

# HEALTHCARE INSPECTORATE WALES

Making a Difference

## Operational Plan 2019 - 2020

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# Healthcare Inspectorate Wales (HIW) is the independent inspectorate and regulator of healthcare in Wales

## Our purpose

To check that people in Wales receive good quality healthcare.

## Our values

We place patients at the heart of what we do.

We are:

- Independent
- Objective
- Caring
- Collaborative
- Authoritative

## Through our work we aim to:

**Provide assurance:**

Provide an independent view on the quality of care.

**Promote improvement:**

Encourage improvement through the reporting and sharing of good practice

**Influence policy and standards:**

Use what we find to influence policy, standards and practice

## Foreword

I am pleased to introduce our Operational Plan for 2019 -20. As we enter the second year of our three-year strategy 'Making a Difference' we will build on a solid foundation to deliver our goal to encourage improvement in healthcare by doing the right work at the right time in the right place; ensuring what we do is communicated well and makes a difference.

This plan contains the detail of the work we plan to do during 2019/20 towards achieving our strategic priorities. It also provides information on the broad areas we plan to review, and reflects the way we will manage our work programme. The plan ensures we meet our statutory requirements and that we focus on areas of concern identified by our intelligence.

As we move through a period of growth and significant change within the organisation, this year will very much be about building our capacity to deliver more across all our strategic priorities and in readiness to respond to a future new legislative framework. We will also continue work to evolve and adapt our approaches as people access more and more of their health and care services in their own homes and communities from multi-professional, multi-agency teams.

The critical role of HIW in checking that people in Wales receive good quality healthcare has been recognised through the allocation of new resources to increase our core activity within the NHS, including follow up work of previous recommendations, and the ability to respond to emerging in-year intelligence which gives immediate cause for concern. We will also increase the number of HIW all-Wales thematic reviews and build on the joint work we have already delivered with Care Inspectorate Wales. The specific detail of what we plan to do is listed in our Commitment Matrix (Annex A).

We will also work to build and refine our approach to joint inspection of integrated care pathways and new models of care emerging from the work of Regional Partnership Boards and the broader NHS Wales transformation programme.

We will continue with our ambitious ICT change programme. Designed to make us more efficient as an organisation, the first year of the programme has seen us move to paperless inspections and online payments. This year we will make a significant investment in managing our data more effectively, helping us to manage our work, relationships and to deliver enhanced intelligence, increasing our impact as an organisation. This, together with an increased investment in our learning and development, will ensure we are developing our people and organisation to do the best possible job.

If you have any comments on our work, your experience, or on healthcare services in general, please contact us – we would love to hear from you.

Dr Kate Chamberlain  
Chief Executive

### Our strategic priorities are:

To maximise the impact of our work to support improvement in healthcare

To take action when standards are not met

To be more visible

To develop our people and organisation to do the best possible job

## A Summary of Our 2019 - 2020 Plan

In addition to the inspections, reviews, regulatory activities and statutory responsibilities outlined in our commitment matrix at Annex A, this is how HIW plans to work towards its strategic aims during 2019-20:

