

# Policy for Patient Access

## DOCUMENT CONTROL

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### Introduction

This Policy sets out the overall expectations of Newmedica on the management of referrals and admissions into and within the organisation. It also sets out the responsibilities of Newmedica staff. This policy details how patients will be managed administratively at all points of contact within Newmedica.

The policy has been developed to ensure Newmedica in conjunction with its commissioners provides a consistent, equitable and fair approach to the management of patient referrals and treatment that meets the requirements of the NHS Operating Framework and the commitments made to patients in the NHS Constitution and Accessible Information Standard.

Newmedica will use this policy to demonstrate how rules are applied fairly and with equity in the provision of planned care.

Newmedica will work to ensure fair and equal access to services for all patients, and ensure it meets its obligations towards people who have had, or have disabilities under the Equality Act (2010). This places a legal obligation on organisations to make reasonable adjustments to facilitate the care of people with disabilities. The decision as to what adjustments to make is not prescriptive, and must be agreed with the patient, their carer and the team caring for the person. By Law, if the adjustment is reasonable, then it should be made. Examples of reasonable adjustments can be found in the NHS England Guidelines: 'supporting people with a learning disability and/or autism who have a mental health condition or display behaviour that challenges' <https://www.england.nhs.uk/wp-content/uploads/2015/07/ld-draft-serv-mod.pdf>

## **Objectives**

This policy aims to inform patients, their relatives and carers of their rights and what they can expect from Newmedica in terms of access to services by outlining relevant rules, responsibilities and actions by which Newmedica will manage patients through their pathways, specifically:

The national 18-week Referral to Treatment (RTT) pathway, which is about improving patients' experience of the NHS, ensuring all patients receive high quality elective care without any unnecessary delay.

National Cancer Waiting Times for all suspected and diagnosed cancers.

The national 6-week guidance for diagnostic tests.

In accordance with the NHS Constitution everyone has the right to access certain services commissioned by NHS bodies within maximum waiting times, or for the NHS to take all reasonable steps to offer a range of suitable alternative providers if this is not possible. This includes a right to start consultant-led treatment within a maximum of 18 weeks from referral for non-urgent conditions; and

This policy sets out the way in which Newmedica will manage patients who are waiting for treatment or on treatment pathways. It covers the management of patients at all sites where Newmedica operates, including community clinics.

Every process in the management of patients who are waiting for treatment must be clear and transparent to the patients and to partner organisations and must be open to inspection, monitoring and audit. This policy sets out how Newmedica will manage 18-week RTT pathways and suspected cancer referrals in line with national targets and guidance. Application of the policy where applicable will ensure that each patient's RTT clock starts and stops fairly and consistently in accordance with an agreed structured methodology. Treatment decisions will be fair and transparent and at an operational level this translates into the adoption of the following key principles:

The management of patients will be fair, consistent and transparent and communication with patients will be clear and informative and will be consistent with the Human Rights Act 1998 and the Equality Act 2010.

Patients seen in outpatients, or diagnostics will be seen firstly according to clinical priority and then in chronological order based upon the 18-week RTT pathway.

We will attempt wherever possible to agree appointment dates to suit patients' personal circumstances.

This policy is intended to be used by all those individuals within Newmedica, who are responsible for managing referrals, adding to, and maintaining waiting lists for organising patient access to treatment. The principals of the policy apply to both medical and administrative waiting list management.

## **Responsibility, Accountability & Duties**

The following are required to instigate appropriate actions to ensure the successful implementation of

this policy within their area(s) of control:

Patients should keep appointments, or if they must cancel, cancel within a reasonable time in order that the appointment can be re-used for another waiting patient. Receiving treatment within the maximum waiting times may be compromised unless patients try wherever possible to keep their original appointments.

Newmedica Medical Advisory Committee – Approval & clinical input of this policy.

Quality Management Committee - Consultation and input to this policy.

Service Managers - Responsible for waiting list and patient access.

Director of Operations and Governance - Participate with the Directors in monitoring Newmedica and commissioning, contract, service agreements, national and local standards and strategies, undertaking benchmarking, reporting and review work as necessary.

All Directors - Responsible for the overall application and adherence to this policy and procedures within their areas of responsibility.

Clinical Staff:

Consistent application and adherence of this policy and its principles.

