

# Primary Care Commissioning Committee

23 November 2016

<b>Details</b>	Part 1	<b>x</b>	Part 2		Agenda Item No.	<b>9</b>
Title of Paper:	Bury CCG's Approach to Managing CQC Outcomes					
Board Member:	Amy Lepiorz, Deputy Director Primary Care					
Author:	Rachele Schofield, Primary Care Manager					
Presenter:	Amy Lepiorz, Deputy Director Primary Care					
Please indicate:	For Decision		For Information	<b>x</b>	For Discussion	

## Executive Summary

<b>Summary</b>	The CQC are the independent regulator of health and adult social care in England, who make sure GP Practices across Bury provide people with safe, effective, compassionate, high-quality care whilst providing valuable feedback to practices on ways in which care services can improve.									
<b>Risk</b>	<b>High</b>		<b>Medium</b>		<b>Low</b>	<b>x</b>				
	Please indicate <b>above</b> the overall level of risk associated with the paper then state here what the risks are and how this paper aims to address them. If the above summary itself is around managing risk etc. state "Included in Summary". <b>NB</b> Risks can include failure to act and lost opportunities.									
	<table border="1"> <thead> <tr> <th>Risk</th> <th>Mitigating actions</th> </tr> </thead> <tbody> <tr> <td>The majority of Bury Practices are showing as "Requires Improvement" against the CQC Safe Standard</td> <td>See Appendix 1</td> </tr> </tbody> </table>		Risk	Mitigating actions	The majority of Bury Practices are showing as "Requires Improvement" against the CQC Safe Standard	See Appendix 1				
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<b>Recommendations</b>	<b>Primary Care Commissioning Committee is asked to:</b> <ul style="list-style-type: none"> <li>Note the contents of this paper</li> <li>Accept the current process following CQC visits as acceptable</li> <li>Offer advice regarding any other action the PCT can take either before or following a CQC visit takes place</li> </ul>									

## Strategic themes

To deliver improved outcomes and reduce health inequalities for patients through better preventative strategies	✓
To deliver service re-design in priority areas through innovation	✓
To develop primary care to become excellent and high performing commissioners	✓
To develop the CCG leadership to work with the Local Authority to be excellent integrated commissioners	✓
To develop robust and effective working relationships with all stakeholders and partners to drive integrated commissioning	✓
To deliver long term financial sustainability through effective commissioning and innovative investment across the wider system	✓

To develop and influence the provider landscape through development of a Locality Care Organisation (LCO)		✓	
Equality Analysis Assessed?		Supports NHS Bury CCG Governance arrangements	✓

# Bury CCG's Approach to Managing CQC Outcomes

## 1. Introduction and background

The CQC are the independent regulator of health and adult social care in England, who make sure GP Practices across Bury provide people with safe, effective, compassionate, high-quality care whilst providing valuable feedback to practices on ways in which care services can improve.

### 1.1 Current position

As at November 2016, all 31 member practices of Bury CCG have been visited by the CQC, the outcome of 28 of those visits are highlighted in the spreadsheet below, we await confirmation of the overall rating of the remaining 3 practices:

Practice	Overall	Caring	Effective	Responsive	Safe	Well-led	Link to CQC Report
<b>North Sector</b>							
Tottington Medical Practice	Good	Good	Good	Good	Req. Imp.	Good	<a href="http://www.cqc.org.uk/location/1-591979596">http://www.cqc.org.uk/location/1-591979596</a>
Garden City	Req. Imp.	Good	Inadequate	Req. Imp.	Req. Imp.	Req. Imp.	<a href="http://www.cqc.org.uk/sites/default/files/new">http://www.cqc.org.uk/sites/default/files/new</a>
Woodbank	TBC	TBC	TBC	TBC	TBC	TBC	
Greenmount	Good	Good	Good	Good	Good	Good	<a href="http://www.cqc.org.uk/provider/1-199784071/">http://www.cqc.org.uk/provider/1-199784071/</a>
Ramsbottom Medical Practice	Good	Good	Good	Good	Req. Imp.	Good	<a href="http://www.cqc.org.uk/location/1-572595420">http://www.cqc.org.uk/location/1-572595420</a>
<b>South Sector</b>							
Longfield Medical Practice	Req. Imp.	Good	Req. Imp.	Req. Imp.	Req. Imp.	Req. Imp.	<a href="http://www.cqc.org.uk/location/1-544412407">http://www.cqc.org.uk/location/1-544412407</a>
St Gabriel's Medical Centre	Good	Good	Good	Good	Req. Imp.	Good	<a href="http://www.cqc.org.uk/location/1-549333424">http://www.cqc.org.uk/location/1-549333424</a>
Fairfax Group Practice	Req. Imp.	Good	Req. Imp.	Good	Req. Imp.	Req. Imp.	<a href="http://www.cqc.org.uk/location/1-552914252">http://www.cqc.org.uk/location/1-552914252</a>
Unsworth Medical Centre	Good	Good	Good	Good	Good	Good	<a href="http://www.cqc.org.uk/location/1-556517449">http://www.cqc.org.uk/location/1-556517449</a>
Greylands Medical Centre	Req. Imp.	Good	Good	Good	Req. Imp.	Req. Imp.	<a href="http://www.cqc.org.uk/location/1-495039524">http://www.cqc.org.uk/location/1-495039524</a>
The Elms	TBC	TBC	TBC	TBC	TBC	TBC	
Blackford House	Good	Good	Good	Good	Good	Good	<a href="http://www.cqc.org.uk/provider/1-199783986/">http://www.cqc.org.uk/provider/1-199783986/</a>
Whittaker Lane Medical Centre	Good	Good	Good	Good	Good	Good	<a href="http://www.cqc.org.uk/location/1-537859859">http://www.cqc.org.uk/location/1-537859859</a>
The Uplands Medical Practice	Good	Good	Good	Good	Good	Good	<a href="http://www.cqc.org.uk/location/1-541747240">http://www.cqc.org.uk/location/1-541747240</a>
The Birches	TBC	TBC	TBC	TBC	TBC	TBC	
<b>East Sector</b>							
Huntley Mount Medical Centre	Req. Imp.	Good	Req. Imp.	Req. Imp.	Req. Imp.	Good	<a href="http://www.cqc.org.uk/location/1-117460442">http://www.cqc.org.uk/location/1-117460442</a>
Walmersley Road	Good	Good	Good	Good	Req. Imp.	Good	<a href="http://www.cqc.org.uk/location/1-495531015">http://www.cqc.org.uk/location/1-495531015</a>
Townside	Good	Good	Good	Good	Good	Good	<a href="http://www.cqc.org.uk/location/1-508718986">http://www.cqc.org.uk/location/1-508718986</a>
Rock Healthcare Limited	Outstanding	Good	Good	Outstanding	Good	Outstanding	<a href="http://www.cqc.org.uk/location/1-517296298">http://www.cqc.org.uk/location/1-517296298</a>
P83019 - Minden (Norman)	Good	Good	Good	Good	Good	Good	<a href="http://www.cqc.org.uk/location/1-565473193">http://www.cqc.org.uk/location/1-565473193</a>
P83008 - Minden (Deval)	Good	Good	Good	Good	Good	Good	<a href="http://www.cqc.org.uk/location/1-544034846">http://www.cqc.org.uk/location/1-544034846</a>
P83020 Minden (Saxena)	Good	Good	Good	Good	Good	Good	<a href="http://www.cqc.org.uk/location/1-571235301">http://www.cqc.org.uk/location/1-571235301</a>
Peel GPs	Good	Good	Good	Good	Good	Good	<a href="http://www.cqc.org.uk/location/1-572322200">http://www.cqc.org.uk/location/1-572322200</a>
Ribblesdale Medical Practice	Good	Good	Good	Good	Good	Good	<a href="http://www.cqc.org.uk/location/1-542363745">http://www.cqc.org.uk/location/1-542363745</a>
Knowsley Medical Centre	Good	Good	Good	Good	Req. Imp.	Good	<a href="http://www.cqc.org.uk/location/1-565517492">http://www.cqc.org.uk/location/1-565517492</a>
<b>West Sector</b>							
Spring Lane Surgery	Good	Good	Good	Good	Req. Imp.	Good	<a href="http://www.cqc.org.uk/location/1-559885871">http://www.cqc.org.uk/location/1-559885871</a>
Radcliffe Medical Practice	Good	Good	Good	Good	Req. Imp.	Good	<a href="http://www.cqc.org.uk/location/1-537717710">http://www.cqc.org.uk/location/1-537717710</a>
The RLC Surgery	Good	Good	Good	Good	Req. Imp.	Good	<a href="http://www.cqc.org.uk/location/1-554086023">http://www.cqc.org.uk/location/1-554086023</a>
Mile Lane Surgery	Good	Good	Good	Good	Good	Good	<a href="http://www.cqc.org.uk/location/1-554086039">http://www.cqc.org.uk/location/1-554086039</a>
Monarch Medical Centre	Good	Good	Good	Good	Good	Good	<a href="http://www.cqc.org.uk/location/1-548124267">http://www.cqc.org.uk/location/1-548124267</a>
Redbank Group Practice	Good	Good	Good	Good	Good	Good	<a href="http://www.cqc.org.uk/location/1-554086005">http://www.cqc.org.uk/location/1-554086005</a>