### Strategic Priority

To maximise the impact of our work to support improvement in healthcare	To take action when standards are not met	To be more visible	To develop our people and organisation to do the best possible job
<p><b>Action</b></p> <p>Improve our approach to the analysis, use and sharing of intelligence.</p> <p>Work closely with other inspectorates, especially Care Inspectorate Wales (CIW).</p> <p>Make sure our work is easy to understand.</p>	<p><b>Action</b></p> <p>Monitor our approach to inspections and reviews to ensure they remain relevant and effective.</p> <p>Improve our communication with current and prospective independent healthcare providers.</p> <p>Work with Welsh Government to review the scope and application of the legal powers available to HIW.</p>	<p><b>Action</b></p> <p>Develop and enhance the way we listen to the public.</p> <p>Improve the way we inform the public and professionals about what we do.</p> <p>Develop the way we involve the public in our work.</p>	<p><b>Action</b></p> <p>Implement a change programme to enhance HIW's ways of working.</p> <p>Invest in developing the skills and knowledge of our people and reviewers.</p> <p>Develop a workforce strategy that includes consideration of succession and career pathways.</p>
<p><b>Key deliverables during 2019 - 2020</b></p> <p>Develop our intelligence and data systems to make sure information about healthcare settings is more accessible and available to inspectors in the field.</p> <p>Continue to develop relationships with a wide range of partners to ensure that we use intelligence well to shape and inform our work.</p> <p>Continue to develop our arrangements for working with CIW on national thematic reviews, particularly in areas where health and social care services need to be delivered in an integrated way.</p> <p>Undertake research to support an expanded programme of national thematic reviews as well as a series of more focused special reviews.</p> <p>Commence a wide ranging project to review our overall approach to reporting findings from our inspections.</p>	<p><b>Key deliverables during 2019 - 2020</b></p> <p>Routinely assess the suitability of our inspection approaches, putting in place a prioritised programme of work to update these approaches where necessary.</p> <p>Put in place arrangements to strengthen the oversight and co-ordination of HIW's follow up activities.</p> <p>Fully embed our approach to enforcement in the independent sector, including staff training and improved arrangements for tracking key stages of our unregistered providers process.</p> <p>Continue to improve our interactions with those providing, or considering providing, independent healthcare services in Wales. We will complete a review of online guidance materials and increase the contact that we have with organisations between inspections.</p> <p>Continue to work with Welsh Government on immediate policy and legislative developments around the introduction of a duty of candour and a duty of quality, as well as revised board governance arrangements and the introduction of a new citizen's voice body.</p>	<p><b>Key deliverables during 2019 - 2020</b></p> <p>Develop the way we seek the public's views for national thematic reviews to ensure as broad a reach as possible including using service user groups and patient forums.</p> <p>Engage with local authorities and the third sector to raise our profile within communities and identify how we can best use established networks to communicate our purpose, work and findings.</p> <p>Work with Healthcare Education Improvement Wales (HEIW), professional bodies as well as NHS and private healthcare settings to build a firm understanding of our role and purpose and how we can all work together to support improvement.</p> <p>We will continue to build our visibility and reputation through attendance at key conferences and seminars to communicate the findings and learning from our work.</p>	<p><b>Key deliverables during 2019 - 2020</b></p> <p>We will deliver a learning and development plan in line with our new strategy.</p> <p>We will refresh and improve our induction process to ensure new staff are effective in their roles as quickly as possible.</p> <p>We will develop a full training package for all NHS Relationship Managers to develop their skills and experience in line with the demands of the role.</p> <p>We will strengthen the training, development and performance management arrangements we provide to our clinical peer reviewers.</p> <p>We will evaluate the use of voluntary lay reviewers</p> <p>We will commence the implementation of a new Data Management and Information System.</p>

## To maximise the impact of our work to support improvement in healthcare

HIW places a strong emphasis on the use of intelligence in developing its work programme. By carrying out the right work at the right time in the right place, HIW can deliver a key element of its role which is to encourage improvement in healthcare.

Collectively, organisations charged with scrutinising healthcare in Wales have a wealth of intelligence available to them. Over the last year, HIW has continued to work closely with these partner organisations; holding regular summits and meeting with Community Health Council colleagues on a six monthly basis. These meetings allow us to exchange intelligence, avoid duplication, work together and calibrate our views on the risks and issues present across Wales. We will continue to work with our partners over the coming year to review existing, or develop new, memoranda of understanding and data sharing agreements which allow us to share critical intelligence when necessary. This includes arrangements to support cross border working, allowing us to work closely with our partners on issues of common interest and in particular where enforcement action is being undertaken against a healthcare provider operating in more than one country.

We have continued to refine our planning processes, making use of available intelligence in order to ensure that we use our resources effectively. Our NHS Relationship Managers continue to provide a critical role in being the first point of contact for health boards and trusts, assessing intelligence and risk and defining our inspection and review work programmes. In 2019/20 we have committed to delivering more thematic and special reviews and to direct more resources towards following up on the recommendations that we make. Special reviews of NHS organisations allow us to explore in greater detail the management arrangements for

providing services or functions. This is particularly beneficial when considering the responsibilities of the three NHS Trusts in Wales. As we seek to deliver an increased number of thematic reviews, our newly constituted Thematic Steering Board will help us to evaluate relevant evidence from a range of sources in order to develop and deliver the most appropriate reviews.

