# **Care Quality Commission**

## **Inspection Evidence Table**

## **Bakersfield Medical Centre (1-547331315)**

Inspection date: 05 February 2020

Date of data download: 04 February 2020

## **Overall rating: Good**

At our previous comprehensive inspection on 20 December 2018 (report published 25 February 2019) we rated the practice requires improvement overall with ratings of requires improvement for safe and well-led services, and good for effective, caring and responsive services. The population groups were all rated good because patients could access timely and effective care and treatment.

At this inspection on 5 February 2020, we found the provider had made improvements and satisfactorily addressed areas of concern found at the previous comprehensive inspection. We have rated the practice Good overall with ratings of good in safe, effective, caring, responsive and well-led services.

Therefore, the practice is rated good for all the population groups of older people, people with long-term conditions, families, children and young people, working age people (including those recently retired and students), people experiencing poor mental health (including people with dementia), and people whose circumstances may make them vulnerable.

Please note: Any Quality Outcomes Framework (QOF) data relates to 2018/19.

### Safe

# **Rating: Good**

The provider is now rated Good for providing safe services.

The practice was previously rated requires improvement for providing safe services.

At the last comprehensive inspection in December 2018, we rated the practice requires improvement in providing safe services because:

- The practice did not have appropriate systems in place for the safe management of medicines.
- The practice needed to improve learning from significant events

At this inspection we found that these areas had been addressed.

#### Safety systems and processes

# The practice had clear systems, practices and processes to keep people safe and safeguarded from abuse.

Safeguarding	
There was a lead member of staff for safeguarding processes and procedures.	Υ
Safeguarding systems, processes and practices were developed, implemented and communicated to staff.	Υ
There were policies covering adult and child safeguarding which were accessible to all staff.	Υ1
Policies took account of patients accessing any online services.	N/A
Policies and procedures were monitored, reviewed and updated.	
Partners and staff were trained to appropriate levels for their role.	
There was active and appropriate engagement in local safeguarding processes.	
The Out of Hours service was informed of relevant safeguarding information.	
There were systems to identify vulnerable patients on record.	
Disclosure and Barring Service (DBS) checks were undertaken where required.	
Staff who acted as chaperones were trained for their role.	
There were regular discussions between the practice and other health and social care professionals such as health visitors, school nurses, community midwives and social workers to support and protect adults and children at risk of significant harm.	

Explanation of any answers and additional evidence:

 The practice kept registers of children and adults with safeguarding concerns, whose records were highlighted on the electronic clinical system and kept up to date as part of ongoing monitoring of their care.

Recruitment systems	Y/N/Partial
Recruitment checks were carried out in accordance with regulations (including for agency staff and locums).	Υ1
Staff vaccination was maintained in line with current Public Health England (PHE) guidance if relevant to role.	Y
There were systems to ensure the registration of clinical staff (including nurses and pharmacists) was checked and regularly monitored.	Y
Explanation of any answers and additional evidence:  1. We reviewed two staff files and found all the appropriate recruitment checks had been undertaken.	

Safety systems and records	Y/N/Partial
There was a record of portable appliance testing or visual inspection by a competent person.	Υ
Date of last inspection/test: June 2018, carried out every two years.	
There was a record of equipment calibration.  Date of last calibration: June 2019, carried out annually.	Y
There were risk assessments for any storage of hazardous substances for example, liquid nitrogen, storage of chemicals.	Υ
There was a fire procedure.	Υ
There was a record of fire extinguisher checks.  Date of last check: February 2019	Υ
There was a log of fire drills. Date of last drill: 21 May 2019	Υ
There was a record of fire alarm checks.  Date of last check: 29 January 2020	Υ
There was a record of fire training for staff.  Date of last training: Variable	
There were fire marshals.	Υ
A fire risk assessment had been completed.  Date of completion: 9 July 2019	Υ
Actions from fire risk assessment were identified and completed.	Υ
Explanation of any answers and additional evidence:	

Health and safety	Y/N/Partial
Premises/security risk assessment had been carried out.	V
Date of last assessment: 28 January 2020, carried out annually.	Y
Health and safety risk assessments had been carried out and appropriate actions taken.	V
Date of last assessment: 28 January 2020	'
Explanation of any answers and additional evidence:	

#### Infection prevention and control

#### Appropriate standards of cleanliness and hygiene were met.

	Y/N/Partial
There was an infection risk assessment and policy.	Υ1
Staff had received effective training on infection prevention and control.	Υ
Infection prevention and control audits were carried out.  Date of last infection prevention and control audit: November 2019	Y
The practice had acted on any issues identified in infection prevention and control audits.	Υ2
There was a system to notify Public Health England of suspected notifiable diseases.	Υ
The arrangements for managing waste and clinical specimens kept people safe.	Y

Explanation of any answers and additional evidence:

- The practice manager was the named lead for infection prevention and control; however, responsibilities were shared between the practice manager and the GPs.
- 2. We found the practice had acted on most of the actions identified in the last audit; the outstanding issues were part of a five year premises improvement plan, and risk assessed to protect patients.

#### Risks to patients

# There were adequate systems to assess, monitor and manage risks to patient safety.

	Y/N/Partial
There was an effective approach to managing staff absences and busy periods.	Y
There was an effective induction system for temporary staff tailored to their role.	Y
Comprehensive risk assessments were carried out for patients.	Y
Risk management plans for patients were developed in line with national guidance.	Y
The practice was equipped to deal with medical emergencies (including suspected sepsis) and staff were suitably trained in emergency procedures.	Y
Clinicians knew how to identify and manage patients with severe infections including sepsis.	Y
Receptionists were aware of actions to take if they encountered a deteriorating or acutely unwell patient and had been given guidance on identifying such patients.	Y
There was a process in the practice for urgent clinical review of such patients.	Y
When there were changes to services or staff the practice assessed and monitored the impact on safety.	Y
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Explanation of any answers and additional evidence:

Protocols in place included requests for urgent home visits for the reception team, which specified issues to be passed on to the GP on call and when to call emergency services.