Consideration is to be given by clinical staff for cross-cover arrangements during periods of annual leave or other absences.

A minimum of 6 weeks' notice is necessary for consultant and medical staff planned leave to ensure patient appointment dates are honoured and to reduce the need for changes and cancellations. All leave requests must be authorised by the line manager.

All referrals (electronic and paper) into Newmedica should be reviewed and prioritised within contract KPI timelines by the accepting clinician to confirm clinical priority, appropriateness and capacity to treat within the mandated timelines.

Head of Operational Governance:

Provide professional leadership on all records management issues within Newmedica to ensure an efficient quality case note service to support effective patient care.

Initiating, interpreting and implementing changes in response to service developments, risk standards, legislation and to ensure the department is compliant with the Newmedica's strategic objectives.

Service Managers:

Responsible for the application of this policy at Service level, including the delivery of national and local targets.

Responsible for training their staff as it relates to patient access and administration.

Responsible for ensuring the minimum 6 weeks' notice required for changes to rota's is adhered to in order to reduce the impact on patient experience and the administrative burden this entails if clinics should be cancelled.

Responsible for providing information and analysis support to monitor targets and adherence to this policy.

Central Operations Director:

Responsible for the production of the Patient Access Policy and the associated user guidance and their routine review. Also, responsible for their compliance and setting the standards for training around patient access and administration.

Responsible for the provision and accuracy of information, data quality reports and the content of EMMA training.

Provide professional leadership on all records management issues within Newmedica to ensure an efficient quality case note service to support effective patient care.

Initiating, interpreting and implementing changes in response to service developments, risk standards, legislation and to ensure the department is compliant with the Newmedica's strategic objectives.

Responsible for the training and education of administrative operatives as it relates to patient access and administration.

Administrators and Secretaries:

Responsible for the day-to-day management and application of their responsibilities in line with this policy.

## **Management of the Policy**

Newmedica recognises the complexity of waiting list and patient access management. National rules are often complex but the procedures contained within this policy for patient access (PPA) give clear direction and expectations of both staff and patients.

The routine management and updating of the PPA is led by the Director of Operations & Governance and passed to the policy review group for publication.

## **Consultant Responsibilities**

Consultants clinically manage the needs of individual patients accessing Newmedica services.

Leave and Clinic Cover - A minimum of 6 weeks' notice for consultant and medical staff planned leave must be given to ensure patient appointment dates are honoured and that the re-work required when clinics are cancelled is kept to a minimum. All leave requests must be authorised by the Service Manager.

Priority treatment for Military Veterans – From 1 January 2008, all military veterans should receive priority access to NHS care for any conditions which are likely to be related to their service, subject to the clinical needs of all patients. Veterans are encouraged to tell their General Practitioner about their veteran status in order to benefit from priority treatment.

### **Newmedica Responsibilities for Patients with Learning Disabilities**

Where a person is recognised as having a learning disability, the clinician should ensure that the notes are recorded appropriately to support the teams, the patient and their carers/family with access to the appointment and any reasonable adjustments that may be required during subsequent appointments / treatment episodes.

#### **Operational Management Responsibilities**

Patients with a learning disability and their families / carers must be supported with reasonable adjustments to ensure equitable access to treatment.

If a service is unable to contact a patient, the Newmedica Discharge protocol should be followed, this is further covered later in this policy.

Patients are to be seen within their maximum waiting times allowable.

Information reports should be used to actively plan capacity to ensure achievement of waiting time targets and thus incur no breaches.

Referrals and booking rules should be actively monitored in order to respond flexibly to demand and to deliver flexible capacity.

Changes to booking rules must be authorised by the Central Ops Director and agreed with a Clinical Director. The exceptions are:

- Ad hoc requests with no reduction to patient booking numbers.
- Changes to medical staff rotas.
- Additions of target urgent slots for patients about to breach.

Systems should be in place to ensure patients do not breach the 18-week RTT targets. Service Managers will monitor pathways and escalate patients to the appropriate manager where a breach is expected.

Staff are to comply with EMMA data quality standards.

Reasons for DNAs should be accurately recorded and monitored as should patient cancellations and discharges (particularly discharges without treatment).

The content of the Directory of Services on E-Referral should be accurate at all times.

Application of the clinical leave policy should be adhered to at all times.

