

Executive Summary Report to the Board of Directors Being Held on 27 September 2022

Subject	Healthcare Governance Review – Response to Recommendations
Supporting TEG Member	Jennifer Hill, Medical Director (Operations)
Author	Lisa Howlett, Deputy Head of Patient and Healthcare Governance
Status ¹	A

PURPOSE OF THE REPORT

The purpose of this report is to provide the Board of Directors with a response to the recommendations made in the Healthcare Governance Review, conducted by the Good Governance Institute.

KEY POINTS

Following the Care Quality Commission (CQC) inspection of Maternity Services in March 2021, which suggested that there were some weaknesses in the Trust's governance systems, a Trust-wide governance review was commissioned to identify good practice and provide a view on areas for improvement. The review was undertaken by the Good Governance Institute (GGI) and focused on a number of CQC well led key lines of enquiry (KLOEs).

The review was undertaken during January to April 2022, and included:

- A review of documentation including governance structures, Board and Healthcare Governance Committee papers, the Integrated Risk and Assurance Report and relevant policies.
- Interviews with key corporate staff including Chair, Chief Executive, Chair of the Quality Committee, relevant Executive Directors and senior corporate staff with roles in healthcare governance.
- Observation of the Healthcare Governance Committee.
- Interviews with the triumvirates of a sample of directorates.

The review identified a number of areas of good practice and included 32 recommendations to support the Trust to strengthen the current arrangements. The headline findings were presented at the Trust Board of Directors development session and recommendations have now been considered, along with links to the CQC findings, by relevant organisational lead(s), who have provided the attached response. Each recommendation has been RAG-rated as follows:

- Green short-term (within 3 months) action required/action already in progress.
- Amber medium term (within 3-6 months) action required.
- Red action may be required in the longer term or action not required.

Following approval of the response it is proposed that progress is monitored by the Quality Committee via a quarterly progress report.

IMPLICATIONS²

Aim	of the STHFT Corporate Strategy	√ Tick as appropriate
1	Deliver the Best Clinical Outcomes	✓
2	Provide Patient Centred Services	✓
3	Employ Caring and Cared for Staff	
4	Spend Public Money Wisely	
5	Create a Sustainable Organisation	
6	Deliver Excellent Research, Education & Innovation	

RECOMMENDATIONS

The Board of Directors are asked to consider the response and approve the actions identified in relation to each of the recommendations and monitoring arrangements via Quality Committee.

APPROVAL PROCESS

Meeting	Date	Approved Y/N
Trust Executive Group	24/08/22	Υ
Trust Board	27/09/22	
Quality Committee	03/10/22	

¹ Status: A = Approval A* = Approval & Requiring Board Approval D = Debate N = Note

² Against the six aims of the STHFT Corporate Strategy 'Making a Difference – The next Chapter 2022-27'

Good Governance Institute – Healthcare Governance Review – Recommendations Review and Response

Recommendation	Link to CQC	Lead	RAG	Response				
KLOE 3 – Culture of high-quality sustainable care								
Recommendation 1: the effectiveness of	The report	Mark		This recommendation will be taken forward in the longer term.				
leadership and delegation in the Trust	identifies	Tuckett,		The additional time allocation will enable a more robust review of				
should be strengthened by improving	concerns	Director of		the Trusts governance and delegation arrangements informed by				
processes for delegation and involvement	"with the	Strategy and		triangulation of feedback following Care Groups attendance at TEG,				
of directorates in corporate decision-	management of	Planning		which are due to begin in October 2022 and the outcome of the				
taking. Specifically, we recommend	information and			Well-led review being undertaken by Audit One in September and				
agreement on:	escalation of risks			October 2022.				
 how directorate leaders can be more 	within the							
formally involved in strategic decision	devolved							
taking.	leadership model							
 development of a scheme of delegation 	namely ward,							
that outlines what decisions should be	directorate and							
made by directorates and where	care group							
decisions should be referred to the	management							
Trust Executive Group (TEG).	teams and within							
 how directorates are involved in 	the unitary							
presenting items referred to TEG to	board".							
increase real-time feedback and active								
participation in decision taking.								

