

HEE Quality Interventions Review Report

Camden and Islington NHS Foundation Trust Pharmacy Learner and Educator Review



Review Overview

<p>Background to the Review:</p>	<p>The purpose of this Learner and Educator review is to review the quality of education for pre-registration pharmacists (PRPs) and pre-registration trainee pharmacy technicians (PTPTs) with a view to identifying areas of good practice and any areas for improvement. It is intended to be supportive and at the same time enable us to better share success and innovation across London and the South East.</p> <p>The 19/20 trainee exit survey feedback highlighted a positive training experience for preregistration trainees. They reported feeling well supported throughout their training year, that they received satisfactory supervision in all rotations and that they had a sufficient range of learning opportunities throughout their training programme.</p> <p>All trainees surveyed would recommend Camden and Islington NHS Foundation Trust as a place to work and learn.</p>
<p>Training Programme/Learner Groups Reviewed:</p>	<p>Pharmacy – including pre-registration Pharmacists and pre-registration Pharmacy Technicians.</p>
<p>Who we met with:</p>	<p>The review team met with the following:</p> <ul style="list-style-type: none"> - Chief Pharmacist - Three Educational Supervisors - Six practice supervisors - Two Pre-registration Pharmacy trainees and two Pre-registration Pharmacy Technicians

Evidence utilised:

The Trust sent the following documents for this review:

- Pharmacy Induction procedure Feb 2019 (1)

LFGs:

- LFG Closed meeting action tracker July 2020
- LFG Open meeting action tracker April 2020
- LFG Open meeting action tracker July 2020
- LFG report 2019 - progress report_ 2020
- LFG Report 2019 Final signed report
- LFG Terms of Reference _2019
- Pharmacy Faculty Closed Meeting 1.07.20
- Pharmacy Faculty Closed Meeting Minutes and Actions 8.04.20
- Pharmacy Faculty Open Meeting 01.07.20
- Pharmacy Faculty Open Meeting Minutes and Actions 8.04. 2020

Organisation Structure:

- Pharmacy Organisation Chart - Oct 2020

PRP:

- CANDI & WHITTINGTON PRP rotation objectives
- CI PRP Clinical Training programme
- HEE pre-reg handbook 2020-21
- Mental Health objectives Non C&I pre Reg – Whittington
- Mental Health objectives RNOH & CSE pre-Reg Pharmacist
- Pre-reg Pharmacist Induction & Training Plan EXTERNAL PRP
- Pre-reg Pharmacist Induction & Training Plan
- PRP rotas 2020 21 CSE
- PRP rotas 2020 21 RNOH
- PRP rotas 2020 21
- RNOH PRP rotation @ C&I

PTPT:

- Clozapine objectives
- Dispensary objectives
- Medicines Management Objectives
- Procurement & Distribution Learning Objectives
- PTPT rota 2020 21
- Surgery objectives WH

Review Panel

Role	Job Title / Role
Quality Review Lead	Shane Costigan Associate Head of Pharmacy, HEE LaSE
Specialty Expert	Rachel Stretch PRP Training Programme Lead, HEE LaSE
External Specialty Expert	Kulpna Daya PTPT Education Programme Director, The Royal Marsden NHS Foundation Trust
Trainee Representative	Sophia Evans-Garcia Pre-registration Pharmacist, Frimley Health NHS Foundation Trust
Lay Representative	Jane Chapman Lay Representative
HEE Quality Representative	Nicole Lallaway Learning Environment Quality Coordinator
HEE Quality Representative	Tarek Hussain Quality, Patient Safety and Commissioning Officer

Executive summary

This learner and educator review of Pharmacy at Camden and Islington NHS Foundation Trust was organised as part of a series of baseline reviews of Pharmacy programmes across the London and South East and was conducted remotely via Microsoft Teams. The review team were pleased to hear that there was a consensus among trainees, supervisors and education leads that the culture of the department was welcoming. Trainees felt supported and empowered to provide feedback and raise concerns, and the supervisors were open and accessible to trainees. The supervisors and leads the review team met were positive, committed to education and training and ready to listen and act upon feedback to further enhance the quality of the training programme

It was clear to the review team that the Trust were involved in innovative work, including the integrated pharmacy technician pilot and the work completed to transfer services previously provided by the Whittington Health NHS Trust Pharmacy, to an in-house model at Camden and Islington NHS Foundation Trust.

