

PATIENT SAFETY INCIDENT POLICY

Policy number H&S4F

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INTRODUCTION

Prestige Nursing & Care is committed to improving the health, wellbeing and safety all clients and all Prestige Nursing & Care colleagues. It is Prestige Nursing & Care's priority to deliver care and support in a safe way to protect clients, colleagues, visitors and the business (reputational, legal and financial) from harm.

All Prestige Nursing & Care colleagues have a legal duty under the Health & Safety At Work Act (1974), and as detailed in Prestige Nursing & Care Health & Safety Policy, to ensure their own safety at work and the safety of others who can be affected by their acts or omissions whilst at work. The policy supports the business to meet the legal requirements of the regulated activities that Prestige Nursing & Care is registered to provide:

- Health & Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013
- The Health and Social Care Act 2008 (Regulated Activities) (Amendment) Regulations 2012

All Prestige Nursing & Care colleagues have a professional and ethical duty to ensure that clients in their care come to no harm.

This policy provides the framework for identifying, reporting, responding to, and learning from patient safety incidents, in line with the Patient Safety Incident

Response Framework (PSIRF). It informs colleagues involved in recognising, escalating, investigating, and managing patient safety incidents, including when an incident requires escalation.

This policy is supported by Prestige Nursing & Care's Accident and Incident policy, Health and Safety policy, Safeguarding policy (Adults & Children England), Adults support and protection Scotland, Child protection policy Scotland, Duty of Candour Policy, Clinical Governance Policy and the Speak Up programme.

This policy is supported by Prestige Nursing & Care's Patient Safety Incident Response Plan (PSIRP), which sets out how the organisation determines and conducts learning responses in line with the Patient Safety Incident Response Framework (PSIRF). The PSIRP is a standalone document and must be read alongside this policy.

SCOPE

An incident is described as an unexpected event, something that occurs in passing or out of the ordinary course of events. Prestige Nursing & Care accepts that many incidents are unremarkable and are not concerning, but some are serious and will require a heightened response.

This policy refers to:

- All colleagues who are involved in the reporting of incidents and accidents onto the IMS (Incident Management System).
- All colleagues who undertake on call duties.
- All incidents that require reporting, review, or response under this policy.

This policy should be read in conjunction with these associated Prestige Nursing & Care Documents:

- Accidents and Incidents policy.
- Safeguarding policy – Adults & Children England.
- Adults support and protection policy Scotland.
- Child protection policy Scotland.
- Health & Safety policy.
- Medication policy.
- Clinical Governance Policy
- Duty of Candour policy.
- Dysphagia policy.
- Disciplinary policy.
- Managing investigations and suspension guidelines.

POLICY OBJECTIVE

Prestige Nursing & Care will ensure that suitable and robust arrangements are in place to report and respond to patient safety incidents consistently with proportionately and reasonableness.

To identify what went wrong, within a just culture that does not apportion blame as a tool but promotes the belief that 'incidents cannot simply be linked to the actions of a single individual, but rather the system they are working in and other contributing factors.

Prestige Nursing & Care are committed to supporting colleagues and managers to establish and maintain safe working practices. Colleagues are supported to have a clear understanding of their responsibilities and will receive appropriate training that is competency assessed through direct observation, supervised practice, professional discussion, and structured competency checklists.

A heightened response may be required for some patient safety incidents, depending on the potential for meaningful learning or the level of risk identified. This policy describes the circumstances in which a heightened response is required and the process for achieving it, in line with Prestige Nursing & Care's Patient Safety Incident Response Plan (PSIRP).

Through consistent and appropriate management of patient safety incidents, lessons learned can be identified, implemented, and shared across Prestige Nursing & Care to promote prevention of recurrence and continuous improvement.

POLICY

Definition of a patient safety incident.

Some incidents are classified as patient safety incidents (PSIs). A patient safety incident is any unintended or unexpected event in healthcare that could have or did lead to harm for a patient. This includes near misses, no-harm events, and incidents resulting in any level of harm. Under the Patient Safety Response Framework (PSIRF), the occurrence of harm does not automatically trigger an investigation. Instead, incidents are reviewed and responded to according to Prestige Nursing & Care's Patient Safety Incident Response Plan (PSIRP), which determines whether a learning response, investigation, or other action is appropriate.

