

How does HIW inspect independent services?

What we inspect against

The [Care Standards Act 2000](#) gives HIW the powers and responsibilities, on behalf of Welsh Ministers, for the registration and inspection of independent health care services in Wales. Further details about how HIW registers [independent services](#) and [private dentists](#) can be found on HIW's website.

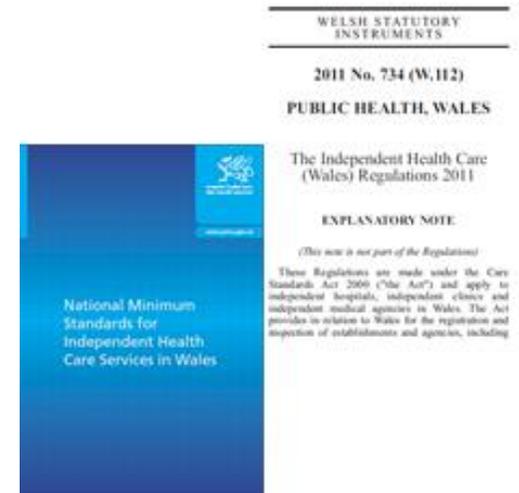
The Welsh Ministers have made several sets of regulations under the Care Standards Act 2000 (secondary legislation) which independent healthcare providers must adhere to. These include the [Independent Health Care \(Wales\) Regulations 2011](#) and [Private Dentistry \(Wales\) Regulations 2008](#) and [Private Dentistry \(Wales\) \(Amendment\) Regulations 2011](#).

Although HIW registers individual private dentists, we inspect the dental practice. The private work carried out in a practice is measured against the Private Dentistry (Wales) Regulations. If NHS care is also provided at a practice, we look at how services meet the Health and Care Standards. See [how HIW inspects the NHS](#) for more details.

HIW inspections of independent healthcare services will look at how services:

- Comply with the Care Standards Act 2000
- Comply with the Independent Health Care (Wales) Regulations 2011
- Meet the [National Minimum Standards](#) (NMS) for Independent Health Care Services in Wales.

The intention of the National Minimum Standards is to ensure that patients and people who choose private healthcare are assured of safe, quality services. These standards apply to all independent healthcare services in Wales, regardless of size and type. We



use these standards to make judgements about the quality, safety and effectiveness of services provided to patients and help us determine whether or not the service is complying with the requirements of the Independent Health Care (Wales) Regulations.

We report and publish our findings from our inspections under three themes:

- **Quality of the patient experience:**

We speak to patients and/or their relatives, representatives and advocates to ensure that the patients' perspective is at the centre of our approach.

- **Delivery of safe and effective care:**

We consider the extent to which services provide high quality, safe and reliable care centred on the person.

- **Quality of Management and leadership:**

We consider how services are managed and led and whether the culture is conducive to providing safe and effective care. We also consider how services review and monitor their own performance against relevant standards and guidance.

Who we inspect

We inspect the following independent services:

- Independent hospitals
- Independent clinics
- Independent medical agencies
- Private dentists

- Healthcare organisations that use ionising radiation for medical purposes e.g. x-ray (see our [website](#) for more details).

Further details of the types of services in each of these categories are defined in the Care Standards Act and also on our [website](#).

How we inspect

Our inspections of independent services may be announced or unannounced.

We will always seek to conduct unannounced inspections because this allows us to see services in the way they usually operate. The service does not receive any advance warning of an unannounced inspection. Our hospital inspections are usually unannounced.

In some circumstances we will decide to undertake an announced inspection, meaning that the service may be given up to 12 weeks' notice of the inspection by letter or email. In deciding if an inspection should be announced, we consider:

- Whether an unannounced inspection may create an unacceptable level of disruption for patients and staff
- Whether it is necessary to collect pre-inspection information from the provider
- Whether we need to ensure certain key staff are present on the day(s) of the inspection.

For the reasons above, inspections of private dentists and some smaller independent hospitals are usually announced, although if we have concerns about a service and the safety of patients or for other reasons, we may choose to conduct an unannounced inspection at anytime.

Our inspection team will include at least one HIW inspector and usually include at least one clinical peer reviewer, who is a person who has expertise in the area we are inspecting. For example, for private dental practice inspections, our clinical peer reviewer is a dentist with recent hands on experience of dentistry. The number of inspection team members will differ depending on the size and complexity of the service.

Our inspections usually last between one and three days, depending on the type of service we are inspecting.

