

[National Assembly for Wales](#)

[Health and Social Care Committee](#)

[The work of the Healthcare Inspectorate Wales](#)

Evidence from Nuffield Health – HIW 12

**Subject: Nuffield Health response to the National Assembly for Wales’ Health and Social Care Committee on the short inquiry into the work of Health Inspectorate Wales (HIW)**

**Submission from:** Nuffield Health - Vale Healthcare, in Cardiff and the Vale of Glamorgan

**Introduction to Nuffield Health and Vale Healthcare:**

[Nuffield Health](#) is the UK’s largest not-for-profit healthcare provider which is independent of Government and with no shareholders. Nuffield Health has been providing health services for almost 60 years and is widely recognised for taking a proactive approach to quality improvement. Nuffield Health has two registered [independent hospitals in Wales](#);

- The Cardiff Bay Clinic, a diagnostic and treatment centre with consulting rooms, daycase operating theatres and endoscopy suites which was commissioned and registered in 2008, and;
- The Vale Hospital, Llantrisant, a surgical centre with operating theatres and inpatient facilities and supporting diagnostic facilities which was commissioned and registered in 2010.

**Nuffield Health response:**

Nuffield Health welcomes the opportunity to respond to the short inquiry into the work of Health Inspectorate Wales (HIW). The contact details of the Nuffield Health representative in our Welsh Hospitals are provided at the end of this response. This representative will be available to give oral evidence on 17<sup>th</sup> October 2013 or 7<sup>th</sup> November 2013, if invited. Nuffield Health makes the following observations to the key points raised in the inquiry terms of reference:

- 1. The effectiveness of HIW in undertaking its main functions and statutory responsibilities.**
  - a. Nuffield Health recognises that HIW is the independent inspectorate and regulator of all healthcare in Wales and that there is a great deal of diversity in the organisations that fall within scope of the statutory responsibilities of HIW.

- b. Nuffield Health also has experience of the healthcare regulatory systems in Scotland and England and notes the drive to support continual improvement in the quality of healthcare across all the regulators. HIW state that it is their role to independently assure the quality and safety of healthcare in Wales. Nuffield Health would welcome the opportunity to discuss with the Committee the wider integration of the ‘Improving Quality Together Framework’ in Wales.
  - c. Nuffield Health considers that HIW is undertaking its main functions and statutory responsibilities. However, Nuffield Health considers that HIW could improve in respect of their stated values of efficiency and effectiveness, for example with respect to accessibility to information on the website. Reports are found under ‘publications’, an area which would usually include key publications such as standards. However the standards are within a document section which is not easy to navigate. The section on [Independent Healthcare Standards](#) points the user to an area on [Technical Guides](#). These guides relate to the previous standards and the information is out of date as is other information on the website. In general, the site is not intuitive to navigate for users and therefore we would consider that patients and public may also find difficulty with accessibility to information.
2. **The investigative and inspection functions of HIW, specifically its responsibility for making sure patients have access to safe and effective services, and its responsiveness to incidences of serious concern and systematic failures.**
- a. HIW states on the home page of the website that one area for primary focus is *“ensuring that timely, useful, accessible and relevant information about the safety and quality of healthcare in Wales is made available to all”* and that it is their role to provide independent and objective information to patients and the public. Nuffield Health considers that HIW are not providing timely information and that the information that is provided is not relevant to the planned work programme.
  - b. Nuffield Health acknowledges the breadth and depth of HIW’s [“Three Year Work Programme 2013-2015”](#). However it was our expectation from that publication that there would be annual inspection to support the statement that HIW would *“undertake annual validation and testing of how healthcare organisations comply with .....the standards.....”*. Nuffield Health has two registered establishments in Wales as identified above. On initial application and commissioning in 2008 and 2010 both establishments underwent vigorous inspections and reviews and received excellent support and professional advice.

However, since commissioning neither registered establishments have received annual inspections.

