

Patient Safety Incident Response Policy

March 2025

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Publication date	March 2023
Review dates	March 2025 CN / CS August 2025 December 2025 March 2026 CN / AN
Next Review	April 2027

1 Purpose

This policy supports the requirements of the NHS England Patient Safety Incident Response Framework (PSIRF) and sets out how Eyecare Medical Limited will approach the development and maintenance of effective systems and processes for responding to patient safety incidents and issues for the purpose of learning and improving patient safety. The PSIRF advocates a co-ordinated and data-driven response to patient safety incidents. It embeds patient safety incident response within a wider system of improvement and prompts a significant cultural shift towards systematic patient safety management. This Policy support Eyecare Medical to develop and maintain an effective patient safety incident response system that integrates four key aims:

- Compassionate engagement and involvement of those affected by patient safety incidents.
- Application of a range of system-based approach to learning from patient safety incidents.
- Considered and proportionate responses to patient safety incidents
- Supportive oversight focused on strengthening response system functioning and improvement.

2 Scope

This policy is specific to incident responses conducted solely for the purpose of learning and improvement throughout Eyecare Medical. Although primarily targeted at patient safety incidents, it is recommended that this approach is also adopted for the investigation of other incident types that occur within a healthcare setting, such as staff trips and falls.

Responses under this policy follow a systems-based approach. This recognises that patient safety is an emergent property of the healthcare system: that is, safety is provided by interactions between components and not from a single component. Responses do not take a 'person- focused' approach where the actions or inactions of people, or 'human error', are stated as the cause of an incident.

There is no remit to apportion blame or determine liability, preventability or cause of death in a response conducted for the purpose of learning and improvement. Other processes, such as claims handling, human resources investigations into employment concerns, professional standards investigations, coroner inquests and criminal investigations, exist for that purpose.

Information from a patient safety response process can be shared with those leading other types of responses, but other processes should not influence the remit of a patient safety incident response.

3 Our patient safety culture

Underpinning this policy, and all of the improvement work we undertake as a NHS provider, is the work that we have already started around building a just culture and improving the organisation culture more widely.

Our aim is for Eyecare Medical to become a truly safe, kind, compassionate and inclusive place to work and be treated, where colleagues live our values and feel empowered to shape and deliver change, learn from mistakes, voice their concerns, and know that their voice will be listened to.

Through listening to our staff, we know that the most important things that we need to get right are creating:

- Compassionate and inclusive leadership
- A well-managed organisation
- Putting patients at the heart of everything we do
- A fit-for-purpose workplace.

We foster a culture where staff are encouraged to voice their ideas, concerns and to share best working practices for staff and patient benefit.

Our approach to incident investigations is embedded in this approach and culture. It will be open and honest in approach and encourage staff to learn from mistakes and work together to ensure we put things right. Investigations will be a way for staff to create and share knowledge with each other, our patients and our professional communities.

We aim to promote a just culture throughout our incident management processes which endorses consistent, constructive and fair evaluation of the actions of staff involved in patient safety incidents. A just culture supports managers to review whether a staff member involved in a patient safety incident requires specific individual support or intervention to work safely. Action singling out an individual is rarely appropriate. Most patient safety issues have deeper causes and require wider action

4 Patient and Public Involvement (stakeholder engagement)

Eyecare Medical recognises the importance of engaging patients, families, and carers in the management and learning from patient safety incidents. In line with the Patient Safety Incident Response Standards (PSIRS), our policies and procedures are designed to ensure meaningful involvement of those affected by incidents.

Eyecare Medical is committed to:

- Engaging openly and compassionately with patients, families, and carers following a patient safety incident.
- Ensuring that their views and experiences inform incident reviews, learning, and improvement activities where appropriate.
- Providing clear, timely, and honest communication throughout the incident response process.

- Seeking opportunities to involve patient and public voices in shaping our patient safety culture and improvement priorities.

We are currently exploring the formation of a stakeholder engagement working group to improve on how patients and carers can be involved in the continual review of our services and learn from incidents and reports via our compliments, concerns and complaints processes.

Eyecare Medical remains dedicated to upholding the principles of openness, transparency, and continuous learning in partnership with the people who use our services.