Ensure booking rules reflect appropriate levels of capacity for new and follow-up consultations and monitor variances in new-to-follow up ratios.

### **Consultant to Consultant & Consultant to GP Referrals**

Direct referrals will be appropriate for:

Suspected cancer.

Urgent problems for which delay would be detrimental to the patient's health. The expectation here would be that the patient needs to be seen within 2 weeks.

Referral as part of the same clinical problem.

Part of the recognised pathway of care for the condition

Transfer of responsibility of care for an on-going condition, when it would be more convenient for the patient to be seen in a different location.

Referral back to GP will be appropriate for:

Conditions that are unrelated to the presenting problems and do not require urgent referral.

Incidental findings.

Conditions that can be dealt with by the GP.

Those patients who Did Not Attend (DNA) their appointment (subject to the KPIs/local agreements).

Those patients who cancel their appointments on multiple occasions (subject to KPIs/local agreements)

Referral Queries:

If there is any doubt as to whether a patient needs to be managed by Newmedica or whether a patient should be offered another choice of hospital, consultant or treatment option, the responsible Consultant should contact the patient's GP to discuss the case.

Patients will only be added to a waiting list if there is an expectation of treating them and they are clinically fit or there is an expectation that they may become fit and ready to undertake the treatment within 18 weeks.

With the exception of urgent screening referrals, all referrals (electronic and paper) will be reviewed and prioritised within contract KPI timelines of receipt.

Processes around the use of the NHS e-Referral Service Advice & Guidance (A&G) service (designed to support GPs with referral queries) must be standardised across Newmedica and, in accordance with contractual requirements. As the NHS e-Referral Service system only supports one response, a

'holding' message must not be used.

At least 2 weeks' notice must be given to the patient when agreeing an appointment date. The only exceptions to this are:

- Where it is clinically urgent
- For a diagnostic test/procedure, where a reasonable offer is 10 days or more.
- Where patients make themselves available at short notice.

### **General Data Protection Regulations 2017 – Patient Requests**

For a patient Subject Access Request (SAR) please refer to the SAR Policy.

Should a patient make a request to restrict the processing of their data, Service Managers should contact the Governance Department at the Support Office for Advice.

Should a patient object to Newmedica processing their data then the referral should be refused and returned to the patients General Practitioner for further discussion.

### **NHS E-Ref Service**

NHS e-Referral Service is a national electronic referral service which gives patients a choice of place, date and time for their first outpatient appointment in a hospital or clinic. The guidance states that the responsibility for the effective implementation of NHS e-Referral Service should be shared between organisations. For example:

Providers are responsible for ensuring that services are made available on NHS e-Referral Service and that patients can book into appointments using the system

Referrers are responsible for using NHS e-Referral Service effectively to find suitable services for their patients

Commissioners are responsible for ensuring that services available on the system accurately represent the clinical needs of their patient population and that those referrers and providers use the system effectively for the benefit of all patients.

### **Appointment Slot Issues**

When no clinic appointment is available for patients to book in the NHS e-Referral Service, the referral can be forwarded (via the Patient Web Application) or deferred (via the professional application) to the provider to enable the provider to book the patient an appointment. When a referral is forwarded or deferred, it will appear on the provider's 'Appointment Slot Issues' (ASI) worklist.

There are two reasons why there may be no clinic appointment available on the NHS e-Referral Service. The first is that, in very rare circumstances, a technical issue can prevent an appointment slot from being shown or booked. The second and usual reason is that where we are providing directly



bookable services we have not made sufficient appointment slots available to the NHS e-Referral Service.

If patients are left on the ASI worklist and their referrals are not processed then the following significant patient safety effects can occur:

Some patients may not receive appointments within reasonable timescales. In some cases, this delay to care could pose a serious danger to their health and wellbeing.

Patients without an appointment will have had no clinical review of their referral, as referral information only becomes visible to the provider once an appointment is booked in the NHS e-Referral Service. This means that providers will not have had the opportunity to change the priority of a referral.

Patients who have been referred into an inappropriate service will not have been identified and there will have been no opportunity to re-direct them into a more appropriate service.

Service managers must ensure that all staff managing the ASI worklists are appropriately trained, are in the correct workgroups, and have the necessary skills and authority to manage these referrals effectively, within the required timescales.