With a focus on the challenges set out in the Parliamentary Review of Health and Social Care in Wales (2018), HIW continues to work with Care Inspectorate Wales (CIW) on reviews and inspections which cross the health and social care boundary. In 2018/19 we worked closely on the publication of a national report on Community Mental Health Teams and we continue to jointly deliver local inspections in this area. In early 2019, we assisted CIW in undertaking a national review of the prevention and promotion of independence for older adults (over 65) living in the community. CIW are also acting as a key stakeholder in HIW's ongoing work on how care and treatment is provided to elderly people who have had a fall and how falls can be prevented.

We have improved the way in which we scope, undertake and present our national thematic reviews and our special reviews. In 2019/20 we will commence a larger piece of work to review our overall approach to reporting findings from our inspections, including an assessment of whether these reports give people the information they need in the way they need it.

*'We have continued to refine our planning processes, making use of available intelligence in order to ensure that we use our resources effectively.'*

### Actions

Improve our approach to the analysis, use and sharing of intelligence.

Work closely with other inspectorates, especially Care Inspectorate Wales (CIW).

Make sure our work is easy to understand.

### During 2019 - 20 we will:

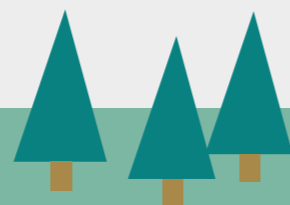
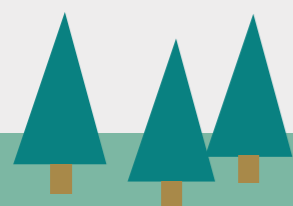
Develop our intelligence and data systems to make sure information about healthcare settings is more accessible and available to inspectors in the field.

Continue to develop relationships with a wide range of partners to ensure that we can use intelligence to shape and inform our work.

Continue to develop our arrangements for working with CIW on national thematic reviews, particularly in areas where health and social care services need to be delivered in an integrated way.

Undertake research to support an expanded programme of national thematic as well as a series of more focused special reviews.

Commence a wide ranging project to review our overall approach to reporting findings from our inspections.



## To take action when standards are not met

HIW's ability to take timely action when standards are not met is dependent upon a number of factors. These factors include the nature of the legal frameworks which define our powers, the quality and timeliness of our work, how we engage with healthcare organisations and the way in which we escalate issues.

HIW undertakes a broad range of inspections and reviews and during 2018 we implemented a Methodology Panel to ensure that we review, update and develop our approaches in a controlled and prioritised way. This has allowed us to devise a programme of methodology work for 2019/20 which ensures that we can continue to effectively assess health provision against relevant standards and take action where those standards are not met. HIW will continue to gain input from a diverse range of stakeholders as part of the methodology development process, convening stakeholder groups where this is beneficial. We will also continue to seek contributions from the specialist peer reviewers who support our inspections.

During 2018/19, we strengthened our approach to enforcement in the independent sector, including our Service of Concern process. We suspended an independent provider and delivered a number of urgent, focussed inspections. HIW successfully prosecuted an unregistered provider in December 2018 and this case allowed us to reflect on the actions we take when we receive intelligence about such providers. As a result of this work, in 2019/20 we will be introducing new performance targets in this area.

In 2018, HIW published a policy setting out how it follows up on recommendations made in its inspections and reviews. In 2019/20, we will publish a revised follow up policy which will provide further detail on the arrangements we are putting in place for co-ordinating and delivering all of our follow up work.

The systems being developed as part of our ICT change programme will enable us to improve the way in which we interact with and capture intelligence about organisations in Wales. This is in turn will support us in making high quality and timely decisions, in particular where standards are not met and there is a need for escalation. In addition, we have commenced a piece of work to review and improve the guidance published on our website so that those providing or considering providing independent healthcare services in Wales understand their legal responsibilities.