#### Information to deliver safe care and treatment

# Staff had the information they needed to deliver safe care and treatment.

	Y/N/Partial
Individual care records, including clinical data, were written and managed securely and in line with current guidance and relevant legislation.	Υ
There was a system for processing information relating to new patients including the summarising of new patient notes.	Υ
There were systems for sharing information with staff and other agencies to enable them to deliver safe care and treatment.	Υ
Referral letters contained specific information to allow appropriate and timely referrals.	Υ
Referrals to specialist services were documented and there was a system to monitor delays in referrals.	
There was a documented approach to the management of test results and this was managed in a timely manner.	Υ
There was appropriate clinical oversight of test results, including when reviewed by non-clinical staff.	Υ
The practice demonstrated that when patients use multiple services, all the information needed for their ongoing care was shared appropriately and in line with relevant protocols.	Υ
Explanation of any answers and additional evidence:	

### Appropriate and safe use of medicines

The practice had systems for the appropriate and safe use of medicines, including medicines optimisation

Indicator	Practice	CCG average	England average	England comparison
Number of antibacterial prescription items prescribed per Specific Therapeutic group Age-sex Related Prescribing Unit (STAR PU) (01/10/2018 to 30/09/2019) (NHS Business Service Authority - NHSBSA)	0.75	0.77	0.87	No statistical variation
The number of prescription items for co-amoxiclav, cephalosporins and quinolones as a percentage of the total number of prescription items for selected antibacterial drugs (BNF 5.1 sub-set). (01/10/2018 to 30/09/2019) (NHSBSA)	2.9%	7.2%	8.5%	Significant Variation (positive)
Average daily quantity per item for Nitrofurantoin 50 mg tablets and capsules, Nitrofurantoin 100 mg m/r capsules, Pivmecillinam 200 mg tablets and Trimethoprim 200 mg tablets prescribed for uncomplicated urinary tract infection (01/04/2019 to 30/09/2019) (NHSBSA)	5.74	5.37	5.60	No statistical variation
Average daily quantity of oral NSAIDs prescribed per Specific Therapeutic Group Age-sex Related Prescribing Unit (STAR-PU) (01/04/2019 to 30/09/2019)	2.83	1.81	2.08	No statistical variation

Medicines management	Y/N/Partial
The practice ensured medicines were stored safely and securely with access restricted to authorised staff.	Y
Blank prescriptions were kept securely and their use monitored in line with national guidance.	Υ
Staff had the appropriate authorisations to administer medicines (including Patient Group Directions or Patient Specific Directions).	Υ1
The practice could demonstrate the prescribing competence of non-medical prescribers, and there was regular review of their prescribing practice supported by clinical supervision or peer review.	N/A
There was a process for the safe handling of requests for repeat medicines and evidence of structured medicines reviews for patients on repeat medicines.	Υ2
The practice had a process and clear audit trail for the management of information about	Υ

Medicines management	Y/N/Partial
changes to a patient's medicines including changes made by other services.	
There was a process for monitoring patients' health in relation to the use of medicines including high risk medicines (for example, warfarin, methotrexate and lithium) with appropriate monitoring and clinical review prior to prescribing.	Y
The practice monitored the prescribing of controlled drugs. (For example, investigation of unusual prescribing, quantities, dose, formulations and strength).	Y
There were arrangements for raising concerns around controlled drugs with the NHS England Area Team Controlled Drugs Accountable Officer.	Υ
If the practice had controlled drugs on the premises there were appropriate systems and written procedures for the safe ordering, receipt, storage, administration, balance checks and disposal of these medicines, which were in line with national guidance.	N/A
The practice had taken steps to ensure appropriate antimicrobial use to optimise patient outcomes and reduce the risk of adverse events and antimicrobial resistance.	Y
For remote or online prescribing there were effective protocols for verifying patient identity.	N/A
The practice held appropriate emergency medicines, risk assessments were in place to determine the range of medicines held, and a system was in place to monitor stock levels and expiry dates.	Υ
There was medical oxygen and a defibrillator on site and systems to ensure these were regularly checked and fit for use.	Υ3
Vaccines were appropriately stored, monitored and transported in line with PHE guidance to ensure they remained safe and effective.	Y

Explanation of any answers and additional evidence:

- The practice nurse administered childhood vaccinations using Patient Group Directions, and the healthcare assistant administered shingles vaccinations and Vitamin B-12 injections using Patient Specific Directions.
- 2. We saw evidence of a significant number of medicines reviews undertaken over the telephone by lead clinicians. Clinicians told us they gave two months' worth of prescriptions where they felt it was safe to do so. They told us they had risk assessed the appropriateness of telephone reviews and would request patients to book face to face appointments if deemed necessary.
- 3. There were no children's pads for the defibrillator on site. However, a risk assessment was in place in mitigation.

#### Track record on safety and lessons learned and improvements made

## The practice learned and made improvements when things went wrong.

Significant events	Y/N/Partial
The practice monitored and reviewed safety using information from a variety of sources.	
Staff knew how to identify and report concerns, safety incidents and near misses.	
There was a system for recording and acting on significant events.	
Staff understood how to raise concerns and report incidents both internally and externally.	
There was evidence of learning and dissemination of information.	
Number of events recorded in last 12 months:	
Number of events that required action:	
Explanation of any answers and additional evidence:	

Example(s) of significant events recorded and actions by the practice.

Event	Specific action taken
Two patients reported that they had not	A new protocol was put in place to make requests for telephone
received a call back from the surgery	calls more visible to clinicians, and chasing MRI results from
following MRI scans	secondary care.

Safety alerts	Y/N/Partial
There was a system for recording and acting on safety alerts.	Υ
Staff understood how to deal with alerts.	Υ
Explanation of any answers and additional evidence: We saw examples of actions taken on recent alerts for example, regarding sodium varanitidine.	Iproate and

### **Effective**

## **Rating: Good**

#### Effective needs assessment, care and treatment

Patients' needs were assessed, and care and treatment was delivered in line with current legislation, standards and evidence-based guidance supported by clear pathways and tools.

