Title of Policy:	**Good Governance**
Section:	**Operations**

Purpose

This Policy explains what is meant by "Good Governance" and the obligations of Carers Choices in compliance with legislation, regulation and standards set out in relation to monitoring its performance, this also includes Carers Choices being open, honest and transparent when things go wrong.

Statement

The processes associated with good governance and adopted by Carers Choices are viewed as essential elements in creating, managing and growing a successful organisation, dedicated to providing the highest possible quality of care and services to its Clients.

Procedure and Guidance

The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014. Regulation 17

This Regulation requires Carers Choices to have systems and processes dedicated to good governance.

"To meet this regulation; providers must have effective governance, including assurance and auditing systems or processes. These must assess, monitor and drive improvement in the quality and safety of the services provided, including the quality of the experience for people using the service. The systems and processes must also assess, monitor and mitigate any risks relating to health, safety and welfare of people using services and others.

Providers must continually evaluate and seek to improve their governance and auditing practice"

Guidance to the Regulations

What is good governance?

Good governance is described in the Good Governance Handbook - a collaborative document produced by the Healthcare Quality Improvement Partnership (HQIP) and the Good Governance Institute (GGI) - as having 10 themes, as follows:

1. Clarity of purpose, roles and behaviours
2. Application of principles
3. Leadership and strategic direction
4. Effective external relationships – stakeholders, patients and community
5. Effective internal relationships
6. Transparency and public reporting
7. Systems and structures: quality and safety, boundary issues
8. Challenge on delivery of agreed outcomes
9. Risk and compliance
10. Organisational effectiveness: adding value

These themes were developed in order to promote excellence and consistency within the NHS. Clearly the same themes cannot apply in total or to the same extent as Carers Choices, operating as we do within the Domiciliary Care market on a scale which is not evenly remotely comparable, however they provide Carers Choices with useful parameters to work within.

The Good Governance Handbook can be found at:
https://www.hqip.org.uk/wp-content/uploads/2015/01/FINAL-Good-Governance-Handbook-Jan-21-V9-pdf.jpg

The Guide also describes the elements of a good governance programme:

- **Vision**. Being certain why Carers Choices exists in the first place, its purpose and what difference it intends to make.

- **Strategy.** The planned means by which Carers Choices delivers the vision.

- **Leadership.** How Carers Choices is able to deliver the strategy over time.

- **Assurance**. That Carers Choices does what it says it will do and behaves in the manner it has agreed.

- **Probity**. That Carers Choices meets standards of openness and transparency, acts with integrity and in good faith. In the public sector, taking note of the Nolan principles of public life.

- **Stewardship**. That Carers Choices is responsible with resources, especially other people's resources (such as credit).

Although the Guide cannot be followed in its precise form, the principles promoted are of course relevant to some degree to Carers Choices. After careful review and after consideration of the limited financial and manpower resources available to Carers Choices, we have selected the following main headings to describe how we aim to approach the subject of the good governance of our activities.

Vision

Everyone working within Carers Choices will be informed of the following:

- The Services provided
- The nature of its Clients
- The management structure
- Future plans regarding structure, size and service provision

This information will be provided through induction, the normal supervisory processes, team briefings, staff handbook etc. Carers Choices' primary purpose will be outlined in its published Mission Statement.

Mission Statement

- To deliver safe, compassionate and personalised care to people in need so that they may continue to live at home and enjoy community life.

- To provide employment opportunities for dedicated professionals in a working environment which promotes dignity and respect, equal opportunities and fair rewards.

- To be recognised within the local community as the provider of choice.

Safe Working Practices

Carers Choices promotes safe working practices through a rigorous and consistent application of the processes of risk assessment covering all of its activities. Specific policy statements cover:

- Accident Investigation
- Alcohol and Drugs
- COSHH
- Display Screen Equipment
- E-Cigarettes
- First Aid
- Health and Safety
- Infectious Diseases
- Lone working
- Manual Handling
- Risk Assessment
- Smoking at Work
- Stress Management
- Workplace Equipment

Staff are encouraged to identify any situation which arises which might suggest that health and safety is or is likely to be compromised, so that appropriate corrective action can be taken without delay.

Business Ethics

Carers Choices' policy statement on business ethics, strategy and financial management states:

Reliability and Keeping Promises - We must keep our word. We must do what we say we will do and at the time we said we will do it. Carers Choices will do this by seeking the views of all stakeholders in the business

Clients. To establish satisfaction levels, identify shortcomings, provide feedback and implement improvements where necessary.

Employees. Employees are at the very heart of our business and "at the coalface" on a daily basis. Their views are essential in managing the business effectively.