Patient safety incidents may include events that directly affect clients or incidents that indirectly impact client safety or Prestige Nursing & Care's ability to deliver safe, effective care. All patient safety incidents must be recorded on the Incident Management System (IMS). Only some incidents will require a specific learning response or investigation, as determined by the PSIRP.

Patient safety incidents may be identified through various routes, including incidents observed during care delivery, concerns raised by clients or relatives, safeguarding enquiries, complaints, whistleblowing, or external notifications such as coroner reports. These processes may highlight potential patient safety issues, but they are not patient safety incidents in their own right.

Examples of patient safety incidents in homecare may include medication errors, choking events, pressure damage, falls, equipment failures, or other acts or omissions that could have or did lead to harm. These examples are not exhaustive; each incident is considered on a case-by-case basis in line with PSIRF principles.

Reportable Incidents (Non-PSIRF)

Not all incidents reported within Prestige Nursing & Care are patient safety incidents. Some events relate to safeguarding, information governance, business continuity, or organisational concerns. These incidents must still be reported, reviewed, and managed through the appropriate statutory or organisational processes, but they are not classified as patient safety incidents under PSIRF unless they directly create a risk of harm to a client.

These incidents may include:

Safeguarding Concerns

Events requiring statutory safeguarding processes, such as:

- Child Safeguarding Enquiries
- Safeguarding Adults Enquiries (Section 42 Care Act)
- Allegations or concerns of abuse, neglect, exploitation, or organisational abuse
- Domestic abuse, self-neglect, modern slavery, human trafficking

Safeguarding concerns may highlight potential patient safety issues, but safeguarding processes run in parallel to PSIRF, not within it.

Business Continuity and Organisational Incidents

Events that affect Prestige Nursing & Care's ability to deliver safe care, including:

- Significant property damage (e.g., fire, flood)
- Activation of the Business Continuity Plan
- Security breaches or missing person incidents
- Failures in information governance, data loss, or cyber incidents
- Systematic failure to provide safe care
- Significant loss of public confidence or adverse media coverage

These incidents may indirectly impact client safety and therefore must be reported and managed, but they are not patient safety incidents unless they directly result in or risk harm.

Other Escalation Routes

Some incidents may be identified through:

- Complaints
- Whistleblowing
- Speak Up
- Coroner reports
- Stakeholder feedback

These processes may reveal patient safety concerns, but they are not PSIs in their own right.

PSIRF: The Four Aims

Prestige Nursing & Care's policy adopts the Patient Safety Incident Response Framework (PSIRF)

1. Compassionate engagement and involvement of patients, families and staff

Meaningful involvement, not procedural contact.

2. Application of a systems-based approach to learning

Human factors, systems thinking, and understanding context.

3. Proportionate responses to patient safety incidents

No automatic investigations. No "Serious Incident" category. Responses are chosen based on learning value.

4. Supportive oversight focused on learning and improvement

Commissioner sign-off removed. Governance focuses on learning, not performance management.

PSIRF: The Six Underpinning Principles:

Key Principle	Supporting Information
Openness and Transparency	The needs of those affected should be the primary concern of those involved in the response to and the investigation of patient safety incidents. The principles of openness and honesty as outlined in the Prestige Nursing & Care's Duty of Candour must be applied in discussions with those involved. Clear communication with patients, families and colleagues. Openness and transparency means: - Acknowledging, sincerely apologising, and explaining when things have gone wrong.