5 Addressing health inequalities

Eyecare Medical has sought to place itself as an ‘anchor institution’, where the organisation’s sustainability is tied to the health and wellbeing of our local population. Our plan has always been to tackle health inequalities. It achieved this by working with the local PCT back in 2007 to prevent patients having to travel 50 miles unnecessarily to receive treatment for macular degeneration.

Eyecare Medical also provides opportunities to those in deprived areas to enter employment. This approach highlights Eyecare Medical’s commitment to providing social value.

We are proud to have won the Macular Society’s Awards for Excellence for Service of the Year in 2014 that recognised the high level of care we give to our patients.

We are exploring signing up to the Cheshire and Merseyside Integrated Care Board (ICB) Anchor Institution Charter so that we can benchmark ourselves against others and share best practice, regionally. Internally, Eyecare Medical has reviewed and published its Sustainability and Equality, Diversity and Inclusion policies.

5.1 Monitoring Patient Safety Incidents and Addressing Health Inequalities

Eyecare Medical is committed to ensuring that all patients receive safe and equitable care, regardless of their background or protected characteristics. As part of this commitment, we actively monitor patient safety incidents to identify any patterns or disparities that may disproportionately affect specific patient groups.

Monitoring and Analysis:

- Patient safety incidents are recorded and categorised using demographic information, including age, gender, ethnicity, disability, and other relevant protected characteristics.
- Regular analysis is undertaken to identify trends, clusters, or recurring issues that may indicate inequalities in patient safety outcomes.
- Findings from this analysis are reviewed by the Patient Safety Team and senior leadership to ensure that any disproportionate risks are promptly addressed.

Addressing Inequalities:

- Where disparities or inequities are identified, targeted interventions are developed to mitigate risk and improve safety for affected groups.

- This may include adapting care pathways, providing additional staff training, improving communication or accessibility, or engaging directly with patient groups to understand their experiences.
- Learning from these reviews is embedded into organisational policies, procedures, and patient safety improvement plans.

Accountability and Reporting:

- Outcomes of patient safety incident monitoring and actions taken to address inequalities are reported regularly to the Board, demonstrating accountability and commitment to equity in care.
- Monitoring processes are aligned with Eyecare Medical's Equality, Diversity, and Inclusion and Sustainability policies, ensuring that addressing health inequalities is integral to our patient safety strategy.

By proactively monitoring and addressing inequalities in patient safety incidents, Eyecare Medical ensures that all patients, regardless of background, benefit from a safe, equitable, and high-quality care experience.

6 Patient Safety Incident Reporting Arrangements

All staff at Eyecare Medical have a responsibility to report patient safety incidents promptly, accurately, and in accordance with the organisation's reporting procedures. This ensures that incidents are addressed in a timely manner, learning is captured, and risks to patients are mitigated.

Internal Reporting:

- Staff should report patient safety incidents through the designated internal reporting system immediately after identifying or becoming aware of an incident.
- Reports must include all relevant details, including the nature of the incident, individuals involved, immediate actions taken, and any potential harm or risk.
- Once an incident is reported, it will be reviewed by the Patient Safety Team to ensure that appropriate actions are taken and that learning opportunities are identified.

Escalation to Senior Staff:

- Incidents that are classified as serious, high-risk, or involving potential harm to patients or staff must be escalated immediately to senior clinical and operational leads, including the Head of Patient Safety or equivalent.
- Senior staff are responsible for overseeing the investigation, providing guidance, and ensuring appropriate resources are allocated.

External Reporting:

- Where required, patient safety incidents will be reported externally in line with statutory obligations, NHS England guidance, and any relevant regulatory requirements.

- External notifications may include reporting to the Integrated Care Board (ICB), Care Quality Commission (CQC), or other regulatory bodies, depending on the severity and nature of the incident.
- The Patient Safety Team will ensure that all external notifications are made accurately and in a timely manner, supporting transparency and compliance with national patient safety standards.

This approach ensures that all patient safety incidents are captured, appropriately escalated, and communicated internally and externally to support patient safety learning and continuous improvement.

7 Engaging and involving patients, families and staff following a patient safety incident.

The PSIRF recognises that meaningful learning and improvement following a patient safety incident can only be achieved if supportive systems and processes are in place. Central to this is the compassionate engagement and active involvement of patients, families, and carers affected by an incident.

