



Londonwide LMCs

The professional voice of London general practice

Response to CQC strategy consultation

Londonwide LMCs responded to the CQC's strategy consultation before the closing deadline of 4 March 2021. Key points from the response are summarised below, grouped around the strategy's four themes, and the full response can be read [here](#).

1. People and communities

The CQC's summary statement on this theme:

"We want to be an advocate for change, ensuring our regulation is driven by people's experiences and what they expect and need from health and care services, rather than how providers want to deliver them. This means focusing on what matters to the public, and to local communities, when they access, use and move between services. Working in partnership, we have an opportunity to help build care around the person: we want to regulate to make that happen."

Our response:

While we absolutely support the focus on people and their needs, the involvement of communities and the specific intention to enable the voice of marginalised, disadvantaged etc people to be heard. However the proposals are very high level and lack detail on how these principles would be implemented in day-to-day practice.

People's 'wants' vs their 'needs' have to be considered in the context of financial and resource constraints GPs are operating within. Practices and regulators also need to be mindful that certain patients or patient groups may be more vocal than others about what they perceive their wants to be.

2. Smarter regulation

The CQC's summary statement on this theme:

"We will be smarter in how we regulate. We'll keep pace with changes in health and care, providing up-to-date, high-quality information and ratings for the public, providers and all our partners. We'll regulate in a more dynamic and flexible way so that we can adapt to the future changes that we can anticipate – as well as those we can't. Smarter use of data means we'll target our resources where we can have the greatest impact, focusing on risk and where care is poor, to ensure we're an effective, proportionate, and efficient regulator."

Our response:

We fully support the CQC's intention to move away from a rigid inspection regime into a more flexible, targeted and dynamic approach, which is built on positive relationships between providers and inspectors.

We wish to see regulation moving away from a tick box approach to a developmental one. As the CQC sees it as part of their role to enable and encourage quality improvement, we wish to see them offer support for learning and sharing best practice.

3. Safety through learning

The CQC's summary statement on this theme:

"We want all services to have stronger safety and learning cultures. Health and care staff work hard every day to make sure people's care is safe. Despite this, safety is still a key concern for us as it's consistently the poorest area of performance in our assessments. It's time to prioritise safety: creating stronger safety cultures, focusing on learning, improving expertise, listening and acting on people's experiences, and taking clear and proactive action when safety doesn't improve."

Our response:

Openness and honesty about failures and challenges should not result in practices being supported to learn and improve, rather than being subjected to significant criticism and/or regulatory sanctions as is often the case at present.

4. Accelerating improvement.

The CQC's summary statement on this theme:

"We will do more with what we know to drive improvements across individual services and systems of care. We'll use our unique position to spotlight the priority areas that need to improve and enable access to support where it's needed most. We want to empower services to help themselves, while retaining our core regulatory role. The key to this is by collaborating and strengthening our relationships with health and care services, the people who use them, and our partners across health and care."

Our response:

We always support the need for GP practices to improve where it is necessary, which is in accordance with the relevant regulatory and contractual requirements they are bound by.

We also appreciate the importance of collaboration and support when it comes to quality improvement.

Having said that, we believe it is important for the CQC as the regulator to recognise that it is not realistically possible for any provider to continue to improve perpetually, for standards to continue to be raised and for expectations to continue to increase.