Recommendation	Link to CQC	Lead	RAG	Response
Recommendation 2: a detailed review of	"Should do"	Mark		There is a commitment to review the FTSU Guardian model at STH.
the Trust's Freedom to Speak Up (FTSU)	recommendation	Gwilliam,		The Director of HR and Staff Development, HR Operations Director,
arrangements should be taken forward		Director of		Head of Operational HR, HR Business Partner Lead and the three
using the self-review tool published by		HR		current Guardians are meeting to discuss an alternative approach
NHSE/I and other available guidance.				for the FTSU Guardian role. Information on the role/approach
Specifically, we recommend the following				taken by other Trust's has been collated to support this discussion
actions:				and support is being provided by NHS England.
a specification for a FTSU guardian who				
is not a staff governor and can be				In the meantime:
dedicated to the specific role should be				It was agreed on 5 July 2022 that the Guardians would present
appointed.				the FTSU quarterly and annual report at the relevant meeting
 a regular reporting cycle by the FTSU 				of the HR & OD Committee from September 2022 onwards. The
guardian should be set by the Board,				report includes information on outcomes, learning and actions
including identifying learning from				from closed cases.
concerns raised and suggested actions				A Communication strategy has been agreed for 2022/2023 and
which result. Reports should be				an overarching FTSU strategy will be developed.
presented by the guardian to the Board				
in person.				In addition, a review of the Freedom to Speak Up Policy will take
a strategy and action plan to improve				place in line with the national guidance issued in June 2022 for all
the FTSU culture and profile of the				Trusts to review and update their Policies to reflect the new
guardian in the Trust should be				national FTSU Policy template by the end of January 2024. The
commissioned on behalf of the Board.				current STH Policy was revised and reissued in February 2022 and
 revising the policy to reflect the new 				is not due for review until November 2024. The review will
arrangements.				therefore be brought forward.

Recommendation	Link to CQC	Lead	RAG	Response
Recommendation 3: A succinct report from the Safety and Risk Forum to the Safety and Risk Committee setting out key matters that require alerting, assurance and advice should become part of the regular reporting cycle to the Committee. Consideration should be given to the "3As" report approach and template set out in Appendix C of the report.	Links to general theme related to escalation	Sue Butler, Head of Patient and Healthcare Governance		Matters which require alerting to the Safety and Risk Committee will be highlighted in the Safety and Risk Forum minutes under the agenda item 'Items to bring to the attention of the SRC' from September 2022.
Recommendation 4: The responsibility for each care group representative on the Safety and Risk Forum to share crosscutting learning and good practice within their respective directorate governance meetings should be reinforced and reviewed on a regular basis.	Link to "must do" recommendation s relating to learning following incidents	Sue Butler, Head of Patient and Healthcare Governance		The audit, planned for September 2022, of Directorate Governance meeting minutes against the requirements of the Quality Governance Framework will include assessment of whether cross cutting learning and good practice from Safety and Risk Forum this been shared. In addition the Terms of Reference for Safety and Risk Forum will be reviewed to emphasise responsibility of members to share learning. This will be completed by December 2022.
Recommendation 5: In order to further enhance the information relating to incidents currently presented to the Board, the agenda should include a scheduled item which allows regular deep dive discussion around incidents and related performance against key metrics, learning, themes and national policy updates.	Links to theme related to board receiving relevant information to enable discussion, challenge and understanding of risks	Sue Butler, Head of Patient and Healthcare Governance		In line with the transition to the Patient Safety Incident Response Framework, the Board will be required to approve the Patient Safety Incident Response Plan and thereafter, the Board will agree the annual review of the plan. This process will ensure that the Board is sighted on information regarding incident themes, trends and performance and will inform a programme of regular deep dive discussions. It is expected that the Trust will publish its first Patient Safety Incident Response Plan in September 2023.

