

Secondary Care

Patient Safety Incident Response Plan (PSIRP)



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Introduction

The NHS Patient Safety Strategy¹ was published in 2019 and described the Patient Safety Incident Response Framework (PSIRF), a replacement for the NHS Serious Incident Framework².

The Serious Incident Framework (or "SIF") defined criteria for establishing which incidents resulting in severe harm or death should be classified as "serious incidents", and their subsequent reporting and investigation requirements.

PSIRF,³ by contrast, removes the "serious incident" classification and advocates a less prescriptive, proportionate approach to incident management. With the exception of a small number of nationally-determined requirements, the response to the majority of incidents is determined by individual organisations, informed by the patient safety priorities they have identified. The framework places greater emphasis on the learning to be derived from incidents that can change systems and cultures, rather than on producing a large number of detailed investigation reports. A range of different incident learning responses will be applied, meaning that fewer Patient Safety Incident Investigations (PSII – the equivalent of the old-style root cause analysis investigation) will be required, with a focus on quality of learning rather than a large quantity of investigations.

This document is Practice Plus Group's secondary care Patient Safety Incident Response Plan (PSIRP). It sets out how Practice Plus Group secondary care intends to respond to patient safety incidents over the next twelve months. The plan is not a permanent rule that cannot be changed; it is expected that our patient safety priorities will evolve over time. We will remain flexible and consider the specific circumstances in which patient safety issues and incidents occurred and the needs of those affected.

Practice Plus Group's values are:



We treat patients and each other as we would like to be treated;



We embrace diversity;



We act with integrity;



We strive to do things better together.

These guiding principles flow through everything we do, from our decision-making to hiring, interactions with one another and how we engage with all of our colleagues. Patient safety incident responses are conducted for the sole purpose of learning and identifying system improvements to reduce risk (not accountability, liability, avoidability and cause of death). They must never undermine just culture by requiring inappropriate automatic suspension of staff involved in patient safety incidents or their removal from business-as-usual activities.

Practice Plus Group supports a Just Culture and uses the Just Culture Guide⁴, as appropriate, to ensure consistent, constructive and fair treatment of staff who have been involved in patient safety incidents.

Our services

Practice Plus Group was founded as Care UK in 1982 and rebranded in 2020. We are one of England's largest independent providers of NHS services. Our secondary care services range from hospitals, surgical centres and diagnostics to urgent treatment centres. We work in partnership with local NHS trusts and commissioners to provide flexible care to meet the needs of local communities, and welcome both NHS and private patients.

The sites and services that form the secondary care division have been mapped and are included in Appendix One.

Defining our patient safety incident profile

The framework for The measurement and monitoring of safety⁵ was applied to the Practice Plus Group secondary care environment to identify the patient safety issues most pertinent to the organisation.

This framework highlights the following five dimensions which should be included in any safety and monitoring approach in order to give a comprehensive and rounded picture of an organisation's safety:

- Past harm: this encompasses both psychological and physical measures;
- **Reliability:** this is defined as 'failure free operation over time' and applies to measures of behaviour, processes and systems;
- **Sensitivity to operations:** the information and capacity to monitor safety on an hourly or daily basis;
- Anticipation and preparedness: the ability to anticipate, and be prepared for, problems;
- **Integration and learning:** the ability to respond to, and improve from, safety information.

Figure 1 – A framework for the measurement and monitoring of safety⁵



The decision to analyse data from the last five years, where available, was made (as opposed to the recommended two - three years) to account for the significant change in service provision during the COVID-19 pandemic.

The PSIRF Implementation Group was established, with representation from all disciplines across a number of sites, and met on a monthly basis.

The review of organisational patient safety data⁶ documents the data analysis undertaken to define our patient safety incident profile, which forms the focus of this PSIRP.

The analysis included review of:

- Clinical negligence claims;
- Patient safety incident reports and investigations;
- Complaints;
- Risks identified in the organisational and local site risk registers.

The data was analysed according to frequency of associated events, the ratio of harm to no harm incurred by the events, and recent trends.

This analysis revealed the following significant themes:

- Breakdown in the diagnostic/treatment pathway;
- Emergency transfer to an NHS Trust;
- Unplanned return to theatre;
- Unplanned readmission;
- Venous thromboembolism;
- Surgical site infection.