This involves:

- Working collaboratively with those affected to understand their experiences, answer questions, and provide appropriate support.
- Involving patients, families, and carers in the learning process, ensuring their perspectives inform incident reviews, system improvements, and future safety initiatives.
- Using insights from those affected to prioritise actions that enhance the safety and quality of care.

Detailed guidance on engaging and involving patients, families, and staff following a patient safety incident is provided by NHS England here: [Engaging and involving those affected by patient safety incidents](#).

7.1 Patient and Family Liaison

Eyecare Medical is committed to creating a culture of openness with patients, families and carers particularly when clinical outcomes are not as expected or planned.

It is expected that an 'Engagement Lead' is appointed following each incident. This would be a senior member of staff who is nominated to be the key contact for communication with patients, families and carers during a patient safety incident review.

It is the Engagement Lead who is responsible for:

- Meeting with patients, families and carers involved in a patient safety incident to explain what has happened, the investigation taking place and provision of contact details.
- Hearing the patient/family account of the incident from their perspective and gathering any questions they would like the review to answer.
- Ensuring that the patient has been provided with appropriate on-going support.

- Documenting the details of all discussions with the patient (and/or carer), copies of letters relating to the patient safety review ensuring this documentation is uploaded to the relevant incident record.
- Keeping in close communication with the patient, family and/or carer as per their wishes.
- Will liaise with staff, managers and, where appropriate, with other relevant organisations to negotiate immediate and prompt solutions.

Eyecare Medical is firmly committed to continuously improving the care and the services provided. There will be occasions when actions do not meet the expectations of patients, service users, family members or carers. On these occasions Eyecare Medical aims to achieve a satisfactory resolution to concerns, comments and complaints and to learn from them to reduce the likelihood of recurrence.

Eyecare Medical staff are empowered to resolve concerns immediately and informally, where this is possible. People with a concern, comment, complaint or compliment about care or any aspect of Eyecare Medical services are encouraged to speak with a member of the care team.

Should the care team be unable to resolve the concern then the Engagement Lead can provide support and advice to patients, families, carers and friends.

7.2 Freedom to Speak Up

To support a culture of openness and safety, Eyecare Medical will establish a Freedom to Speak Up (FTSU) Officer and implement a corresponding policy. This role will provide a confidential and accessible route for staff to raise concerns, share insights, or report patient safety issues, with the aim of promoting continuous learning and improvement for the benefit of both patients and staff.

7.3 National sources of support

National guidance for NHS trusts engaging with bereaved families, patients and carers affected by patient safety incidents.

[NHS England » Engaging and involving patients, families and staff following a patient safety incident](#)

Learning from deaths – information for families explains what happens after a bereavement (including when a death is referred to a coroner) and how families and carers should comment on care received.

<https://www.england.nhs.uk/publication/learning-from-deaths-information-for-families>

The NHS Complaints Advocacy Service can help navigate the NHS complaints system, attend meetings and review information given during the complaints process.

<https://www.voiceability.org/about-advocacy/types-of-advocacy/nhs-complaints-advocacy>

Healthwatch Cheshire East provides information to help make a complaint, including sample letters. Address: Healthwatch Cheshire CIC, Sension House, Denton Drive, Northwich, CW9 7LU. Email: info@icascheshire.org.uk Website:

www.healthwatchcheshireeast.org.uk Call: 0300 323 0006

Parliamentary and Health Service Ombudsman makes the final decisions on complaints patients, families and carers deem not to have been resolved fairly by the NHS in England, government departments and other public organisations.

<https://www.ombudsman.org.uk/>

Citizens Advice Bureau provides UK citizens with information about healthcare rights, including how to make a complaint about care received.

<https://www.citizensadvice.org.uk>

7.4 Supporting staff following Patient Safety Incidents

Eyecare Medical is committed to the principles of the NHS Just Culture Guide for ensuring the fair, open and transparent treatment of staff who are involved in patient safety incidents. Eyecare Medical recognises the significant impact being involved in a patient safety incident can have on staff and will ensure staff receive the support they need to positively contribute to the review of the incident and continue working whilst this takes place.

All staff with knowledge of the events being reviewed are encouraged to actively participate in the learning response. That may be through submitting written information, joining a debrief meeting or a one-to-one conversation with the incident review team.

