

## Board of Directors – Meeting held in Public

**11 May 2023**

<b>Paper title:</b>	Care Quality Commission Update and Developments including Compliance against CQC registration	<b>Agenda Item</b>  <b>24.0</b>
<b>Presented by:</b>	Phillipa Hubbard, Director of Nursing, Professions and Care Standards, Deputy Chief Executive, DIPC	
<b>Prepared by:</b>	Beverley Fearnley, Deputy Director of Patient Safety, Compliance and Risk	
<b>Committees where content has been discussed previously</b>	N/A	
<b>Purpose of the paper</b> Please check <b>ONE</b> box only:	<input type="checkbox"/> For approval <input checked="" type="checkbox"/> For information <input type="checkbox"/> For discussion	
<b>Link to Trust Strategic Vision</b> Please check <b>ALL</b> that apply	<input checked="" type="checkbox"/> Providing excellent quality services and seamless access <input type="checkbox"/> Creating the best place to work <input type="checkbox"/> Supporting people to live to their fullest potential <input type="checkbox"/> Financial sustainability, growth and innovation <input checked="" type="checkbox"/> Governance and well-led	
<b>Care Quality Commission domains</b> Please check <b>ALL</b> that apply	<input checked="" type="checkbox"/> Safe <input checked="" type="checkbox"/> Caring <input checked="" type="checkbox"/> Effective <input checked="" type="checkbox"/> Well-Led <input checked="" type="checkbox"/> Responsive	

<b>Purpose of the report</b>
<p>The purpose of this report is to provide Board with:</p> <ul style="list-style-type: none"> <li>- assurance that the Trust is compliant with its CQC registration; and</li> <li>- an overview of recent CQC activity that is not held within other reports, such as the Chief Executive’s report or learning reports received by the Quality and Safety Committee</li> </ul>

<b>Executive Summary</b>
<p><b>CQC Registration</b></p> <p>As an NHS provider organisation, the trust is required to maintain its registration with the CQC. The Trust is currently registered with the CQC and is in compliance with its registration requirements.</p>

**Implementation of the new Care Quality Commission (CQC) Assessment Framework – progress and next steps**

The Board of Directors have previously received updates as to the new model of inspection the CQC are looking to implement. CQC had initially planned to roll out their new inspection framework in January 2023. After receiving feedback and considering a number of different elements it was decided not to do this until later in 2023.

The CQC’s new approach will give them the ability to make judgements about quality more regularly, instead of only after an inspection. To do this they will use evidence from a variety of sources and look at any number of quality statements.

Whilst CQC will continue to describe the quality of care using 4 ratings: outstanding, good, requires improvement, or inadequate, they will use a scoring framework to enable them to make consistent judgements. The scores will translate into one of the ratings for the key questions (safe, effective, caring, responsive, and well-led). Scores will also be the basis for the CQC’s view of quality at an overall service level.

As part of these changes, the CQC will also change how they report ratings on their website. Whilst initially publishing only the usual ratings, the intention is to move to publishing the underlying scores for each rating and so there will be changes to how this is reported on their website.

CQC is committed to continuing to implement the new approach in phases, making sure each phase is properly implemented before moving to the next.

From spring they will focus on:

- making sure the technology needed is in place
- being confident that the new regulatory approach is ready to launch.

In summer they plan to launch the new online provider portal in stages. In the first stage:

- providers will be able to submit statutory notifications.
- the CQC will improve how our enforcement process works.

Towards the end of 2023 CQC will gradually start to carry out assessments using the new assessment framework.

**Routine engagement meetings**

Since our last report we have had one quarterly engagement meeting with the CQC. This happened on 13 March 2023. The meeting followed the usual agenda, with a broad range of items being discussed. No items of concern were highlighted by the team.

Do the recommendations in this paper have any impact upon the requirements of the protected groups identified by the Equality Act?

- Yes** (please set out in your paper what action has been taken to address this)
- No**

Recommendation(s)
<p>The Board of Directors is asked to:</p> <ul style="list-style-type: none"> <li>• Take assurance that the Trust is compliant with its CQC registration</li> <li>• Note the current position with regard to CQC's on going consultation and implementation of a new model.</li> <li>• Note the position with our ongoing relationship with the CQC</li> </ul>