Each secondary care site undertook a similar review to determine whether there are additional, site-specific priorities. These are included as a separate section in this secondary care PSIRP.

The review of organisational patient safety data also served to facilitate consultation with both internal and external stakeholders on the proposed patient safety priorities. Stakeholder analysis was undertaken, guided by the NHSEI Stakeholder analysis tool⁷. The PSIRF Implementation Stakeholder Map is included as Appendix Two. The majority of these stakeholders were kept appraised regarding progress with PSIRF implementation by means of monthly progress updates and were also consulted on draft documentation.

Defining our patient safety improvement profile

The patient safety improvement and service transformation work underway across Practice Plus Group secondary care services is aligned to the patient safety analysis explored above.

The patient safety improvement programme is supported by the head of clinical effectiveness and improvement, and monitored via the quarterly Clinical Audit (CA) and Effectiveness Group (CAG). The chair of the CAG is the head of clinical effectiveness and the head of patient safety is a member. The quality improvement strategy is aligned to the patient safety profile, and the various workstreams are designed to reduce the risks associated with our current patient safety priorities.

The programme currently includes:

24-hour helpline

This has been identified as an issue from complaints and patient safety incidents. Currently at the stage of data gathering from sites and identifying trends and themes:

Patient health questionnaire review

This project is being led by the outpatient team at the Emerson's Green site. It is hoped to reduce duplication and ensure the patient is on the correct pathway leading up to surgery. The draft questionnaire is currently being reviewed;

Pre-operative surgical site infection risk assessment

The surgical site infection risk assessment will be used to identify patients undergoing arthroplasty who have a higher risk than most of surgical site infection. This will enable our team to take pre-emptive measures to reduce the risk as far as possible, for example through the use of specialist dressings. These patients will be followed up for one year following their surgery for evidence of infection, with prompt investigations and treatment if surgical site infection does arise.

RAG-rated risk assessments (traffic light model)

The RAG-rated assessments have been developed by an anaesthetist and are being used in theatres on the Maxims system;

Standardisation of Point of Care Testing (POCT) machines and cartridges at sites

This project is being assisted by teams from Shepton Mallet, St. Mary's, Portsmouth and Emerson's Green.
The POCT policy is in draft for sharing at the next CAG meeting. This will be accompanied by a suite of Standard Operating Procedures for adaption at local level;

DVT management pathway

A draft pathway has been presented to main stakeholders and was welcomed. Some small modifications are needed following feedback, prior to ratification;

VTE video

Data collection has been completed to confirm interest from patients and feasibility of the project. These data are being processed and, so far, look positive;

Pain management pathway

The pathway has been signed off and is in use. A suitable patient for pilot has been identified at Ilford. Waiting audit outcomes to be able to provide feedback;

Optimisation of patient waiting lists

Iron infusion pathway

A pathway has been set up and is ready to be piloted at Barlborough and Plymouth, once suitable patients have been identified

BMI management pathway

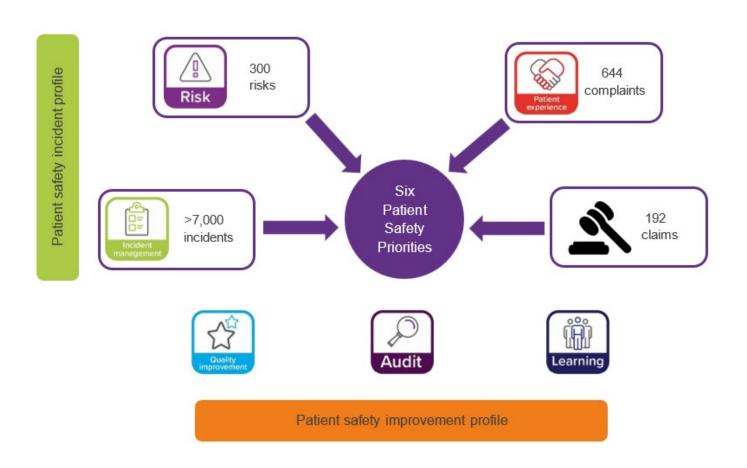
The pathway has resulted in positive outcomes to date. Some minor changes are being made to the original pathway version prior to being adopted by each site.

Site-specific quality improvement projects are also undertaken and shared across sites at the CAG.