Recommendation	Link to CQC	Lead	RAG	Response
Recommendation 6: More structured	Link to "must do"	Sue Butler,		The Quality, Safety and Risk Dashboard in now place and continues
guidance/training should be developed for	recommendation	Head of		to be developed to support easy access to, and review of,
directorates on the effective use of	s relating to	Patient and		directorate-level data.
available data to identify themes, trends	learning following	Healthcare		The Trust Quality Improvement Matron will be regularly visiting
and learning from incidents in their	incidents	Governance		wards and departments and will use this as an opportunity to
individual governance meetings.				provide staff with support and guidance regarding the dashboard.
				In addition, consideration will be given to supporting directorates
				in effectively using available data, including learning sessions at
				Safety and Risk Forum and Medical Quality Leads meetings.
Recommendation 7: The Mortality	"Should do"	Simon		This is a key recommendation following the Review of Mortality &
Governance Committee should receive a	action for UEC	Buckley,		Morbidity Meetings undertaken in June 2022. A Mortality and
standardised quarterly/six-monthly	relating to	Deputy		Morbidity (M&M) report template will be produced for all
update report (run as a rolling	frequency of	Medical		directorates/specialties to complete, and a rolling programme of
programme). This should be reported by	M&M meetings;	Director		reports and attendance of M&M Leads at Mortality Governance
each directorate's M&M lead outlining:	concerns			Committee will be developed. The template report and schedule
 key themes/learning identified from 	regarding			will be agreed by the end of September 2022.
their mortality review work.	frequency of			
actions being implemented to address	meetings in			
any learning, including any overdue	Medical Care			
actions.	(RHH)			
dissemination of learning from deaths				
across their directorate.				

Recommendation	Link to CQC	Lead	RAG	Response
Recommendation 8: The Directorate	As above	Sue Butler,		The Quality Governance Framework has been launched and
Healthcare Governance Framework should		Head of		includes responsibilities in relation to M&M. An initial self-
set out how directorate governance		Patient and		assessment process is in progress to check that this has been put in
meetings will be expected to have		Healthcare		place and a wider audit is planned for September 2022.
oversight for M&M learning and resulting		Governance		
actions.				In addition, the results of the M&M audit completed June 2022 are
				being considered by Mortality Governance Committee (MGC).
				The need to add further detail to the Quality Governance
				Framework will be consider following completion of the self-
				assessment, governance framework audit and discussion at MGC.
Recommendation 9: The Board should	The report	Mark		An initial meeting will be held on 15 th August with colleagues from
adopt a clear engagement and	identifies lack of	Tuckett,		across the Trust to review and scope work to improve our
involvement strategy to support the	evidence to	Director of		approach to patient engagement.
involvement of patient and carers in the	support "a	Strategy and		
design of its services and its decision	commitment	Planning		
making processes.	from the trust to			
	monitor and			
	improve patient			
	experience"			

Recommendation	Link to CQC	Lead	RAG	Response
Recommendation 10: The Quality	The CQC report	Chris Morley,		The IQSR has been enhanced to include more detailed information on
Committee should include a regular	highlights that	Chief Nurse		patient experience and in future, it will be made explicit that this
assurance report from the Patient	they "did not see			information is drawn from the Patient Experience Committee.
 assurance report from the Patient Experience Committee. We recommend this includes: a Patient story (ideally presented through the voice of the patient/carer themselves). key themes/learning from patients/carer engagement activities that impact on the Trust's quality governance agenda and how these are changing over time. how patient/carer engagement has led to improved healthcare services and how this learning and good practice has been shared across the organisation. 	evidence of output or reporting from the patient experience committee to the trust's healthcare governance committee." and "the trust board did not regularly hear patient stories from patients			Information is drawn from the Patient Experience Committee. There is now a programme of presentations to Quality Committee including patient experience to increase visibility of both this work and the patient voice. By September 2022, a new Strategic Patient Experience Committee will be established to implement the Patient Experience Strategy, which will provide assurance to Quality Committee.
	themselves and as such we were			
	not assured the			
	board was fully			
	sighted"			

Recommendation	Link to CQC	Lead	RAG	Response
Recommendation 11: Each care group	Links to above.	Chris Morley,		A rolling programme of Care Group presentations reports to the Patient
should present a standardised		Chief Nurse		Experience Group will commence in October 2022.
quarterly/six monthly update report (run				
as a rolling programme) to the Patient				
Experience Committee. This should outline:				
 key themes/learning identified from 				
patient experience work.				
 actions being implemented to address 				
any learning, including resolving any				
overdue actions.				
 how they are disseminating learning 				
from patient and carer feedback across				
their care group.				
KLoE 4 - Roles in good governance				
Recommendation 12: The Quality	CQC highlighted	Sandi		The diagram which demonstrates the reporting routes to TEG and
Governance Policy and Framework should	concerns	Carman,		assurance to the Board Committee will be revised to demonstrate
be revised to increase clarity on delegation	regarding the role	Assistant		the separation between management and assurance functions.
and reporting arrangements. Specifically,	of TEG.	Chief		Once finalised this will be included in the Quality Governance
to ensure the correct separation between		Executive/		Policy.
management and assurance functions, it		Sue Butler,		
should make clear that the TEG does not		Head of		
report into the Board and its assurance		Patient and		
committees in this framework.		Healthcare		
		Governance		

