

# CQC – Where are we now? Where are we going? and how do I best prepare my service?

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“Definitely my go to law firm,  
would highly recommend.”

Andrew Lockett, Managing Director  
New Concept Care and Nursing

# Introduction

- I'm Philippa Doyle
- Partner in Health & Social Care Advisory Team
- Over 25 years experience
- Primary Care
- Community Care
- Social Care
- Court of Protection
- Information Governance
- CQC challenges
- CQC training and advice

# Where are we now?

- 2 years into SAF now - go live date was 6 Feb 2024
- If CQC turn up tomorrow –no change to current remige - Assessment, not inspection
  - 2 parts – paper- based analysis
  - “cross the threshold” observations
- Reality at the moment is can look and feel like an old inspection
- Asking for a PIR – no correlation with timescales
- Will tell you what information they want you to provide – this is the bare minimum – always send more!

# Where are we now & where are we going?

- 34 Quality Statements
- Consultation documentation released last week – now looking at 24 key lines of enquiry / quality indicators
- 5 original domains/key questions:
  - Safe
  - Effective
  - Caring
  - Responsive
  - Well led
- No change in the regulations under pinning the care you deliver
- I've inputted via Care England and Care Provider Alliance into the new documentation
- Still not perfect – have your say!

# New Quality Statements – an overview

- De-duplication and simplification was the aim of the game with CQC's review
- Confident that has been achieved
- Still some work to do – Chris Badger would like to see down to 17!
- Overview of changes:
  - SAFE – 8 QS → 7 QS
  - EFFECTIVE – 6 QS → 4QS
  - CARING – 5 QS → 3QS
  - RESPONSIVE – 7 QS → 4QS
  - WELL LED – 8QS → 6 QS

# The consultation

- 64 pages long – grab a cuppa and read slowly!
- Sets out:
  - Key Question (e.g. safe, well led etc)
  - Key Lines of Enquiry (Quality Statements)
  - Ratings Characteristics (what does good look like)
  - I statements (outcomes and experiences that people expect)
- Together form Quality Indicators
- Consultation open until 12 June – make sure you have your say
- CQC obsessed with feedback – so give it!
- Detailed supporting guidance to follow
  - How the Quality Indicators map to Fundamental Standards of Care (the regs) and
  - More specific detail on what good looks like

# New Quality Indicators

- Care England and Care Provider Alliance inputted into drafting of revised Quality Statements
- Delighted to be involved in that process – reviewing the wording, ensuring it wasn't too NHS-y or outcomes focused
- Share my overarching thoughts

*I consider the work done, in the main, to be helpful to social care providers. Quality Statements have been appropriately merged to reduce duplication and time has been taken to clarify what CQC are looking for to demonstrate compliance. I think the Quality Statements and the descriptors are simpler and clearer and I welcome the proposed changes as a positive.*

# New Quality Statement concerns

- Well Led QS's caused me most concern
- In particular:
  - Separating out governance and sustainability – delighted that sustainability has been removed for ASC
  - Some wording is very outcomes focused and NHS driven
- What's happening with numbering and scoring?
- Some feedback around scoring being unhelpful and numbering potentially causing "ranking" of QSs to suggest some are more important than others
- Scoring generally beneficial to providers/ no suggestion of "ranking" (although everyone knows Safe and Well Led most important!)
- Very clear bullet point seems to be the half way house we've reached!

# New Ratings Characteristics – an overview

- Phase 2 of changes involved the drafting of sector specific Ratings Characteristics – “what does GOOD look like?”
- Again, Care England, Care Provider Alliance and myself have reviewed and inputted into what those Ratings Characteristics might look like
- Designed to give you providers (and CQC inspectors) a benchmark
- Start with GOOD for each Key Question and each QS, then extrapolate up for OUTSTANDING and down for RI and INADEQUATE
- My starting point GOOD = compliance with the regulations
- Suggestion in the RC documentation that could be compliant with the regs but score RI - I’m vigorously opposing that, as are CPA

# New Ratings Characteristics Feedback

- Generally well written and well thought out
- But....
  - Some inconsistency
  - Unclear in some cases how to get from GOOD to OUTSTANDING
  - Over use of “outcomes” in some areas
  - NHS-y language
  - Use of the word “proactive” – I advocate it’s use in OUTSTANDING only – there was some interchangeable use between GOOD and OUTSTANDING
  - Currently isn’t a clear line by line description that links descriptions in a QS with a Rating Characteristic
- Next step in Phase 3 is sub-sector reviews – adapting the RC for e.g. LD / older peoples services
- Use this consultation as the opportunity to say what you want to say to shape your regulator

# Where does that leave me now?

- Timetable for implementation - still several months away
- In the meantime –
  - business as usual
  - if CQC turn up tomorrow – using the current system
  - Got to be prepared?
- How do I prepare?
- Start with Hempsons / Care England toolkit!
- Review each QS – think about the evidence – start collating it
- Will not be wasted time – will always be useful as auditing / prep for new system

# Why it's important to prepare and how to do it

- Services of all shapes and sizes who prepare for inspection are getting the better ratings
- A lot like learning to pass your driving test or school exams – it's an art
- This is your opportunity to tell CQC about your service
- They don't know what they don't know – you do!
- They have standard questions –
  - make sure you answer those questions
  - share all the information / evidence they ask for
  - Share all the information / evidence you have that they haven't ask for!
  - Make sure it's specific and tailored to each QS
- CQC will tell you no need to prepare, your service should be operating as "good" anyway.....but your service, your inspection – you have to drive it

# What do I need to do?

- Divide the Qs up into month by month chunks so you cover 2 or 3 each month in depth
- Get everyone involved in thinking about what good evidence you have
- Start to build up a folder (hard copy or on a shared drive) that you can drop evidence into whenever you get a good example of something
- Start to think business as usual e.g. writing an incident report / delivering feedback – put a copy of it in a relevant CQC QS folder
- Analyse where your gaps might be – e.g. do you need to review your MCA assessments? Have you fed back on changes to a service following a complaint?

# What do I need to do?

- Focus on
  - SAFE
  - WELL LED
  - Staffing – 4 Qs all about staff – they are the heart of your service – get the culture right, and support to staff right, and everything else should flow

Any Questions?



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Seek advice

# Hempsons free social care advice line: 01423 724056



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## Social care advice line

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\*non-partner organisations are eligible for 20 minutes free advice

# Contact

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