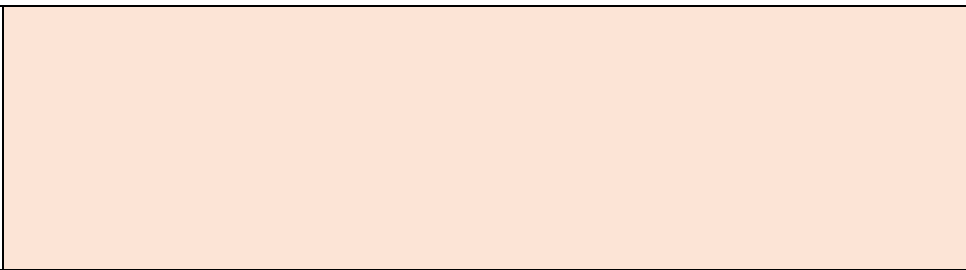
<ul style="list-style-type: none"> • <i>What oversight arrangements are in place for clinical care provided by clinical and non-clinical staff?</i> <ul style="list-style-type: none"> ○ <i>To people in care homes (GP/ Dental)</i> ○ <i>To vulnerable people in their own homes (GP/ OOHs)</i> ○ <i>Clinical decisions made during calls (including closing cases at the appropriate time in NHS 111)</i> 	
<p>E1. Additional prompts for sub-sectors</p> <p>Urgent Care/ NHS 111/ OOHs: <i>How are you keeping up to date with NHS Pathways and Clinical Decision Support System (CDSS) updates, and ensuring all staff are aware?</i></p> <p>NHS 111: <i>Where adjustments are made to services how is this reflected in the Directory of Services?</i></p>	
<p>E3: How does the service make sure that staff have the skills, knowledge and experience to deliver effective care, support and treatment?</p> <ul style="list-style-type: none"> • <i>How do you ensure that all staff (clinical and non-clinical), including those being flexibly re-deployed, have the skills and knowledge to carry out their roles and responsibilities effectively?</i> <ul style="list-style-type: none"> ○ <i>How do you ensure staff who are dealing with patients are operating within the appropriate scope of practice at the point of recruitment and ongoing? E.g. audit of consultations?</i> 	<p><i>Examples of additional information may include:</i></p> <ul style="list-style-type: none"> • <i>Records of training</i>
<p>E3. Additional prompts for sub-sectors</p> <p>Urgent Care/ NHS 111 (including 111 First)/ OOHs: <i>How do you ensure all relevant staff (including call-handlers) have the knowledge and confidence to make appropriate clinical decisions when triaging/ assessing patients?</i></p>	
<p>E5: How are people supported to live healthier lives and, where the service is responsible, how does it improve the health of its population?</p>	

<ul style="list-style-type: none"> • <i>How are you ensuring people who are affected by health inequalities are receiving the care they need?</i> • <i>How are you promoting good health/targeted approaches in response to COVID-19 and people at risk?</i> 	
<p>E5. Additional prompts for sub-sectors</p> <p>Dental: <i>How is the service working with other practices, and sectors, to promote access to good oral health and deal with any missed routine oral health appointments?</i></p> <p>GP: <i>How is the service identifying people who have missed screening tests/immunisations? What actions are being taken to promote people to access these services?</i></p> <p>GP: <i>What arrangements are in place for your patients to receive flu vaccinations?</i></p>	
<p>C1: How does the service ensure that people are treated with kindness, respect and compassion, and that they are given emotional support when needed?</p> <ul style="list-style-type: none"> • <i>How has the service adapted how it supports and engages with patients and their families/loved ones (for example in the context of more remote working)?</i> 	<p><i>Examples of additional information may include:</i></p> <ul style="list-style-type: none"> • <i>Patient/service-user feedback</i>
<p>C2: How does the service support people to express their views and be actively involved in making decisions about their care, support and treatment as far as possible?</p> <ul style="list-style-type: none"> • <i>How does the service support people to express their views and be actively involved in making decisions about their care, support and treatment as far as possible?</i> 	<p><i>Examples of additional information may include:</i></p> <ul style="list-style-type: none"> • <i>Patient/service-user feedback</i>
<p>C2. Additional prompts for sub-sectors</p> <p>NHS 111: <i>How do you support people to make informed decisions about services they need to access?</i></p>	