Practice Plus Group secondary care has implemented the Medical Practitioners Assurance Framework (MPAF) in response to the Paterson Inquiry, with an assessment of strengths and weaknesses against the four key recommendations. The clinical governance framework has been reinforced to support the provider and medical practitioners' responsibilities and provide assurance of behaviours, processes and systems. This is depicted in the Quality and Governance Review and Assurance Framework, Appendix Three.

Existing resources will be utilised more efficiently through the implementation of PSIRF, maximising the improvements derived through new learning from patient safety events, as opposed to focussing on repetitive investigations that were initiated in accordance with nationally-defined thresholds.

Figure 2 - Data sources which informed the review of organisational patient safety data



The review of organisational patient safety data considered the secondary care patient safety incident profile in conjunction with the patient safety improvement profile to identify six secondary care patient safety priorities for 2024/25, illustrated in figure 3, in addition to the nationally-mandated responses.

These six priorities were selected based on the recent incident themes and reporting trends, the impact on patients and the wider health community and the potential for the learning responses to generate patient safety improvements.

The review of organisational patient safety data, including the proposed patient safety priorities, was circulated to the majority of stakeholders for consultation. The proposed patient safety priorities were agreed at a meeting of the PSIRF Implementation Group, at which all referring ICBs were invited to attend. Representation from our lead ICB was in attendance and the learning responses to each of the priorities were discussed and agreed.

Figure 3 - The six secondary care patient saefty priorities identified for 2024/2025



Our patient safety incident response plan

There are now just two nationally-mandated indications for which a Patient Safety Incident Investigation (PSII) must be undertaken:

- 1. Deaths thought more likely than not due to problems in care;
- 2. Incidents meeting the **Never Event** criteria.

Staff undertaking a Patient Safety Incident Response Investigation should use the Learning Response Review and Improvement Tool (Appendix Four) to inform the development of the written report. This tool will help the investigator to maintain focus

on a systems approach and avoid the use of blame language. The tool should be applied again for peer review of the final draft to provide constructive feedback on the quality of reports and to learn from the approach of others.

Application of the learning response algorithm will inform decisions regarding the appropriate response to incidents relating to the six patient safety priorities identified for 2024/25.

Additionally, emergent patient safety risks might be identified through, for example, a cluster of similar incidents. The decision to undertake an extraordinary PSII or thematic review will be made locally in conjunction with the Central Governance Team via an escalation call request.

Incidents that meet the statutory duty of candour thresholds

There is no legal duty to investigate a patient safety incident. Once an incident that meets the **Statutory Duty of Candour** threshold has been identified, as described in Regulation 20, a PSII is not automatically required unless indicated by the Learning Response Algorithm. Regulation 20 states we have a legal duty to:

- Tell the person/people involved (including family where appropriate) that the safety incident has taken place;
- Apologise. For example, "we are very sorry that this happened";
- Provide a true account of what happened, explaining whatever you know at that point;
- Explain what else you are going to do to understand the events. For example, review the facts and develop a brief timeline of events;
- Follow up by providing this information, and the apology, in writing, and providing an update. For example, talking them through the timeline;
- Keep a secure written record (attached to the Datix incident report) of all meetings and communications.

National patient safety priorities

The following table identifies the nationally-mandated indications for which a PSII must be undertaken, and the instances where referral to an external agency for investigation or review is required.

Event	Response	Improvement
Deaths thought more likely than not due to problems in care	Patient Safety Incident Investigation (PSII)	Create local organisational recommendations and actions, feeding into the quality
Incidents meeting the Never Event criteria		improvement programme
Everyone with a learning disability aged four and above who dies and every adult (aged 18 and over) with a diagnosis of autism	Patient Safety Incident Investigation (PSII) and Refer for Learning Disability Review (LeDeR)	
Child deaths	Refer for Child Death Overview Panel review	Respond to recommendations made by external referred agency
 Safeguarding incidents in which: babies, children, or young people are on a child protection plan, looked after plan or a victim of wilful neglect or domestic abuse; adults are in receipt of care and support needs from their local authority; the incident relates to FGM, Prevent, modern slavery and human trafficking or domestic abuse/violence. 	Refer to local authority safeguarding lead	
All stillbirths, early neonatal deaths and severe brain injuries that occur following labour at term	Refer to Health Services Safety Investigation Branch (HSSIB)	
Incidents meeting the maternal death criteria		
Death of patients in custody/ prison/probation	Report to Prison and Probation Ombudsman (PPO)	

Practice Plus Group secondary care patient safety priorities

The following table identifies the secondary care patient safety priorities and the associated learning responses that should be taken. These are in addition to the nationally-mandated responses described in the previous section, and any local site-specific priorities that have been identified in the next section.