	Y/N/Partial
The practice had systems and processes to keep clinicians up to date with current evidence-based practice.	Y
Patients' immediate and ongoing needs were fully assessed. This included their clinical needs and their mental and physical wellbeing.	Υ
Patients presenting with symptoms which could indicate serious illness were followed up in a timely and appropriate way.	Υ
We saw no evidence of discrimination when staff made care and treatment decisions.	Υ
Patients' treatment was regularly reviewed and updated.	Υ
There were appropriate referral pathways to make sure that patients' needs were addressed.	Y
Patients were told when they needed to seek further help and what to do if their condition deteriorated.	Υ
The practice used digital services securely and effectively and conformed to relevant digital and information security standards.	N/A
Explanation of any answers and additional evidence:	

Explanation of any answers and additional evidence:

Prescribing	Practice performance	CCG average	England average	England comparison
Average daily quantity of Hypnotics prescribed per Specific Therapeutic group Age-sex Related Prescribing Unit (STAR PU) (01/10/2018 to 30/09/2019) (NHSBSA)	0.78	0.65	0.74	No statistical variation

#### Older people

#### Population group rating: Good

- The practice used a clinical tool to identify older patients who were living with moderate or severe frailty. Those identified received a full assessment of their physical, mental and social needs.
- The practice followed up on older patients discharged from hospital. It ensured that their care plans and prescriptions were updated to reflect any extra or changed needs.
- The practice carried out structured annual medication reviews for older patients.
- Staff had appropriate knowledge of treating older people including their psychological, mental and

communication needs.

- Health checks, including frailty assessments, were offered to patients over 75 years of age.
- Flu, shingles and pneumonia vaccinations were offered to relevant patients in this age group.

#### People with long-term conditions

#### Population group rating: Good

- Patients with long-term conditions were offered a structured annual review to check their health
  and medicines needs were being met. For patients with the most complex needs, the GP
  worked with other health and care professionals to deliver a coordinated package of care. They
  worked closely with a diabetes nurse specialist who provided regular sessions at the practice
  for the more complex patients who were not compliant with their treatment.
- Staff who were responsible for reviews of patients with long-term conditions had received specific training.
- GPs followed up patients who had received treatment in hospital or through out of hours services for an acute exacerbation of asthma.
- The practice shared clear and accurate information with relevant professionals when deciding care delivery for patients with long-term conditions.
- The practice could demonstrate how they identified patients with commonly undiagnosed conditions, for example diabetes, chronic obstructive pulmonary disease (COPD), atrial fibrillation and hypertension.
- Adults with newly diagnosed cardio-vascular disease were offered statins.
- Patients with atrial fibrillation were assessed for stroke risk and treated appropriately.
- Patients with asthma were offered an asthma management plan.

Diabetes Indicators	Practice	CCG average	England average	England comparison
The percentage of patients with diabetes, on the register, in whom the last IFCC-HbA1c is 64 mmol/mol or less in the preceding 12 months (01/04/2018 to 31/03/2019) (QOF)	62.3%	73.1%	79.3%	Variation (negative)
Exception rate (number of exceptions).	2.4% (8)	12.2%	12.8%	N/A
The percentage of patients with diabetes, on the register, in whom the last blood pressure reading (measured in the preceding 12 months) is 140/80 mmHg or less (01/04/2018 to 31/03/2019) (QOF)	77.7%	73.8%	78.1%	No statistical variation
Exception rate (number of exceptions).	1.5% (5)	9.1%	9.4%	N/A

	Practice	CCG average	England average	England comparison
The percentage of patients with diabetes, on the register, whose last measured total cholesterol (measured within the preceding 12 months) is 5 mmol/l or less (01/04/2018 to 31/03/2019) (QOF)	80.1%	78.4%	81.3%	No statistical variation
Exception rate (number of exceptions).	1.8% (6)	11.9%	12.7%	N/A

Other long-term conditions	Practice	CCG average	England average	England comparison
The percentage of patients with asthma, on the register, who have had an asthma review in the preceding 12 months that includes an assessment of asthma control using the 3 RCP questions, NICE 2011 menu ID: NM23 (01/04/2018 to 31/03/2019) (QOF)	67.1%	75.8%	75.9%	Tending towards variation (negative)
Exception rate (number of exceptions).	1.4% (5)	7.1%	7.4%	N/A
The percentage of patients with COPD who have had a review, undertaken by a healthcare professional, including an assessment of breathlessness using the Medical Research Council dyspnoea scale in the preceding 12 months (01/04/2018 to 31/03/2019) (QOF)	84.9%	89.6%	89.6%	No statistical variation
Exception rate (number of exceptions).	10.4% (10)	11.3%	11.2%	N/A

Indicator	Practice	CCG average	England average	England comparison
The percentage of patients with hypertension in whom the last blood pressure reading measured in the preceding 12 months is 150/90mmHg or less (01/04/2018 to 31/03/2019) (QOF)	87.4%	82.7%	83.0%	No statistical variation
Exception rate (number of exceptions).	1.2% (9)	4.7%	4.0%	N/A
In those patients with atrial fibrillation with a record of a CHA2DS2-VASc score of 2 or more, the percentage of patients who are currently treated with anti-coagulation drug therapy (01/04/2018 to 31/03/2019) (QOF)	90.6%	91.6%	91.1%	No statistical variation
Exception rate (number of exceptions).	8.6% (5)	8.1%	5.9%	N/A

#### Any additional evidence or comments

The practice told us they faced challenges with compliance with diabetes care, particularly with patients from minority ethnic groups, who formed 13% of the practice population. They had previously held education events on diabetes care at the practice, and worked closely with the diabetes specialist nurse to provide additional support.

They had identified a coding issue with the asthma indicators which had resulted in a lower achievement when compared to local and national averages, but the practice told us that this had been identified and resolved.

#### Families, children and young people

# Population group rating: Requires improvement

- The practice had not met the minimum 90% target for all four childhood immunisation uptake
  indicators. The practice had not met the WHO based national target of 95% (the recommended
  standard for achieving herd immunity) for all four childhood immunisation uptake indicators. The
  healthcare assistant contacted parents or guardians of children due to have childhood
  immunisations who did not attend their appointments.
- The practice had arrangements for following up failed attendance of children's appointments
  following an appointment in secondary care or for immunisation and would liaise with health
  visitors when necessary.
- The practice had arrangements to identify and review the treatment of newly pregnant women on long-term medicines. These patients were provided with advice and post-natal support in accordance with best practice guidance.
- Young people could access services for sexual health and contraception.
- Staff had the appropriate skills and training to carry out reviews for this population group.