Carers/Family Members. The views of "significant others" involved in the care of our Clients or family members may not always be available, as many of our Clients live alone, but where they are available, they can provide an important "second opinion".

Legislation Compliance. To comply with all relevant legislation, Health and Social Care Act 2014 (Registration and Regulated Activities) (Amendment) Regulations 2015 and to Care Quality Commission regulations that relate to good governance and financial position.

Quality Assurance Statement

Carers Choices is judged by its Clients, Clients' families, other important stakeholders and the Care Quality Commission (CQC) on its merits. Carers Choices' expectations, in respect of the quality of The Service it delivers are high. It is essential, therefore, that the views of those receiving the care and those closely associated with them, are known. This translates into the very purpose of the Quality Assurance programme to establish:

- How well we are doing
- How we can improve

Quality Management Procedure and Guidance

It is the policy of Carers Choices to identify targets, standards and key performance indicators that can be measured through the performance reporting systems.

Informal Processes

All employees of Carers Choices are encouraged, when in contact with Clients or their representatives or family members, to ask their views on how care is being delivered and to what level of satisfaction. This allows Carers Choices to maintain a constant finger on the pulse and to remove any known areas of dissatisfaction without unnecessary delay.

Formal Processes

Carers Choices will ask the views of Clients, family members and staff on a regular basis using questionnaires in order to gain feedback on how well it is doing. These questionnaires are based upon how Carers Choices is performing both before and during the delivery of service. Our approach is to use the questionnaires to identify with quality statements which we have devised and seek a response from the individual completing the questionnaire as to how they relate to the statement. For example:

5 = Strongly agree
4 = Agree
3 = Neither agree nor disagree
2 = Disagree
1 = Strongly disagree

	Tick one Box only				
Statement	**5**	**4**	**3**	**2**	**1**

	Tick one Box only				
Statement	**5**	**4**	**3**	**2**	**1**
	√				

This individual therefore is very positive, fully agreeing with the statement as always applying to them.

All of the questionnaires operate on similar lines and a quality statement is offered to the Client. The Client offers his/her opinion as to how much they agree with the Statement. This allows Carers Choices to identify areas where we are performing well and areas where we need to make some improvement.

CQC's Key Questions

We have identified closely in preparing our questionnaires with the *statutory guidance for service providers and responsible individuals* on meeting service standard regulations. For the purposes of a degree of simplicity and to meet our objectives in being able to relate to a wide group of people, we have decided to group the guidance into the 5 Domains outlined by the Care Quality Commission. These are:

1. Is The Service Safe?
2. Is The Service Effective?
3. Is The Service Caring?
4. Is The Service Responsive?
5. Is The Service Well-led?

Our approach in designing questionnaires is to examine the document relating to Key questions and Quality Standard and rating characteristics for adult care services", with particular emphasis on the guidance for CQC inspectors as to what might constitute an "outstanding" rating.

In designing quality statements which associate with and mirror the CQC's own assessments of what behaviours are outstanding, we are in a sense asking those

invited to complete the questionnaires to contribute their own views on how Carers Choices is performing.

Clients who need help and support to complete questionnaires

Carers Choices does not wish to ignore the views of any Client or "Significant Other" from contributing feedback on the quality of services provided, if, for example, they are not able, independently, to complete a questionnaire.

Carers Choices will try to facilitate the completion of questionnaires using family, friends and/or significant others and will only assist directly in cases where, otherwise, the views of a particular individual would not be obtained.

Carers Choices will also make use of easy-read documentation where appropriate to assist our Clients in the voicing of their opinions and/or concerns.

Feedback and using the results

Carers Choices will analyse the results and provide feedback to contributors either orally, usually on an individual basis or through a group newsletter or similar.

A personal interview will be undertaken with any contributor whose feedback is especially negative so as to explore the reasons for this and identify possible actions enabling a more positive outcome in the future.

No Client will suffer any form of harassment, discrimination or unfair treatment as a result of providing negative feedback.

Action Plans, Changes and Communication

Carers Choices aims to use feedback from questionnaires to identify any areas of concern and to develop formal action plans aimed at improvements in satisfaction.

Where feedback identifies concerns, the Management Team will:

- Investigate appropriately
- Implement corrective actions

- Monitor outcomes

Changes made as a result of feedback may include:

- Adjustments to care delivery
- Policy updates
- Training provision
- Service redesign

Carers Choices will communicate actions taken:

- Directly to individuals where appropriate
- Through meetings or newsletters
- Via governance review processes

This ensures people using the service are able to:

- Influence how services are delivered
- See how their views lead to improvement

Information Governance

General Data Protection Regulations

Carers Choices operates in full compliance with UK GDPR and the Data Protection Act 2018, ensuring that all personal data relating to both staff and Clients is handled lawfully, fairly, transparently and securely. This includes a structured and accountable approach to the entire records lifecycle, from the point of creation through to secure storage, controlled access, retention and final disposal. Carers Choices recognises that effective records management is essential not only for legal compliance, but also for safe, consistent and high-quality care delivery.