- c. The Cardiff Bay Clinic had an unannounced inspection in December 2009 and both facilities had a further announced inspection in March 2012 however the reports were delayed. This delay in receipt of the inspection report was stated by HIW to be an internal inspectorate system and process failure relating to validation of the inspection report. Subsequently Nuffield Health had a revalidation inspection in December 2012 and the inspection report, for the March 2012 inspections, was received in April 2013. The inspection reports were made available on the website in May 2013, which was some fifteen months after the inspection. The delay in the publication of these reports prevents local management from ensuring all of the issues raised can be dealt with and equally importantly the delay has meant that patients and the public have been denied timely, useful, accessible and relevant information about the excellent safety and quality of healthcare provided by Nuffield Health.
- d. Nuffield Health considers that the process for challenging published information must also be transparent and timely. The independent sector is likely to see more direct and rapid reputational and commercial impact from any published negative information and therefore there must be the right level of scrutiny applied both prior to, and following publication of information (in case of unintended consequences from patients perception).

**3. The effectiveness of working relationships, focusing on collaboration and information sharing between HIW, key stakeholders and other review bodies.**

- a. Nuffield Health at Vale Healthcare has always had a good relationship with HIW however there are issues (as stated above) with sharing relevant timely information. Collaboration with the independent sector in Wales is variable, for example Nuffield Health, Vale Healthcare, and other independent sector organisations, were not part of the distribution of the terms of reference of this inquiry. The Welsh Independent Hospitals Association (WIHA) is the relevant body for representing independent hospitals in Wales.
- b. Quality standards and continual quality improvement are very important to Nuffield Health. Integrated Governance is the mechanism used to challenge and measure quality - responding quickly to safety concerns, measuring customer feedback and understanding and evaluating where things have gone wrong and embedding lessons learned. Nuffield Health is transparent in reporting through annual

quality reports (since 2007) that are openly available on our website. With increasing choice in the healthcare system regulation and standard setting must be flexible enough to reflect wider healthcare trends.

- c. Nuffield Health considers that the changing face of healthcare is underpinned by local, national and global factors:
  - i. Personalisation - the service is more commoditised with patients researching the range of products and services available to them. Changes in regulation and standards of acute hospitals need to ensure adaptability with the pace of change.
  - ii. Model of health system delivery - the patient, whether insured, self-funding or via corporate provision, may have the choice to move from NHS to the independent sector and within the independent sector. Regulations and standards that are predicated on a long term relationship with a single provider will not support patients as consumers of healthcare services.
  - iii. IT and globalisation - the use of the internet for research and recommendations for a range of products and services has become common place and this includes health related products and services. Supporting patients as consumers with high quality information is key, however, it is well documented that patients will make poor choices where they are ill-informed.

#### **4. Consideration of the role of HIW in strengthening the voice of patients and the public in the way health services are reviewed.**

- a. Nuffield Health welcomes the prioritisation by HIW in the inspection of services where people are in the most vulnerable circumstances and where there are higher risks to people. In addition, Nuffield Health is pleased to see the restatement by HIW that they aim to work in line with the *National Principles for Public Engagement in Wales*, involving citizens.
- b. This statement of citizen involvement aligns with Nuffield Health's mission to become recognised and valued as the UK's leading health charity by consumers and patients by creating and delivering services for *health as it should be*; making evidence-based knowledge a cornerstone of our approach and being the consumer advocate. Understanding customer requirements and meeting those requirements are fundamental pillars of continual quality improvement.
- c. Nuffield Health welcomes the focus on transparency for customers and the delivery of this at speed. Furthermore, we welcome the HIW intention to work together with Third Sector and representative

organisations to help ensure that the views of specific user groups inform and influence what HIW do and how they do it. Nuffield Health considers that it is vital to move away from individual provider focus given the way customers move between providers.

**5. Safeguarding arrangements, specifically the handling of whistleblowing and complaints information.**

- a. Nuffield Health endorses the HIW special review process in response to concerns that may arise from a particular incident or serious incident. Nuffield Health supports the intention of work programmes which focus on the extent to which healthcare organisations provide appropriate support to individuals during their involvement with the service.
- b. Nuffield Health ensures its organisation and its services promote and protect the welfare and safety of children and vulnerable adults. The internal processes within Nuffield ensure compliance of legislation and guidance, alongside multi agency working and co-operation. Nuffield has a robust training portfolio that ensures that staff are trained and able to act and recognise concerns, including sharing of information and lessons learnt.

**Further information:**

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