

How to write inspection reports for primary medical services

Guidance for inspectors

July 2015

This guidance gives you the information you need to produce your inspection reports.

1. Process

You will use two systems for reporting after inspections: CRM and the digital publishing tool:

CRM

The inspection record continues to be the place where you store documents, information and reports. You also still send out correspondence and reports from the inspection record. Guidance on using CRM is available here.

Digital publishing tool

You should use the publishing tool to produce all your inspection reports. If you don't already have a publishing tool account, the Digital Development Team will send you an email with your account and login details. You will need to download draft and final inspection reports (as PDFs) from the publishing tool and save them into CRM so they can be sent out to the location at the relevant stages. We publish the final report directly from the publishing tool to our website, and the ratings and the letter from the Chief Inspector are also extracted and displayed on the location's profile page.

If you have any problems accessing or using the publishing tool, please email digitalpublisher@cqc.org.uk and state the location name and ID you need access to.

Guidance on using the digital publishing tool is available here.

Publishing the final report

The Digital Development Team have developed functionality within the Digital Publisher for inspection leads to now be able to publish reports themselves.

The new functionality enables you to select a future publication date in order to decide when a report is published and to help co-ordinate publication with press releases where required. Dates can be set in advance, but the earliest publication date that can be selected is for two clear days after clicking 'Publish'. However, the Digital Development Team can arrange for an earlier publication date in urgent situations. The new functionality also enables you to cancel publication at any point before the report goes Live on the website.

This new functionality will go live on 08 December 2014 and from this date you will notice a change to your dashboard in the Digital Publisher, with new columns for:

Publish Status - showing the status of your report as:

- Draft i.e. report not yet published;
- o Pending Publication i.e. submitted for publication; and
- o Live i.e. on the website

Publish Date

Operations – with function links to:

- Edit report
- Download a PDF (without having to go into the template)
- Publish/Cancel Publication

Publishing dates can be found here.

2. Style and content

Remember that the purpose of the report is to record and communicate your findings and judgements. When writing your report, it's important to keep in mind who is going to read the report and how they will use it.

You might feel you're repeating yourself when you write the individual detailed findings and summaries, and then the overall summary. But remember that the public will mostly only read the summaries, and the detailed findings are much more useful to the practices. This means that both parts are equally important and it is essential that the summaries reflect the main points of the detail, and vice versa.

If there is an area for concern, then it should be mentioned in both the summary as well as the detailed findings.

All PMS reports must be written for a location. For NHS GP practices and GP out-of-hours services, we are reporting against the five key questions. In addition, we will report against the six population groups for **NHS GP practices only**. You should include your detailed findings for each population group under each key question. However, you must also write a summary for each population group to feed the website and show ratings.

We are aware of some registration issues with GP out-of-hours services. For some providers, all places where they carry out a regulated activity are registered as locations (where they provide out-of-hours services). Other providers have been registered with just one location, their headquarters, and the places where they carry on a regulated activity (where they provide out-of-hours services) are classed as 'satellites'. There could be anything from two to 15 or more satellites. Our current position is that if you inspect a location, you will have to write a location report.

When you inspect a location that is the headquarters (where the out-of-hours services are managed from) and you also inspect a number of satellite sites, you will need to clearly state the address of the sites visited within the 'Background' section of the report. You will also need to list details of <u>all</u> the satellite services/addresses that are managed from the headquarters location (whether visited or not) in this section.

You must check the spelling on all reports (for a shortcut to the spellcheck function in Word, press the F7 key on your keyboard).

Follow CQC's editorial house style and write in clear, plain English. The guidance can be found here.

When writing about the background to the service, use the present tense but when reporting what you found, use the past tense.

In the publishing tool, the 'overall summary' section is where you need to write the letter from the Chief Inspector of General Practice (see the guidance in the Word template).

Corroborate your findings and answer the 'so what' question, but don't use the phrase 'This meant that....'

Wherever possible, say how many people told you something. Be careful not to include information in a way that will identify people; this is particularly important with smaller services.

Avoid using jargon. Where you can't avoid using technical terms, explain what they mean.

Avoid using acronyms unless they are universally understood, for example 'NHS' or 'GP'. If you have to use acronyms, write the relevant title in full the first time you use it in each section, followed by the acronym in brackets, for example, 'Care Quality Commission (CQC)', 'COPD (chronic obstructive pulmonary disease)' or 'patient participation group (PPG)'. After that you can use the acronym on its own.

Make sure the font, font size and spacing are consistent throughout the report. Don't copy and paste paragraphs into more than one section of the report as this makes it repetitive to read.