### **Referral to Treatment Rules**

The NHS Constitution confirms that all patients have the legal right to start NHS consultant-led treatment within a maximum of 18 weeks from referral, unless they choose to wait longer or it is clinically appropriate that they wait longer. The national standard for 18-week RTT is:

Those on an incomplete pathway whose clock is still running; 92% of those on the waiting list should not have waited more than 18 weeks.

Consultant-led treatment includes treatments where a consultant retains overall clinical responsibility for the treatment. This could include treatments provided by the service or team led by the consultant. The setting of the consultant-led treatment, whether hospital-based or in a community-based clinic, will not affect a patient's right to start treatment within 18 weeks.

### **RTT Measurement**

**Clock Starts.** A clock start is the date that the Unique Booking Reference Number (UBRN) is converted in the case of referrals made via e-Referral Service, or when Newmedica receives notice of the referral in to any service (consultant led, interface or assessment service) via FAX.

'Defer to Provider' functionality is used in the NHS e-Referral Service. Where a paper referral is sent, the clock start is the date on which the referral is received by Newmedica.

**Clock Continues** The clock continues while tests and investigations are taking place.

A clock does not automatically stop when a patient DNAs a follow-up appointment.

The clock does not stop when a patient gives more than 24 hours' notice that they are unable to attend an appointment.

**Clock Stops** The 18-week clock stops when first definitive treatment is given i.e. treatment given surgically or non-surgically or when the following is communicated without undue delay to the patient and subsequently their GP and/or other referring practitioner:

It is clinically appropriate to return the patient to primary care for any non-consultant-led treatment in primary care.

A clinical decision is made to start a period of active monitoring.

A patient declines treatment having been offered it.

A clinical decision is made not to treat.

A patient DNAs their first appointment twice following the initial referral that started their 18-week clock, provided that the provider can demonstrate that the appointment was clearly communicated to the patient.

A patient DNAs any other appointment twice and is subsequently discharged back to the care of their GP provided that:

Newmedica can demonstrate that the appointment was clearly communicated to the patient.

Discharging the patient is not contrary to their best clinical interests.

Discharging the patient is carried out according to publicly available, policies on DNA's.

If there is a delay in booking a further follow-up appointment because the patient preference makes it "impossible or unreasonable" for 18 weeks to be achieved for that patient, they will be discharged back to their GP. For example, if the patient repeatedly denies treatment or appointments offered or in accordance with Para 9 below.

In order to ensure that the above RTT standards are adhered to, this policy confirms that:

Service Managers will undertake a review of breaches of the RTT standards in order to identify themes to address to prevent a reoccurrence. This will be supported by the clinical lead responsible for the patient's treatment.

The reasons for breaches are to be reviewed regularly by Central Operations and fed in to appropriate forums and / or escalated where appropriate.

The Quality Management Committee will receive a regular report detailing the volume of breaches by speciality and reason, together with a supporting document detailing any lessons identified and subsequently learned, from the Service Managers

Newmedica will formally document the process for escalation of issues related to RTT delivery.

## **Refusal of Referrals**

NHS guidance states that providers should accept all clinically appropriate referrals made to them. Patients choosing a particular NHS provider must be treated by that provider as long as this is clinically appropriate and in accordance with the patient's wishes.

## **Patients who DNA and Cancellations by Newmedica and the Patient**

If a patient DNAs an appointment (local KPIs differ), they should be referred back to their GP, unless the consultant deems it clinically necessary to offer another appointment, and they will be removed from the waiting list (a letter confirming their removal must be sent to the patient and their GP). If a patient cannot make a planned appointment, they should contact their clinic as soon as possible as this may make it possible for the appointment to be offered to somebody else who is waiting.

Regarding measurement of RTT times, the national guidance states that:

For first appointments on an RTT pathway:

If the patient DNAs, their RTT clock can be stopped and nullified on the date of the DNA appointment.

If the patient DNAs but Newmedica chooses to rebook the patient, then their original RTT clock would be stopped on the date of the DNA appointment and a new clock will start (at zero) on the date that the Newmedica rebooks the patient.

For subsequent appointments on an RTT pathway:

If the patient DNAs and the Newmedica returns the patient back to primary care, then their RTT clock would stop on the date of the DNA appointment.

If the patient DNAs but the Newmedica chooses to rebook the patient, then their existing RTT clock would continue to tick.