Child Immunisation	Numerator	Denominator	Practice %	Comparison to WHO target of 95%
The percentage of children aged 1 who have completed a primary course of immunisation for Diphtheria, Tetanus, Polio, Pertussis, Haemophilus influenza type b (Hib), Hepatitis B (Hep B) ((i.e. three doses of DTaP/IPV/Hib/HepB) (01/04/2018 to 31/03/2019) (NHS England)	43	51	84.3%	Below 90% minimum
The percentage of children aged 2 who have received their booster immunisation for Pneumococcal infection (i.e. received Pneumococcal booster) (PCV booster) (01/04/2018 to 31/03/2019) (NHS England)	50	58	86.2%	Below 90% minimum
The percentage of children aged 2 who have received their immunisation for Haemophilus influenza type b (Hib) and Meningitis C (MenC) (i.e. received Hib/MenC booster) (01/04/2018 to 31/03/2019) (NHS England)	50	58	86.2%	Below 90% minimum
The percentage of children aged 2 who have received immunisation for measles, mumps and rubella (one dose of MMR) (01/04/2018 to 31/03/2019) (NHS England)	50	58	86.2%	Below 90% minimum

Note: Please refer to the CQC guidance on Childhood Immunisation data for more information: https://www.cqc.org.uk/guidance-providers/gps/how-we-monitor-gp-practices

#### Any additional evidence or comments

The provider attributed their lower performance above to some families who declined immunisation; this was clearly recorded in the clinical records. There was a nominated member of staff who followed up non-attendees and opportunistic vaccinations were offered when the patients attended the practice for other reasons.

# Working age people (including those recently retired and students)

#### Population group rating: Good

#### <u>Findings</u>

- The practice had systems to inform eligible patients to have the meningitis vaccine, for example before attending university for the first time.
- Patients had access to appropriate health assessments and checks including NHS checks for
  patients aged 40 to 74. The practice told us they invited 490 patients for the checks in 2019, and
  447 took up the service. There was appropriate and timely follow-up on the outcome of health
  assessments and checks where abnormalities or risk factors were identified.
- Patients could book or cancel appointments online and order repeat medication without the need to attend the surgery.

Cancer Indicators	Practice	CCG average	England average	England comparison
The percentage of women eligible for cervical cancer screening at a given point in time who were screened adequately within a specified period (within 3.5 years for women aged 25 to 49, and within 5.5 years for women aged 50 to 64). (01/07/2019 to 30/09/2019) (Public Health England)	76.2%	N/A	80% Target	Below 80% target
Females, 50-70, screened for breast cancer in last 36 months (3 year coverage, %) (01/04/2018 to 31/03/2019) (PHE)	79.2%	67.5%	71.6%	N/A
Persons, 60-69, screened for bowel cancer in last 30 months (2.5 year coverage, %)(01/04/2018 to 31/03/2019) (PHE)	61.4%	53.7%	58.0%	N/A
The percentage of patients with cancer, diagnosed within the preceding 15 months, who have a patient review recorded as occurring within 6 months of the date of diagnosis. (01/04/2018 to 31/03/2019) (PHE)	100.0%	63.9%	68.1%	N/A
Number of new cancer cases treated (Detection rate: % of which resulted from a two week wait (TWW) referral) (01/04/2018 to 31/03/2019) (PHE)	50.0%	53.7%	53.8%	No statistical variation

#### Any additional evidence or comments

The practice attributed their performance for cervical screening to some non-attendance to appointments. They told us they had eligible young women who declined cervical screening, and kept records of any patients who declined. This did not exclude them from future invitations and they were continually offered the service. Additionally, patients were offered additional cervical screening appointments at a location in the city centre through the extended opening hours arrangements provided by the local GP federation. Smear tests were undertaken by the two GPs; there were limited nurse appointments as they struggled to recruit a practice nurse.

# People whose circumstances make them vulnerable

Population group rating: Good

- Same day appointments and longer appointments were offered when required.
- All patients with a learning disability were offered an annual health check. There were 30 patients
  with learning disabilities on the register and 53% of these had received an annual health check at
  the time of our inspection.
- End of life care was delivered in a coordinated way which took into account the needs of those whose circumstances may make them vulnerable.

- The practice had a system for vaccinating patients with an underlying medical condition according to the recommended schedule.
- The practice demonstrated that they had a system to identify people who misused substances.

# People experiencing poor mental health

Population group rating: Good

### (including people with dementia)

- The practice assessed and monitored the physical health of people with mental illness, severe mental illness, and personality disorder by providing access to health checks, interventions for physical activity, obesity, diabetes, heart disease, cancer and access to 'stop smoking' services.
- Same day and longer appointments were offered when required.
- There was a system for following up patients who failed to attend for administration of long-term medication.
- When patients were assessed to be at risk of suicide or self-harm the practice had arrangements in place to help them to remain safe.
- The practice had registered patients with dementia who lived in care home. Patients at risk of dementia were identified and offered an assessment to detect possible signs of dementia.
   When dementia was suspected there was an appropriate referral for diagnosis.
- All staff had received dementia training in the last 12 months. The practice had achieved the 'dementia friendly' status awarded by the Alzheimer's Society.
- Patients with poor mental health, including dementia, were referred to appropriate services.

Mental Health Indicators	Practice	CCG average	England average	England comparison
The percentage of patients with schizophrenia, bipolar affective disorder and other psychoses who have a comprehensive, agreed care plan documented in the record, in the preceding 12 months (01/04/2018 to 31/03/2019) (QOF)	96.2%	91.5%	89.4%	No statistical variation
Exception rate (number of exceptions).	0.0% (0)	14.8%	12.3%	N/A
The percentage of patients with schizophrenia, bipolar affective disorder and other psychoses whose alcohol consumption has been recorded in the preceding 12 months (01/04/2018 to 31/03/2019) (QOF)	96.2%	90.3%	90.2%	No statistical variation
Exception rate (number of exceptions).	0.0% (0)	13.4%	10.1%	N/A
The percentage of patients diagnosed with dementia whose care plan has been reviewed in a face-to-face review in the preceding 12 months (01/04/2018 to 31/03/2019) (QOF)	84.9%	82.9%	83.6%	No statistical variation
Exception rate (number of exceptions).	3.6% (2)	5.5%	6.7%	N/A

## Any additional evidence or comments

#### **Monitoring care and treatment**

The practice had a comprehensive programme of quality improvement activity and routinely reviewed the effectiveness and appropriateness of the care provided.