Review leads will agree with staff the timescales for feedback of progress and findings in accordance with the type of review method being utilised. All contact with staff will involve the collection of their account of the events along with their views and opinions on how systems can be improved.

Supervisors, with support from senior managers, will advise and signpost staff involved in patient safety incidents to the most appropriate information about the patient safety incident review process and further support functions.

Psychological Safety and Staff Wellbeing

Eyecare Medical recognises that psychological safety is a fundamental component of a healthy, effective, and patient-focused organisation. Psychological safety refers to an environment in which staff feel confident to speak up about concerns, raise patient safety issues, share ideas, and admit mistakes without fear of blame, retribution, or negative consequences.

Importance of Psychological Safety:

- Encourages open reporting of patient safety incidents, enabling learning and continuous improvement.
- Supports staff wellbeing, reducing stress, burnout, and moral distress.
- Promotes collaboration, innovation, and problem-solving by creating a culture where all voices are heard.
- Enhances patient safety and quality of care by ensuring concerns are addressed early and appropriately.

Support for Staff:

Eyecare Medical staff have access to psychological support and interventions as part of

the organisation's health and wellbeing programme. This service can be accessed confidentially through senior managers and is regularly promoted across the organisation.

- Staff are encouraged to seek support when dealing with the emotional impact of patient safety incidents or workplace challenges.
- Senior managers are trained to recognise signs of distress and provide guidance or referral to appropriate support services.
- The organisation actively fosters a culture of openness, respect, and psychological safety to ensure staff feel supported in raising concerns, learning from incidents, and contributing to the continuous improvement of patient care.

By prioritising psychological safety, Eyecare Medical ensures that staff are empowered, resilient, and able to engage fully in patient safety and quality improvement initiatives.

Second Victim (<https://secondvictim.co.uk>) is a website resource for healthcare staff and managers involved in patient safety incidents.

8 Patient safety incident response planning

PSIRF supports organisations to respond to incidents and safety issues in a way that maximises learning and improvement, rather than basing responses on arbitrary and subjective definitions of harm. Beyond nationally set requirements, organisations can explore patient safety incidents relevant to their context and the populations they serve rather than only those that meet a certain defined threshold.

Eyecare Medical will take a proportionate approach to its response to patient safety incidents to ensure that the focus is on maximising improvement. To fulfil this, we will undertake planning of our current resource for patient safety response and our existing safety improvement workstreams. We will identify insight from our patient safety and other data sources both qualitative and quantitative to explore what we know about our safety position and culture.

Our patient safety incident response plan will detail how this has been achieved as well as how Eyecare Medical will meet both national and local focus for patient safety incident responses.

8.1 Resources and training to support patient safety incident response

Eyecare Medical is committed to ensuring that we fully embed PSIRF and meet its requirements. We have therefore used the NHS England Patient Safety Response Standards to frame the resources and training required to allow for this to happen.

Eyecare Medical will ensure that:-

- Learning response leads are appointed by Medical Director
- Learning responses are not led by staff who were involved in the patient safety incident itself or by those who directly line manage those staff.
- Learning response leads have an appropriate level of seniority and influence within an organisation.
- Learning responses are not undertaken by staff working in isolation and that there is dedicated support available for staff leading on learning responses.

- Staff affected by patient safety incidents are given time and are supported to participate in learning responses.
- Learning response leads have dedicated paid time to conduct learning responses. If necessary, their normal roles are backfilled.
- Experts with relevant knowledge and skills are involved, where necessary, throughout the learning response process to provide expertise advice and proofreading.
- There is dedicated staff resource to support engagement and involvement of those affected.

Training will only be conducted by staff who have attended courses in learning from safety incidents, are up to date in learning response best practice and have both conducted and reviewed learning responses.

8.3 Learning responses

Staff leading a Patient Safety Incident Investigation will be provided formal training and skills development in learning from patient safety incidents and experience of patient safety incident response.

Learning response leads will also undertake continuous professional development in incident response skills and knowledge.

All staff leading learning responses should be able to:

- Apply human factors and systems thinking principles to gather qualitative and quantitative information from a wide range of sources.
- Summarise and present complex information in a clear and logical manner and in report form.
- Manage conflicting information from different internal and external sources.
- Communicate highly complex matters and in difficult situations.