Key Principle	Supporting Information
	- Conducting a thorough investigation into the incident, ensuring clients, their families and carers are satisfied that lessons learned will help prevent the incident recurring. - Providing support for those involved to cope with the physical and psychological consequences of what happened. Saying sorry is not an admission of liability and is the right thing to do, this should be done by the Registered Manager. This must be done as early as possible and then on an ongoing basis as appropriate
Just Culture	Investigations of patient safety incidents are undertaken to ensure that weaknesses in Prestige Nursing & Care's system and/or process are identified and analysed to understand what went wrong, how it went wrong and what can be done to prevent similar incidents occurring again. Investigations carried out under this Framework are conducted for the purposes of learning to prevent recurrence.
Continuous learning and improvement	Learning is ongoing, not triggered only by harm. Learning is not dependent on the severity of an incident, nor is it confined to traditional investigations. Instead, we continually gather insights from a wide range of sources: including everyday work, near misses, system weaknesses, staff feedback, patient experience, proactive risk assessments and incident analysis reports – to understand how care is delivered and how it can be made safer.
Proportionate response	The scale and scope of the investigation should be proportionate to the incident to ensure resources are effectively used. Incidents which indicate the most significant need for learning to prevent serious harm should be prioritised. Most incidents within Prestige Nursing & Care can be managed by an individual, however for very complex or catastrophic incidents a team may be required (specifically drawing on the expertise of clinical colleagues), as well as consideration to an independent investigation.
Systems-based approach	Systems-based approach to understanding patient safety incidents. means examining the conditions, processes, environments, human factors, and organisational influences that shape how care is delivered, rather than attributing issues to individual performance. Investigations and learning responses explore how different parts of the system interact,

Key Principle	Supporting Information
	how work is actually carried out in practice, and how system pressures, constraints, and variability influence outcomes. This approach seeks to understand <i>why</i> the system allowed the incident to occur and what aspects of the wider system require strengthening. It avoids blame, supports psychological safety, and ensures that learning leads to meaningful, sustainable improvement across the organisation.
Compassionate Engagement	Involving patients, families, carers, and staff in a respectful, supportive, and trauma-informed way following a patient safety incident. Provide clear, honest, and timely communication, recognising the emotional impact incidents can have and offering appropriate practical and emotional support. Individuals are encouraged to share their experiences, questions, and concerns, their contributions are valued and used to inform learning. Staff involved in incidents are treated with empathy and supported through a just and psychologically safe culture. This approach ensures involvement is meaningful, sensitive, and central to improving patient safety.

While the emphasis of investigating and learning from patient safety incidents focuses on identifying and addressing failures in systems and processes, in certain circumstances it may be necessary for disciplinary procedures to be initiated, including occasions where:

- The incident has resulted in a police investigation or an investigation by the National Crime Agency and / or His Majesty's Revenue & Customs (HMRC).
- There are repeated occurrences involving the same individual.
- In the view of Prestige Nursing & Care and/or any professional body, the action(s) causing the incident were far removed from acceptable practice.
- There is evidence of an attempt to conceal the fact that the incident occurred or to tamper with any material evidence relating to the incident.
- Safeguarding allegations are made against a Prestige nursing & care colleague.

Duties roles and responsibilities

Managing Director who is the Nominated Individual has overall accountability for Clients' Safety and Risk Management. Responsible for:

- Promoting an effective people, we support safety reporting culture within Prestige Nursing & Care.
- Ensuring that Prestige Nursing & Care fulfils its legal responsibilities, and that the policy objectives are achieved and that there are effective arrangements in place for the reporting, investigation and management of patient safety incidents.
- Ensuring that there are robust arrangements in place to share all learning from all patient safety incidents.
- Ensuring that Prestige Nursing & Care policies are reviewed as appropriate in order to secure continuing compliance with existing policies, current legislation and any changes in the law.
- Ensuring the allocation of the resources necessary to maintain robust and efficient patient safety incident reporting arrangements.
- The effective implementation of this policy within Prestige Nursing & Care.
- The effective implementation of this policy and any related policies within their Directorates, and for ensuring that there are adequate resources available to fulfil the requirements of this policy for company owned branches.
- Ensuring that processes are in place for all colleagues who are involved in a traumatic or stressful event to be supported throughout and receive continued support after the event, if required for company owned branches.
- Responsible for developing and maintaining a robust governance framework which ensures:
 - All actions required are fully implemented, evidenced and lessons learned are shared.
 - Patient safety incidents are monitored, identifying any trends and outlying events - using this information to support the identification of risks.
 - Providing additional scrutiny and action as required, to address any concerns.
 - Promoting best practice.