Indicator	Practice	CCG average	England average
Overall QOF score (out of maximum 559)	534.3	528.9	539.2
Overall QOF score (as a percentage of maximum)	95.6%	95.0%	96.7%
Overall QOF exception reporting (all domains)	2.8%	6.1%	5.9%

	Y/N/Partial
Clinicians took part in national and local quality improvement initiatives.	Υ
The practice had a comprehensive programme of quality improvement and used information about care and treatment to make improvements.	Y
Quality improvement activity was targeted at the areas where there were concerns.	Υ
The practice regularly reviewed unplanned admissions and readmissions and took	Y

appropriate action.	
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Examples of improvements demonstrated because of clinical audits or other improvement activity in past two years

An audit was carried out on women diagnosed with gestational diabetes to ensure they received annual monitoring. The first cycle of the audit found eight out the 19 patients identified required monitoring. A repeat of the audit found five patients who had been diagnosed with diabetes and required monitoring to be implemented, a reduction from the previous audit.

Other audits carried out, but were yet to be repeated for quality improvement included prescribing of statins, deaths, high risk medicines, anticoagulants and overall safe prescribing.

#### Any additional evidence or comments

#### **Effective staffing**

The practice was able to demonstrate that staff had the skills, knowledge and experience to carry out their roles.

	Y/N/Partial
Staff had the skills, knowledge and experience to deliver effective care, support and treatment. This included specific training for nurses on immunisation and on sample taking for the cervical screening programme.	Υ
The learning and development needs of staff were assessed.	Υ
The practice had a programme of learning and development.	Υ
Staff had protected time for learning and development.	Υ
There was an induction programme for new staff.	Υ
Induction included completion of the Care Certificate for Health Care Assistants employed since April 2015.	Y
Staff had access to regular appraisals, one to ones, coaching and mentoring, clinical supervision and revalidation. They were supported to meet the requirements of professional revalidation.	Y
The practice could demonstrate how they assured the competence of staff employed in advanced clinical practice, for example, nurses, paramedics, pharmacists and physician associates.	N/A
There was a clear and appropriate approach for supporting and managing staff when their performance was poor or variable.	Υ

Explanation of any answers and additional evidence:

The healthcare assistant's appraisal was undertaken by one of the GP partners. The practice manager conducted appraisals for the administration staff, and her own appraisal was done by the GPs.

#### **Coordinating care and treatment**

Staff worked together and with other organisations to deliver effective care and treatment.

Indicator	Y/N/Partial
The contractor has regular (at least 3 monthly) multidisciplinary case review meetings where all patients on the palliative care register are discussed (01/04/2018 to 31/03/2019)	
We saw records that showed that all appropriate staff, including those in different teams and organisations, were involved in assessing, planning and delivering care and treatment.	Y
Care was delivered and reviewed in a coordinated way when different teams, services or organisations were involved.	Υ
Patients received consistent, coordinated, person-centred care when they moved between services.	Υ

For patients who accessed the practice's digital service there were clear and effective processes to make referrals to other services.

N/A

Explanation of any answers and additional evidence:

There was evidence of monthly multidisciplinary meetings where information was shared between professionals about the care of individual patients.

#### Helping patients to live healthier lives

Staff were consistent and proactive in helping patients to live healthier lives.

	Y/N/Partial
The practice identified patients who may need extra support and directed them to relevant services. This included patients in the last 12 months of their lives, patients at risk of developing a long-term condition and carers.	Υ1
Staff encouraged and supported patients to be involved in monitoring and managing their own health.	Υ
Patients had access to appropriate health assessments and checks.	Y
Staff discussed changes to care or treatment with patients and their carers as necessary.	Y
The practice supported national priorities and initiatives to improve the population's health, for example, stop smoking campaigns, tackling obesity.	Y

Explanation of any answers and additional evidence:

1. Staff had received signposting training and also worked with a recently appointed social prescriber to refer people to relevant support services.

Smoking Indicator	Practice	CCG average	England average	England comparison
The percentage of patients with any or any combination of the following conditions: CHD, PAD, stroke or TIA, hypertension, diabetes, COPD, CKD, asthma, schizophrenia, bipolar affective disorder or other psychoses whose notes record smoking status in the preceding 12 months (01/04/2018 to 31/03/2019) (QOF)	97.6%	95.2%	95.0%	Tending towards variation (positive)
Exception rate (number of exceptions).	0.2% (3)	1.1%	0.8%	N/A

#### Any additional evidence or comments

#### Consent to care and treatment

The practice always obtained consent to care and treatment in line with legislation and guidance.

	Y/N/Partial
Clinicians understood the requirements of legislation and guidance when considering consent and decision making. We saw that consent was documented.	Υ1
Clinicians supported patients to make decisions. Where appropriate, they assessed and recorded a patient's mental capacity to make a decision.	Υ
The practice monitored the process for seeking consent appropriately.	Y
Policies for any online services offered were in line with national guidance.	Y

Explanation of any answers and additional evidence:

- 1. Consent forms for circumcisions included confirmation of parental responsibility of the adult presenting with the child, including identification checks. Details for both parents were recorded and reasons why they were absent when they attended the clinic for procedures.
  - We saw other consent forms for minor surgery procedures and coil fittings.

# Caring

# **Rating: Good**

#### Kindness, respect and compassion

Staff treated patients with kindness, respect and compassion. Feedback from patients was positive about the way staff treated people.

	Y/N/Partial
Staff understood and respected the personal, cultural, social and religious needs of patients.	Y
Staff displayed understanding and a non-judgemental attitude towards patients.	Υ
Patients were given appropriate and timely information to cope emotionally with their care, treatment or condition.	Y
Explanation of any answers and additional evidence:	

CQC comments cards	
Total comments cards received.	28
Number of CQC comments received which were positive about the service.	27
Number of comments cards received which were mixed about the service.	1
Number of CQC comments received which were negative about the service.	0

Source	Feedback
Comment cards	Patients told us the practice was always clean and they felt safe. They did not feel rushed when seen at the appointments.
NHS Choices	Comments posted were positive about being treated with dignity and respect by all staff at the practice.

### **National GP Survey results**

Indicator	Practice	CCG average	England average	England comparison
The percentage of respondents to the GP patient survey who stated that the last time they had a general practice appointment, the healthcare professional was good or very good at listening to them (01/01/2019 to 31/03/2019)	84.0%	90.4%	88.9%	No statistical variation
The percentage of respondents to the GP patient survey who stated that the last time they had a general practice appointment, the healthcare professional was good or very good at treating them with care and concern (01/01/2019 to 31/03/2019)	87.2%	86.9%	87.4%	No statistical variation
The percentage of respondents to the GP patient survey who stated that during their last GP appointment they had confidence and trust in the healthcare professional they saw or spoke to (01/01/2019 to 31/03/2019)	92.5%	95.1%	95.5%	No statistical variation
The percentage of respondents to the GP patient survey who responded positively to the overall experience of their GP practice (01/01/2019 to 31/03/2019)	86.3%	84.2%	82.9%	No statistical variation

#### Any additional evidence or comments

The practice told us they continued to review feedback from patients from various sources, and discussed it at team meetings as well as meetings with the patient participation group.

