

Care Quality Commission Registration

Updated version of the presentation
used at the LLMC events on CQC
on 10 & 11 July 2012

Feel free to share with colleagues at your practice / locality

CQC

- **Background & Introduction**
- **Timeline**
- **Registration process**
- **Regulated Activities**
- **Service Types**
- **Outcomes & Essential Standards**
- **Monitoring**
- **Judgement Framework**
- **Fees**
- **Myths & Rumours**
- **Top Tips**
- **Further Information**

Care Quality Commission Seminar

The application form and process:

CQC guidance

http://www.youtube.com/watch?v=Ct7vgmyjAr0&feature=player_embedded

Background & Introduction

- CQC is the independent regulator of health and adult social care services in England
- It includes services provided by the NHS, local authority, private companies and voluntary organisations
- It also protects the interests of people whose rights are restricted under the Mental Health Act

Legal Background

- Health and Social Care Act 2008
(regulated activities) Regulations 2010
- Care Quality Commission
(registration) Regulations 2009
- New Essential Standards of Quality
and Safety have replaced:
 - Standards for better health – Care Standards Act 2000
 - National Minimum Standards for social care and independent healthcare providers

How do CQC achieve this?

- Driving continuous improvement
- Putting people first and championing their rights
- Monitoring
- Acting swiftly to remedy bad practice
- Gathering and using knowledge and expertise
- Working with others

How will it improve care? (1)

“People will be able to expect that all registered providers meet the same set of essential standards of quality and safety and respect their dignity and rights”

“Wherever care is provided and however care is funded, it will have to meet the same standard of quality and safety”

How will it improve care? (2)

- Regulations will be **outcomes** focused rather than being based on systems, policies and processes – although all of these are required in order to achieve the outcomes
- A quality experience is what matters to service users and they will be involved in providing feedback to CQC
- The new system will make it easier for people to compare one provider with another

How will it improve care? (3)

- Concerns about a provider may require them to make improvements
- CQC will use its formal powers to bring about improvement. These include:
 - restriction of services
 - suspension of services, or
 - removing the provider's CQC registration

Timeline



The Registration Process

Who has to register?

- Any legal entity that is legally responsible for providing regulated activities, ensuring that essential standards of quality and safety are met
- A provider can be one of the following:
 - An individual GP
 - A partnership or
 - An organisation

The Registration Process

➤ Individual GP

- You should register as an individual if you are a single-handed GP. Single handed GPs should register in their own name.

If you are applying as an individual, you do not need to have a Registered Manager, unless you are not in charge of the day-to-day running and managing of the regulated activities, and/or not fit to do so

The Registration Process

➤ Partnership

- You should only register as a partnership if you have made arrangements for all partners to accept joint and several liabilities for the way the activity is carried out, and each individual partner has agreed to this. This will normally be documented through a written agreement, but this is not a requirement; for example, partnerships-at-will can register as a partnership as long as appropriate arrangements are in place.

➤ Organisation

- An organisation is a registered company, charity, limited liability partnership or other body corporate

If you are applying for registration as a partnership or an organisation, you are required to have at least one Registered Manager

The Registration Process

➤ What is a Location?

- A location is a place from which regulated activities are provided or managed
- If you have a main surgery and branch surgeries, you should include the branch surgeries under the main surgery's location, as long as all surgery sites offer services to the same registered patient list.
- If your branch surgery offers services to a different patient list, then it needs to be registered separately
- You can only provide services from the locations specified in your registration application

The Registration Process

- **Registered Manager (RM)**
 - The RM has a legal role in enabling and monitoring compliance with essential standards across your regulated activities
 - BMA have advised that in most cases the RM would be a partner
 - If you have more than one registered location you may need to appoint more than one RM

The Registration Process

- **Nominated Individual (NI)**
 - You are not required to have a NI if you register as an individual or partnership
 - The NI will act as the main point of contact with the CQC
 - The NI does not hold legal responsibility in relation to CQC



CQC Regulated Activities

- 15 CQC Regulated Activities
- 28 Services
- 28 Standards, 16 of which are considered Essential Standards



CQC Regulated Activities

There are 15 regulated activities that can trigger the need to register with the CQC. It is expected that GP practices and other primary medical services should register for the following:

- All expected to undertake:
 - Treatment of disease, disorder and injury
 - Diagnostic and screening procedures

- Most or many GPs to register for:
 - Surgical procedures (don't register this if you only perform curettage, cautery or cryocautery of warts, verrucae or other skin lesions)
 - Maternity and midwifery services
 - Family planning services (but only if you fit or remove IUCDs)