HIW continues to work with Welsh Government on immediate policy and legislative developments around the introduction of a duty of candour and a duty of quality, as well as revised board governance arrangements and the introduction of a new citizen's voice body.



### Actions

Monitor our approach to inspections and reviews to ensure they remain relevant and effective.

Improve our communication with current and prospective independent healthcare providers.

Work with Welsh Government to review the scope and application of the legal powers available to HIW.

### During 2019 - 20 we will:

Routinely assess the suitability of our inspection approaches, putting in place a prioritised programme of work to update these approaches where necessary.

Put in place arrangements to strengthen the oversight and co-ordination of HIW's follow up activities.

Fully embed our approach to enforcement in the independent sector, including staff training and improved arrangements for tracking key stages of our unregistered providers process.

Continue to improve our interactions with those providing, or considering providing, independent healthcare services in Wales. We will complete a review of online guidance materials and increase the contact that we have with organisations between inspections.

Continue to work with Welsh Government on immediate policy and legislative developments around the introduction of a duty of candour and a duty of quality, as well as revised board governance arrangements and the introduction of a new citizen's voice body.

## To be more visible

To achieve our strategic goal, we need to build on our work to improve public and stakeholder understanding of HIW's role and the work we do.

In year one of our strategy we have worked to better use both digital and traditional media to communicate about our role, purpose and findings. We have introduced new digital approaches to seeking views and perspectives from patients directly before and during inspections. We have also updated public facing documents, expanded our audience on social media and attended high profile events to communicate our purpose and the findings of our work.

In 2019/20, we will build on these successes to improve our methods of communication and engagement to enable people to tell us about their experiences and for us to explain our findings. We will deliver this through developing our usage of service user groups, patient forums and by building our social media presence, both our own following and by disseminating information through partners including local authorities, third sector and community groups.

It is also important that we review the way in which we communicate the key findings of our work to make it more engaging, easily accessible and shareable across digital media.

We will review the way in which we engage with stakeholders and healthcare professionals to ensure that they can contribute to the development of HIW's work and build awareness of our role and purpose.

We will continue to use the Wales Omnibus Survey to measure public understanding of HIW's purpose and work and will gain feedback from stakeholders and healthcare professionals to gauge progress against this priority.

*'We have also updated public facing documents, expanded our audience on social media and attended high profile events to communicate our purpose and the findings of our work.'*

### **Actions**

Develop and enhance the way we listen to the public.

Improve the way we inform the public and professionals about what we do.

Develop the way we involve the public in our work.

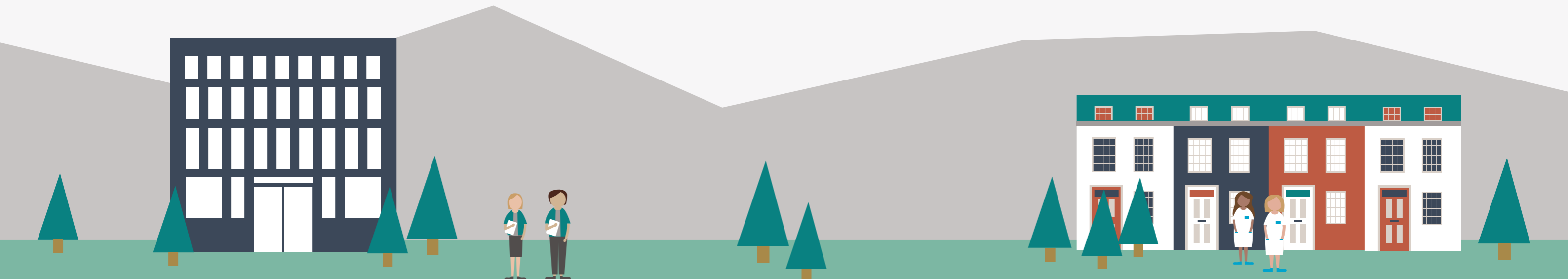
### **During 2019 - 20 we will:**

Develop the way we seek the public's views for national thematic reviews to ensure as broader reach as possible including using service user groups and patient forums.

Engage with local authorities and the third sector to raise our profile within communities and identify how we can best use established networks to communicate our purpose, work and findings.