Question	Y/N
The practice carries out its own patient survey/patient feedback exercises.	Y

#### Any additional evidence

A suggestion box was available in the waiting room.

#### Involvement in decisions about care and treatment

Staff helped patients to be involved in decisions about care and treatment.

	Y/N/Partial
Staff communicated with patients in a way that helped them to understand their care, treatment and condition, and any advice given.	Y
Staff helped patients and their carers find further information and access community and advocacy services.	Υ
Explanation of any answers and additional evidence:	
Easy read and pictorial materials were available.	

Source	Feedback
Interviews with patients.	One patient told us the practice responded promptly to any concerns in order to meet their needs. They were sent reminders to attend flu vaccination appointments.
Comment cards	Patients told us they did not feel rushed during both face to face and telephone appointments.

#### **National GP Survey results**

Indicator	Practice	CCG average	England average	England comparison
The percentage of respondents to the GP patient survey who stated that during their last GP appointment they were involved as much as they wanted to be in decisions about their care and treatment (01/01/2019 to 31/03/2019)	95.4%	92.1%	93.4%	No statistical variation

Any additiona	l evid	lence or	comment	ts
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	Y/N/Partial
Interpretation services were available for patients who did not have English as a first language.	Y
Patient information leaflets and notices were available in the patient waiting area which told patients how to access support groups and organisations.	Y
Information leaflets were available in other languages and in easy read format.	Y
Information about support groups was available on the practice website.	Y

Explanation of any answers and additional evidence:

The practice told us they had staff who spoke up to five languages who supported patients when appropriate.

We saw posters displayed in languages other than English.

Carers	Narrative
Percentage and number of	2.5% (138 patients)
carers identified.	
	The practice hosted a carers hub workshop at their premises for patients who
	preferred to access carers services from the surgery. There were no young
carers).	carers identified on their list.
How the practice supported	All patient deaths were highlighted to the GPs who sent sympathy cards
recently bereaved patients.	where appropriate. There were leaflets on bereavement available in the
	practice.

#### **Privacy and dignity**

The practice respected patients' privacy and dignity.

	Y/N/Partial
Curtains were provided in consulting rooms to maintain patients' privacy and dignity during examinations, investigations and treatments.	Y
Consultation and treatment room doors were closed during consultations.	Y
A private room was available if patients were distressed or wanted to discuss sensitive issues.	Y
There were arrangements to ensure confidentiality at the reception desk.	Y
Explanation of any answers and additional evidence:	

If the practice offered online services:

	Partia
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	I
Patients were informed and consent obtained if interactions were recorded.	Υ
The practice ensured patients were informed how their records were stored and managed.	Υ
Patients were made aware of the information sharing protocol before online services were delivered.	Υ
The practice had arrangements to make staff and patients aware of privacy settings on video and voice call services.	Υ
Online consultations took place in appropriate environments to ensure confidentiality.	N/A
The practice advised patients on how to protect their online information.	Υ
Explanation of any answers and additional evidence: Patients could access appointments and order repeat prescriptions online.	

# Responsive

# **Rating: Good**

### Responding to and meeting people's needs

The practice organised and delivered services to meet patients' needs.

	Y/N/Partial
The practice understood the needs of its local population and had developed services in response to those needs.	Y
The importance of flexibility, informed choice and continuity of care was reflected in the services provided.	Y
The facilities and premises were appropriate for the services being delivered.	Υ
The practice made reasonable adjustments when patients found it hard to access services.	Y
There were arrangements in place for people who need translation services.	Υ
The practice complied with the Accessible Information Standard.	Υ
Explanation of any answers and additional evidence:	

Practice Opening Times	
Day	Time
Opening times:	
Monday	8am to 8.45pm
Tuesday	8am to 6.30pm
Wednesday	8am to 6.30pm
Thursday	8am to 6.30pm
Friday	7.30am to 6.30pm
Appointments available:	I
Monday	8am to 11.30am and 3.30pm to 8.45pm
Tuesday	8am to 11.30am and 3.30pm to 6.30pm
Wednesday	8am to 11.30am and 3.30pm to 6.30pm
Thursday	8am to 11.30am and 3.30pm to 6.30pm
Friday	7.30am to 11.30am and 3.30pm to 6.30pm

#### **National GP Survey results**

Indicator	Practice	CCG average	England average	England comparison
The percentage of respondents to the GP patient survey who stated that at their last general practice appointment, their needs were met (01/01/2019 to 31/03/2019)	95.5%	94.6%	94.5%	No statistical variation

#### Any additional evidence or comments

#### Older people

#### Population group rating: Good

#### **Findings**

- The practice was responsive to the needs of older patients, and offered home visits and urgent appointments for those with enhanced needs and complex medical issues.
- The practice provided effective care coordination to enable older patients to access appropriate services.
- In recognition of the religious and cultural observances of some patients, the GP would respond
  quickly, often outside of normal working hours, to provide the necessary death certification to
  enable prompt burial in line with families' wishes when bereavement occurred.

#### People with long-term conditions

#### **Population group rating: Good**

- Patients with multiple conditions had their needs reviewed in one appointment.
- The practice provided effective care coordination to enable patients with long-term conditions to access appropriate services.
- The practice liaised regularly with the local district nursing team and community matrons to discuss and manage the needs of patients with complex medical issues.
- Care and treatment for people with long-term conditions approaching the end of life was coordinated with other services.

#### Families, children and young people Population group rating: Good

#### **Findings**

- Appointments were available from 7.30am on Fridays and until 8.45pm on Mondays for school age children so that they did not need to miss school.
- We found there were systems to identify and follow up children living in disadvantaged circumstances and who were at risk, for example, children and young people who had a high number of accident and emergency (A&E) attendances. Records we looked at confirmed this.
- All parents or guardians calling with concerns about a child were offered a same day appointment when necessary.

# Working age people (including those Population group rating: Good recently retired and students)

- The needs of this population group had been identified and the practice had adjusted the services it offered to ensure these were accessible, flexible and offered continuity of care.
- The practice used the electronic prescription service. Patients were able to order repeat prescriptions online.
- The practice was open from 7.30am on Fridays and until 8.45pm on Mondays. Pre-bookable
  appointments were also available to all patients at additional locations within the area, as the
  practice was a member of a GP federation. Appointments were available Saturday and Sunday
  10am until 1pm.