From the CQC visits to date, we are aware of a number of common themes, all within the "Safe" standard that Practices across Bury have scored as "Requires Improvement" against. The elements within the Safe Standard that the CQC measures Practices against are as follows:

- Safe track record
- Learning & improving from safety incidents
- Reliable safety systems & processes in place
- Safeguarding
- Medicines Management
- Cleanliness & infection control
- Staffing & recruitment
- Monitoring safety & responding to risk
- Equipment
- Arrangement to deal with emergencies & major incidents

The following comparison of the “Safe Standard” across GM shows that, whilst Bury has not received an “Inadequate” in this area, we are the highest scoring CCG in terms of “Requires Improvement” with 46% of practices receiving this rating:

Safe Standard Analysis	Bury	HMR	Bolton	Salford	Mcrs	Trafford	T&G	Stockport	Oldham	Wigan
Total No CQC visits to November 2016	28	28	30	35	62	24	34	14	32	36
Outstanding	0%	0%	0%	3%	2%	0%	0%	0%	0	0%
Good	54%	82%	73%	83%	61%	71%	79%	72%	68%	78%
Req. Imp.	46%	18%	27%	14%	27%	21%	18%	21%	16%	19%
Inadequate	0%	0%	0%	0%	10%	8%	3%	7%	16%	3%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

Based on the feedback received in the CQC reports published to date across Bury, the Primary Care Team have issued a newsletter to Practice’s (Appendix 1) highlighting the themes within the Safe Standard to ensure Practices proactively address any areas of concern within their own surgeries before visits to ensure compliance.

## 2. Next Steps

As the PC Work Stream develops we are aiming to move to a model where we can start to identify potential issues prior to a CQC visit and also to share the learning so that the same issues do not reoccur. The GP 5 Year Forward View advises that the CQC will complete its first round of comprehensive inspections of all practices in 2016/17. The CQC is consulting on changes to its regulatory model for its work thereafter. The CQC will tailor its inspection activity, taking a more risk-based approach where it monitors and acts on intelligence and information. It will reduce the frequency of some inspections, so that it targets its resources on those practices where there is a risk of poor care. CQC will agree with NHS England and local CCGs a shared framework to understand and report on quality. Practices rated good and outstanding - currently the vast majority - will move to a maximum interval between inspections of five years, subject to the provision of transparent data, available to CQC, NHS England and CCGs; and also to CQC remaining assured that the quality of care has not changed significantly since the previous inspection. Where CQC has concerns, it may revisit sooner.

This is a work in progress however, the PCT have established the following process which is triggered when the CQC have conducted a visit and written their final report and we will continue with this as practices are visited/revisited:

- CQC email the Primary Care Team to provide advanced notification that they plan to visit Practices and ask the CCG to provide them with a list of any concerns the CCG may have regarding the practices on the list (the CQC do not provide a date when the visits will take place and they ask that we do not advise the practice of the visit)
- CQC notifies the Practice of the visit in writing (the CCG are not notified of the date)
- CQC visit the practice
- CQC release the report on their website
- CCG contact the Practice for a supportive conversation and produce any positive press if required
- NHS England review the CQC report, cross referencing actions against GP Core Contract
- Any relevant breach/remedial notices are issued in a formal letter from the CCG (signed by Stuart North) to the Practice
- NHS England & the CCG request formal advise from the Practice re their corrective action against core contract breeches
- Dr Schryer, Clinical Director & Zoe Alderson, Head of Primary Care visit the Practice to discuss the CQC report and explore what support they may need
- The results of all CQC visits are fed into the Primary Care Workstream Meeting for discussion