Recommendation	Link to CQC	Lead	RAG	Response
Recommendation 13: The quality	Not specifically	Jennifer Hill,		The new Quality Director will undertake a review on
governance structure should be reviewed	reflected in CQC	Medical		commencement in post in October 2022.
to reduce the number of trust-wide and	report.	Director		
specialist quality governance groups		(Operations)		
reporting directly to the Trust Executive				
Group for management purposes and to				
the Quality Committee for assurance				
purposes.				
Recommendation 14: Consideration	As per	Mark		This recommendation will be taken forward in line with
should be given to expanding the role of	recommendation	Tuckett,		recommendation 1.
the Care Groups as part of the quality	1	Director of		
governance structure, whereby		Strategy and		
directorates report to Care Groups which		Planning		
in turn are held to account by TEG. This				
would provide more capacity for				
accountability and governance and improve				
reporting and connectivity between the				
executive and directorate leadership.				
Recommendation 15: The Quality	Not specifically	Sue Butler,		A review has been completed and relevant indicators are now
Committee should receive a monthly	reflected in CQC	Head of		included in the IQSR.
report on the relevant sections of the	report but links to	Patient and		
Integrated Performance Report at both an	Board oversight	Healthcare		
organisational and directorate level. This		Governance		
should include metrics associated with				
delivery of the best clinical outcomes and				
providing patient centred care.				

Recommendation	Link to COC	Lead	RAG	Decrease
	Link to CQC		KAG	Response
Recommendation 16: Action trackers	CQC identified	Michael		Structure of the notes being reviewed to ensure clarity of actions
should be introduced for directorate	concerns about	Harper, Chief		and responsibilities and a running action log is being developed
performance meetings that show the	the clarity of	Operating		
status of completion against agreed	actions required	Officer		
actions and record their impact upon	following			
performance.	directorate			
	reviews under the			
	PMF			
Recommendation 17: A review of	Not specifically	Jennifer Hill,		Work is in progress as follows:
resourcing of quality and safety	reflected in CQC	Medical		 Job planned time for Medical Quality Leads is being reviewed
governance across the Trust, including the	report.	Director		with an increase in resource to be discussed further at TEG.
central team, directorates and care		(Operations)		A review of central Patient and Healthcare Governance Team
groups, should be undertaken to ensure		(0)0146.01.57		has been undertaken and a bid for additional resources will be
appropriate resourcing is in place. The				presented to TEG 24 August 2022.
review should consider both the numbers				-
of staff and their grades, roles and				Details of the resources available across directorate
,				governance teams are being collated and a review is underway
expertise, with the aim of reducing				with the aim of matching capacity to workload across all care
unwarranted variation and achieving				groups.
greater consistency.				
Recommendation 18: An engagement	Not specifically	Sue Butler,		The Quality Governance policy and framework has been launched,
programme to roll out the Quality	reflected in CQC	Head of		a self-assessment against the framework is in progress, which will
Governance Policy and Framework and	report.	Patient and		be followed by a wider audit in September. The results of the
promote collective working across the		Healthcare		audits will be discussed, and any actions agreed via Safety and Risk
Trust should be developed and		Governance		Forum and Medical Quality Leads Forum by January 2023.
implemented. This should include a review				
timeline.				