If a patient DNAs their appointment in accordance with the policy, the following will occur:

Adults - where there are no safeguarding issues, the patient will be discharged back to their GP. Where there are potential safeguarding issues, the patient should be offered another appointment.

Children - will automatically be offered another appointment. In DNA cases, all Consultants must identify whether safeguarding issues are a factor and whether the DNA constitutes potential neglect of medical needs. Children who fail to attend a second outpatient appointment will be discharged back to their GP and the Safeguarding Lead should be informed. For missed follow-up appointments, the lead clinician will decide if there is a clinical need for follow-up in the community or whether primary care management would be appropriate. An assessment will be made as to whether the repeated non-attendance of the child could indicate neglect of their health needs and further referrals to safeguard the wellbeing of the child/young person may be made.

For patients with a series of planned appointments, DNA's will need to be considered on a case-by-case basis by the lead Consultant.

If a patient DNA's where a face-to-face interpreter has been booked, clinic administration staff are authorised to use that interpreter to attempt to make contact with the patient in order to establish a reason why and to offer a new appointment where that is appropriate in order to maximise the use of the translator resource.

In the event that an interpreter DNAs a pre-booked appointment, clinics are encouraged to continue with the appointment utilising other methods of communication, including attempting to resource interpretation services via the telephone service. Only if it is deemed clinically unsafe to continue with an appointment should a patient's appointment be cancelled and rescheduled.

### **Patient Tracking Lists (PTL)**

A PTL is a list of patients who need to be treated by given dates in order to start treatment within maximum waiting times set out in the NHS Constitution. A PTL is an established, forward-looking, management tool that is utilised by Newmedica to help achieve and sustain short Referral to Treatment and diagnostic waits. The PTL provides a prospective viewpoint, and so can act as a planning tool for managing patient waiting lists in a way that a retrospective data collection cannot.

Essentially, a PTL contains the data required to manage patients' pathways, by showing clearly which patients are approaching the maximum waiting time so referral management centre staff can offer dates according to clinical priority and within maximum waiting times. PTL lists for services can be accessed through Checks and Balances.

The NHS Standard Contract requires providers to submit information on referrals and waiting times. Where a CCG requests a PTL data set they are to be provided. Both the CCG and Newmedica should review this information routinely to understand performance.

### **General Booking and Referral Management Principles**

If the patient was discharged more than 6 months ago, GPs will have to re-refer if an appointment is required for the same condition.

Review of referrals must be completed within 7 working days.

Referrals are not expected to be routinely rejected. Newmedica can reject a referral that hasn't been accepted (to be seen) in NHS e-Referral Service, other rejections are maintained on EMMA post registration. The rejection process sends the patient back onto a work list at their GP surgery and the appointment is automatically cancelled on EMMA and NHS e-Referral Service. It is then the GP's responsibility to notify the patient of their appointment cancellation. All inappropriate referrals will be referred back to the GP for them to review the choice of provider prior to the referral being re-directed.

The 'Date Request Received' in EMMA constitutes a clock start for those patients on an active 18-Week RTT pathway. This is the date an attempt was made to convert a Unique Booking Reference Number into a booking for NHS e-Referral Service patients and the date the referral letter was received into the Newmedica for paper referrals.

Agreeing the dates of appointments with patients rather than notifying them of an appointment is the preferred option wherever possible in order to avoid the risk of patient cancellations or DNAs.

### **Summary of Guidelines for Managing New Referrals**

A new referral will be required for:

A new condition within the same specialty.

Same condition where previous referral was discharged over 6 months ago.

An assessment should have been undertaken by the referring clinician to determine any need for special considerations at the next level of care and this should then be recorded on EMMA to alert staff. If any new or changed requirements are identified during any treatment episode, then this information should be captured and EMMA updated.

### **Follow Ups**

Patients will only be followed up where there is a specific clinical need following the specialty protocol.

### **Changing/Cancelling Appointments at Patient Request**

Patients may have an additional option to cancel and change their outpatient appointment on line, via NHS e-Referral Service appointments must be cancelled and changed using the NHS e-Referral Service telephone appointments line or website.

If patient requests a rearrangement or cancellation within 24 hours of the appointment time it must be recorded as a patient cancellation and the 18-Week RTT clock will continue ticking and the reason for cancellation must be recorded.