Relationship to the Board Assurance Framework (BAF)	
<p>The work contained with this report links to the following strategic risks as identified in the BAF:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <b>SO1:</b> Engaging with our patients, service users and wider community to ensure they are equal partners in care delivery (QSC)</li> <li><input type="checkbox"/> <b>SO2:</b> Prioitising our people, ensuring they have the tools, skills and right environment to be effective leaders with a culture that is open, compassionate, improvement-focused and inclusive culture (WEC)</li> <li><input checked="" type="checkbox"/> <b>SO3:</b> Maximising the potential of services to delivery outstanding care to our communities (QSC)</li> <li><input type="checkbox"/> <b>SO4:</b> Collaborating to drive innovation and transformation, enabling us to deliver against local and national ambitions (Board)</li> <li><input type="checkbox"/> <b>SO5:</b> To make effective use of our resources to ensure services are environmentally and financially sustainable and resilient (FBIC)</li> <li><input type="checkbox"/> <b>SO6:</b> To make progress in implementing our digital strategy to support our ambition to become a digital leader in the NHS (FBIC)</li> </ul>	
<b>Links to the Strategic Organisational Risk register (SORR)</b>	<p>The work contained with this report links to the following corporate risks as identified in the SORR:</p> <ul style="list-style-type: none"> <li>• 2417: Ability to meeting regulatory requirements</li> </ul>
<b>Compliance &amp; regulatory implications</b>	<p>The following compliance and regulatory implications have been identified as a result of the work outlined in this report:</p> <ul style="list-style-type: none"> <li>• Well-led</li> </ul>

## **The Board of Directors - Public**

**11 May 2023**

### **CQC Updates and Developments including Compliance against CQC registration**

#### **1 Purpose**

The purpose of this report is to provide Board with:

- assurance that the Trust is compliant with its CQC registration; and
- an overview of recent CQC activity that is not held within other reports, such as the Chief Executive's report or learning reports received by the Quality and Safety Committee

#### **2 Care Quality Commission (CQC) Registration**

As a provider of NHS services, the Trust is required to be register all relevant services with the CQC. The Trust has held CQC registration since 2010.

As part of the registration, the Trust has developed its Statement of Purpose. This statement includes details of services delivered by the Trust. In the period April 2022 – March 2023 there have been no changes to the services delivered by the Trust which have required amendments to the Statement of Purpose.

The Board of Directors can take assurance that Bradford District Care NHS Foundation Trust is compliant with the requirements of registration with the CQC.

#### **3 Implementation of the new CQC Assessment Framework – progress and next steps**

The Board of Directors have previously received updates as to the new model of inspection the CQC are looking to implement. Whilst progress in implementing the new model has not been as rapid as was initially proposed, the CQC have recently provided an update as to their plans, as well as seeking views on new ways of reporting ratings.

##### **3.1 Progress on implementing the new assessment framework**

CQC had initially planned to roll out their new inspection framework in January 2023. After receiving feedback and considering a number of different elements it was decided not to do this until later in 2023.

Whilst the CQC continues to work on the framework, they will continue to complete monthly reviews of services based on information shared with them from multiple services, including via routine engagement and contacts from the public and staff.

During this period CQC have told us that we will not see any changes in our local relationships with CQC, however for the Trust this relationship remains fluid, with regular changes to the make-up of the local team.

In terms of next steps, the CQC will continue to implement their new approach in phases.

From spring the focus will be on:

- making sure the technology is in place and tested with providers
- being confident that the new regulatory approach is ready to launch.

CQC have told us that they recognise that services are under pressure during this period and so will focus on mainly internal priorities.

As well as this, the CQC's new Regulatory Leadership team will set out their priorities across their sectors, including thematic reviews. During this time the CQC will be regulating as normal using their current sector-based approaches.

During this time CQC will also be seeking to understand more about what is happening locally by looking at how care is provided at a system level.

In summer the new online provider portal will be launched stages, In the first stage:

- providers will be able to submit statutory notifications
- CQC will improve how their enforcement process works.

Towards the end of 2023 CQC will gradually start to carry out assessments using the new assessment framework.

### **3.2 Implementation of scoring to support rating judgements and related changes to reporting**

The new regulatory approach enables CQC to make judgements about quality more regularly, instead of only after an inspection, using evidence from a variety of sources and looking at any number of quality statements to do this.

Whilst the CQC will continue to describe the quality of care using the 4 ratings: outstanding, good, requires improvement, or inadequate, to support them in making consistent judgements this will be supported by using a scoring framework. Scores will translate into one of the ratings for the key questions (safe, effective, caring, responsive, and well-led) and will be the basis for the view of quality at an overall service level.

Whilst only the ratings will be published initially, the CQC also intend to publish the scores in future. CQC believe that using scoring as part of assessments will:

- help them be more transparent about judgements on quality
- show if a service is close to another rating. For example, for a rating of good the score can show if it's nearing either outstanding or requires improvement
- help make more visible whether quality is moving up or down within a rating.

The CQC quality statements clearly describe the standards of care that people should expect.

To make things clearer, CQC are planning to set out the types of evidence they will focus on in each required evidence category when assessing a quality statement.

