CQC first inspection: A survival guide

How to avoid failing your first CQC inspection (and all the others) with QCS compliance management
Introduction

The Care Quality Commission’s staged registration across the four tranches of health and social care providers was completed on 1 April 2013, when the deadline for GPs practices and other primary medical services providers was reached.

For many across the health and social care sector the new compliance regime has been a culture shock. This is especially true for GPs and dental practices. The previous approach of self-regulation made compliance something of a grey area.

Perhaps unsurprisingly in this day and age, leaving something as important as service user outcomes to the ‘discretion’ of each practice has proved unworkable. Essential standards of quality and safety need to be upheld and it is impossible to establish and measure the quality of services without the baseline of a universally applied compliance standard.

The main requirement of registration activity is gathering and submitting information to CQC. This means registration is little more than a tick-box exercise that requires the right information in the right place. First impressions shaped by registration may make CQC inspection seem like a similar piece of routine bureaucracy. However, nothing could be further from the truth.

One image of inspection is that a nice inspector from the CQC turns up for a cup of tea and an informal chat to see how things are going. Unfortunately the reality is that you are more likely to be confronted by someone with a clipboard and an MSc in Risk Management!

The regulator has come under increasing pressure to raise its game. High profile cases of cruelty and neglect in adult social care and horror stories such as the scandal at Mid Staffordshire NHS Foundation Trust fuel public outrage at regulatory failure and raise the political stakes.

Consequently, it is reasonable to conclude that CQC’s inspectors now have no purpose in life other than to catch health and social care providers out at inspection time. In this guide we discuss how QCS compliance management helps ensure that you pass your first inspection as well all the others that come afterwards.

Registration versus Inspection - the compliance difference

During the tick-box CQC registration process, service providers are required to declare compliance or non-compliance for each regulated activity at every location operated.

For the purposes of inspection, the approach for monitoring on-going compliance is different and is not as simple as making a declaration. At inspection, service providers are required to demonstrate compliance across the whole of the service at a location level.

The CQC provides a self-assessment tool called the PCA or Provider Compliance Assessment to help with this. It is not necessary to routinely use the PCA; however, healthcare providers may be compelled to complete it and within a specified timeframe. In part, the CQC provides the PCA to help address areas of weakness and move regulated activities from a position of non-compliance to compliance where necessary. To achieve this, monitoring compliance using the PCA lets service providers:

- Identify those areas where there are varying levels of concerns about non-compliance to certain outcomes
- Develop action plans that state what is going to be done about shortfalls in a timely manner and to ensure that people who use services experience the essential standards of quality and safety

The burden of proof

Unlike the criminal justice system where the burden of proof lies with the prosecution, CQC compliance is something of a reversal. The burden of proof is not with CQC, to show a lack of compliance, but rests squarely on the service provider to show it behaves compliantly.

Consequently, whether the PCA is used or not, inspection places the onus on the service provider to produce evidence which shows it follows compliant practice. For every aspect of operations there is a need for accurately maintained records which reliably report on compliance matters. While not quite equating to ‘guilty until proven innocent’, it is for service providers to show they are ‘innocent’ of compliance failure.
**Data triangulation**

On the face of it, inspection appears to be about proving compliance by providing an audit trail which documents operational procedures and maintaining a CQC evidence repository. However, it is a false assumption to believe that presenting a flawless set of records, reports and a PCA ensures an inspection pass.

To arrive at a robust judgement, the inspection process requires CQC inspectors and assessors to cross-reference or ‘triangulate’ data with information from several other sources where possible. Other methods for gathering information include talking to people who use services, using surveys or making direct observations of care during a visit. If the evidence on paper is not supported by triangulated data, this will not go unnoticed and the inspection process will almost certainly try to uncover the reason for the inconsistency.

**The QCS framework for achieving compliance**

The QCS compliance management system is a comprehensive library of compliance policies and procedures. The documentation within the management system enables all health and social care to adhere to processes that have compliance interwoven. In effect it is a ‘compliance blueprint’ enabling every activity which is governed by CQC compliance to be managed so that service providers achieve the required regulatory standard.