Using the active voice instead of the passive voice makes sentences more concise, clearer and easier to read. That is exactly what we want from our inspection reports so that members of the public, and the GP practices we're inspecting, can use the information we give them in a meaningful way.

The best way to explain this is to give some examples:

Passive ×	Active ✓
Patients were referred to other services if specialist care was needed.	Doctors referred patients to other services if they needed specialist care.
Learning was shared by the practice with staff.	The practice shared learning with staff.
The views of patients had been sought and were taken into account on how the practice was run.	The practice asked patients for their views about how it managed services and took account of their feedback.
Discussions and observations within the pharmacies at both surgeries showed that the dispensing of medication was well organised and safe.	We spoke with staff in the pharmacies at both surgeries and saw that they dispensed medication in a well organised and safe way.

We were told by members of the PPG that their voice was heard by the practice.

Members of the PPG told us that the practice listened to them.

Don't copy and paste the KLOEs and characteristics of ratings into reports. They are prompts and guidance and are not to be used as standard sentences for reporting.

Population group summaries

When writing population groups summaries you may need to describe why there is a rating of inadequate even though the evidence for that specific population groups looks positive. This will need to be described in the summary as follows (the key sentence is shown in red, the rest will need to be tailored to the particular practice/findings):

Example - The provider was rated as good for caring overall and this includes for this population group. The provider was rated as inadequate for safety and for well-led and requires improvement for effective and responsive. The concerns which led to these ratings apply to everyone using the practice, including this population group.

3. Comprehensive inspection reports

There is a word version of the report template, which contains guidance on how to complete each section. You can use this to familiarise yourself with the new approach and use off-line.

You can see the word report template <u>here</u>.

There is also a word version of the report template with illustrative text. This illustrative text is intended to help you draft your report by providing examples of how and where to present your evidence, what evidence you could include and to indicate the level of detail needed in your report.

You should not regard this text as standard text to be copied and pasted. You will need to amend it to include the specific evidence, findings and examples you find on your inspection. This will mean adding and deleting as appropriate to ensure that all relevant evidence is included in each section and that the final text accurately reflects your findings and conclusions.

In general, the illustrative text in the detailed findings section of the report describes a 'good' provider. However, even for a 'good' service, you will need to ensure that the illustrative text is appropriately tailored to the provider.

You should carefully proof read each completed section to ensure that what you have written is tailored, accurate and coherent.

You can see the word report template with illustrative text <u>here</u>.

Writing about breaches of regulations

Where the provider did not meet requirements, you will need to state which regulation(s) was not being met in the requirement notices / enforcement action sections at the end of the report.

In the 'our findings' section of the report, you should include the analysis of the evidence that led to your judgement, but do not state the regulation within the summary or findings sections.

Use the current regulations (April 2015) to make judgements of a breach of regulations.

Explain the breach of the regulation in either the 'requirement notices' or 'enforcement action' section as appropriate, along with a description of how the regulation was not being met. Breaches should be collected together for a single regulation so there is one requirement notice which sets out a number of ways in which the regulation has been breached.

We cannot publish the details of enforcement action until the provider has been given the opportunity to appeal against the action. The representation period for Warning Notices is 10 working days.

If you judge that the provider meets the all regulations, you can still state actions the provider should take in the 'areas for improvement' section of the report. These may be useful to the provider and to the public about where minor improvements could be made.

4. Focused inspection reports

We carry out a focused inspection to:

- Follow up compliance actions / requirement notices and warning notices
- Monitor a location after we have served a notice of proposal
- Look into new concerns
- Explore a theme as part of a national programme

We use the publishing tool to write all focused inspection reports.

We now write separate focused inspection reports (for example, when following up requirement notices), rather than having to ask for the previous comprehensive report to be 'cloned' and editing in additional content.

A desk-based follow-up review is also a focused inspection and the guidance below is relevant. Please see this <u>guidance</u> for when a desk-based review can be carried out.

When planning a focused inspection, inspectors create the inspection record in CRM as 'New Approach - Focused'. The inspection planners will complete the bulk uploader spreadsheet and the report template will be created and will be available on the dashboard in the publishing tool. The report template is the same as that used for comprehensive inspections.

In the publishing tool, each section of the report has a checkbox or dropdown that can be used to exclude it from the final report. Focused inspections do not normally assess performance against all five key questions / six population groups and may not make any requirement notices or lead to enforcement action; inspectors must exclude key question sections (detailed and summary) that were not assessed and make sure that the requirement notices and enforcement sections only show when needed.

A focused report will not need to duplicate any of the findings already reported on in a previous comprehensive inspection report.