Recommendation	Link to CQC	Lead	RAG	Response
KLoE 5 – Processes			_	
Recommendation 19: For 2022/23 the	The CQC "were	Sandi		This recommendation links to CQC Action 16: We have effective
Trust Board should ensure that it is sure	not assured the	Carman,		systems to ensure Board oversight of the management of risk.
that the principal risks are genuinely	IRAR accurately	Assistant		
comprehensive, strategic and used to	or adequately	Chief		There is agreement to transition to a Board Assurance Framework.
design and drive the agenda for the Board	reflected the	Executive		Actions completed to date, are as follows:
and its committee meetings. To reinforce	significant			Strategic Risks approved
the Board's role, we would recommend	operational risks			Working BAF developed
developing the Integrated Risk and	which could			BAF operating principles agreed
Assurance Report into a Board Assurance	impact on the			
Framework and increasing the focus on the	trust."			
Board's responsibility in relation to the				
strategic risks.				
Recommendation 20: The Quality	As above	Sandi		Implementation of Strategic Risk Deep Dive Schedule for Quality
Committee should receive a report each		Carman,		Committee to be considered as part of Committee level operation
quarter summarising the position of the		Assistant		of the Board Assurance Framework.
principal risks that the committee provides		Chief		
oversight for. This should be used to inform		Executive		
the contents of the agenda. The report				
should be presented early on in the				
meeting, so that there is a clear linkage				
between the principal risks and the focus of				
the meeting, allowing members of the				
committee to obtain assurance on how the				
principal risks are being managed.				

Recommendation	Link to CQC	Lead	RAG	Response
Recommendation 21: The Quality	As above	Sandi		Implementation of Strategic Risk Deep Dive Schedule for Quality
Committee should receive a regular report		Carman,		Committee (which would include presentation of Corporate Risk
outlining the highest operational risks		Assistant		Register Report extracts) to be considered as part of Committee
relating to quality and safety. This should		Chief		level operation of the Board Assurance Framework.
include trends and key actions being taken		Executive/Su		
and identify where any risks require actions		e Butler,		Full population of Corporate Risk Register Report (operational risks
that need additional resource or support.		Head of		scored 15) in line with this recommendation is dependent on
		Patient and		considerable further work in relation to the current risk
		Healthcare		improvement plan before comprehensive data can be extracted
		Governance		and routine reports produced.

Recommendation	Link to CQC	Lead	RAG	Response
Recommendation 22: A Trust Risk Group,	Not specifically	Jennifer Hill,		The Trust's new Quality Director will undertake a review of quality
reporting to the Safety and Risk	reflected in CQC	Medical		committee structures on commencement in October. This
Committee, should be added to the	report.	Director		recommendation will be considered as part of this review.
governance structure with responsibility		(Operations)		
for reviewing and scrutinising the ongoing				
management of the Trust's operational				
risks. The work of this group would inform				
the report on the Trust's extreme risks,				
which we understand is now being				
produced for the Board. The responsibilities				
of the group should include reviewing and				
challenging:				
 risks which are overdue for review. 				
 risks scoring 8 and above where 				
there has been no reduction in the				
risk score for the past 6 months (3				
months for risks scoring 15 and				
above).				
 risks where the score has been 				
reduced to below 8.				
 risks that have been closed. 				

Recommendation	Link to CQC	Lead	RAG	Response
Recommendation 23: All clinical	Not specifically	Sue Butler,		The recommendation is reflected in the Quality Governance
directorate governance meetings should	reflected in CQC	Head of		framework as follows:
use the model agenda which is included in	report	Patient and		Risks due for closure is on the model agenda.
the Directorate Healthcare Governance		Healthcare		Items for escalation is on model agenda and this would include
Framework to increase the consistency of		Governance		any risks which required additional support or resources.
risk management discussion and action in				
directorate management meetings. This				As previously stated, a self-assessment against the framework is in
should be expanded to include:				progress, which will be followed by a wider audit in September.
 risks due for closure. 				The results of the audits will be discussed, and any actions agreed
 identification of additional support 				via Safety and Risk Forum and Medical Quality Leads
or resources needed to manage its				
risks				
Recommendation 24: Improvements in	As per	Mark		This will be considered as part of the current review of the scheme
communication and reporting should be	recommendation	Tuckett,		of delegation, as per recommendation 1.
made to create more integrated and	1	Director of		
effective risk management arrangements.		Strategy and		
This integrated approach would need to set		Planning		
out clearer reporting and communications				
across directorates and between				
directorates and Trust Executive Group and				
develop ways of engaging with staff to help				
deliver required improvements. This				
Recommendation links with other				
recommendation including				
Recommendation 14.				

