3 steps to surviving inspection by the Care Quality Commission

A structured approach for adult care providers and dentists in England to passing CQC compliance inspection

Introduction

It is easy to adopt a simplistic view and negative position on the subject of compliance and regulation. There is mounting evidence to support the perception that regulators rarely perform adequately. Where was the FSA (Financial Services Authority) when the banks were re-engineering the financial industry in such a way that it precipitated a global financial disaster? Where is Ofgem (Office of the Gas and Electricity Markets) as soaring energy costs force increasing numbers of households into fuel poverty? Regulators, it seems, are just quangos staffed by poachers turned gamekeepers.

In the health and social care sector, it follows that such negative connotations on regulation can lead some to the viewpoint that compliance is all a bit of a bore and The Care Quality Commission (CQC) synonymous with time consuming processes and procedures.

However, whether we like it or not, we have to accept that regulation is essential to maintaining standards and ensuring the safety of both the consumers and providers of health and social care services. For every organisation regulated by the CQC inspection is an unavoidable part of the process of achieving compliance.

CQC is inspecting adult social care providers and dentists in some numbers. Reports say less than 1 week's notice is being given of inspection and there is a lack of clarity about what inspectors are checking. It is reported that inspectors turned up at one dental practice without any notice.

However, undergoing inspection, meeting regulatory standards and fulfilling compliance obligations has neither to be a tedious chore nor a cause for concern. In this guide we provide a three step structured approach that enables adult care providers and dentists in England to take control of compliance and CQC inspection.

Step 1 - Sign up with a provider of high quality systems for managing CQC compliance

A typical manual process

If we break down the manual process and look at the steps needed to achieve compliance we can see that it may include some or all of the following:

- Requirement to search and cross reference multiple information sources such as:

    - Legislative instruments and documentation
    - Department of Health documentation and guidance
    - CQC documentation and guidance

- Checking that all reference material is up to date and in step with legislative change

- Understanding which compliance requirements are applicable to the practice areas of the service provider, including those relevant to each site

- Aggregate information from multiple reference sources

- Write policies and procedures and insert the correct details of the health or social care organisation

Perform ongoing maintenance of policies and procedures

The inadequacies of a manual approach

For those that use a manual approach to compliance processes a thorough knowledge of the subject matter is often a pre-requisite. This clearly places an emphasis on practice managers or registered providers to develop expert levels of understanding. This may be unnecessary and overly demanding while distracting attention from core practice matters.

Frequently, start up organisations may use a manual approach; a small scale organisation may be readily managed through simple paper based processes. However, as businesses get larger they outgrow many of

the processes and systems with which they commenced operations. As the organisation scales up, manual processes become inadequate. Often they are labour intensive, time consuming and repetitive.

Manual methods are prone to errors; results may be inconsistent and require re-checking, consuming further time. There is a need to adopt better ways of doing things. At the root of this need is the imperative to obtain efficiency through a better use of time and the need to ensure that manual processes do not undermine the ability of service providers to achieve compliance.

The advantages of the QCS compliance management system

Technology based systems offer the ability to simplify and automate many labour intensive administrative tasks. Using automated processes and pre-compiled information from compliance experts vastly simplifies the task of managing compliance matters.

The ongoing compliance requirement requires continual management. This is far less of a burden and is easier to manage in growing and larger scale service providers with a management system. Through removing much of the potential for human error a compliance management system transforms accuracy, and the repeatability of results improves consistency.

The cost - benefit analysis of adopting a compliance management system makes a compelling case. The time saved by management staff and the ability to achieve compliance quickly and with confidence make adopting a high quality QCS compliance management system a logical decision.

Step 2 - Use the system to manage your CQC compliance

Once an organisation adopts a compliance management system it is an imperative that it is used throughout the organisation. There may well be a degree of culture change management required, especially for larger scale and multi site operations.

A good management system provider should provide support to enable those tasked with managing the compliance mission to rapidly obtain the benefits. Here are some examples of QCS compliance management in action.

Example 1 - Accident and Incident Reporting

- Compliance issue: Health and social care workers must ensure accidents and incidents are recorded and analysed.

- What is the compliance requirement: The overarching objective of accident and incident reporting is to record events appropriately to ensure risks are minimised.

- What the system provides: The QCS system provides the procedure, up to date with HSE requirements and the correct form which enables the required information to be recorded.

- How compliance is managed: Health and care workers fill in the appropriate form for recording accident or incidents relating to employees or other persons, or those relating to service users.