<p>R1: How do people receive personalised care that is responsive to their needs?</p> <ul style="list-style-type: none"> • <i>How is patient choice about how, when, where they want to be seen taken into account?? (Not Online)</i> • <i>How do you ensure that people with information and communication needs are able to access appointments and services in ways that meet their needs?</i> • <i>How does care provision take account of the needs of individual people? (e.g. Trans people, people who have a disability, people with long term conditions or mental health needs etc)</i> • <i>Have you identified any barriers to care provision, particularly for patients with protected characteristics? For example, disabled people, older people, BAME people. If yes, what actions have been taken to combat them?</i> 	<p><i>Examples of additional information may include:</i></p> <ul style="list-style-type: none"> • <i>Patient/service-user feedback</i>
<p>R1. Additional prompts for sub-sectors</p> <p>GP/ NHS 111 Online: <i>How do you engage with patients who are unable to use the telephone or digital/online platforms to understand their health needs and offer them care or treatment?</i></p>	
<p>R3: Can people access care and treatment in a timely way?</p> <ul style="list-style-type: none"> • <i>How are you managing access to services?</i> <ul style="list-style-type: none"> ○ <i>Do you have backlogs of activity and long waiting times as a result of COVID-19? How are you managing this? What are your recovery plans?</i> ○ <i>How are you ensuring high-risk/vulnerable patients and pathways are being identified and prioritised appropriately? (Not Online)</i> ○ <i>What arrangements are in place to follow-up and support patients whose care and treatment was delayed due to</i> 	<p><i>Examples of additional information may include:</i></p> <ul style="list-style-type: none"> • <i>Appointment data</i>

COVID-19? For example, patients with non-COVID related issues. **(Not Online)**

- How are you ensuring equitable access to appointments when they are needed, especially for people with protected characteristics and vulnerable groups? For example: Trans people, people who are housebound, people at the end of their life etc. **(Not Online)**



R3. Additional prompts for sub-sectors

Dental/ GP/ Urgent Care/ OOHs: How is the service working with partners to maintain and improve access? (for example, PCN, third-party providers, carer services, local services such as Ambulance service etc)

GP: How do you ensure that patients are receiving appropriate types of appointments to meet their needs?

GP: How are you supporting and working with care homes to ensure patients receive the right care at the right time?

GP: How do you ensure that people are able to register with the practice? For example, refugees, asylum seekers, migrants, homeless people.

GP/ NHS 111/ OOHs: What are your arrangements for clinician call-backs (including online and video) i.e. specified time/date offered to patient? How do you ensure patients are not missed or lost through this arrangement?

W3: Is there a culture of high-quality, sustainable care?

- What actions are you taking to protect and support the health, safety and wellbeing of staff, particularly those who are high-risk/BAME? For example, COVID-19 testing
- How do you promote equality and diversity, and check that staff feel supported, respected and valued?
- What training and support is available for staff using new technology to facilitate care delivery? **(Not Online)**

Examples of additional information may include:

- Staff survey

W3. Additional prompts for sub-sectors

GP/ Urgent Care/ NHS 111/ OOHs: How are you supporting staff who work remotely and how are you assessing them?