28 Service Types

- There are 28 service types and you may need to register some of them so check the guidance carefully
- Activities may span a number of different service types
- When you fill in your application form, you will be asked to tell the CQC which service types you provide

Service Types

- CQC expects:
 - All GPs and some other primary care providers to register for ‘Doctors’ treatment services’ and ‘Doctors’ consultation services’
 - Some minor injury units to register for ‘Acute services’
 - All urgent care centres, minor injury units, GP-led health centres and walk-in centres to register for ‘Urgent care services’

CQCs Essential Standards & Declaration of Compliance ⁽¹⁾

- Your registration application needs to include a specific declaration of compliance (or non-compliance) against the 16 Essential Standards
- The remaining 12 Standards relate to routine management of a service and include certain notifications you must make to the CQC once you are registered

CQCs Essential Standards & Declaration of Compliance (2)

- If you declare non-compliance, you will be required to submit an action plan detailing how you intend to achieve compliance
- You do not need to provide any evidence of compliance at this stage, however you are strongly advised to have any relevant evidence available, as it may be requested at a later stage as part of the monitoring process

Monitoring

- Site visits
- Talking to staff and patients
- Unannounced review
- Publicly available data source
- Information from the provider

Fees

- You do not need to pay a fee in order to register with CQC
- However, an annual fee will be charged once you are registered
- The fee covers the CQC's costs of initial registration, ongoing monitoring of compliance after your initial registration, and any changes you wish to make to vary or add to your registration during the year.

Judgement Framework (1)

- Non-compliance will be assessed and judged to be either Minor, Moderate, or Major
- CQC's response will take into account the impact of your services on patients
- If you are **not** meeting the Essential Standards, the CQC will take some regulatory action, compliance action or enforcement action

Judgement Framework (2)

In cases of non-compliance:

- they may issue a warning notice, which demands compliance, or
- they may cancel your CQC registration, which will prevent you from carrying out your regulated activities

Myths and Rumours that are not correct

- You must be fully compliant when you submit your application
- Premises – no carpets etc.
- It's all about policies and protocols
- You need expensive consultants / IT software
- You need to change how you work
- CRBs are required for everyone
- Others?

Top Tips (1)

- *Start preparing now*
- *Check you are ready to register and all partners are ready for sign-off*
- *Ensure you know which regulated activities apply to you*
- *Make sure everyone in the practice knows about CQC*
- *Be prepared to inform patients about CQC*
- *Enlist the help from everyone in the practice in developing action plans*
- *Agree your NI and RM (as appropriate)*
- *BMA guidance suggests it would be appropriate for a GP partner to be a registered manager, although in some cases it may be more appropriate for a practice manager to take on this role*

Top Tips (2)

- *You will need to declare compliance/non-compliance with the essential standards when you apply for registration, but you do not need to submit evidence at that stage*
- *Collate and organise evidence so that is all in one place; it may be requested at a later stage for monitoring purposes*
- *If non-compliant, you will need to submit an action plan to demonstrate the steps you will take to achieve compliance*
- *The registered manager should take responsibility for ensuring all members of the practice are familiar and involved with CQC processes*
- *Infection control is NOT in CQC Guidance as it is based on the DoH directive which practices should be following*
- *CQC by law are allowed to request access to patient identifiable information, but they must have a good reason*

Top Tips (3)

- *Become familiar with the Judgement Framework and the Enforcement Policy*
- *Ensure all practice policies are fit for purpose and are applied consistently by all your staff*
- *Assess your practice yourself using the CQC Judgement Framework*
- *The sooner you set up your registration, the more choice you will have about when you can submit your application (as at the end of July, the December slot is already gone and the November slot may be gone as well)*
- *One member of staff should take responsibility for the entire CQC process, have knowledge of regulated activities and understand compliance*

Further Information

- Care Quality Commission
 - Website: www.cqc.org.uk/primarymedicalservices
 - Provider reference group: www.cqc.org.uk/prg
 - National Contact Centre: 03000 616161
 - Email at: 2012registration@cqc.org.uk

- Londonwide Local Medical Committees Ltd
 - Contact Helen Musson hmusson@lmc.org.uk or Jill Stubbs jstubbs@lmc.org.uk in the first instance

- BMA Guidance <http://bma.org.uk/practical-support-at-work/doctors-as-managers/managing-your-practice/cqc-registration>