# People whose circumstances make them vulnerable

#### Population group rating: Good

#### **Findings**

- The practice held a register of patients living in vulnerable circumstances including those with a learning disability.
- The practice provided effective care coordination to enable patients living in vulnerable circumstances to access appropriate services.
- The practice adjusted the delivery of its services to meet the needs of patients with a learning disability.

# People experiencing poor mental health

Population group rating: Good

(including people with dementia)

- Priority appointments were allocated when necessary to those experiencing poor mental health.
- Staff interviewed had a good understanding of how to support patients with mental health needs and those patients living with dementia.
- The practice was aware of support groups within the area and signposted their patients to these accordingly.

#### Timely access to the service

#### People were able to access care and treatment in a timely way.

National GP Survey results

	Y/N/Partial
Patients with urgent needs had their care prioritised.	Υ
The practice had a system to assess whether a home visit was clinically necessary and the urgency of the need for medical attention.	Y
Appointments, care and treatment were only cancelled or delayed when absolutely necessary.	Y

Explanation of any answers and additional evidence:

On the day of the inspection, we found there were appointments available with a GP on the next day. The next appointment with a healthcare assistant was four days later, and there were no appointment slots on the system with a nurse. The provider acknowledged the challenges with nurse recruitment and the nurse duties were shared across the practice staff as appropriate.

Indicator	Practice	CCG average	England average	England comparison
The percentage of respondents to the GP patient survey who responded positively to how easy it was to get through to someone at their GP practice on the phone (01/01/2019 to 31/03/2019)	93.2%	N/A	68.3%	Variation (positive)
The percentage of respondents to the GP patient survey who responded positively to the overall experience of making an appointment (01/01/2019 to 31/03/2019)	80.9%	69.8%	67.4%	No statistical variation
The percentage of respondents to the GP patient survey who were very satisfied or fairly satisfied with their GP practice appointment times (01/01/2019 to 31/03/2019)	84.6%	69.2%	64.7%	Variation (positive)
The percentage of respondents to the GP patient survey who were satisfied with the type of appointment (or appointments) they were offered (01/01/2019 to 31/03/2019)	84.0%	73.0%	73.6%	No statistical variation

#### Any additional evidence or comments

GPs told us they offered a significant number of telephone appointments and issued two months' worth of prescriptions for stable patients, which freed up face to face appointments for those who needed to be seen.

Source	Feedback
For example, NHS Choices	Patients told us they found it easy to book appointments and were able to access appointments on the same day or the next day.

#### Listening and learning from concerns and complaints

# Complaints were listened and responded to and used to improve the quality of care.

Complaints	
Number of complaints received in the last year.	5
Number of complaints we examined.	2
Number of complaints we examined that were satisfactorily handled in a timely way.	2
Number of complaints referred to the Parliamentary and Health Service Ombudsman.	0

	Y/N/Partial
Information about how to complain was readily available.	Y
There was evidence that complaints were used to drive continuous improvement.	Y
Explanation of any answers and additional evidence:	

#### Example(s) of learning from complaints.

Complaint	Specific action taken
prescription due to family circumstances,	This was discussed with staff concerned who were reminded that whilst they followed practice procedure correctly, they
	should be mindful of individuals and be accommodating when appropriate. An apology was given to the patient.

### Well-led

## **Rating: Good**

The provider is now rated Good for providing well led services.

The practice was previously rated requires improvement for providing well led services.

At the last comprehensive inspection in December 2018 we rated the practice as requires improvement in providing well led services because:

• The practice's governance arrangements required improvement to ensure that all significant issues were identified and addressed and the practice learned and made changes from investigations and audits where appropriate.

At this inspection we found that these areas had been addressed.

#### Leadership capacity and capability

There was compassionate, inclusive and effective leadership at all levels.

	Y/N/Partial
Leaders demonstrated that they understood the challenges to quality and sustainability.	Y
They had identified the actions necessary to address these challenges.	Y
Staff reported that leaders were visible and approachable.	Y
There was a leadership development programme, including a succession plan.	Y

Explanation of any answers and additional evidence:

The practice were a member of a primary care network comprising seven GP practices, and one of their GPs was a clinical director of the network. This network focused on local health priorities, peer reviews and shared learning to encourage quality improvements within the locality.

The leaders acknowledged their challenges with recruitment of a nurse and additional management support. They worked closely with their Local Medical Committee and their GP federation to support these roles.

#### Vision and strategy

The practice had a clear vision and credible strategy to provide high quality sustainable care.

	Y/N/Partial
The practice had a clear vision and set of values that prioritised quality and sustainability.	Y
There was a realistic strategy to achieve their priorities.	Y
The vision, values and strategy were developed in collaboration with staff, patients and external partners.	Υ
Staff knew and understood the vision, values and strategy and their role in achieving them.	Y

Progress against delivery of the strategy was monitored.	Y

Explanation of any answers and additional evidence:

The practice had a mission statement to provide high quality services tailored to the needs of their population, and this was visible within the practice.

Plans to improve the service included improving diabetes care for non-compliant patients.

#### Culture

The practice had a culture which drove high quality sustainable care.

	Y/N/Partial
There were arrangements to deal with any behaviour inconsistent with the vision and values.	Y
Staff reported that they felt able to raise concerns without fear of retribution.	Υ
There was a strong emphasis on the safety and well-being of staff.	Y
There were systems to ensure compliance with the requirements of the duty of candour.	Υ
When people were affected by things that went wrong they were given an apology and informed of any resulting action.	Y
The practice encouraged candour, openness and honesty.	Υ
The practice's speaking up policies were in line with the NHS Improvement Raising Concerns (Whistleblowing) Policy.	Y
The practice had access to a Freedom to Speak Up Guardian.	Υ
Staff had undertaken equality and diversity training.	Υ
Explanation of any answers and additional evidence:	

#### **Governance arrangements**

There were clear responsibilities, roles and systems of accountability to support good governance and management.

	Y/N/Partial
There were governance structures and systems which were regularly reviewed.	Υ
Staff were clear about their roles and responsibilities.	Y
There were appropriate governance arrangements with third parties.	Y

Explanation of any answers and additional evidence:

A list of lead areas and the named lead person was displayed in the practice to ensure staff knew who approach for specific issues.