Example 2 - Performance management

- Compliance issue: Employees need to perform to employers' standards in order to deliver consistent quality care.

- What is the compliance requirement: Outcome 13 requires that the staff employed must be suitably qualified, skilled and experienced.

- What the system provides: The management processes which are used to supervise and support employees to achieve the required standards, and the legally compliant processes for when performance standards are not achieved.

- How compliance is managed: Utilising a comprehensive set of working standards in a format that it is easy to distribute and use, ensures that everyone has fingertip access to all the information needed to act responsibly, safely and above all in compliance.

Example 3 - Medication

- Compliance issue: Medications recording may be incomplete or difficult to understand, leading to practices that have the potential to be unsafe.

- What is the compliance requirement: The Provider must obtain, record, safely handle, use, keep safe, dispense, administer, and dispose of medicines safely.

- What the system provides: An easy to understand Medications Policy and supporting records.

- How compliance is managed: Users of the system work from one single document which merges the various requirements from multiple sources and combines practical processes which have been developed by experienced practitioners to achieve compliance.

Example 4 - Privacy and dignity

- Compliance issue: Privacy and dignity of Service Users is of primary importance, but is often not well provided.

- What is the compliance requirement: Regulation 17 (1) states that the registered person must, as far as is practicable, make suitable arrangements to ensure the privacy and dignity of service users.

- What the system provides: A set of policies which instruct and guide all employees on the importance of the promotion of privacy and dignity. QCS policies are written and maintained by hands on practitioners with a commitment to human rights. This approach integrates policies that are directly relevant with those that are less obviously relevant to ensure that there are there are no conflicts within the management process, and that positive standards are reinforced at all times.

- How compliance is managed: Make the QCS management system readily available to all employees and emphasise that it is the single point of reference for policy. This promotes complete immersion of all staff and ensures that employee actions are consistent with best practice in privacy and dignity promotion. A QCS policy set is consistent throughout with best practice and is a good management aid towards developing and maintaining a supportive and complaint culture.

These examples indicate that use of a QCS management system to take care of compliance matters on a day to day basis provides excellent benefits for any given compliance scenario. Routine practice is, in itself, an excellent way of getting the organisation up to speed with how CQC want to see compliance matters handled. However, there is QCS tool that helps you thoroughly prepare for a CQC inspection.

Step 3 - 'Stress test' your organisation with a QCS Mock Inspection Toolkit

One excellent approach to preparing for CQC inspection is to use a QCS Mock Inspection Toolkit. This enables adult social care providers and dentists to asses the extent of compliance. It lets each service provider take itself through its compliance paces, identifies any areas of weakness and highlights matters that may need urgent attention.

There are three core elements around which successful inspection revolves. These should naturally be in place if service providers have adhered to CQC methodologies.

1. An understanding of the framework of what CQC look for during inspections
   - An integral part of the CQC registration process is to become familiar with the 16 key Essential Standards of Quality and Safety and the CQC Outcomes

2. Check what policies and procedures are in place to ensure that Outcomes are met
   - Inspectors almost certainly ask to see procedures as evidence that Outcomes are being met and should be able to demonstrate that policies are being used

3. Inspectors may wish to see your practices in operation to ensure that the right equipment and process is followed

- One example is decontamination

There are other aspects of inspection which may not have become naturally embedded through the simple routine of adhering to CQC's methodology. QCS Mock Inspection Toolkit factors them in. For example:

- Inspectors may wish to talk with your staff or patients

  - Staff
    - Each individual within the practice is required to meet the Essential Standards and demonstrate awareness of compliance responsibilities
  - Patients
    - Each service provider needs to be service user centric; clarity of communication is pivotal; in the case of dentists inspectors may try to gauge patients' awareness of treatment costs and payment terms for example

The QCS Mock Inspection Toolkit enables all of these aspects to be brought together, 'stress tested' and assessed holistically. This prevents compliance issues 'falling through the cracks' and helps to prepare the organisation to go under CQC's microscope.

Summary

Achieving CQC compliance is burdensome and this is symptomatic of increasing levels of regulation in many areas of society and business. A good compliance management system enables all those regulated by CQC to take control of registration and ongoing compliance.

The design of QCS Mock Inspection Toolkits is the result of many years of guiding adult social care and healthcare organisations through inspection. The experience that goes into our toolkits ensures your adult social care organisation or dental practice is able to measure up to the scrutiny of CQC inspection.

Ultimately well designed and properly supported compliance management systems, like those developed by QCS, button down the compliance mission, and provides the platform for every adult social care provider and dentist to achieve the highest standards of safety and care.

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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