Recommendation	Link to CQC	Lead	RAG	Response
KLoE 6 – Information				
Recommendation 25: A systematic process	The CQC	Sue Butler,		A proforma will be shared via SRF to collate examples of good
should be developed and implemented for	identified a lack	Head of		practice for sharing with the Forum and these will be built into the
collecting and sharing examples of good	of awareness of	Patient and		dashboard guidance by December 2022.
practice on how live dashboard data is	dashboard data in	Healthcare		
being used at ward level to support staff,	some areas	Governance		
share learning and identify and act on				
areas of service improvement. This would				
allow the Trust to develop a standard				
guidance note for all key directorate staff				
outlining how they should be using live				
dashboard data in practice.				
Recommendation 26: An implementation	Must do	Sue Butler,		The Quality Governance policy and framework has been launched,
timetable and plan should be agreed for	recommendation	Head of		which includes a model agenda. A self-assessment against the
roll out and review of the draft Directorate	for Jessops and	Patient and		framework is in progress, which will be followed by a wider audit in
Healthcare Governance Framework across	Beech Hill to	Healthcare		September (which will be undertaken annually.
the organisation, together with the	ensure effective	Governance		
standardised agenda. Implementing a	governance			The suggestion of a template workplan to be considered once audit
template cycle of business would also	arrangements			results available.
support directorates in identifying when	and issues			
they need to discuss less frequent quality	identified with			
governance agenda items. The Trust should	effectiveness of			
consider implementing a system of rolling	governance			
review to ensure that the framework is	arrangements in			
being operationalised in practice.	a number of			
	other areas.			

Recommendation	Link to CQC	Lead	RAG	Response
Recommendation 27: The Trust should ensure that regular data quality oversight and assurance reports are provided to TEG and to the Audit Committee and that a forward plan clearly outlining the priorities for data quality is completed and	The CQC found that the "trust did not always collect reliable data"	Sandi Carman, Assistant Chief Executive		Whilst this recommendation is agreed by the Trust, further work is required to develop a plan to address the requirement. The key constraint to delivery relates to sufficient resources to deliver the data quality agenda.
agreed.				
Recommendation 28: Reporting between assurance committees and the Board should be strengthened through the provision of a summary report in a consistent format. This should include the key matters discussed, where assurance had been sought by the committee and where additional information/assurance was requested, together with a summary of any issues or risk that require escalating to the Board for its oversight or action.	Not specifically reflected in CQC report	Sandi Carman, Assistant Chief Executive		This recommendation is not supported by TEG at present due to resource concerns. This will be re-considered following completion of the Well-led review.
Recommendation 29: Feedback on decisions taken by the Board to its assurance committees should be strengthened on matters escalated for discussion, action or decision.	Not specifically reflected in CQC report	Sandi Carman, Assistant Chief Executive		Whilst this recommendation is agreed by the Trust, further work is required to develop a plan to address the requirement.

Recommendation	Link to CQC	Lead	RAG	Response
Recommendation 30: The Board should set a clear timeline for further improving the level of qualitative intelligence received by the Board and its assurance committees from staff, patients and its wider stakeholders.	Not specifically reflected in CQC report	Sandi Carman, Assistant Chief Executive		Assistant Chief Executive to facilitate discussion with relevant Executive Directorates to agree approach, this approach will be guided by the contents of the new Board Assurance Framework.
Recommendation 31: The Board Action Log should be used more proactively and systematically to capture and drive forward specific actions agreed for each agenda item, following discussion and challenge. As well as promoting good governance in action this will improve the audit of progress and provide a firm foundation for review of Board impact and effectiveness over time.	Not specifically reflected in CQC report	Sandi Carman, Assistant Chief Executive		The process for the Board Acton Log is currently under review and will be developed in line with the proposals in the recommendation.
Recommendation 32: The Trust should add the requirement to complete an action log for all directorate executive and governance meetings as part of the Directorate Healthcare Governance Framework, together with a standard template.	Not specifically reflected in CQC report	Sandi Carman, Assistant Chief Executive/ Sue Butler, Head of Patient and Healthcare Governance		The requirement for action log is on the model agenda for Directorate Governance Groups. The standard template action log will be included in the framework as part of the annual review planned for October 2022.