#### Managing risks, issues and performance

There were effective processes for managing risks, issues and performance.

	Y/N/Partial
ere were comprehensive assurance systems which were regularly reviewed and proved.	Υ
ere were processes to manage performance.	Υ
ere was a systematic programme of clinical and internal audit.	Υ
ere were effective arrangements for identifying, managing and mitigating risks.	Υ
major incident plan was in place.	Υ
aff were trained in preparation for major incidents.	Υ
hen considering service developments or changes, the impact on quality and stainability was assessed.	Υ
planation of any answers and additional evidence:	
planation of any answers and additional evidence:	

#### Appropriate and accurate information

There was a demonstrated commitment to using data and information proactively to drive and support decision making.

	Y/N/Partial
Staff used data to adjust and improve performance.	Υ
Performance information was used to hold staff and management to account.	Υ
Our inspection indicated that information was accurate, valid, reliable and timely.	Υ
There were effective arrangements for identifying, managing and mitigating risks.	Υ
Staff whose responsibilities included making statutory notifications understood what this entails.	Y
Explanation of any answers and additional evidence:	•

#### If the practice offered online services:

	Y/N/Partial
The provider was registered as a data controller with the Information Commissioner's Office.	Y
Patient records were held in line with guidance and requirements.	Υ
Any unusual access was identified and followed up.	N/A
Explanation of any answers and additional evidence:	1

#### Engagement with patients, the public, staff and external partners

The practice involved the public, staff and external partners to sustain high quality and sustainable care.

	Y/N/Partial
Patient views were acted on to improve services and culture.	Υ
The practice had an active Patient Participation Group.	Υ
Staff views were reflected in the planning and delivery of services.	Υ
The practice worked with stakeholders to build a shared view of challenges and of the needs of the population.	Y

Explanation of any answers and additional evidence:

There Patient Participation Group had five members who met quarterly with the practice manager, and was sometimes attended by the GP partners if they were available. Information about the group was displayed on a board in the waiting area.

Feedback from Patient Participation Group.

#### **Feedback**

A representative of the group told us they were aware that they did not accurately represent the practice population and were trying to recruit new members from ethnic minority groups and young people. The group felt listened to by the practice leaders, and they were responsive to suggestions. For example, they suggested a clock for the waiting area, and the practice immediately provided one. The group were involved in health promotion, for example, a member attended a diabetes learning event where they presented diabetes care information to patients in attendance.

#### Any additional evidence

There was a You Said We Did poster in the waiting room which showed actions taken by the practice in response to patient feedback. For example, the practice implemented the electronic prescribing service which sends prescriptions electronically to a pharmacy, in response to patient requests for the service.

#### Continuous improvement and innovation

There was evidence of systems and processes for learning, continuous improvement and innovation.

	Y/N/Partial
There was a strong focus on continuous learning and improvement.	Υ
Learning was shared effectively and used to make improvements.	Υ
Explanation of any answers and additional evidence: An audit programme was put in place to monitor quality improvements over time.	

## Examples of continuous learning and improvement

The practice told us they participated in a research project on type two diabetes, and were still awaiting results.

#### Notes: CQC GP Insight

GP Insight assesses a practice's data against all the other practices in England. We assess relative performance for the majority of indicators using a "z-score" (this tells us the number of standard deviations from the mean the data point is), giving us a statistical measurement of a practice's performance in relation to the England average. We highlight practices which significantly vary from the England average (in either a positive or negative direction). We consider that z-scores which are higher than +2 or lower than -2 are at significant levels, warranting further enquiry. Using this technique we can be 95% confident that the practices performance is genuinely different from the average. It is important to note that a number of factors can affect the Z score for a practice, for example a small denominator or the distribution of the data. This means that there will be cases where a practice's data looks quite different to the average, but still shows as no statistical variation, as we do not have enough confidence that the difference is genuine. There may also be cases where a practice's data looks similar across two indicators, but they are in different variation bands.

The percentage of practices which show variation depends on the distribution of the data for each indicator, but is typically around 10-15% of practices. The practices which are not showing significant statistical variation are labelled as no statistical variation to other practices.

N.B. Not all indicators in the evidence table are part of the GP insight set and those that aren't will not have a variation band.

The following language is used for showing variation:

Variation Bands	Z-score threshold
Significant variation (positive)	≤-3
Variation (positive)	>-3 and ≤-2
Tending towards variation (positive)	>-2 and ≤-1.5
No statistical variation	<1.5 and >-1.5
Tending towards variation (negative)	≥1.5 and <2
Variation (negative)	≥2 and <3
Significant variation (negative)	≥3

Note: for the following indicators the variation bands are different:

- Child Immunisation indicators. These are scored against the World Health Organisation target of 95% rather than the England average. Note that practices that have "Met 90% minimum" have not met the WHO target of 95%.
- The percentage of respondents to the GP patient survey who responded positively to how easy it was to get through to someone at their GP practice on the phone uses a rules based approach for scoring, due to the distribution of the data. This indicator does not have a CCG average.
- The percentage of women eligible for cervical cancer screening at a given point in time who were screened adequately within a specified period (within 3.5 years for women aged 25 to 49, and within 5.5 years for women aged 50 to 64). This indicator does not have a CCG average and is scored against the national target of 80%.

It is important to note that z-scores are not a judgement in themselves, but will prompt further enquiry, as part of our ongoing monitoring of GP practices.

Guidance and Frequently Asked Questions on GP Insight can be found on the following link: <a href="https://www.cqc.org.uk/quidance-providers/gps/how-we-monitor-qp-practices">https://www.cqc.org.uk/quidance-providers/gps/how-we-monitor-qp-practices</a>

Note: The CQC GP Evidence Table uses the most recent validated and publicly available data. In some cases at the time of inspection this data may be relatively old. If during the inspection the practice has provided any more recent data, this can be considered by the inspector. However, it should be noted that any data provided by the practice will be unvalidated and is not directly comparable to the published data. This has been taken into account during the inspection process.

#### Glossary of terms used in the data.

- COPD: Chronic Obstructive Pulmonary Disease
- PHE: Public Health England
- QOF: Quality and Outcomes Framework
- STAR-PU: Specific Therapeutic Group Age-sex weightings Related Prescribing Units. These weighting allow more accurate and meaningful comparisons within a specific therapeutic group by taking into account the types of people who will be receiving that treatment.