Engagement and involvement during a Patient Safety Incident Investigation with those affected is led by those with at least six hours of training in involving those affected by patient safety incidents in the learning process. Engagement leads will also be expected to complete [level 1 \(essentials of patient safety\)](#) and [level 2 \(access to practice\)](#) of the patient safety syllabus.

Engagement leads undertake continuous professional development in engagement and communication skills and knowledge.

All engagement leads will:

- Communicate and engage with patients, families, staff, and external agencies in a positive and compassionate way.
- Listen and hear the distress of others in a measured and supportive way.
- Maintain clear records of information gathered and contact with those affected.
- Identify key risks and issues that may affect the involvement of patients, families, and staff.
- Recognise when those affected by patient safety incidents require onward signposting or referral to support services.

8.4 Resources and Training to Support Patient Safety Incident Response

Eyecare Medical is committed to ensuring that patient safety incident responses are appropriately resourced to enable timely, thorough, and effective investigations and learning. Patient safety incident responses will be led by trained staff with dedicated time allocated to undertake investigations and learning activities. The organisation has sufficient capacity to respond to incidents, with a flexible resourcing model that allows staff to be redeployed from non-essential activities when a significant incident occurs. Oversight and support will be provided by the Patient Safety Team and, where required, senior clinical and operational leads to ensure appropriate expertise and decision-making throughout the response process.

Staff Training and Development

Staff leading a Patient Safety Incident Investigation will receive formal training and ongoing skills development in patient safety incident response and learning from incidents. Learning response leads will also undertake continuous professional development in incident response skills and knowledge. All staff leading learning responses will be competent to:

- Apply human factors and systems thinking principles to gather qualitative and quantitative information from a wide range of sources.
- Summarise and present complex information in a clear and logical manner, including written reports.
- Manage conflicting information from different internal and external sources.
- Communicate highly complex matters in difficult situations with clarity and professionalism.

Engagement and Involvement

Engagement with patients, families, carers, and staff affected by incidents is a critical part of the learning process. Engagement leads will have completed at least six hours of training specifically involving those affected by patient safety incidents.

Additionally, engagement leads are expected to complete:

- Level 1: Essentials of Patient Safety
- Level 2: Access to Practice

Engagement leads undertake continuous professional development in engagement and communication skills and knowledge. All engagement leads are expected to:

- Communicate and engage with patients, families, staff, and external agencies in a positive and compassionate way.
- Listen and respond to the distress of others in a measured and supportive manner.

- Maintain accurate records of information gathered and contact with those affected.
- Identify key risks and issues that may affect the involvement of patients, families, and staff.
- Recognise when those affected require onward signposting or referral to support services.

Training Matrix

Eyecare Medical maintains a training matrix to ensure that all staff involved in patient safety incident responses have access to the required training. The matrix captures:

- Roles and responsibilities of staff involved in investigations and learning responses.
- Mandatory training completion status for patient safety investigation, human factors, and engagement skills.
- Continuous professional development activities and refresher training schedules.

Resource Availability

All training and development resources are made available through a combination of internal and external programmes, including:

- Online and face-to-face patient safety training modules.
- Access to NHS England guidance and materials for patient safety incident response and engagement.
- Mentorship and support from experienced staff within the Patient Safety Team.
- Dedicated time allocation for staff to complete training and undertake incident investigations.

This approach ensures that Eyecare Medical has a structured, well-resourced, and competent workforce capable of conducting patient safety incident investigations while actively engaging those affected to inform learning and improvement.

Oversight

All patient safety incident response oversight is led/conducted by those with formal training and skills development in learning from patient safety incidents and learning from patient safety incidents. The [Health Safety Investigation Branch \(HSIB\) level 2](#) investigation training meets these requirements.

Those with organisational oversight of the processes associated with this policy will primarily be directors. Those with this oversight role will be expected to complete level 1 (essentials of patient safety) and level 1 (essentials of patient safety for boards and senior leadership teams) of the patient safety syllabus.

All individuals in oversight roles in relation to PSIRF will undertake continuous professional development in incident response skills and knowledge.

