An Announced Care Inspection Report
25 July 2017

Armagh Orthodontic Clinic Ltd
Type of Service: Independent Hospital (IH) – Dental Treatment
Address: Gillis Terrace, Loughgall Road, Armagh BT61 7NX
Tel No: 028 3752 5665
Inspector: Winifred Maguire

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

- **Is care safe?** Avoiding and preventing harm to service users from the care, treatment and support that is intended to help them.
- **Is care effective?** The right care, at the right time in the right place with the best outcome.
- **Is the service well led?** Effective leadership, management and governance which creates a culture focused on the needs and the experiences of service users in order to deliver safe, effective and compassionate care.
- **Is Care Compassionate?** Service users are treated with dignity and respect and should be fully involved in decisions affecting their treatment, care and support.

2.0 Profile of service

This is a registered dental practice with two registered places, providing both private and NHS orthodontic treatment.
3.0 Service details

<table>
<thead>
<tr>
<th>Registered Organisation</th>
<th>Registered Manager:</th>
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<tr>
<td>Armagh Orthodontic Clinic Ltd</td>
<td>Ms Jane Gormley</td>
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<table>
<thead>
<tr>
<th>Registered Person:</th>
<th>Date manager registered:</th>
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<tbody>
<tr>
<td>Ms Jane Gormley</td>
<td>3 January 2013</td>
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<table>
<thead>
<tr>
<th>Person in charge at the time of inspection:</th>
<th>Number of registered places:</th>
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<tr>
<td>Ms Jane Gormley</td>
<td>2</td>
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<table>
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<tr>
<th>Categories of care:</th>
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<tr>
<td>Independent Hospital (IH) – Dental Treatment</td>
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Armagh Orthodontic Clinic Ltd operates a total of three dental chairs. The practice is registered with RQIA for two dental chairs which are used for private and NHS orthodontic treatment, while the third dental chair is used for NHS orthodontic treatment only.

4.0 Inspection summary

An announced inspection took place on 25 July 2017 from 10.00 to 13.15.

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 staff training and development, patient safety in respect of radiology and the management of medical emergencies, infection prevention and control and decontamination, the environment, the range and quality of audits, health promotion and engagement to enhance the patients’ experience.

One area of improvement against the minimum standards has been made with regards to the safeguarding lead/champion undertaking formal training in safeguarding adults and amending the adult safeguarding policy.

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

<table>
<thead>
<tr>
<th>Total number of areas for improvement</th>
<th>Regulations</th>
<th>Standards</th>
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Details of the Quality Improvement Plan (QIP) were discussed with Ms Jane Gormley, 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 7 July 2016

Other than those actions detailed in the QIP no further actions were required to be taken following the most recent inspection on 7 July 2016.

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 staff prior to the inspection by the practice on behalf of RQIA. Patient questionnaires were also provided to the practice for issue to patients; however Ms Gormley declined to issue these, following consultation with her dental advisory body. The purpose of the patient questionnaires were discussed with Ms Gormley. Returned completed staff questionnaires were analysed prior to the inspection.

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

During the inspection the inspector met with Ms Gormley, registered person, a dental nurse and a trainee dental nurse. A tour 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 Ms Gormley at the conclusion of the inspection.

### 6.0 The inspection

### 6.1 Review of areas for improvement from the most recent inspection dated 7 July 2016

The most recent inspection of the practice was an announced 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 7 July 2016

<table>
<thead>
<tr>
<th>Area for improvement 1</th>
<th>Validation of compliance</th>
</tr>
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<tbody>
<tr>
<td>Ref: Standard 11</td>
<td>Met</td>
</tr>
<tr>
<td>Stated: First time</td>
<td></td>
</tr>
<tr>
<td>Action required to ensure compliance with The Minimum Standards for Dental Care and Treatment (2011)</td>
<td>The following records should be retained in the practice and be available for inspection:</td>
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<tr>
<td></td>
<td>- a record of all documentation relating to the recruitment process</td>
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<td></td>
<td>- a record of training and professional development activities completed by staff</td>
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<td>- a record of the annual appraisal for each member of staff</td>
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**Action taken as confirmed during the inspection:**