	Event	Response	Improvement				
Practice Plus Group Priorities	Surgical Site Infections Deep or organ/joint space	Post Infection Review (PIR)	Create local organisational recommendations and actions, feeding				
	Surgical Site Infections Endophthalmitis	Endophthalmitis- specific PIR	into the national quality improvement programme				
	Surgical Site Infections Superficial	Thematic review (frequency determined by site)					
	Venous thromboembolism	VTE-specific review					
	Emergency transfer to NHS Trust	Swarm huddle as soon as possible after the event					
	Unplanned return to theatre Structured case note review. PSII if deficiencies in care identified						
	Unplanned readmission						
	Diagnostic / treatment pathway delay	If reasons for delay understood, clinical harm review; If not, PSII					

The reasons why each of the above responses were chosen and the timeframe in which they must be completed are described below.

Patient safety priority	Rationale for chosen response	Timeframe
Emergency transfer	SWARM huddles will be undertaken as soon as possible following all transfers to increase the likelihood that all those involved will be able to contribute, to improve retention of key information, identify immediate learning and early action, and as a means of debriefing.	Day of the transfer but, in exceptional circumstances, within forty-eight hours.
Unplanned return to theatre	The algorithm filters out incidents relating to SSI and then requires a structured review of each of the phases of care. Only if the review identifies	Initial review – 10 working days
Readmission	Any problems with the care of the patient that definitely or potentially led to harm, a PSII must be undertaken, thereby maximising the potential of investigative resources.	PSII – to be agreed in conjunction with patient/family & SMT, but no more than six months
Venous thromboembolism	The VTE review tool provides a standardised approach to the contributory and potentially causative factors that led to a VTE, with the advantage of providing direct comparison and contrast between a number of events to identify common themes and maximise learning.	Within 20 working days
Surgical site infection	The Post Infection Review tool focuses on comparison with nationally-recognised standards of best practice, thereby identifying system weaknesses for improvement. A similar tool, specific to endophthalmitis, has also been developed to capture the pertinent information. A thematic review of superficial SSIs will be undertaken as agreed by the site and IPC Team. This will identify common causation factors that might be lost if investigated as individual incidents.	Within 20 working days Within 40-60 days
Delays in diagnostic- treatment pathway	A clinical harm review for incidents where the causation factors are easily understood allows us to use a standardised approach to identify the level of potential harm that may have been caused. Where causation factors are more complex, or not understood at the time of the incident, a PSII provides the opportunity to fully explore actions taken and decision made as related to the incident.	Initial review — 5 working days PSII — to be agreed in conjunction with patient/family & SMT, but no more than six months

Roles and responsibilities

Heads of departments will be empowered to make the decision regarding the most appropriate response to patient safety incidents, guided by the learning response algorithm, and supported by the local site governance manager, who will liaise with external bodies / central governance team as necessary. The learning response will be documented on Datix, where the appropriate template to guide and record the response can be generated.

All learning responses will be conducted by learning response leads who have undergone the necessary training, as defined in the Patient Safety Incident Response Policy. Trained engagement leads will ensure that those affected by patient safety incidents are given the opportunity for involvement in the learning response, provided the support they require and consulted on the final draft report.

Collaboration with other organisations involved in incidents will be sought in all applicable cases to enrich and integrate learning responses across the health economy and foster the cross-boundary work ethic.

The PSIRF executive lead (medical director, secondary care), in conjunction with the chief nurse and the head of patient safety (patient safety specialist), will provide leadership, advice, and support in complex/high profile cases.

Monthly quality reviews, held between the central governance team and key senior members of each, individual site, offer the opportunity for oversight of the patient safety incidents that have occurred during the preceding month, the responses taken and the learning derived from incidents. Less reliance will be placed on the number of incident categories (other than to inform thematic reviews) and more on the learning and improvements made.