How we decide when and where we inspect

We aim to inspect independent healthcare services at least once every three years and in settings where more complex procedures are carried out, we will carry out inspections more frequently.

When considering when and where to inspect we consider all the evidence and intelligence we have about an organisation built up over time. This includes:

- Information from previous HIW inspections or reviews
- The vulnerability of the patient group or the complexity of the service.
- Specific data available to HIW
- Issues and concerns shared by partner organisations
- Concerns raised by patients and staff (see our [website](#) for further details about raising concerns)
- National priorities, new standards or quality requirements
- Blind spots

Further details about how we decide where to focus our work can be found on our [website](#).

What we look at during our inspections

HIW inspections capture a snapshot of the standards of care patients receive. They may also point to wider issues associated with the governance of healthcare services provided.

The following table shows each of the National Minimum Standards we consider, what we are looking for during the inspection and how we do this.

HIW inspection theme	What National Minimum Standards apply?	What are we looking for?	How do we do this?
Quality of patient experience	3. Health promotion, protection and improvement	<ul style="list-style-type: none"> • Patients should be supported to look after their own health and well-being • Health services should promote healthy lifestyles and workplaces and help people make healthy choices • Health services should make sure they use public health issues and advice in their work • Health services should have ways to screen, detect and prevent the spread of diseases 	<ul style="list-style-type: none"> • Discussions with patients; family; friends, advocates and carers • Discussions and interviews with staff • Observations • Review of available patient information • Responses within completed HIW patient questionnaires
	10. Dignity and	<ul style="list-style-type: none"> • Patients should be treated with dignity, 	<ul style="list-style-type: none"> • Responses within completed HIW

HIW inspection theme	What National Minimum Standards apply?	What are we looking for?	How do we do this?
	respect	and respect <ul style="list-style-type: none"> Health services should make sure all patient's needs are met including physical, social, psychological, religious, spiritual, linguistic, cultural needs and preferences 	patient questionnaires <ul style="list-style-type: none"> Observations of interactions between staff and patients Discussions with patients; family; friends, advocates and carers
	9. Patient information and consent	<ul style="list-style-type: none"> Patients should have good information about their care that is easy to understand and given at the right time so they can make the choice that is best for them Patients should be able to discuss their care and make choices Health services should carefully think about how patients give consent to their care and treatment and understand about the guidelines and laws that apply 	<ul style="list-style-type: none"> Review of patient information Discussions with patients; family; friends, advocates and carers Discussions and interviews with staff Review of available patient information Responses within completed HIW patient questionnaires
	18. Communicating effectively	Health services should make sure they communicate with patients and others: <ul style="list-style-type: none"> At the right time 	<ul style="list-style-type: none"> Discussions with patients; family; friends, advocates and carers Responses within completed HIW

HIW inspection theme	What National Minimum Standards apply?	What are we looking for?	How do we do this?
		<ul style="list-style-type: none"> • In a way that people can easily understand • Meeting all language and communication needs • Giving clear information about all the services they provide and costs of treatment 	<p>patient questionnaires</p> <ul style="list-style-type: none"> • Discussions and interviews with staff • Responses within completed HIW patient questionnaires
	8. Care planning and provision	<ul style="list-style-type: none"> • Patients should have the right care at the right time in the right place with the right staff • Patients should be supported to look after their own health and well-being • Health services should work with other organisations to meet the needs of patients 	<ul style="list-style-type: none"> • Discussions with patients; family; friends, advocates and carers (where appropriate) • Responses within completed HIW patient questionnaires • Discussions and interviews with staff • Observations • Examination of a sample of patient medical records
	2. Equality, diversity and human rights	<ul style="list-style-type: none"> • All health services must understand and support equality and human rights for everyone 	<ul style="list-style-type: none"> • Discussions with patients; family; friends, advocates and carers (where appropriate) • Examination of a sample of patient

HIW inspection theme	What National Minimum Standards apply?	What are we looking for?	How do we do this?
			<p>medical records</p> <ul style="list-style-type: none"> • Review of staff training records • Observations • Discussions and interviews with staff
	5. Citizen engagement and feedback	<ul style="list-style-type: none"> • Patients and their families should be able to tell health services about their experiences of care • Health services should learn from what patients and families tell them and make services better 	<ul style="list-style-type: none"> • Discussions with patients; family; friends, advocates and carers (where appropriate) • Responses within completed HIW patient questionnaires • Review of feedback systems including complaints policy and procedures • Observations • Information held by HIW • Interviews with senior management
Delivery of Safe and Effective Care	12. Environment	<p>Health services should make sure that health care environments are:</p> <ul style="list-style-type: none"> • Accessible 	<ul style="list-style-type: none"> • Discussions with patients; family; friends, advocates and carers (where appropriate) • Responses within completed HIW