However, the review team identified the following concerns:

- The structure and objectives of the Pre-registration Pharmacist programme were not clear to trainees;
- There was limited introduction into mental health conditions and services across the NHS for trainees;
- There was limited formal training of supervisors within the department;
- PRPs had limited experience of working weekends
- Pre-registration Pharmacy Technicians (PTPTs) did not always have adequate supervision when working at the weekends.

Review Findings

Not all the Quality Framework standards have been included within the tables below. The standards included are where the quality interventions are expected to have a direct operational impact on the quality of the learning environment. The other standards are still expected to be reviewed for each organisation and will be undertaken through different tools than the Quality Interventions identified within Table 2.1

Identify the review findings for each of the relevant standards below and remove the standards where there is no comment to be made.

Domain 1 - Learning environment and culture		
<p>1.1. Learners are in an environment that delivers safe, effective, compassionate care that provides a positive experience for service users.</p> <p>1.2. The learning environment is one in which education and training is valued and learners are treated fairly, with dignity and respect, and are not subject to negative attitudes or behaviours.</p> <p>1.3. There are opportunities for learners to be involved in activities that facilitate quality improvement (QI), improving evidence-based practice (EBP) and research and innovation (R&I).</p> <p>1.4. There are opportunities to learn constructively from the experience and outcomes of service users, whether positive or negative.</p> <p>1.5. The learning environment provides suitable educational facilities for both learners and educators, including space, IT facilities and access to quality assured library and knowledge.</p> <p>1.6. The learning environment promotes interprofessional learning opportunities.</p>		
HEE Standard	HEE Quality Domain 1 - Learning Environment & Culture	Requirement Reference Number
1.2	<p>Bullying and undermining</p> <p>The review team heard that trainees had not experienced any bullying or undermining in their placement, nor seen others experience bullying or undermining.</p>	
1.4	<p>Appropriate levels of Clinical Supervision</p> <p>The pre-registration Pharmacists (PRPs) reported that in the first two months of their placement they were in Highgate Mental Health Centre and had then rotated to Whittington Health NHS trust. They reported that during their induction period at the Highgate Mental Health Centre, they did not have any clinical ward based placements and so were not assigned a ward based Practice Supervisor (PS), however they had been undertaking a range of ward based placements at the Whittington, with appropriate PS supervision as part of these placements. The pre-registration Pharmacy Technicians (PTPTs) reported that they were aware of who their PS were for their rotations and received constructive verbal feedback on progress from their supervisors.</p> <p>The PS reported that their meetings with PTPTs were ad hoc, as they only met with them when or if there was something specific to feedback. It was reported that there were no formal, regular meetings between the PS and the PTPTs.</p>	Yes, please see 1.4
1.4	<p>Appropriate levels of Educational Supervision</p> <p>The review team heard that the PTPTs met with their Educational Supervisor (ES) once a month, and that they felt comfortable to raise any concerns with them. The PTPTs noted that they should have met with their ES once a fortnight, however this has been difficult due to the pandemic. PTPTs reported</p>	

	<p>that the meetings were documented and shared with them afterwards, and that they felt their ES was approachable.</p> <p>The PRPs reported that in the first two months of their placement at Highgate Mental Health Centre, they met with their ES every one or two weeks. These meetings were documented and shared with both the PRPs afterwards. It was also reported that whilst the PRPs were in post at Whittington Health NHS Trust, they provided feedback to their ES via emails or feedback forms. The PRPs felt that their ES was approachable and accessible, and that any feedback they provided was acted upon.</p> <p>The review team heard that one ES was supervising two PRPs and were concerned that without adequate succession planning and upskilling of development of others ES's in the department, there was a risk of significant gaps in educational supervision should the current ES leave the department or be off for a period.</p>	Yes, please see PH1.4b
1.6	<p>Multi-professional learning</p> <p>The review team heard that the PRPs felt part of the wider multidisciplinary team (MDT), particularly while working on the wards. They reported that they attended the MDT meetings and were involved in pharmaceutical care plans and felt that this enabled them to feel involved in the team beyond Pharmacy.</p> <p>The PTPTs reported that they had limited opportunities to work on the wards as part of the MDT, but that when they did, they felt that colleagues were not able to distinguish between the different job roles of PRPs and PTPTs. Despite this, the trainees reported that the nursing staff were supportive and approachable.</p> <p>The PTPTs reported that they met with the integrated-pilot PTPTs earlier in the programme and had a WhatsApp group with them to keep in touch while they were on rotations in other hospitals. This enabled them to share experiences with them throughout their placement.</p>	