Work with Healthcare Education Improvement Wales, professional bodies as well as NHS and private healthcare settings to build a firm understanding of our role and purpose throughout the healthcare sector.

We will continue to build our visibility and reputation through attendance at key conferences and seminars to communicate the findings and learning from our work.





## To develop our people and organisation to do the best possible job

HIW's greatest asset is its people. During the course of the past year, the organisation has made strides forward in developing as an organisation. Our latest staff survey shows improvement across all areas.

However, during a period of growth for the organisation and an ambitious work programme it is more important than ever that our people are equipped with the right tools, skills and knowledge to deliver HIW's challenging work.

We will continue with our ICT change programme, embedding new developments in our working practices whilst also making a significant investment in managing our data more effectively. This will help us to manage our work and relationships and to deliver enhanced intelligence, increasing our impact as an organisation.

Having developed a three year learning and development strategy and action plan for the organisation we will

continue to improve the learning opportunities available for all of our staff and reviewers. We will increase our investment in learning and development and ensure that all have the opportunity to request training in line with their own personal and professional development requirements.

Our NHS Relationship Managers deliver a critical role and we will improve our training programme for them to ensure that they continue to develop the skills to perform effectively in this important role.

We will also build on strengthened workforce planning arrangements to develop a workforce strategy that includes consideration of succession planning and career pathways.

*'We will increase our investment in learning and development and ensure that all have the opportunity to request training in line with their own personal and professional development requirements.'*

### Actions

Implement a change programme to enhance HIW's ways of working.

Invest in developing the skills and knowledge of our people and reviewers.

Develop a workforce strategy that includes consideration of succession and career pathways.

### During 2019 - 20 we will:

We will deliver a learning and development plan in line with our new strategy.

We will refresh and improve our induction process to ensure new staff are effective in their roles as quickly as possible.

We will develop a full training package for all NHS Relationship Managers to develop their skills and experience in line with the demands of the role.

We will strengthen the training, development and performance management arrangements we provide to our clinical peer reviewers.

Evaluate the use of voluntary lay reviewers.

We will commence the implementation of a new Data Management and Information System.



## Our Work

Our work is guided by the Wellbeing of Future Generations (Wales) Act 2015. In making decisions about the work we do through inspection, review and follow up, we consider the short term and long term needs of patients and work collaboratively with partners, patients and the community to support improvement.

We check that people in Wales receive good quality health care. To do this, we check that services provide safe and effective care which meets recognised standards.

We regulate and inspect independent healthcare and we inspect the NHS in Wales. Independent healthcare includes a wide range of providers from full private hospitals to beauty salons who use lasers. Our coverage in the NHS ranges from dentistry and general practice to hospitals.

HIW also works with other bodies to examine healthcare in other settings such as the clinical review of deaths in

prison settings undertaken with the Prison and Probation Ombudsman, and the reviews of Youth Offending Teams led by Her Majesty's Inspectorate of Probation.

We put the patient at the heart of what we do, and we make sure our work promotes and protects equality and human rights for everyone. We have a specific responsibility to consider the rights of vulnerable people, such as those who are being cared for under the Mental Health Act or the Mental Capacity Act Deprivation of Liberty Safeguards. Our responsibilities in relation to mental health span both the NHS and the independent sector.

## Performance Standards

We set explicit standards for the timeliness of our reporting:

- Where immediate assurance is required following an NHS inspection, letters will be issued to the Chief Executive of the organisation within 2 days
- Where urgent action is required following an inspection in the independent sector, the service will be issued with a non-compliance notice within 2 days
- We publish all reports 3 months after an inspection as stated in our publication policy

We also use our Operational Plan to set out clearly where we plan to focus our resources in the coming year.

We publish our performance against these standards in our Annual Report. Our Annual Report for 2018-19 will be published in July 2019.

## Our Resources

For 2019/20, we have an increased budget of approximately £4.2m. This will enable us to increase our coverage of core activity within the NHS, including follow-up work of previous recommendations, and the ability to respond to emerging in-year intelligence which gives immediate cause for concern. This funding will also enable us to conduct specific bespoke reviews and to increase the number of HIW all-Wales thematic reviews including joint reviews with CIW.