The quality governance and assurance committee will scrutinise an overview of patient safety incidents, their responses and the learning and make recommendations. The quarterly clinical quality and compliance committee and monthly data against key performance indicators provide assurance to the Practice Plus Group executive board that high quality services are being delivered.

Oversight under PSIRF focuses on engagement and empowerment. Oversight of patient safety incidents and approval of learning responses will be led by members of the central governance team according to their subject matter expertise in collaboration with the relevant forum membership:

- Medical Director:
- Chief Nurse;
- Head of Patient Safety;

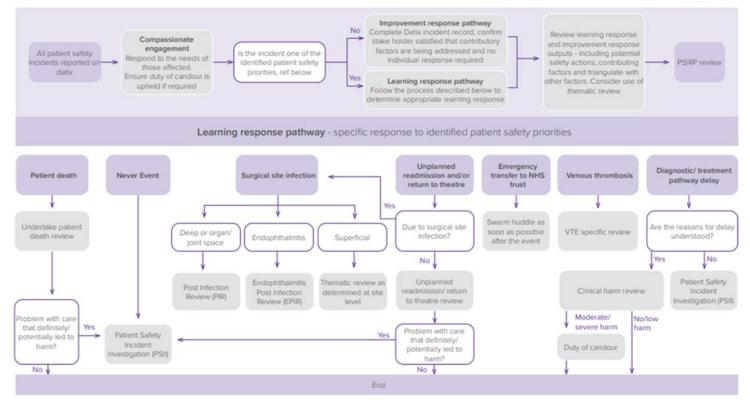
- Head of Diagnostic Imaging and Endoscopy,
- · Chief Pharmacist:
- Associate Chief Pharmacist and VTE Lead;
- Head of Infection Prevention and Control.

All of the above will have participated in the oversight training.

Approval of, and feedback on, PSII reports will be provided using the learning response review and improvement tool, appendix four, to focus on the key principles of PSIRF, particularly the learning to be derived from incidents that can change systems and cultures and the improvements to patient safety that can be made in response.

Learning response algorithm





Site-specific priorities

Site	Event	Response		
Practice Plus Group Hospital, Southampton	Inpatient fall	Swarm huddle, followed by review at the falls meeting		
Practice Plus Group Hospital, Southampton Urgent Treatment Centre	Monthly unplanned re-attendance within seven days for same condition exceeds 5% of attendances	Thematic review		
Practice Plus Group Hospital, Barlborough	Five adverse clinical outcomes (e.g., hip dislocations, leg length discrepancies) associated with the same surgeon in a six month period	Thematic review		
Practice Plus Group Hospital, MSK & Spinal	Patient pathway delays- five events	Thematic review		
Service Lincolnshire.	Breaches of patient confidentiality e.g., wrong letter sent to patient - five events	Thematic review		
Practice Plus Group Hospital, Plymouth	Medical cancellation of patient	Structured case notes and pathway review		
	Ophthalmic complications	Structured review of each complication Thematic review over 3 months		
	Medical devices and theatre set/kit issues	Thematic review		
	Clinical deterioration of post-operative patient	AAR PSII if deficiencies in care identified		
Practice Plus Group Hospital, Emerson's Green	Two incidents of wrong TTA medication given to patients on discharge from the same department	Thematic review Process mapping		
Practice Plus Group Hospital, Ilford	Five or more avoidable cancellations in any one month	Thematic review		
	Delayed MDT input	Swarm huddle		
Practice Plus Group, NW Ophthalmology	Three or more patients with Posterior Capsule Ruptures in one month, or if recurring within a list	Thematic review		
Practice Plus Group Hospital, Shepton Mallet	Patient fall >5 patient falls	Swarm huddle Thematic review		
	>5 medication administration errors	Thematic review		