All staff with oversight roles will:

- Be inquisitive with sensitivity
- Apply human factors and systems thinking principles.
- Obtain and assess both qualitative and quantitative information from a wide range of sources.
- Constructively challenge the strength and feasibility of safety actions to improve underlying system issues.
- Recognise when safety actions following a patient safety incident response do not take a system-based approach (e.g. inappropriate focus on revising policies without understanding 'work as done' or self-reflection instead of reviewing wider system influences).
- Summarise and present complex information in a clear and logical manner and in report form

8.5 Our patient safety incident response plan

Our plan sets out how Eyecare Medical intends to respond to patient safety incidents. The plan is not a permanent set of rules that cannot be changed and focuses on an initial period of 12 to 18 months. We will remain flexible and consider the specific circumstances in which each patient safety incident occurred and the needs of those affected, as well as the plan.

8.6 Reviewing our patient safety incident response policy and plan

Our patient safety incident response plan is responsive to change that will be appropriately amended and updated as we use it to respond to patient safety incidents. Eyecare Medical is working towards upholding the highest standards of patient safety incident responses and as this develops will update the Policy to reflect any changes made. Any changes will be made with the support and agreement of all stakeholders, including external stakeholders.

We will continue to review the plan every 12 to 18 months to ensure our focus remains up to date and to ensure that as ongoing improvement work embeds, our patient safety incident profile is updated. This will also provide an opportunity to re-engage with stakeholders to discuss and agree any changes made in the previous 12 to 18 months as a result of improvement.

An updated response plan will be available upon request. The review of this policy and any changes will be in collaboration and agreement with partners, particularly our integrated care board (ICB) and will ensure efforts continue to be balanced between learning and improvement. This more in-depth review will include reviewing our response capacity, mapping our services, a wide review of organisational data (for example, patient safety incident investigation reports, improvement plans, complaints, claims, staff survey results, inequalities data, and reporting data) and wider stakeholder engagement.

9 Responding to patient safety incidents

9.1 Patient safety incident reporting arrangements

All staff have a responsibility for reporting an incident when it is identified. The most senior member of staff on duty is responsible for ensuring that the incident is reported by the most appropriate member of staff and that immediate action is taken to ensure staff and patients are safe.

Each team leader must review incidents reported within their area of responsibility, consider undertaking an after-action review and ensure actions are taken to prevent or minimise the risk of reoccurrence.

9.2 patient safety incident response decision-making

Safety meetings will be held on a weekly basis to ensure that all incidents are assessed against the patient safety incident response plan. Eyecare Medical's safety meeting will assess incidents against the focus areas and take a decision on which merit the additional resource a systems level response requires.

9.3 Responding to cross-system incidents/issues

Where a case is identified as potentially requiring a cross system response, Eyecare Medical will contact the integrated care board (ICB) to agree this is the case. Where multiple organisations need to be involved in a single learning response, Eyecare Medical will take the lead on responses it is identified to be best placed to investigate the concerns.

Eyecare Medical acknowledges this may depend on capability, capacity, or remit and will work with the ICB to agree relevant cases and will request support to facilitate cross-system learning where it is required.

Wherever possible, Eyecare Medical will ensure that a learning response examines the care provided throughout a specific care pathway as opposed to focussing solely on the part of the pathway most proximal to the incident.

Eyecare Medical will actively engage partner organisations that provided care to the patient(s) involved where that care may have played a role in the incident being examined. Eyecare Medical will provide support to other organisations and co-operate with any learning response that crosses organisational boundaries.

Eyecare Medical will ensure that information governance agreements allow information sharing within and between relevant bodies to support effective communication during both incident response and improvement endeavours.

9.4 Timeframes for learning responses

Where an investigation is indicated, the investigation must be started as soon as possible after the patient safety incident is identified.

The time frame for completion of an investigation should wherever possible be agreed with those affected by the incident, as part of the setting of terms of reference. Eyecare Medical will strike a balance between conducting a thorough investigation, the impact that extended timescales can have on those involved in the incident, and the risk that delayed findings may adversely affect safety or require further checks to ensure they remain relevant.

No Eyecare Medical investigation is expected to take longer than six months. However, in exceptional circumstances, a longer timeframe may be required for completion of particularly complex investigations. In this case, any extended timeframe should be agreed between the Eyecare Medical, the ICB and those affected.