HIW inspection theme	What National Minimum Standards apply?	What are we looking for?	How do we do this?
		<ul style="list-style-type: none"> Well maintained Fit for purpose Safe and secure Protect privacy Sustainable 	<p>patient questionnaires</p> <ul style="list-style-type: none"> Review of policies and procedures Observations Discussions and interviews with staff
	22. Managing risk and health and safety & 4. Emergency Planning Arrangements	<ul style="list-style-type: none"> Health services must look after people's health and safety and make sure that any risks are managed as well as they can 	<ul style="list-style-type: none"> Review of policies and procedures Observations Discussions and interviews with staff Interviews of senior management
	13. Infection prevention and control (IPC) and decontamination	<ul style="list-style-type: none"> Health services should involve everyone in helping to control and stop infections so that people do not get ill 	<ul style="list-style-type: none"> Review of documentation e.g. audits, risk assessments, policies and procedures Observations Discussions and interviews with staff
	14. Nutrition	<ul style="list-style-type: none"> Patients should be supported to eat and drink so that they can get better quicker Patients should be able to get food and 	<ul style="list-style-type: none"> Review of documentation e.g. audit and monitoring processes Examination of a sample of patient medical records

HIW inspection theme	What National Minimum Standards apply?	What are we looking for?	How do we do this?
		<p>drink when they need it</p> <ul style="list-style-type: none"> Patients should be given a choice of food which meets their needs, including nutritional, therapeutic, cultural and religious needs Mothers who are breastfeeding should be supported to do this 	<ul style="list-style-type: none"> Discussions with patients; family; friends, advocates and carers Discussions and interviews with staff Observations Responses within completed HIW patient questionnaires
	15. Medicines management	<ul style="list-style-type: none"> Health services should make sure medicines are managed safely by the right staff Patients should get the right medicine at the right time Patients should be given advice and information about their medication and should be able to ask questions and talk about any concerns they have 	<ul style="list-style-type: none"> Review of documentation e.g. audits, medicines management policy and procedures Examination of a sample of patient medical records Discussions and interviews with staff Discussions with patients; family; friends, advocates and carers (where appropriate) Observation of medicines administration and storage
	11. Safeguarding children and safeguarding	<ul style="list-style-type: none"> Health services must support and protect all children and any adults who 	<ul style="list-style-type: none"> Review of staff training records Discussions and interviews with staff

HIW inspection theme	What National Minimum Standards apply?	What are we looking for?	How do we do this?
	vulnerable adults	<p>are vulnerable or at risk</p> <ul style="list-style-type: none"> Health services should make sure staff have the right skills in safeguarding and share their learning 	<ul style="list-style-type: none"> Scrutiny of safeguarding policies and procedures Review of Deprivation of Liberty Safeguards (DOLS) and Mental Capacity Act assessments in patient medical records where appropriate
	17. Blood management	<ul style="list-style-type: none"> Patients should be able to get blood when they need it Health services should make sure that patients are given blood safely by staff with the right skills and training 	<ul style="list-style-type: none"> Review of policies and procedures Staff training records Discussions and interviews with staff Interviews with senior staff
	16. Medical devices, equipment and diagnostic systems	<ul style="list-style-type: none"> Health services must make sure that all the equipment they use is safe and works well Health services should make sure that equipment is suitable for the for what it is used for and for environment it is used in Health services should have staff with the right skills and training to use equipment safely 	<ul style="list-style-type: none"> Discussions and interviews with staff Interviews with senior staff Observation Review of documentation e.g. servicing and installation

HIW inspection theme	What National Minimum Standards apply?	What are we looking for?	How do we do this?
	7. Safe and clinically effective care	<ul style="list-style-type: none"> • Patients should get the right care and treatment for their needs • Health services should know the best ways to care and support patients 	<ul style="list-style-type: none"> • Examination of a sample of patient medical records • Discussions and interviews with staff • Review of documentation e.g. audits, risk assessments, monitoring processes • Responses within completed HIW staff questionnaires
	6. Participating in quality improvement activities & 21. Research, Development and Innovation	<ul style="list-style-type: none"> • Health services should look at different ways to make services better based on good research and sharing learning 	<ul style="list-style-type: none"> • Interviews with senior management • Review of documentation e.g. audits, quality improvement initiatives • Responses within completed HIW staff questionnaires
	19. Information management and communications technology	<ul style="list-style-type: none"> • Health services should have the right information systems to support patient care • Health services should make sure this information is secure and shared safely 	<ul style="list-style-type: none"> • Interviews with senior management • Review of documentation e.g. policies and procedures • Discussions and interviews with staff