- Compliance concepts such as focusing on service users are not just given ‘lip service’; the emphasis on service users is embedded throughout the entire QCS policy set, giving staff users constant direction and redirection towards the goal of achievement of compliance with the focus concept

- HR policies within the system are designed to follow the same compliance pathways that are required for direct interaction with service users

  - Based on research by Maslow, it is indicated that when care workers or other employees are subject to a particular management culture they will impose that culture onto their own interactions with service users

  - The HR culture dictated by the QCS HR policy set is consistent with the care culture embedded within the QCS care policy set

- This enables a consistent view of compliance to be achieved when assessment is carried out through cross-referencing triangulated data

- The same is true of maintenance policies, which can easily slip, only becoming evident under inspection; this also holds true for catering and housekeeping policies

**Providing proof with QCS compliance management**

**Integrated recording and reporting with QCS**

The QCS compliance management system not only provides the framework to ensure health and social care providers operate in a compliant way, but also provides the recording and reporting which is critical to achieving compliance.

Wherever there is a requirement, QCS integrates the process of collecting all the information by providing templates to record the data which supports compliance.

- QCS ‘pack approach’ provides a complete set of documents and templates to manage critical processes; in recruitment for example this reduces training needs while maximising effectiveness and compliance; the pack approach enables all necessary recording, minimising the risk of a critical process going undocumented

- In many areas such as recruitment, care planning and employee performance management, the templates guide the user easily and seamlessly through the whole process
CQC compliance made simple

Action planning and management control

QCS compliance management incorporates action planning and the management control which are critical to achieving compliance. This also enables compliance shortfalls to be addressed without the need for extra CQC paperwork such as the PCA. Key features include:

- Statements of compliant processes (policies), the effective use of which can be audited
- Anything in the system that requires a PDCA (Plan, Do, Check, Act) cycle approach has an Action Plan attached and all audits are appended by an Action Plan
- There is also an Action Plan policy which states that the intention of action planning is to promote and systematise PDCA
- The QCS approach is further supported by the Quality Assurance Policy

To ensure that the outputs of the above are brought together and co-ordinated, the Management Meeting Policy promotes PDCA and action planning.

- The Management Meeting embeds the process of formally ensuring that all Action Plans are monitored for progress and completion
- Completion is only acknowledged when the Management Meeting formally signs it off
- It is recommended that the Management Meeting is held every week to review all Action Plans, audits, complaints, external quality reports and statutory inspection reports; this also includes reports by regulators other than CQC
- QCS provides a very simple Management Meeting Policy template to promote and support this approach
- The template agenda is essentially an aide memoir, and produces an integrated Action Plan which is circulated to all employees with the intention of driving the whole organisation along the PDCA pathway

Summary

QCS compliance management provides policies and procedures to ensure processes are compliant, and the recording and reporting systems that ensure health and social care service providers survive first and subsequent inspections.

QCS compliance management also provides other compelling benefits such as:

- Raising compliance standards - exceed rather than just achieve the minimum acceptable standard
- Improving care quality standards by providing the means to ensure care is consistent and that outcomes are repeatable
- Structured approach ensures that critical areas like infection control, care planning and medications are carried out with confidence by care workers and with reduced risks to service users and service providers
- The natural output of service providers following compliant policies and procedures is to provide consistency from all points of view; this means that service providers stand up to scrutiny under data triangulation methods such as talking to service users
About QCS

Quality Compliance Systems (QCS) offers a unique approach to CQC Compliance with an online and paper based service specifically tailored to the individual needs of your organisation.

Whether you are an established Care Provider, Dental Practice, GP Surgery or a start-up organisation, our service is provided with the aim of ensuring that all aspects of compliance are being attended to.

Our industry experts continually update existing policies and procedures, whilst introducing new ones in response to the latest changes issued by the Care Quality Commission (England) and the SCSWIS(Scotland).

Read the reviews

http://www.trustpilot.co.uk/review/ukqcs.co.uk

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- Full Access to up to 2,300+ online pages of easy to use guidance with 300+ policies & procedures
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- PLUS! Gain FREE online trial access to our Mock Inspection Toolkit

Register for a free trial here: www.ukqcs.co.uk

Or Call one of our Compliance Advisors now on 0333 405 33 33 or email: info@ukqcs.co.uk

Further reading and references

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Provider Compliance Assessment - Guidance for providers
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