All records held by Carers Choices – whether electronic or paper-based - are managed in a secure and controlled manner. Electronic records are stored within protected systems with appropriate technical safeguards such as password protection, role-based access controls, audit trails and encryption where applicable. Paper records are

stored in locked, access-restricted environments when not in active use, with clear accountability for their movement and handling. In all cases, access to personal data is strictly limited to authorised personnel who require the information to fulfil their role, ensuring a clear “need-to-know” principle is consistently applied.

Retention of records is managed in accordance with legal, regulatory and contractual requirements, ensuring that data is not kept for longer than necessary. Retention periods are defined based on the type of record and its purpose, including safeguarding, employment, care delivery and statutory reporting obligations. Once records reach the end of their retention period, they are securely and permanently disposed of in a way that prevents unauthorised access or reconstruction. Electronic data is securely deleted using approved methods, while physical records are disposed of via confidential waste shredding or secure destruction services.

Carers Choices ensures that both staff and Client records are accurate, relevant and kept up to date. Staff have a responsibility to ensure that information they input or manage is correct and reflective of current circumstances, while systems are in place to support regular review and updating of care records, risk assessments and associated documentation. Where inaccuracies are identified, appropriate corrections are made promptly and transparently in line with data protection requirements.

Robust access controls are in place to protect confidentiality and ensure information is only accessed for legitimate purposes. Staff receive training on data protection responsibilities, including safe handling of information, secure communication methods and the importance of maintaining confidentiality at all times. Any sharing of information is carefully considered, proportionate and recorded, with appropriate safeguards applied in line with organisational procedures.

Where records are no longer required, secure disposal processes ensure that information cannot be recovered or misused. This includes the use of confidential waste streams for paper records and approved digital destruction methods for electronic files. All disposal activities are undertaken in a controlled manner to maintain compliance with UK GDPR principles and to uphold the trust placed in Carers Choices by Clients and staff.

Overall, Carers Choices' approach to records management ensures that personal data is treated as a protected asset throughout its lifecycle, supporting safe service delivery, safeguarding responsibilities and full legal compliance.

Further Reading (Related Policies):

More detailed procedures and legislative guidance regarding data protection can be found within our separate suite of Data Protection policies:

- Data Protection – Breach Notification
- Data Protection – Clients
- Data Protection – Data Subject Rights
- Data Protection – Data Transfer Security
- Data Protection – Records Retention
- Data Protection – Employees
- Data Protection – Subject Access Requests

Information Commissioner's Office

The Information Commissioner's Office (ICO) is the independent regulatory office in charge of upholding information rights in the interest of the public. Carers Choices will ensure it is registered with the ICO, will ensure that this registration is maintained via annual renewals and will continually ensure that Carers Choices meets the standards and requirements of the ICO.

Record Keeping

Carers Choices is aware of the obligation it has to securely store any data we hold with respect to our service users, the staff we employ and the management procedures we put into practice. More information on the methods we utilise in the security and storage of such information can be found in our Record Keeping – Clients and Staff policy.

Audits

Policy Audits

All of Carers Choices' policies and procedures are to be reviewed on an annual basis. This task will be undertaken by a review panel appointed by senior management. Where possible this panel will be representative of stakeholders and the panel may, for example, comprise a director, a senior manager, a carer/support worker, a Client and a family member/informal carer of a person who uses The Service.

Quality Audits

The governance framework should be read in conjunction with other relevant audits, assurance and management policies and procedures.

Directors and senior management need to know that Carers Choices is operating as intended. Auditing provides written evidence that users of The Service, carers and staff are involved in measuring the effectiveness of The Service.

Auditing demonstrates and provides evidence to regulators and Local Authority Commissioners that Carers Choices is able to respond to the Key Questions and meet the CQC Quality Statements.

The scope of audits is as broad as The Service that is being offered. Regulators for example, focus their attention on Care Plan auditing, but as a Company we are also committed to auditing care notes in Clients Daily Records, Clients Medication Administration Records, stocks of medication in Client's homes, stocks of PPE available to staff and many other critical aspects of The Service.

An audit schedule will be drawn up and reviewed to give a clear structure and timeline for undertaking relevant audits and when completing reports, the Management Team will ensure that the report is correctly completed in a timely manner and is provided in an accessible format, which supports a positive culture of trust and openness.