All of the following records were available for inspection:

- a record of all documentation relating to the recruitment process
- a record of training and professional development activities completed by staff
- a record of the annual appraisal for each member of staff
development activities completed by staff
- a record of the annual appraisal for each member of staff

<table>
<thead>
<tr>
<th>Area for improvement 2</th>
<th>A robust system should be introduced to monitor the professional indemnity status of those who require individual professional indemnity.</th>
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<tbody>
<tr>
<td>Ref: Standard 11</td>
<td>Action taken as confirmed during the inspection: A robust system to monitor the professional indemnity status of those who require individual professional indemnity was in place.</td>
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<tr>
<td>Stated: First time</td>
<td>Met</td>
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<tr>
<th>Area for improvement 3</th>
<th>Minutes of staff meetings should be retained in the practice.</th>
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<tbody>
<tr>
<td>Ref: Standard 11.6</td>
<td>Action taken as confirmed during the inspection: Minutes of staff meetings have been retained in the practice and were available for inspection.</td>
</tr>
<tr>
<td>Stated: First time</td>
<td>Met</td>
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### 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**

Three dental surgeries are in operation in this practice two of which are registered for private orthodontic treatment. Discussion with staff and a review of completed 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 one 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 Ms Gormley confirmed that a member of staff had been recruited since the previous inspection. A review of the personnel files for this member of staff demonstrated that all the relevant information as outlined in Schedule 2 of The Independent Health Care Regulations (Northern Ireland) 2005 has been sought and retained.

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/champion had not yet completed formal training in safeguarding adults in keeping with the Northern Ireland Adult Safeguarding Partnership (NIASP) training strategy (revised 2016). Ms Gormley agreed to explore options in relation to the provision of this training including the provision of onsite formal training for all staff.

Policies and procedures were in place for the safeguarding and protection of adults and children at risk of harm. The policy for safeguarding children included the types and indicators of abuse and had the relevant contact details for onward referral to the local Health and Social Care Trust should a child protection issue arise.

The adult safeguarding policy did not fully reflect the regional guidance document entitled ‘Adult Safeguarding Prevention and Protection in Partnership’ (July 2015). The relevant contact details for onward referral to the local Health and Social Care Trust should an adult safeguarding issue arise were not included and a copy of these details were forwarded to Ms Gormley following inspection.

An area for improvement against the minimum standards was identified in relation to adult safeguarding training and updating the adult safeguarding policy.

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 with the exception of a paediatric self-inflating bag with reservoir. Evidence of the purchase of a paediatric self-inflating bag with reservoir was provided to RQIA following inspection. 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. A minor amendment was suggested and a copy of the amended policy was forwarded to RQIA following inspection. 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 most work surfaces were intact and easy to clean; with the exception of a small strip of the work surface in the surgery which was missing. Ms Gormley gave assurances that this small area would be made good as a priority. 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 a washer disinfector and two steam sterilisers 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.

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 June 2017.
A range of policies and procedures were in place in relation to decontamination and infection prevention and control.

Radiography

The practice has an intra-oral x-ray machine and an orthopan tomogram machine (OPG) with lateral cephalogram, which are 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, x-ray audits and digital x-ray processing.

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 fair standard of maintenance and décor. Some of the paintwork is showing sights of wear and tear and Ms Gormley gave assurances it was her intention to redecorate the practice in the near future.

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. This included the routine servicing of the fire detection system and firefighting equipment and intruder alarm. The fixed electrical wiring installations had been inspected in October 2016.

A legionella risk assessment was completed in house and water temperatures are monitored and recorded as recommended.

A fire risk assessment had been undertaken in June 2017 and routine checks are completed in respect of the fire detection system.

It was confirmed that arrangements are in place to review the legionella and fire risk assessments on an annual basis.
A written scheme of examination of pressure vessels was in place.

Ms Gormley confirmed that no prescription pads/forms are retained in the practice. Should a patient require a prescription, arrangements are in place to refer them to their own dentist for treatment.