Domain 2 – Educational governance and leadership		
<p>2.1. The educational governance arrangements measure performance against the quality standards and actively respond when standards are not being met.</p> <p>2.2. The educational leadership uses the educational governance arrangements to continuously improve the quality of education and training.</p> <p>2.3. The educational governance structures promote team-working and a multi-professional approach to education and training where appropriate, through multi-professional educational leadership.</p> <p>2.4. Education and training opportunities are based on principles of equality and diversity.</p> <p>2.5. There are processes in place to inform the appropriate stakeholders when performance issues with learners are identified or learners are involved in patient safety incidents.</p>		
HEE Standard	HEE Quality Domain 2 – Educational Governance and Leadership	Requirement Reference Number
2.1	<p>Effective, transparent and clearly understood educational governance systems and processes</p> <p>The review team heard that there was a mechanism in place to support both PRPs and PTPTs if they were struggling in their placement. The PS/ES reported that there was a tool supported by Health Education England (HEE)</p>	

	<p>called Trainee Requiring Additional Support (TRAS). This tool enabled the PS/ES to apply for structured support from HEE for learners to help with completing objectives. It was noted that this tool had not been used yet. PS also reported that they were able to contact the ES or the programme director for advice on how to support learners in difficulty.</p>	
2.1	<p>Impact of service design on users</p> <p>The review team heard that PTPTs began their placement in February 2020 and attended college one day per week. PTPTs reported that they had quarterly rotations, which included dispensary and medicine management on the wards.</p> <p>The PRPs reported that they were working at Highgate Mental Health Centre for the first two months of their programme and felt that there was a lack of structure during this element of their training programme. Trainees reported that the first rotation was in the dispensary, and that after this the structure was unclear. The review team heard that they supported with medicines management on different wards each day and felt there was no continuity of working on a ward for a period of time. During this time, the PRPs focused on their Moodle modules as it was unclear what they were supposed to be doing at times. It was reported that trainees were sometimes approached by Pharmacists and taken to the ward on an ad hoc basis, but this was not often the case due to how busy it was.</p> <p>PRPs felt that they were expected to have the knowledge and skills for particular areas such as medicines reconciliation when they rotated to Whittington Health NHS Trust. However, PRPs reported that their initial placement at Highgate Mental Health Centre had not adequately prepared them. However, the review team noted that the ES was working on improving the structure of their placements. This included the development of a booklet and a plan for when trainees return from their Whittington placement to Highgate Mental Health Centre.</p> <p>The review team heard that PTPTs worked on weekends. It was reported that whilst working on the weekend, there was one senior pharmacist present to supervise the PTPT, and that trainees worked from 10:00 – 13:00. The PTPTs reported that to achieve the necessary competency level required, they needed to log 500 dispensed items. The review team were concerned that the supervision of PTPT trainees over the weekend could be inadequate, as it was noted that the senior Pharmacist may not be able to provide appropriate support during busy periods and that trainees should be working alongside another qualified pharmacy staff member.</p> <p>The review team also heard that the PRPs did not have any weekend working arrangements during their first two months at Highgate Mental Health Centre. However, it was noted that they expected to do so on their return to the site from the Whittington but details of this had not been finalised. The review team were concerned that PRPs may not receive enough experience working on the weekends, which may have a negative impact on their preparation for their role as a qualified pharmacist.</p>	<p>Yes, please see PH2.1a</p> <p>Yes, please see PH2.1b</p> <p>Yes, please see PH2.1c</p>
2.2	<p>Appropriate systems for raising concerns about education and training</p> <p>The review team heard that the Pharmacy department at the Trust linked in with the Whittington Health NHS Trust Local Faculty Group (LFG), and that this was a forum to raise concerns about education and training. Trainees</p>	