The pdf created by the digital publishing tool for sending to the provider will include all of the report sections not excluded.

All focused inspection reports will include:

- The overall summary section (letter from the chief inspector)
- Key question summary section(s) for those that were inspected on the focused inspection (including rating/s)
- Population group summary section(s) for those that were inspected on the focused inspection (including rating/s) note there may not be any population group summaries if not inspected as part of the follow up
- Why we carried out this inspection
- Detailed sections for the key questions that were inspected on the focused inspection (including rating/s).
- Where needed, the tables for requirement notices and / or enforcement action.

Where the focused inspection takes place within 6 months of the last comprehensive inspection the location's overall rating is re-assessed using a fresh ratings aggregation tool and the inspector's judgement. Where the focused inspection took place after 6 months the overall rating is not reassessed.

Where a focused inspection is carried out to follow up concerns from a comprehensive inspection, the focused report should only show the findings and ratings from the key question/s and population group/s inspected.

Please note: If you select 'no rating given' on the ratings page, the publishing tool will think that you have inspected all key questions, but decided not to rate and will NOT allow you to exclude the sections not inspected. Therefore inspectors will need to select 'do not include in report' under ratings where there was not a follow up.

The website will then display a combination of the original ratings not followed up (from the comprehensive inspection) and the new ratings from the focused inspection. Do NOT select 'no rating given' for the areas not followed up as this will delete the ratings given at the comprehensive inspection.

The focused report replaces the comprehensive report on the top level of the website, so it is important that the summary explains why the focused inspection was done, and that the last comprehensive inspection report remains available through the 'All Reports' link on the location's 'Overview and CQC Inspections' page on our website.

Report writing guidance by section

Overall summary (letter from chief inspector)

Please add the following:

We carried out an announced / unannounced comprehensive inspection of this practice on <date>. A breach / breaches of legal requirements was / were found. After the comprehensive inspection, the practice wrote to us to say what they would do to meet legal requirements in relation to <the breaches>.

We undertook this focused inspection to check that they had followed their plan and to confirm that they now met legal requirements. This report only covers our findings in relation to those requirements. You can read the report from our last comprehensive inspection, by selecting the 'all reports' link for <location name> on our website at www.cqc.org.uk

Where the focused inspection was to look into concerns, add the following:

We carried out an announced / unannounced comprehensive inspection of this practice on <date>. After that inspection we received concerns in relation to <summarise concerns>. As a result we undertook a focused inspection to look into those concerns. This report only covers our findings in relation to those/this topic. You can read the report from our last comprehensive inspection, by selecting the 'all reports' link for <location's name> on our website at www.cqc.org.uk

Add key findings (as you would for a comprehensive inspection report).

Key question / population group summary section/s

In this section you must complete a summary for each key question / population group that was re-inspected in the focused inspection (remember to exclude sections not inspected).

If the follow-up inspection only looked at specific areas under a key question, these will need to be reported under the summary section (but only the areas inspected on the follow-up – do not add any details from the previous comprehensive report).

For example you may have re-inspected infection control and medicines management and the summary for these areas only will be reported on.

Why we carried out this inspection section

Please add the following:

We undertook an announced / unannounced focused inspection of <location> on
date>. This inspection was carried out to check that improvements to meet legal requirements planned by the practice after our comprehensive inspection on
comprehensive inspection date> had been made. We inspected the practice against <number> of the five questions we ask about services: is the service <add relevant key

question/s> <and against the following population groups <insert if relevant>>. This is because the service was not meeting some legal requirements.

Key question / population group detailed findings section/s

In this section you must complete the detailed findings for each key question / population group that was re-inspected in the focused inspection (remember to exclude sections not inspected).

If the follow-up inspection only looked at specific areas under a key question, these will need to be reported under the detailed findings section (but only the areas inspected on the follow-up – do not add any details from the previous comprehensive report).

For example you may have re-inspected infection control and medicines management and the findings for these areas only will be reported on.

Sometimes we will carry out more than one focused inspection, or we may need to look into concerns that came to light after a follow-up inspection. In these situations you will need to adapt the above to meet the particular circumstances.

5. Easy read reports

As an organisation, we are committed to produce easy read inspection summaries of all inspections on request (usually from a member of the public, someone who uses services or the provider – but occasionally from the inspector when they are aware of a specific need).

The organisation doesn't get many of these, and the requests are generally fulfilled by the requestor emailing accessible.communications@cqc.org.uk with a link to the inspection report asking for an easy read report and who to send it to (like other requests for accessibly products/services like interpreters, language translations, etc.)

These will be produced in-house or through the CQC supplier.