

Care Quality Commission
Reviews in 2009/10

AUKUH response to consultation, March 2009

1. The Association of UK University Hospitals (AUKUH) is overall supportive of the integrated approach to regulation taken by the CQC. AUKUH supports the intention to assess throughout a care pathway. Whilst generally supportive of the suggested special reviews, the detail is of critical importance. It is difficult to comment meaningfully without further terms of reference.
2. The consultation document implies that the administrative burden associated with securing assurance of compliance with Standards for Better Health for a six month period is less than securing compliance for a twelve month period. This is an incorrect assumption as the workload is unchanged.
3. It is unclear whether the criteria for assessing compliance of core standards for the six month period will remain the same. If there are any changes this will further intensify the workload for the Trust. If there are no further changes, the likelihood is that the declaration for 2008/09 will remain eligible for the first six months of 2009/10. The risk of divergence between what is declared for 2008/09 and contemporaneous compliance increases with time, as the CQC will be increasingly reliant on weaker processes to gain assurance.
4. The consultation paper is specifically focused on 2009/10 as a year of transition, but AUKUH is concerned that this signals a major shift in regulation from 2010/11. The current system is only in its fourth annual round, and, as mentioned in the accompanying Regulatory Impact Assessment, the system evaluated well. The Annual Healthcheck ratings are well understood by the public and by the media. The system is embedded well within organisations and there is greater understanding and sign-up by staff (including clinical staff) and the third parties who are asked to comment on declarations. Whilst the future registration regulations may reference the Standards for Better Health core standards, there is a sense from the document of impending regulatory change with consequent loss of momentum and diversion of much needed resources into managing the change.
5. The Annual Health Check ratings for 2008/09 will be published in October 2009. In November 2009, the CQC will be posting compliance declarations from organisations for the period April to September. This has the potential for sending anomalous messages to the public regarding performance, e.g. a 'good' rating for 2008/09 but a fully compliant declaration. The CQC will need to manage this in terms of public information.



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6. AUKUH shares the concerns of the CQC that the current Annual Health Check ratings are relatively crude and can disguise a more complex picture. However, the ratings are clear and simple, and well understood. The Trusts agree that assessment should be at service level, but it is essential that any assessment must take account of broader quality dimensions which impact on the patient experience, e.g. environment and cleanliness as well as clinical outcomes.
7. AUKUH would welcome clarity about how the CQC will rate organisations in the future. Will the current Annual Health Check ratings remain after 2009/10? If so, will they be derived from the outcome of the periodic review? How will the ratings fit with the registration classifications so that they are meaningful to the public?
8. It is important to ensure that performance information available to the public is accessible and easy-to-understand but it needs to be balanced, comprehensive and transparent.