References

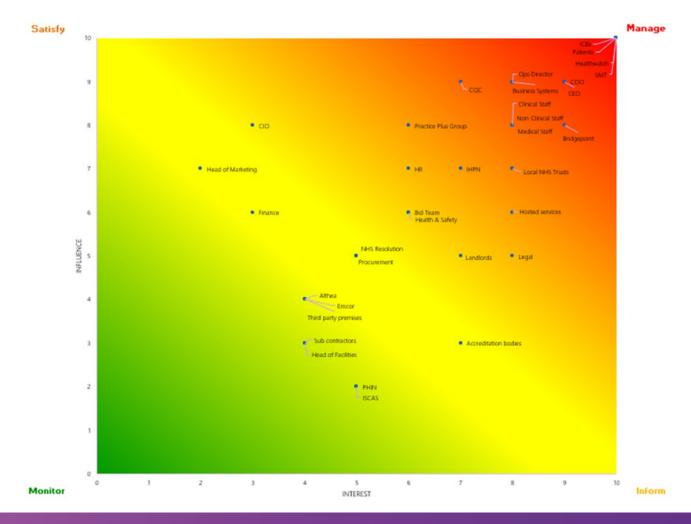
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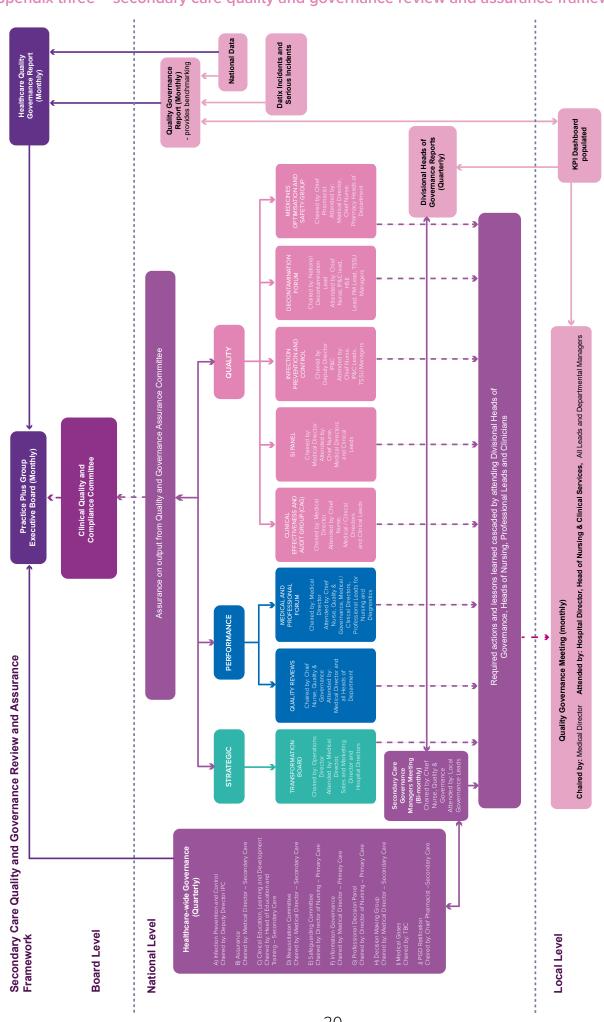
Appendix one - Practice Plus Group Secondary Care Services

Hospitals and Surgical Centres	Dental surgery	Diagnostic imaging	Ear, nose and throat	Endoscopy	Ophthalmology	Foot and ankle surgery	General surgery	Gynaecology	Hand and wrist surgery	Hip surgery	Knee surgery	Shoulder and elbow surgery	Spinal surgery	Urology
Practice Plus Group Hospital, Barlborough, Chesterfield, S43 4XE		✓			✓	✓	✓		✓	✓	✓	✓	/	
Practice Plus Group Hospital, Emerson's Green, BS16 7FH	✓	✓	✓	✓	✓	√	√	✓	✓	✓	✓	√		✓
Practice Plus Group Hospital, Ilford, IG3 8YY		√		✓	√	√	√		√	✓	✓	√		
Practice Plus Group Hospital, Plymouth, PL6 5XP		✓		✓	✓	✓	✓		✓	✓	✓	✓		
Practice Plus Group Hospital, Shepton Mallet, BA4 4LP		✓		✓	✓	✓	✓	✓	/	✓	✓	✓		\
Practice Plus Group Hospital, Southampton SO14 0YG	\	\		✓	✓	\	\	✓		✓	✓	\		
Practice Plus Group Surgical Centre, Devizes, SN10 3UF	✓	\	\	✓	✓	✓	✓	✓	✓					\
Practice Plus Group Ophthalmology, Rochdale OL16 2UP					✓									
Practice Plus Group Surgical Centre, Gillingham, ME8 6AD		✓		✓	✓	✓	✓		✓					
Practice Plus Group Surgical Centre, St Mary's Portsmouth, PO3 6DW			√	✓	✓	√	√		√					✓