To assess a particular quality statement, CQC will take into account the evidence available in each of the required evidence categories. This will vary depending on the type of service. Evidence could be information that CQC already have, for example from statutory notifications; or information they actively look for, for example from an on-site inspection.

Depending on what the evidence shows, a score will be assigned for each evidence category:

4 = Evidence shows an exceptional standard of care

3 = Evidence shows a good standard of care

2 = Evidence shows shortfalls in the standard of care

1 = Evidence shows significant shortfalls in the standard of care

As CQC are moving away from assessing at a single point in time, it is likely they will assess different areas of the framework on an ongoing basis. This means they can update scores for different evidence categories at different times.

Any changes in evidence category scores can then update the existing quality statement score. This can then have an impact on the rating.

To support this new approach CQC have been consulting on changing the way reports and ratings are presented on their website. An example of what this might look like is included at Appendix A. The Trust have engaged with this consultation, providing feedback on the clarity, look and utility of the proposed reporting format.

#### **4 Routine engagement meetings**

Since our last update, we have had one quarterly engagement meeting with the CQC. This happened on 13 March 2023 and was chaired by our interim Inspection Manager. The meeting followed the usual agenda, and a wide range of updates were provided on the quality of services across both care groups. Specific attention was paid to the management of waiting lists across a number of specialties, the improvements made in the public health nursing services (previously known as 0-19 services) and the operational planning round, including the scale of the financial challenge both for us as an organisation and across Bradford District and Craven.

It is of note that we still have interim arrangements in place with regards to our CQC relationship team whilst the CQC moves towards its new operational models and structures.

#### **5 Recommendations**

- Take assurance that the Trust is compliant with its CQC registration
- Note the current position with regard to CQC's ongoing consultation and implementation of a new model
- Note the position with our ongoing relationship with the CQC

**Beverley Fearnley**  
**Deputy Director of Patient Safety, Compliance and**  
**Risk**  
**20 April 2023**

## Appendix A: Proposed reporting layout for CQC

Examples of narrative not included.

### Overview

Latest inspection: 4 January 2023

Report published: 15 February 2023

[Read our current view of this service](#)

[Read about people's experience of this service](#)

Safe	Good	
Effective	Good	
Caring	Outstanding	
Responsive	Good	
Well-led	Good	

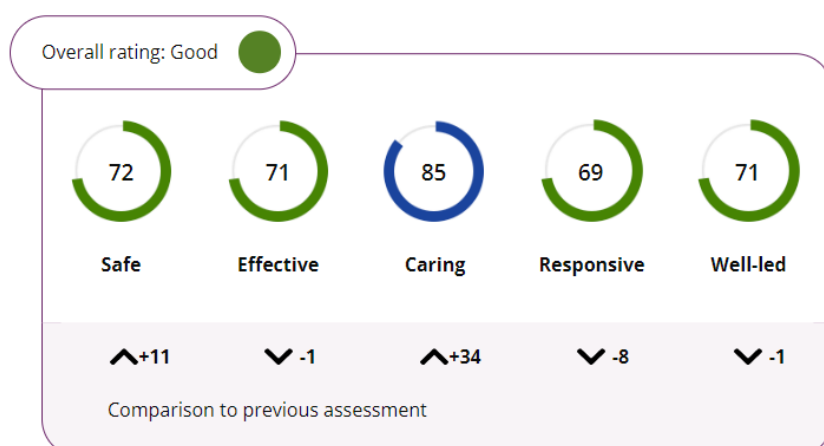
**Read the full assessment report**

Published 15 February 2023

Download

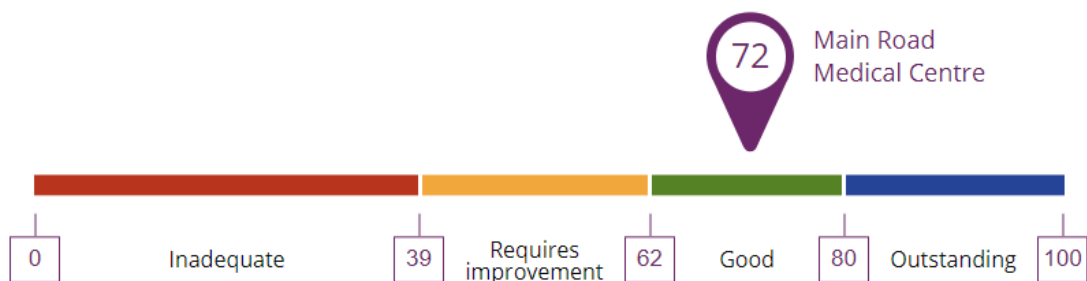
Read online

### Ratings





This service scored **72** (out of 100) for safety. [Find out what we look at when we assess this area](#) and [How we calculate these scores.](#)



How this compares with other GP practices [in England](#)