	<p>reported that they had appropriate representation at the forum, and that they were able to feed into the discussions there.</p> <p>The PS also reported that they were able to attend the LFG meetings at the Whittington and were confident to raise concerns and feed into this forum. It was reported that actions were recorded and tracked via a traffic light system to demonstrate 'completed', 'in progress' or 'not complete'.</p> <p>Both PRPs and PTPTs reported that they were able to feedback any concerns about education and training with their ES. The PRPs reported that they also felt comfortable providing feedback to the previous PRP who is now a PS. The review team heard that the PTPTs were able to contact the stores manager or lead Pharmacy technician about concerns if they could not raise these with their ES. Otherwise, the PTPTs would provide feedback at the end of their rotation direct to the PS, and the response to this was verbal.</p>	
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Domain 3 – Supporting and empowering learners		
<p>3.1. Learners receive educational and pastoral support to be able to demonstrate what is expected in their curriculum or professional standards to achieve the learning outcomes required.</p> <p>3.2. Learners are supported to complete appropriate summative and formative assessments to evidence that they are meeting their curriculum, professional standards or learning outcomes.</p> <p>3.3. Learners feel they are valued members of the healthcare team within which they are placed.</p> <p>3.4. Learners receive an appropriate and timely induction into the learning environment.</p> <p>3.5. Learners understand their role and the context of their placement in relation to care pathways and patient journeys.</p>		
HEE Standard	HEE Quality Domain 3 – Supporting and empowering learners	Requirement Reference Number
3.1	<p>Learners being asked to work above their level of competence, confidence and experience</p> <p>The PTPTs reported that there were no patient safety concerns in their placement. However, the review team were concerned to hear that PTPTs felt overwhelmed when there were staff shortages. Trainees reported that whilst in post, there were instances where they had to multi-task and mistakes could have been made. It was reported that these were usually picked up and resolved before any issues arose. Trainees noted that errors would be picked up at either the dispensing stage or checking, and that there was a new process in place to log errors made and reflection so that errors were minimised and lessons learned when they did occur. The review team heard that if the PTPTs made an error, the Pharmacist approached them in a professional manner and would work with them to resolve the issue.</p>	
3.4	<p>Induction (organisational and placement)</p> <p>When asked what would improve their programme, both the PRPs and PTPTs reported that having more structure and planning would improve the organisation of the programme. The review team also heard that there was a lack of communication between the PTPTs college and ES. It was reported that there were instances where they were unclear on what they needed to do to fulfil their competencies. It was noted that work is being done to resolve this, as trainees are working with the ES to cover objectives and set targets for the programme.</p>	

	Both the PRPs and PTPTs felt that the induction was lacking an introduction to common mental health conditions, as well as a general introduction to mental health services across the NHS. Trainees reported that these aspects were not covered in depth as part of their undergraduate degrees or in previous roles.	Yes, please see PH3.4
3.1	Regular constructive and meaningful feedback The PTPTs reported that they received constructive feedback from their supervisors after each rotation in the form of an appraisal. This was felt to be useful when discussing training and development with their ES.	

Domain 4 – Supporting and empowering educators

- 4.1. Those undertaking formal education and training roles are appropriately trained as defined by the relevant regulator or professional body.
- 4.2. Educators are familiar with the curricula of the learners they are educating.
- 4.3. Educator performance is assessed through appraisals or other appropriate mechanisms, with constructive feedback and support provided for role development and progression.
- 4.4. Formally recognised educators are appropriately supported to undertake their roles.

HEE Standard	HEE Quality Domain 4 – Supporting and empowering educators	Requirement Reference Number
4.1	Educators who are supporting and assessing learners, meet the requirements of the relevant Professional Body The review team were concerned that there was a lack of formal training of PS within the department. The PS reported that they had/were undertaking training and development (including some enrolled on the HEE ES/PS training courses) to equip them for their roles as supervisors, however, it was felt that this was inconsistent among the supervisors.	Yes, please see PH4.1
4.2	Educators are familiar with the learners' programme/curriculum The PS reported that they met with each other every morning and that this was an opportunity to share any concerns. It was also noted that this was a useful forum for the ES to communicate any changes to the curriculum. It was reported that any changes to the curriculum were also communicated via their clinical meeting on Fridays or via email from the ES. One of the PS was previously a PRP and noted that they were involved in the development of the rotation plan and handbooks for the trainees. It was noted that the ES for the PRPs asked for feedback on the programme and used this to make changes to meetings and rotations. The PS felt that their opinion was taken on board and changes were implemented to improve the programme.	
4.3	Educational appraisal and continued professional development The educational leads reported that there were good opportunities for development within the Trust, and that there were clear pathways for staff to progress. They reported that that the culture of the department was open and non-hierarchical, and ideas for improvements were actively encouraged and implemented.	