Registered Manager is responsible for:

- Reading and understanding this policy
- Escalating any patient safety incidents in line with this policy.
- Managing any patient safety incidents in line with this policy.
- Logging actions from patient safety incident investigations on their service improvement plan.
- Ensuring this policy and procedure is applied within their area of responsibility; ensuring colleague they are responsible for are aware and comply with their responsibilities outlined in this policy.

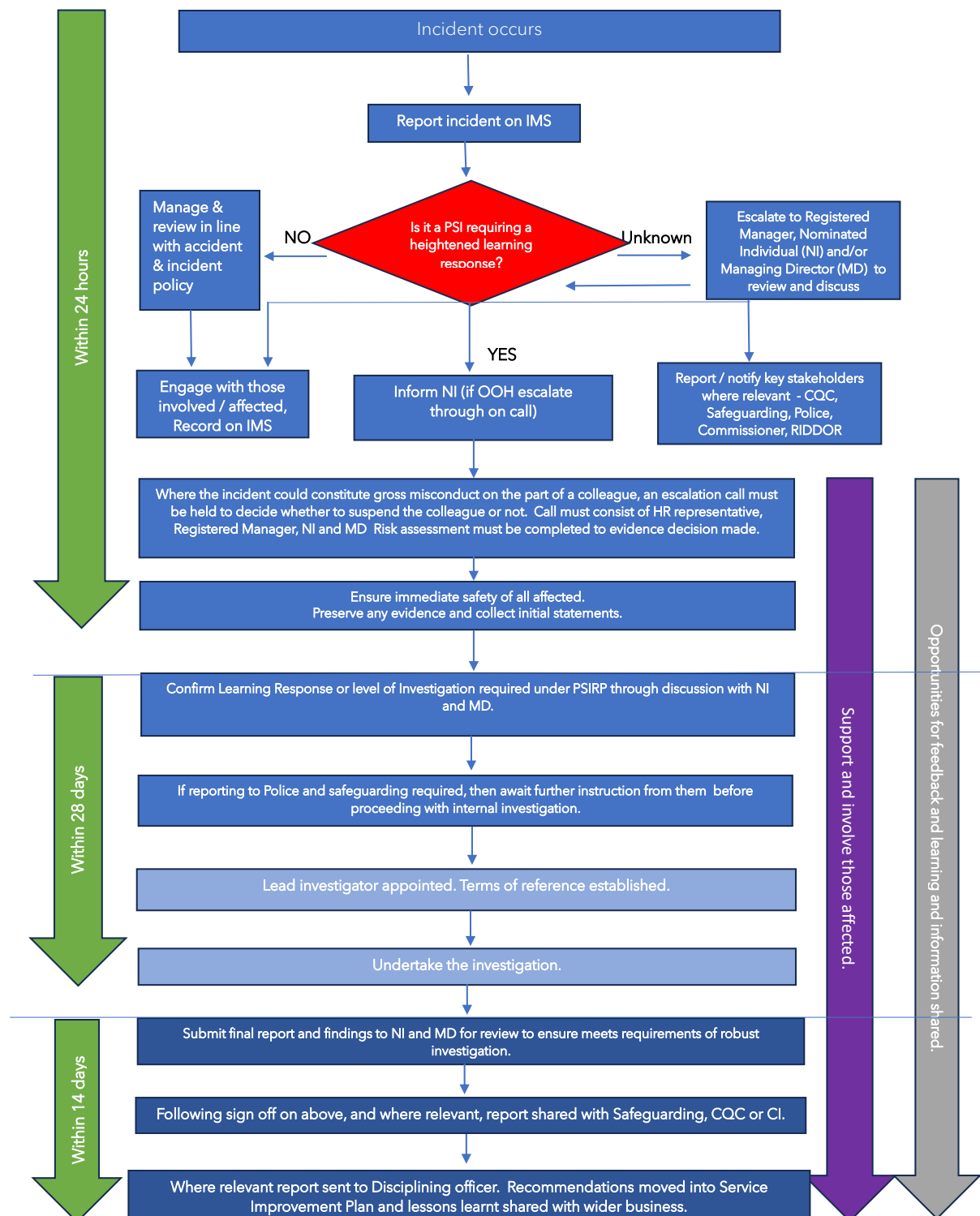
- Demonstrating that all colleagues they are responsible for (including temporary staff) have received appropriate training in these arrangements.
- Ensuring appropriate corrective actions are implemented following a patient safety incident, escalating concerns where management is outside of their area of control or where the incident or its impact may affect others.
- Providing colleagues, clients and or other persons involved in the patient safety incident with appropriate support or access to such support as appropriate.
- Ensuring that incidents involving colleagues or clients that are RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations).