- The overall results of the CQC visit including all must & should do actions are built into the Primary Care Quality Visit Action Plan for discussion & monitoring by the Primary Care Manager as part of the Primary Care Quality Strategy
- Any issues are escalated back for discussion to the PCQIG

### **3 Recommendations**

#### **Primary Care Commissioning Committee is asked to:**

- Note the contents of this paper
- Accept the current process following CQC visits as acceptable
- Offer advice regarding any other action the PCT can take either before or following a CQC visit takes place

### **Appendices**

#### **Appendix 1**



13 - CQC Inspection  
Common Themes Sep

**Rachele Schofield**  
Primary Care Manager  
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# Primary Care Team Update

## Message from the CCG

### CQC Inspection Common Themes

The Primary Care Team have been busy analysing all of the reports published by the CQC following the Practice inspections that have taken place in Bury across the course of 2015/2016.

From the reports, we have identified a number of key themes and hot topic areas that the CQC identified during their visits with Practices and we want to use this issue to alert you to them.

There is a lot of shared learning around CQC visits and the primary care team has been discussing with the 'Fed' how we might further enhance the learning capitalising on the experience of us all, and it is really encouraging to see how practices have worked together to meet the challenge.

Overall Bury Practices have achieved really good results from the CQC inspection, and to date the Bury practices are amongst the best in GM

Rachele Schofield  
Primary Care Manager

Jeff Schryer  
Primary Care Clinical Lead



### Inside This Issue

Page 1 – Common Themes &  
Contact Details

## Top 10 CQC Common Themes

The last 12 months have been a busy time for the member practices of Bury CCG with most now having had CQC Inspections.

As part of the Primary Care Quality Strategy, the Primary Care Team have read each report with care and noted all of the best practice within the reports to feedback to practices as part of their Practice Action Plan. We have taken extra care to note all of the key outcomes that are common to most practices that have seen the CQC visit their Practice. Practices rated 'requires improvement' routinely receive a supportive visit from the Primary Care Team with an expectation of looking how the CCG might help the practice demonstrate competency against the areas identified.

We wish to share this learning across Bury so that practices with visits pending can take measures to ensure these common issues are addressed prior to the assessment. Overall, Practices are encouraged to ensure they are compliant with all of the requirements within the "Safe" Standard as this frequently meets with "Requires Improvement" within Bury CCG. The top 10 reasons for that are outlined in list below which we hope serves as a checklist to practices that have yet to go through this process:

- Ensure all relevant staff are DBS checked, including those who act as chaperones
- Medicines must be checked and monitored to ensure their safe use
- Ensure all staff receives current training in safeguarding vulnerable adults and children.
- A comprehensive, up to date record of this training is maintained
- Formal Appraisals are held with all staff and outcomes documented
- Look at increasing the number of clinical audits carried out, making sure audit cycles are completed so any improvements can be evidenced
- Current Legionella Risk Assessments are in place
- Ensure a PPG is in place
- Practice Meetings held and minutes taken
- Learning & improvement from safety incidents

Following the CQC visits, NHS England alert the CCG to any failures to comply with Core Contract which require immediate action. Common areas of non-compliance with GMS Contract have included:

- Clinical Governance
- Training
- Infection Control
- PPG



# Primary Care Team Update

## Next Steps

We will be resuming our Primary Care Quality Visits with Practices across the remainder of 2016 and we will be happy to discuss the outcomes & actions of any CQC visits that have taken place and, of course, we are always on hand to visit you if you have any concerns or queries about upcoming CQC inspections or anything else you wish to discuss. If you would welcome a visit outside of the usual process, please do contact Rachele Schofield, Primary Care Manager to arrange.

## Contact details and information

Questions relating to Primary Care Quality - Rachele Schofield- [racheleschofield@nhs.net](mailto:racheleschofield@nhs.net)

Clinical queries relating to Primary Care Quality – Dr Jeff Schryer - [jeffrey.schryer@nhs.net](mailto:jeffrey.schryer@nhs.net)