UTCs, MSK and Diagnostics	Urgent Care	Х-гау	MRI	Ultrasound	Echo- cardiogram	Landmark guided	Ultra- sound-guided	Hand & wrist	Men's health	Telemedicine	Spinal clinic	Sports injury	Women's health	Women's health
Practice Plus Group Urgent Treatment Centre, St Mary's Portsmouth, PO3	✓	✓												
Practice Plus Group Urgent Treatment Centre, Southampton, SO14 0YG	√	√												
Practice Plus Group MSK & Spinal Service, Lincolnshire		√	✓	√		√	√							
Practice Plus Group MSK, Buckinghamshire						√	✓	√	√	√	√	√	√	✓
Practice Plus Group MSK, Berkshire West														√
Practice Plus Group Diagnostics, Buckinghamshire		✓	✓	✓	✓									
Practice Plus Group Diagnostics, Havant		/		✓	/									

Appendix two – PSIRF implementation stakeholder map





Learning Response Review and Improvement Tool







Report details:		ID		Title		
a	nd report writing. with HSIB and NHS	The tool was originally de	eveloped by ed in approx	NHS Scotla	and. It has NHS Trus	raps to avoid' in safety investigations been further refined in collaboration ts and healthcare organisations in
	ow to use nis tool:	inform the develop	ning respons oment of the written repor	written reg	oort de construc	patient safety incident or complaint, to
	rea of review rescriptor)		Rating sca	ale		Comments / examples of text quotes Add comments to clarify your ratings, this may be things that can be improved or content that you thought worked well and should be used in other reports
1	The report demon all those affected staff, patients, fam been actively liste supported where	aged and involved astrates evidence that by the incident such as ailies and carers have ned to and emotionally required (i.e. interviews of those affected are	Good evidence	Some evidence	Little evidence	
The systems approach is applied The report demonstrates consideration of system-based performance influencing factors (e.g. task complexity, technology, work procedures, workplace design, information transfer, clinical condition of patient, stress, fatigue, culture, leadership/management, policy/regulation) and how these interacted to contribute to the incident in question.		Good evidence	Some evidence	Little evidence		

3	'Human Error' is considered as a symptom of a system problem 'Human error' or similar (e.g. nurse error, medical error, loss of situation awareness) is not concluded to be the 'cause' of the incident. Instead, multiple contributory factors which influenced the event are explored.	Good evidence	Some evidence	Little evidence
4	Blame language is avoided Language does NOT directly or indirectly infer blame of individuals, teams, departments, or organisations and/or focus on human failure (i.e. the nurse failed to follow policy; the doctor lost situation awareness).	Good evidence	Some evidence	Little evidence
5	Local rationality is considered The report clearly explains why the decisions and actions taken by individuals involved felt right at the time (i.e. the situation and context faced by those individuals is explored and described).	Good evidence	Some evidence	Little evidence
6	Counterfactual reasoning is avoided The report focuses on what happened and understanding why and NOT what people, departments or organisations 'could' or 'should' have done during or before the incident.	Good evidence	Some evidence	Little evidence
	Safety actions/recommendations are effective	Good evidence	Some evidence	Little evidence
7	Safety actions/recommendations proposed: have been developed collaboratively with relevant staff/stakeholders and with consideration of wider organisation priorities and improvement work focus on system elements (IT, equipment, care processes/pathways) not individuals are specific, robust and actionable i.e. they don't add to 'safety clutter' are accompanied by a plan to monitor progress over time are demonstrably linked to the evidence and findings in the report	0	0	0
	The written report is clear, easy to read and anonymised The report is concise, written in plain	Good evidence	Some evidence	Little evidence
8	The report is correise, Writter in plant		-	-

	Name	Title	Date
Author	Joanne Kinborough Mata	Head of Patient Safety	December 2023
Reviewer		Clinical Quality and Compliance Committee Practice Plus Group Board	26 February 2024 02 April 2024
Authoriser		NHS Hampshire and Isle of Wight ICB	05 March 2024

Review date 1st April 2025, Version 1 PPG2088 Apr.24 (0474)