If a patient cancels the same appointment twice they must be:

As a new patient, be removed from the registered referral list and referred back to their GP subject to clinical agreement.

As a follow-up patient, referred to the consultant for discharge to GP.

Patients can change NHS e-Referral Service appointments at any time; this is out of Newmedica's control.

All patient cancellations must be dealt with immediately to ensure they are not recorded as a DNA.

If a patient has to leave a clinic prior to being seen (clinic over-running or other circumstance), their appointment must be changed to ensure that they are not penalised in the 18-week cycle as the clock will continue ticking.

If a child's appointment is cancelled twice, the issues/concerns associated with this must be reviewed and assessed by the consultant, referring to the Newmedica policy for Safeguarding Children.

If a patient cancels an appointment a second time, they should be referred back to their GP unless there is a clinical decision not to do so.

### **Unable to Contact Patient**

If a service is unable to contact a patient, the following protocol must be followed before the patient is discharged:

Patient receives a minimum of two telephone calls. These sets (from first to last) of calls must be at least one week apart on different days and one am and one pm.

If there is no response from the patient, the patient must be sent an appointment in the post. This appointment must be at least five days away.

If the patient fails to attend this appointment, they will be discharged, depending upon the requirements of each specific contract. The following patients will not be discharged without clinician over read:

Children

Vulnerable patients

Breach patients in accordance with local policies

The discharge letter back to the GP will state why the patient has been discharged, should the GP wish to re-refer this patient they will follow the pathway and be seen within four weeks

This applies to all clinics.

### **Communication**

Under the Human Rights Act, the Equal Opportunities Acts and anti-discrimination legislation, Newmedica has a duty to provide interpreters for appointments when requested and to ensure reasonable adjustments are made for those patients and their families.

Interpretation can be managed via the telephone interpretation service or face-to-face with an interpreter present.

### **Priority Treatment for Veterans**

Where clinicians agree that a veteran's condition is likely to be service related, they are asked to prioritise veterans over other patients with the same level of clinical need. But veterans should not be given priority over other patients with more urgent clinical needs.

### **Overseas Visitors**

Before patients can access any community services, they must have registered with a GP and so will have satisfied eligibility for free NHS care at that time. If the patient bypasses/negates this process then Newmedica will initiate retrieval of NHS costs.

## Glossary

RTT – Referral to Treatment

PTL –Patient Tracking List

DNA – Patient did not attend

Active Monitoring - An 18w clock may be stopped where it is clinically appropriate to start a period of monitoring in secondary care without clinical intervention or diagnostic procedures. A new 18- week clock would start when a decision to treat is made following a period of active monitoring

NHS e-Referral service - A method of electronically booking a patient into the service of their choice.

First Definitive Treatment - An intervention intended to manage a patient's disease, condition or injury and avoid further intervention. What constitutes First Definitive Treatment is a matter for clinical judgement, in consultation with others as appropriate, including the patient.

## Key References

Accessible Information Standard. Available from: <  
<https://www.england.nhs.uk/ourwork/patients/accessibleinfo-2/>>

NHS e-Referral Service. Available from: < <http://www.hscic.gov.uk/referrals>>

Equality Act 2010. Available from: <  
<http://www.legislation.gov.uk/ukpga/2010/15/contents>>

Guide to NHS Waiting Times. Available from: <  
<http://www.nhs.uk/choiceintheNHS/Rightsandpledges/Waitingtimes/Pages/Guide%20to%20waiting%20times.aspx>>

Human Rights Act 1998. Available from: <  
<http://www.legislation.gov.uk/ukpga/1998/42/contents>>

Referral to treatment consultant-led waiting times - How to Measure. Available from: <  
<http://www.england.nhs.uk/statistics/wp-content/uploads/sites/2/2013/12/How-To- Measure-Jan-2012-Final.pdf>>

2014/15 Choice Framework. Available from: <  
<https://www.gov.uk/government/publications/nhs-choice-framework>>

## Links

### Please see also:

Policy for Dignity in Care	Policy for Consent & Mental Capacity
Policy for Monitoring Patients' Views	Policy for Information Management and Access to Health Records
Control of Documents and Records Procedure	Policy for Maintenance of Health Care Premises
Policy for Infection Prevention and Control	Policy for Medicines Management
Policy for Safeguarding Vulnerable Adults	Policy for Safeguarding Children