<p>W5: Are there clear and effective processes for managing risks, issues and performance?</p> <ul style="list-style-type: none"> • <i>Has your business model/operating model changed since the pandemic? If so, how and what has been the impact on staff and people who use your services?</i> • <i>How do you assure yourself you are providing a safe service? For example, regular audits and increased supervision etc</i> • <i>How are you monitoring business risks and issues, and what actions are you taking to respond to them?</i> <ul style="list-style-type: none"> ○ <i>What are the arrangements for business continuity? For example, arrangements for diverting calls, contingency planning for staff shortages/ outbreak onsite, changes made in light of COVID-19</i> ○ <i>How are you flexing the service/models of care to adapt to changing circumstances, including second wave of COVID-19?</i> • <i>How are you working with partners to review and update local pathways?</i> 	
<p>W5. Additional prompts for sub-sectors</p> <p>Dental: <i>What arrangements are in place for X-ray equipment at the practice and radiation protection?</i></p> <p>NHS 111: <i>How are you working with partners to understand any changes to their services/ models, and ensure your service is aligned? For example: ambulance service, local GP practices, local A&E departments, OOHs</i></p> <p>GP/ Urgent care/ NHS 111/ OOHs: <i>How do you ensure oversight, and governance, of care provided by external staff who are working with your patients? e.g. staff employed by PCN or third-party provider?</i></p> <p>IH/ Dental: <i>Have you faced challenges in relation to financial viability? If so, what impact has this had on your ability to deliver the service and what actions have you taken to ensure people are kept safe?</i></p>	
<p>W8: Are there robust systems and processes for learning, continuous improvement and innovation?</p>	

- *What systems are in place to support people (staff/ people who use your services and their families/ carers) to speak up and raise concerns?*
- *How are people supported to provide feedback?*



W8. Additional prompts for sub-sectors

Urgent Care/ NHS 111/ OOHs: *How are complaints/feedback shared with relevant partners to facilitate learning across the local system? For example: Ambulance service, local A&E departments, OOHs, urgent treatment centres, NHS 111*

Useful guidance

General

[PHE guidance for primary and community healthcare providers](#)

[NHSE Risk assessments for at-risk staff groups: Letter from Prerana Issar, Dr Nikki Kanani and Amanda Pritchard](#)

[NHS People Supporting information for staff](#)

[HSE guidance: Protect homeworkers](#)

[NHS Employers risk assessments for staff](#)

[NHSE Addressing the impact of COVID-19 on BAME staff in the NHS](#)

[NHSE Primary Care infection control information](#)

[Guidance on NHS test and trace: how it works](#)

Dental

[Guidance for inspectors on identifying and responding to closed cultures](#)

[Dental Mythbuster 29: Safeguarding children and young people at risk](#)

[Dental Mythbuster 28: Safeguarding adults at risk](#)

[BDA: Coronavirus information](#)

[NHS England: Dental standard operating procedure: Transition to recovery](#)

[NHS England: Urgent dental care guidance and standard operating procedure](#)

[NHS England: Letters, updates and additional guidance for dental teams](#)

[BDA: Information on PPE](#)

[Faculty of General Dental Practice: Implications of COVID-19 for the safe management of general dental practice - a practice guide](#)

[Standards for Conscious Sedation in Provision of Dental Care: Report of the Intercollegiate Advisory Committee for Sedation in Dentistry \(2015\)](#)

[Dental mythbuster 10: safe and effective conscious sedation](#)

[Resuscitation Council UK: list of equipment](#)

[Dental myth buster 4: Drugs and equipment required for a medical emergency](#)

GP/ Urgent Care/ NHS 111/ OOHs/ IH

[NHSE Managing COVID-19 in General Practice SOP](#)

[NHSE Guidance and updates for GPs: Highest clinical risk patients](#)

[NHSE Letter to GPs regarding access Sept 2020](#)

[NHSE Access to general practice communications toolkit](#)

[RCGP latest COVID-19 guidance](#)

[PHE Number of coronavirus \(COVID-19\) cases and risk in the UK](#)

[PHE COVID-19: investigation and initial clinical management of possible cases](#)

[PHE Guidance on shielding and protecting people who are clinically extremely vulnerable from COVID-19](#)

[PHE New recommendations for primary and community health care providers in England on face masks and coverings.](#)