In addition we have been allocated non recurring funding to support the development and implementation of new ICT systems. We have posts equivalent to approximately 78 whole time staff.

We rely on the input of peer and lay reviewers to assist in the delivery of our inspection and review programme. We currently have a panel of over 150 specialist peer reviewers

with backgrounds including specialist and general nurses, GPs, dentists, anaesthetists, and GP practice managers. We also have specialists in Mental Health Act Administration and a panel of psychiatrists who provide our second opinion appointed doctor (SOAD) service. We are also extremely grateful to the twenty-nine individuals who have volunteered to be on our panel of lay reviewers.

Team	Whole time posts
Senior Executive	3
Inspection, Regulation and Concerns	39
Intelligence, partnership and methods	9
Strategy, Policy and Communication	5
Clinical advice (including SOAD service)	4
Business support (including recruitment, allocation and support of panel reviewers)	18
<b>Total</b>	<b>78</b>



# Annex A - Commitment Matrix

The following table is a list of HIW's specific commitments for 2019-20

Regulating Independent Healthcare	
Deliverable	Measured by
Process applications to register, or changes to registration, in a timely manner  Ensure all applicants can demonstrate they meet relevant regulation and minimum standards	- Registration applications determined within 12 weeks of full and complete submission
Conduct a programme of visits to suspected unregistered providers - As required	- Number of visits undertaken - Number of inspections undertaken - Number of reports published 3 months following inspection
Deliver a programme of inspections in independent settings - Approximately 27 laser - Approximately 19 non-laser excluding mental health	
Ensure that concerns and Regulation 30/31 notifications are dealt with in a timely and professional manner	- Number of concerns received - Number of Reg 30/31 notifications received - Analysis of source and action taken
Inspecting the NHS	
Deliverable	Measured by
Undertake a broad inspection programme in the NHS informed by intelligence and an assessment of risk including approximately - 31 general hospital inspections - 36 GP inspections - 75 dental inspections - 5 IR(ME)R inspections - 6 surgical services inspections - Of these inspections 23 include an element of follow up from previously conducted inspections	- Number of inspections undertaken
Continue our programme of national thematic reviews including: - Crisis Care in mental health - Maternity Services - Care Pathways for elderly people in Wales: Focus on Falls - National Review of the prevention and promotion of independence for older adults (over 65) living in the community.	- Publication of terms of reference of each project - Publication of thematic review
Conduct a high level review of each NHS body through - Further development of the Relationship Management function - Producing an Annual Statement for each Health Board and NHS Trust	- Publication of health board and NHS trust annual statements

## Our Work in Mental Health

Deliverable	Measured by
Undertake a programme of inspections in NHS and independent mental health settings including approximately - 15 NHS mental health units - 14 independent mental health units  Mental Health Unit inspections include reviewing the application of the Mental Health Act - 7 inspections of Community Mental Health Teams	- Number of inspections undertaken
Provide a Second Opinion Appointed Doctor service for about 1000 SOAD requests	- Key Performance Indicators

## Sharing what we find

Deliverable	Measured by
Publish reports from all our inspection and review activity in accordance with our performance standards.	- Publication of reports - Publication Schedule - Publication of HIW performance against targets
To actively share our findings and recommendations with stakeholders, service providers and the public to influence and drive improvements in health care. In particular in relation to: - Hospital Inspections - GP Practices - Dental Practices - Mental Health Act Annual Monitoring Report - Deprivation of Liberty Safeguards (DOLS) - IR(ME)R - Lasers - HIW Annual Report	- Publication and dissemination of our findings in a number of ways including: - Learning events held - Learning bulletins distributed - Case studies of good practice distributed - Improved website content

## Working with others

Deliverable	Measured by
Continue our joint inspection work with UK agencies - Approximately 16 death in custody reviews with the Prison and Probation Ombudsman - Up to 3 joint reviews with HMI Prisons and HMI Probation	- Number of inspections undertaken
Continue our joint work with other UK and international agencies on joint inspections and influencing best practice	- Participation in joint work - Consolidation of key findings and emerging themes on youth services found by Inspection Wales members.

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