Domain 5 – Delivering curricula and assessments		
<p>5.1. The planning and delivery of curricula, assessments and programmes enable learners to meet the learning outcomes required by their curriculum or required professional standards.</p> <p>5.2. Placement providers shape the delivery of curricula, assessments and programmes to ensure the content is responsive to changes in treatments, technologies and care delivery models.</p> <p>5.3. Providers proactively engage patients, service users and learners in the development and delivery of education and training to embed the ethos of patient partnership within the learning environment.</p>		
HEE Standard	HEE Quality Domain 5 – Developing and implementing curricula and assessments	Requirement Reference Number
5.1	<p>Placements must enable learners to meet their required learning outcomes</p> <p>The review team heard that in the first year of the programme, the objectives for the PTPTs were focused on fulfilling competencies and acquiring supporting evidence from their rotations for their portfolios. It was noted that the disruption to business as usual caused by the Covid-19 pandemic had an impact on this, most notably in-person teaching.</p> <p>It was also noted that staff shortages impacted on the PTPT training experience, meaning that PTPTs were not always able to meet their objectives, and that they may be required to catch up on their competencies in the second year of the programme. The review team also heard that their Whittington rotation was cancelled due to the pandemic.</p>	

Domain 6 – Developing a sustainable workforce		
<p>6.1. Placement providers work with other organisations to mitigate avoidable learner attrition from programmes.</p> <p>6.2. There are opportunities for learners to receive appropriate careers advice from colleagues within the learning environment, including understanding other roles and career pathway opportunities.</p> <p>6.3. The organisation engages in local workforce planning to ensure it supports the development of learners who have the skills, knowledge and behaviours to meet the changing needs of patients and service.</p> <p>6.4. Transition from a healthcare education programme to employment is underpinned by a clear process of support developed and delivered in partnership with the learner.</p>		
HEE Standard	HEE Quality Domain 6 – Developing a sustainable workforce	Requirement Reference Number
6.1	<p>Retention and attrition of learners</p> <p>Both the PRPs and PTPTs reported that they would recommend their placements to their peers, citing the welcoming and supportive culture within the department.</p>	

Requirements (mandatory)

Any Immediate Mandatory Requirements (IMRs) identified should be identified separately in the appropriate table below. The requirement for any immediate actions will be undertaken prior to the draft Quality Review Report being created and forwarded to the placement provider. The report should identify how the IMR has been implemented in the short term and any longer termed plans. Any failure to meet these immediate requirements and the subsequent escalation of actions to be taken should also be recorded if there is a need to.

- All mandatory requirements should be detailed in this section. The requirement reference should work chronologically throughout the report and link with the right-hand column in the 'Review Findings' section
- Requirements identified should be succinct, SMART and not include the full narrative from the detailed report
- Any Requirements should clearly relate to improved achievement of HEE Domain & Standards by the placement provider

Immediate Mandatory Requirements		
Given the severity of an Immediate Mandatory Requirement, initial action must be undertaken as required within 5 days and will be monitored by HEE Quality Team. Completion of immediate requirements will be recorded below. Subsequent action to embed and sustain any changes may be required and should also be entered below with relevant timescales		
Requirement Reference number	Review Findings	Required Action, timeline, evidence (to be completed within 5 days following review)
	N/A	N/A
Requirement Reference number	Progress on immediate actions	Required Action, timeline, evidence (to be completed within an agreed timeframe)
	N/A	N/A