Identification of learning and implementation of change must be started as soon as possible after the patient safety incident is identified and should continue throughout the investigation.

9.5 Safety action development and monitoring improvements

Safety actions will be developed to address areas for improvement identified in learning responses. Safety actions can relate to the local context or broader system issues. Eyecare Medical will adopt the principles set out in NHS England's 'Safety action development guide'. It is expected that:

- Once systemic, interconnected contributory factors are robustly identified, the leadership team directs, champions and appropriately resources improvements, including by refocusing activity from individual responses to implementation and monitoring of required actions where appropriate.
- All safety actions are developed with relevant stakeholders including those responsible for implementation.
- The implementation and efficacy of all safety actions are monitored, and a named individual identified with responsibility for this.

9.6 Safety improvement plans

Organisational context

Eyecare Medical is on a three to five-year improvement journey as an organisation. The plan has been informed by inspections and reviews from the Care Quality Commission (CQC), patients, and others.

By delivering on improvements, we will not only tackle some of our current issues, but we will build a solid foundation to make sure we are getting the fundamentals right.

The patient involvement is a key component of our safety response planning as it will set out how analysis will contribute to identifying suitable safety improvement strands in the future.

Regular updates on progress will be shared with staff, patients and key stakeholders.

10. Oversight and responsibilities

Eyecare Medical will work with partners to develop a local executive-led and commissioner care system around investigations and seek alternative responses to patient safety incidents, which promote ownership, rigour, expertise and efficacy. Eyecare Medical will adhere to NHS England's specification on oversight roles and responsibilities. In order to meet these ambitions, Eyecare Medical has identified the Medical Director as lead for this work, acting with the support of another Consultant Ophthalmologist and nurse manager.

11. Complaints and appeals

Eyecare Medical acknowledges the importance of an effective and efficient process for the management of complaints and concerns. This includes affording the opportunity for complaints and appeals relating to the organisation's response to patient safety incidents.

Eyecare Medical's Policy for the Management of Complaints, Concerns and Compliments is publicly available and provides a framework for managing all complaints, concerns and compliments in line with the core expectations set by the Parliamentary and Health Service Ombudsman.

The policy ensures that Eyecare Medical:

Meets the requirements of the statutory legal framework for the Local Authority and National Health Service Complaints (England) Regulations 2009

Meets the requirements of the NHS Constitution and Duty of Candour, and ensures compliance with commissioner, regulatory and good practice requirements.

Manages complaints, concerns and compliments in keeping with the Parliamentary and Health Service NHS Complaints Standards

Ensures that as an organisation we realise the opportunity feedback provides in learning and improvement for the services we provide.

12. Exceptions

There are no exceptions to this policy

13. Monitoring document effectiveness

This policy will be continually reviewed in readiness for incident reporting, but will have a thorough executive review every 12 months.

14. Legislation, regulations, standards and references

Patient Safety Incident Response Framework

<https://www.england.nhs.uk/patient-safety/incident-response-framework/>

NHS England: An Approach to Reducing Health Inequalities

<https://www.england.nhs.uk/wp-content/uploads/2021/03/B0468-implementation-guidance-21-22-priorities-and-operational-planning-guidance.pdf>

NHS England Patient Safety Incident Response Standards

<https://www.england.nhs.uk/wp-content/uploads/2022/08/B1465-5.-Patient-Safety-Incident-Response-standards-v1-FINAL.pdf>

NHS England Safety Action Development Guide

<https://www.england.nhs.uk/wp-content/uploads/2022/08/B1465-Safety-action-development-v1.1.pdf>

NHS England Oversight Roles and Responsibilities

<https://www.england.nhs.uk/wp-content/uploads/2022/08/B1465-4.-Oversight-roles-and-responsibilities-specification-v1-FINAL.pdf>

NHS Resolution Saying Sorry Guidance

<https://resolution.nhs.uk/wp-content/uploads/2018/09/NHS-Resolution-Saying-Sorry-2023.pdf>

15. Equality, diversity and human rights statement

Eyecare Medical is committed to an environment that promotes equality and embraces diversity in its performance both as a service provider and employer. It will adhere to legal and performance requirements and will mainstream Equality, Diversity and Human Rights principles through its policies, procedures, service development and engagement processes.