All Colleagues are responsible for

- Reading and understanding this policy and its content, and their responsibilities within it.
- Ensuring that they report all incidents, near misses or issues of concern immediately or within 1 hour.
- If they are unable to report the incident, near miss or issue of concern immediately or within 1 hour they should make arrangements to ensure that their manager is aware of the incident, near miss or issue of concern; and as soon as they are able to, the colleague should report the incident, near miss or issue of concern.
- Taking appropriate action following an incident to prevent or reduce the chance of the incident re-occurring, escalating concerns where needed, and supporting improvements to work processes following incident investigations and recommendations.
- Raising concerns using Prestige Nursing & Care's policies/procedures as appropriate.
- Cooperating with any investigation into a patient safety incident that they may be involved in.

PROCEDURE

The Serious Incident Response Management Framework



Immediate Action to Undertake When a Patient Safety Incident Requiring a Learning Response Occurs.

- Ensure the immediate safety of all involved in the incident, including the safety of the person affected, colleagues, clients, others involved at the time of the incident.
- Seek emergency services via 999 if required.
- Seek medical advice, if required.
- Inform the Registered manager or on call colleague of the incident (via on call if Out of Hours OOH) immediately.
- Registered manager or on call colleague for branch, to escalate incident to Managing Director and Nominated Individual (via on call if OOH) within 1 hour of incident or sooner.
- Managing Director to escalate to Franchisor within 2 hours of incident or sooner via sir@prestige-nursing.co.uk.
- Follow relevant Prestige Nursing & Care's policies relating to infection control, falls, medicines management and safeguarding.
- Report the incident on Prestige Nursing & Care's IMS (Incident Management System) as soon as possible.

Where the incident could constitute gross misconduct on the part of a Prestige Nursing & Care's colleague, an escalation call must be held with the Managing Director to decide whether to suspend the colleague from duties or not.

During the call the following risks need to be considered in respect of the colleague implicated:

- Could their continued presence in the workplace be a risk to the individual (i.e. physical or emotional well-being)?
- Could their continued presence in the workplace be a risk to others (i.e. clients, colleagues, third parties)?
- Could their continued presence in the workplace make it difficult for a full and proper investigation of the incident/ allegation?
- Could their continued presence in the workplace cause significant disruption to the branch or departments activities (i.e. service provision, anxiety for colleagues)?
- Would their continued presence in the workplace pose a risk to the reputation of Prestige Nursing & Care?
- Is the allegation one that may lead to or involve significant legal action, e.g. fine, imprisonment, etc (and could their continued presence in the workplace compromise a criminal investigation)?
- Are there any other risks (e.g., financial)? Please specify.
- Would the implementation of control measures/safeguards lessen the risks identified (e.g., Relocation of colleague)?

Other regulatory, statutory, and professional bodies should be informed about patient safety incidents depending on the nature and circumstances of the incident. The IMS entry must clearly state that relevant bodies have been informed.

Obtain all relevant physical, scientific and documentary evidence, and make sure it is secure and preserved. Registered Manager must ensure the collection and retention of information, as they are important for the overall integrity of the investigation process.

Identify witnesses, including colleagues, and clients, family members, to ensure they receive effective support.

Nominated Individual must conduct an initial incident review to confirm whether the incident meets criteria for a patient safety incident requiring a learning response has occurred and if applicable, to determine the level of investigation required and outline immediate action taken (including where other organisations have been informed).

Agree who will make the initial contact with those involved, or their family/carer(s). Where a colleague has been harmed by the actions of a person we support, particular thought should be given to who is best placed to contact the victim and/or their family.