**Patient and staff views**

As previously outlined patients questionnaire were provided to Ms Gormley for issue to patients; however Ms Gormley declined to issue these following consultation with her dental advisory body.

Seven staff submitted questionnaire responses. All indicated that they felt that patients are safe and protected from harm and indicated that they were very satisfied with this aspect of care. Staff spoken with during the inspection concurred with this. No comments were included in submitted questionnaire responses.

**Areas of good practice**

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

**Areas for improvement**

The adult safeguarding policy should be updated to reflect the regional guidance document entitled ‘Adult Safeguarding Prevention and Protection in Partnership’ (July 2015) and the safeguarding lead/champion must complete formal training in safeguarding adults at risk of harm and abuse. The adult safeguarding training must be in keeping with the Northern Ireland Adult Safeguarding Partnership (NIASP) training strategy (revised 2016).

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**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.

Staff 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.
Both manual and computerised records are maintained. Electronic records have different levels of access afforded to staff dependent on their role and responsibilities. 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. Information leaflets and posters were available in the practice promoting good oral health. Staff confirmed that oral health is actively promoted on an individual level with patients during their consultations. Patients are provided with oral and written aftercare instructions when braces are fitted and models are available to demonstrate good teeth cleaning techniques. The practice website contains information to promote good oral hygiene. A dental hygienist is also available to provide advice and support to patients in relation to oral hygiene.

**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
- assimilation of information retained by patients
- a range of monthly checks in relation to the environment

**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 quarterly 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.
**Staff views**

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 and indicated that they were very satisfied with this aspect of care. Staff spoken with during the inspection concurred with this. No comments were included in submitted questionnaire responses.

**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.

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<th>Regulations</th>
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**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 comments included:

- “Very efficient service.”
- “Excellent.”
- “Prompt and on time.”
- “I was more than impressed with the care and attention I received.”
Patient feedback whether constructive or critical, is used by the practice to improve, as appropriate.

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.

**Staff views**

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 and indicated that they were very satisfied with this aspect of care. Staff spoken with during the inspection concurred with this. No comments were included in submitted questionnaire responses.

**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.

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**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.

Ms Gormley is the nominated individual with overall responsibility for the day to day management 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 an annual 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.

Ms Gormley demonstrated a clear understanding of her 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.

**Staff views**

All submitted staff questionnaire responses indicated that they felt that the service is well led and indicated that they were very satisfied with this aspect of the service. Staff spoken with during the inspection concurred with this. No comments were included in submitted questionnaire responses.

**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.

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<th>Regulations</th>
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<tr>
<td><strong>Total number of areas for improvement</strong></td>
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7.0 Quality improvement plan

Areas for improvement identified during this inspection are detailed in the QIP. Details of the QIP were discussed with Ms Jane Gormley, registered person, as part of the inspection process. The timescales commence from the date of inspection.

The registered person/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 person 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 dental practice. 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; 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).

7.2 Actions to be taken by the service

The QIP should be completed and detail the actions taken to address the areas for improvement identified. The registered provider should confirm that these actions have been completed and return the completed QIP to Independent.Healthcare@rqia.org.uk for assessment by the inspector.

RQIA will phase out the issue of draft reports via paperlite in the near future. Registered providers should ensure that their services are opted in for the receipt of reports via Web Portal. If you require further information, please visit www.rqia.org.uk/webportal or contact the web portal team in RQIA on 028 9051 7500.
## Quality Improvement Plan

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<thead>
<tr>
<th>Action required to ensure compliance with The Minimum Standards for Dental Care and Treatment (2011)</th>
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<tbody>
<tr>
<td><strong>Area for improvement 1</strong></td>
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<tr>
<td><strong>Ref</strong>: Standard 15.3</td>
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<td><strong>Stated</strong>: First time</td>
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<td><strong>Ref</strong>: 6.4</td>
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*Please ensure this document is completed in full and returned to Independent.Healthcare@rqia.org.uk from the authorised email address*