Mandatory Requirements		
The Quality Review Panel will consider which individual or collective findings from the intervention will be added to the Quality Reporting Register, determining the relevant risk score, ISF rating and reflecting the accepted QRR narrative conventions.		
Requirement Reference number	Review Findings	Required Action, timeline, evidence
PH1.4a	<p>The review team heard that the Practice Supervisors (PS) and the Pre-registration Pharmacy Technicians (PTPTs) did not have scheduled regular formal meetings to discuss their progress in rotations or provide feedback.</p> <p>HEE LaSE would recommend as a minimum that trainees have a beginning, middle and end of rotation progress meeting with their PS. We would suggest that both trainees and supervisors are involved in the process of deciding the right balance</p>	<p>The Trust is required to ensure that the PTPT handbook outlines clearly expectations regarding regular meetings between trainees and their PS. Updates should be clearly documented and communicated with the wider department. Please submit an update on this action by the next reporting cycle.</p>

	for their programme at CANDI moving forward.	
PH1.4b	The review team heard that one ES was supervising two PRPs and were concerned that without adequate succession planning and upskilling of development of others ES's in the department, there was a risk of significant gaps in educational supervision should the current ES leave the department or be off for a period.	The trust is required to develop a PRP ES succession and development plan, with a view to upskilling others in the department to support with this role in the future. Please provide documentation to evidence that this action is being developed locally by the next HEE reporting cycle.
PH2.1a	PRPs felt that their rotation structure and objectives were unclear in the first two months of their programme, and that this inadequately prepared them for their placement at the Whittington. The review team noted that trainees were keen to work collaboratively with the ES to develop the programme further, please ensure that they are involved throughout this process moving forward.	The Trust is required to develop the structure of the PRP programme, and accompanying documentation, with specific focus on the first 2 months to ensure that trainees are clear on their objectives and what they will be learning. Please provide documentation to evidence that this action is being addressed locally by the next HEE reporting cycle.
PH2.1c	At the time of the review, PRP trainees had not received enough experience working on the weekends, which may negatively impact on how prepared they are for their role as a qualified Pharmacist.	The Trust is required to ensure PRPs have adequate opportunities to experience weekend working throughout their training programme. Please submit the weekend working rota and dates where PRPs are scheduled to work in support of this action by the next HEE reporting cycle.
PH3.4	Both the PRPs and PTPTs reported that they did not receive an introduction to mental health generally, and this impacted on their knowledge of mental health conditions and the structure of mental health services in the NHS. To address this concern, we would recommend in the first instance incorporating additional signposting to already available learning resources such as the CPPE mental health resources , those available through the college of MH Pharmacy, Mental health service overviews provided by the Kings fund etc. as opposed to creating brand new content in house.	The Trust is required to include an introduction to mental health as part of the Trust induction, to include mental health conditions and the structure of mental health services across the NHS. Evidence will be required by the next HEE reporting cycle.
PH4.1	There were concerns around the formal training of supervisors within the department.	The Trust is required to provide appropriate training for current practice supervisors. Please complete a gap analysis of supervisor training within the department and submit an action plan to address any gaps in training moving forward by the next HEE reporting cycle.

Recommendations

Recommendations are not mandatory, and they would not be expected to be included within any requirements for the placement provider in terms of action plans or timeframe. It may however be useful to raise them at any future reviews or conversations with the placement provider in terms of evaluating whether they have resulted in any beneficial outcome.

Recommendation	
Related Domain(s) & Standard(s)	Recommendation
PH2.1b	The review team were concerned that pre-registration Pharmacy Technicians (PTPTs) may not have adequate professional supervision from the lead pharmacist when working at weekends. The trust is recommended to clearly outline the roles, responsibilities, and scope of competence of PTPTs when working weekends and ensure that this is communicated with relevant leads across the department.

Good practice

Good practice is used as a phrase to incorporate educational or patient care initiatives that, in the view of the HEE Quality representatives, enable the standards within the Quality Framework to be more effectively delivered or help make a difference or improvement to the learning environment being reviewed. Examples of good practice may be worthy of wider dissemination

Learning environment / Prof. group / Dept. / Team	Good practice	Related Domain(s) & Standard(s)

Report sign off

Outcome report completed by (name):	Nicole Lallaway, Learning Environment Quality Coordinator
Review Lead signature:	Shane Costigan, Associate Head of Pharmacy, HEE LaSE
Date signed:	15/01/2021

HEE authorised signature:	Helen Porter, Pharmacy Dean, HEE LaSE
Date signed:	20/01/2021

Date final report submitted to organisation:	21/01/2021
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What happens next:

Any requirements generated during this review will be recorded and monitored following the usual HEE Quality Assurance processes.

As part of our intention to develop a consistent approach to the management of quality across England, Quality Reports will increasingly be published and where that is the case, these can be found on [\(web link\)](#) Information from quality reports will be shared with other System Partners such as Regulators and Quality Surveillance Groups