Corrective actions to address any shortfalls highlighted by the audit process will demonstrate Carers Choices' willingness to put things right and our commitment to continuous improvement.

Auditing is an essential ongoing tool that is an integral part of our service. In doing so it ensures that standards and Clients requirements continue to be met. If senior

management is assured that their service is operating as intended, they will have confidence in satisfying regulatory inspections.

Company Structure

Carers Choices is registered with Companies House as a Company Limited by shares. The organisational structure is as below:

Board of Trustees

▼

Chief Executive Officer

▼

Managers

Nominated Individual The nominated individual is responsible for supervising the management of the regulated activity provided.

Registered Manager A registered manager is in day-to-day charge of one or more *regulated activities*. The manager has joint legal responsibility with the *provider* for ensuring compliance with the regulations.

Safeguarding Lead Takes the lead role for managing safeguarding processes / investigations.

Information governance lead Sometimes referred to as a data protection lead, this person is responsible for overall governance of information and data in all forms.

Caldicott Guardian A Caldicott Guardian is a senior person responsible for protecting the confidentiality of people's health and care information and making sure it is used properly. In small organisations this is usually the same person who is the information governance lead.

Health and Safety lead The person responsible for Health and Safety.

HR lead The Person responsible for HR compliance and safer recruitment.

Complaints lead The person who manages complaints on a day-to-day basis. You may also detail a director to handle complaints that fall outside of the scope of the complaints lead e.g., very serious issues or issues related to the complaints lead.

Key Performance Indicators

Key Performance Indicators focus on how a task is being performed by measuring performance and establishing if individual goals are being achieved. There are 8 types of key performance indicators:

- Productivity Indicators
- Efficiency Indicators
- Effectiveness Indicators
- Capacity Indicators
- Quality Indicators
- Competitiveness Indicators
- Profitability Indicators
- Value Indicators

Carers Choices will ensure good governance standards are met by measuring and reviewing conduct and practice to ensure we provide a service that is free of abuse and corruption and with due regard for the rule of law.

All of the above practices will be overseen by our Information Governance Lead, Paul Ramsden, who is contactable via telephone at 0300 3021212 or email at info@carerschoices.org should any person have any queries about the data we collect or how it is being used to help improve our service.

Roles, Responsibilities and Accountability

Leadership and Staff Responsibilities

To ensure effective governance, Carers Choices clearly defines the responsibilities of specific leadership roles and staff groups in relation to quality, safety and regulatory compliance.

The following responsibilities apply:

Directors

Directors are responsible for:

- Setting the strategic direction of Carers Choices
- Ensuring systems of governance are effective
- Monitoring organisational performance
- Ensuring resources are available to deliver safe and effective services
- Ensuring compliance with regulatory and statutory obligations

Nominated Individual

Responsible for:

- Supervising the management of regulated activities
- Ensuring governance systems are implemented and maintained
- Acting as a link between operational delivery and strategic leadership

Registered Manager

Responsible for:

- Day-to-day governance of regulated activities
- Monitoring quality and safety of care delivery
- Ensuring policies are implemented in practice
- Escalating risks or concerns to senior leadership
- Leading improvement activity

Team Leaders / Supervisors

Responsible for:

- Monitoring frontline practice
- Supporting staff compliance with policies
- Identifying emerging risks or quality concerns

- Reporting incidents, feedback and trends

Care and Support Staff

Responsible for:
- Delivering care in accordance with policies and care plans
- Reporting risks, incidents or concerns
- Participating in audits, supervision and training
- Contributing to service improvement through feedback

Governance Lead

Responsible for:
- Oversight of governance systems
- Monitoring audit outcomes
- Tracking improvement actions
- Ensuring learning is shared across Carers Choices

All staff share responsibility for:
- Maintaining quality and safety
- Identifying risks
- Raising concerns
- Supporting continuous improvement

Closed Cultures

Definition

A closed culture is a working environment where staff feel unable or unwilling to raise concerns, challenge poor practice or speak openly about mistakes or risks. In such environments information may not flow freely, decision-making may lack transparency and staff may fear negative consequences if they question decisions or report concerns.

Closed cultures can develop gradually and may be characterised by:

- Lack of openness or transparency
- Poor communication between staff and management
- Staff feeling unable to raise concerns
- Defensive or dismissive responses to feedback
- Failure to learn from incidents or complaints
- Isolation of individuals or teams
- Excessive control or lack of accountability

In health and social care environments, closed cultures represent a significant governance risk as they can prevent issues from being identified early and addressed appropriately.