Those involved need to be given a single point of contact from Prestige Nursing & Care and a Duty of Candour (see supporting document) letter needs to be sent by the Registered Manager or Nominated Individual. However, any incidents pending a police investigation, the police need to be involved in agreeing who will make the initial contact with the victim(s), their family and/or the perpetrator's family.

It is often clear that a patient safety incident requiring a learning response has occurred, but where this is not the case the Registered Manager should engage in open and honest discussions with the Nominated Individual and/or Managing Director to agree the appropriate and proportionate response in line with the PSIRF and the PSIRP.

Nominated Individual to appoint Investigation Officer and provide Terms of Reference.

Investigating officer to follow Prestige Nursing & Care's Managing investigations guidelines and Prestige Nursing & Care's investigation template to complete a thorough investigation.

The investigation must include the following stages:

Gathering and mapping information	The Investigating Officer will identify what information/evidence is needed and how this will be obtained (this may include interviewing people, mapping services, reviewing daily notes/records, care plan and where appropriate, visiting the area).
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	During and after this phase there will be consideration regarding what went wrong (i.e. the problems: service deliver problems, care delivery problem/ lapses, acts and omission in care).
Analysing Information	The Investigating Officer must review the collated information and agree the priority problems identified (so far). Analyse the problems to identify the underlying problems known as 'contributory factors'. Consideration must be given to which are the root causes/fundamental issues to be addressed.
Generating Solutions	At this stage recommendations are developed that will help to prevent another patient safety incident (of same kind or similar kind). Recommendations will then be assessed for their ability to provide robust solutions to existing problems.

Once the investigation has been completed and the report written, the draft report must be sent to Nominated Individual and Managing Director

The final draft report to be shared with Franchisor, via sir@prestige-nursing.co.uk.

Once final report is signed off, where required, it can be shared with Police, safeguarding and CQC/ CI.

Outcomes and recommendations from the report to be communicated in writing, to the person we support / family where appropriate.

Registered Manager must ensure any recommendations are added to their service improvement plan and acted upon.

If disciplinary action is recommended, investigating officer to follow Prestige Nursing & Care's Disciplinary policy.

Any learnings to be shared across the business to prevent reoccurrence, and where appropriate added to the risk register.

Reporting and Recording

- Registered Managers are responsible for ensuring all patient safety incidents are recorded on IMS.

- The Registered Manager or Nominated Individual are responsible for reporting relevant patient safety incidents to RIDDOR.
- The Nominated Individual and/or Managing Director will monitor and report on the number of patient safety incidents across the business.
- The Nominated Individual and/or Managing Director are responsible for reporting to the Nurse and Midwifery Council (NMC) any Nurse misconduct resulting from a patient safety incident.

TRAINING

All colleagues must complete eLearning Health & Safety Training, which includes RIDDOR reporting.

Managers involved in investigating patient safety incidents must have attended Managing Investigations training.

ASSOCIATED DOCUMENTS & LEGISLATION

Prestige Nursing & Care Accident & Incidents policy
 Prestige Nursing & Care Safeguarding policy - Adults and Children
 Prestige Nursing & Care Clinical Governance policy.
 Prestige Nursing & Care Health & Safety policy.
 Prestige Nursing & Care Medication policy.
 Prestige Nursing & Care Duty of Candour policy. England and Scotland
 Prestige Nursing & Care Dysphagia policy.
 Prestige Nursing & Care Disciplinary policy.
 Prestige Nursing & Care Managing investigations and suspension guidelines.
 Prestige Nursing & Care Bed rails guidance.
[RIDDOR - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations - HSE](#)

Supporting documents

Prestige Nursing & Care Duty of Candour letter – Patient safety incidents
 Prestige Nursing & Care Patient Safety Incident Response Plan (PSIRP)

REVIEW SCHEDULE

This policy will be reviewed on a minimum of two-yearly basis or as required.

Version	Date	Changes by	Approved by	Updated from previous Version
V1	June 2025	SG	SH &KM	N/A - New policy
V2	June 2026	SG	AOC	Reviewed