HIW inspection theme	What National Minimum Standards apply?	What are we looking for?	How do we do this?
	20. Records management	<ul style="list-style-type: none"> • It is very important that health services keep good records to make sure patients get the right care • Health services must follow the rules about how to record information and keep it safe 	<ul style="list-style-type: none"> • Examination of a sample of patient medical records • Discussions and interviews with staff • Review of documentation e.g. audits
Quality of Management and Leadership	1 Governance and accountability framework	<p>Health services should:</p> <ul style="list-style-type: none"> • Do the right things well • Know how well they are doing • Make sure they are meeting the regulations and standards • Put things right quickly, when they go wrong 	<ul style="list-style-type: none"> • Interviews with senior management • Discussions and interviews with staff • Review of documentation e.g. policies and procedures, audits, future plans • Information held by HIW • Responses within completed HIW staff questionnaires
	23 Dealing with concerns and managing incidents	<p>Health services should:</p> <ul style="list-style-type: none"> • Report and act on any concerns quickly • Are open and honest with patients when they tell them that something has gone wrong 	<ul style="list-style-type: none"> • Interviews with senior management • Discussions and interviews with staff • Review of feedback systems including complaints policy and procedures • Review of documentation e.g. policies and procedures, audits

HIW inspection theme	What National Minimum Standards apply?	What are we looking for?	How do we do this?
		<ul style="list-style-type: none"> • Support patients and staff when a concern affects them • Learn from things that have gone wrong and share this learning with others 	<ul style="list-style-type: none"> • Information held by HIW • Responses within completed HIW staff questionnaires
	<p>25. Workforce planning, training and organisational development</p> <p>24. Workforce recruitment and employment practices</p>	<ul style="list-style-type: none"> • Health services should have enough staff with the right skills and training to be able to give patients the best care • Health services should support staff to get the right skills they need for their job and make sure they can do their job well 	<ul style="list-style-type: none"> • Responses within completed HIW staff questionnaires • Discussions and interviews with staff • Review of documentation e.g. rotas, staff training records, recruitment procedures • Observation

What happens after our inspections?

The diagram below shows the process following our inspections.



We will write an inspection report

After our inspections we will write an inspection report which will be published on our website. Prior to this, services will receive a draft inspection report to check for factual accuracy.

We will require services to make improvements where necessary

Where we identify areas of improvement or concerns, we may take the following actions:

- We will raise any immediate concerns relating to patient safety with the service on the day of inspection
- We may issue a non-compliance notice where we have significant concerns about the wellbeing of people using the service. This notice can be issued at any time, including immediately following the inspection where we identify an area of non-compliance that requires immediate action. The issuing of a non-compliance notice is a serious matter, and is the first step in a process which may lead to civil or criminal proceedings
- Where inspectors find very poor outcomes and a serious risk to the health and wellbeing of people, urgent action may be required. In these circumstances, we may take the following actions:
 - Immediate imposition (variation or removal) of conditions or immediate suspension.
 - Application for urgent cancellation of registration
- We may ask the service to submit an improvement plan which describes how the service will address the findings from the inspection
- We may ask service representatives to attend a face to face meeting to discuss our concerns

Further details of our [enforcement and non-compliance process](#) can be found on our website.

We expect registered services to have good governance arrangements in place to continually monitor the care and services they provide to make sure patients receive safe and effective care in line with legal expectations.

We will decide if we need to take further action

Following an inspection and the receipt of any improvement plan, we will consider if any further action is necessary in order to follow-up on issues identified during an inspection. We may take the follow actions:

- Request an update from the service on delivery of an improvement plan
- Conduct a focused inspection to check or test whether specific actions have been completed
- Conduct a full re-inspection which is not limited to the issues noted in the original inspection
- Ask other agencies to consider undertaking follow-up activities with HIW or on their own
- We may also take enforcement action, including the issue of a non-compliance notice in accordance with our enforcement and non-compliance process.

On an ongoing basis, we will also consider any concerns (e.g. from patients and staff) and intelligence (e.g. incidents and inspection findings) we receive about healthcare services to determine what action from HIW is necessary. Further details can be found on our [website](#).