Risks and Potential Harm

Closed cultures can have a detrimental effect on the quality and safety of services. When concerns are not raised or are ignored, opportunities to improve care may be lost and risks may remain unmanaged.

Potential consequences may include:

- Reduced safety for Clients
- Failure to identify safeguarding concerns
- Reduced staff morale and wellbeing
- Increased likelihood of mistakes being repeated
- Lack of organisational learning
- Loss of trust between staff, service users and management
- Reputational damage and regulatory concern

A closed culture is incompatible with the principles of good governance, openness and accountability that underpin the delivery of safe and effective care.

Commitment to an Open and Transparent Culture

Carers Choices is committed to maintaining an open, honest and transparent organisational culture in which staff, Clients and other stakeholders feel confident to raise concerns, share feedback and contribute to improvement.

Carers Choices recognises that openness and psychological safety are essential to:

- Delivering safe, high-quality care
- Meeting regulatory expectations
- Identifying risks early
- Supporting staff wellbeing
- Promoting learning and continuous improvement

Carers Choices therefore actively works to prevent the development of closed cultures and to address them promptly should they arise.

Measures to Prevent Closed Cultures

To support an open culture, Carers Choices promotes the following practices:

Encouraging Speaking Up

- Staff are encouraged to raise concerns about care, safety or practice without fear of retaliation
- Clear whistleblowing and safeguarding reporting routes are available
- Concerns raised by staff will be taken seriously and investigated appropriately

Visible and Approachable Leadership

- Managers maintain regular contact with frontline staff
- Leadership promotes openness, honesty and respectful challenge

- Staff are supported to share views through supervision, meetings and feedback processes

Learning from Incidents and Feedback

- Incidents, complaints and concerns are reviewed constructively
- The focus is on learning and improvement rather than blame
- Outcomes and lessons learned are shared where appropriate

Regular Communication

- Staff briefings, supervision and team meetings provide opportunities for open discussion
- Information about service performance, improvements and changes is shared transparently

Staff Engagement

- Staff are invited to contribute ideas for improving services
- Feedback from staff surveys and discussions is reviewed and acted upon where appropriate

Monitoring Organisational Culture

- Feedback from Clients, staff and stakeholders is reviewed through governance processes
- Audit results, complaints, incidents and safeguarding concerns are monitored for patterns that may indicate cultural issues

Addressing a Closed Culture

Where there are indications that a closed culture may exist, the Management Team will take appropriate action which may include:

- Reviewing leadership and management practices
- Increasing engagement with staff and Clients
- Investigating concerns or patterns of behaviour
- Providing additional training or supervision
- Strengthening reporting systems and governance oversight

Where necessary, external guidance or support may be sought to ensure that organisational culture supports safe, effective and compassionate care.

Promoting openness and transparency is an essential component of good governance and Carers Choices expects all staff and leaders to contribute to maintaining a culture where concerns are welcomed and learning is continuous.

Risk Assessment and Management

Risk Identification and Mitigation

As part of its governance framework, Carers Choices operates structured risk assessment processes to identify, monitor and mitigate risks to:

- Clients
- Staff
- Visitors
- The organisation

Risk assessments form part of:

- Care planning
- Service delivery
- Environmental safety
- Workforce planning

- Information governance
- Business continuity

Governance Oversight of Risk

Risk assessments are:

- Completed at initial assessment
- Reviewed regularly
- Updated following incidents, changes in need or emerging concerns

Identified risks are:

- Recorded
- Evaluated
- Escalated where required
- Subject to control measures

The Management Team will:

- Review risk trends through audits
- Monitor incident reports
- Implement corrective actions where required

Where risks cannot be eliminated, Carers Choices will ensure they are:

- Reduced as far as reasonably practicable
- Managed through documented action plans

Risk management forms a key part of:

- Continuous improvement
- Service safety
- Regulatory compliance

CQC Registration and Inspection Compliance

Key Questions and Quality Statements applicable to this Policy	Care Quality Commission (Registration) Regulations 2009 applicable to this Policy
Safe • Safe systems, pathways and transitions **Responsive** • Care provision, integration and continuity • Listening to and involving people **Well-Led** • Governance, management and sustainability	

Legislative Compliance

Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 applicable to this Policy	Other legislation relevant to this Policy
Regulation 4: Requirements where service provider is an individual or partnership Regulation 5: Fit and proper persons: directors Regulation 6: Requirement where service provider is a body other than a partnership	The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014

Regulation 7: Requirements relating to registered managers **Regulation 17: Good governance**	

Policy Reviewed on Date of Implementation by the Following Company Officer:

Full name:

Paul Ramsden

Job Title:

CEO

Signature:

P. Ramsden