

[National Assembly for Wales](#)

[Health and Social Care Committee](#)

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

Evidence from Aneurin Bevan Health Board – HIW 27

Aneurin Bevan Health Board

Comments regarding the National Assembly for Wales’ Health and Social Care Committee’s Short Enquiry into the work of Healthcare Inspectorate Wales (HIW)

Aneurin Bevan Health Board welcomes the opportunity to provide comments with regard to the above enquiry into the work of Healthcare Inspectorate Wales (HIW).

Firstly, the Health Board wishes to emphasise the importance of having a strong and independent regulator focused on the quality and safety of the provision of health services in Wales. The criticality of this is clear to ensure Welsh Government, NHS organisations and most importantly patients, their families and carers in Wales are given assurance that NHS services are independently assessed and evaluated based on a common framework of standards and expectations with regard to the quality and safety of services. It is suggested, however, that HIW currently has more work to do to ensure that its important work is known and understood by the people of Wales and therefore, that it is seen and considered to be an important and trusted source of assurance for patients and the public.

It is crucially important for the NHS Wales in order to work openly and transparently and clearly in the interests of patients and the public that we have a regulator that is high profile, instils confidence and demonstrates that it is making considered judgements. Also, an inspectorate that seeks to ensure that NHS services continue to improve, meet patient needs and also patient expectations.

Aneurin Bevan Health Board also wishes to highlight the importance of having an independent regulator such as Healthcare Inspectorate Wales as a source of advice, guidance and challenge for the service. The Health Board’s relationship with HIW over recent years has always been

appropriately challenging and constructive, but also developmental. The Health Board has worked closely with HIW on a number of key, high profile areas, such as Homicide Reviews, Serious Case Reviews and specific issues such as the period when the Health Board's Maternity Services, albeit prior to the establishment of the Health Board, were placed in Special Measures. The Health Board has actively worked with HIW to ensure the new organisation responded to their concerns with regard to maternity services and with their support and guidance had the special measures status removed following a demonstration of real improvement in performance and quality of our maternity services.

Also, in relation to Homicide Reviews, as the Committee will be aware, these are very difficult periods of time with many associated sensitivities for the families concerned and also those involved from our local services. However, HIW responded to these instances with professionalism and sensitivity. These were difficult discussions for public services and the NHS in particular. However, HIW provided constructive criticism from both professional and patients and service user perspectives. Although HIW worked with us closely and advised our response they were able to maintain and protect their independence as a regulator, but also be clear about expected standards and how these could be achieved to ensure the Health Board's and our partners responses were compassionate and appropriate to provide the required assurance of service improvement going forward.

The Health Board also has experience of HIW's approach to unannounced service visits with regard to standards of services, especially in relation to cleanliness checks at our hospitals and facilities. These have been undertaken professionally and the reports received have been constructive and helpful to further inform service improvement. However, on a number of occasions there has been a time lag in receiving the final reports, which has meant that when they are published they are somewhat out of date and are historical as services have improved. However, at the time of publication this is not always made clear and it can undermine confidence in current services. Also, an area of clarity in this area, would be with regard to the role of HIW vis-a-vis the role of Community Health Councils in their inspection visits as it is currently not clear how much liaison takes place between HIW and CHCs and whether assurance could be taken from the range of visits undertaken by each body to provide a co-ordinated approach for the future.

The Health Board has reflected that working with and responding to HIW does require a significant investment in time and resources, but this investment does provide added value for the organisation and most importantly builds trust and provides clarity with regard to expectations. The Health Board continues to be very supportive of the Standards for Health Services in Wales and the Board, Executive Team and service levels throughout the organisation and continue to have regular contact with HIW under the banner of the Standards. However, this emphasises even more, the need to ensure that contact is regularised and continues over time to ensure that the profile of HIW within and outside organisation continues to build and is understood.

It is also important therefore, that HIW does not work in isolation and triangulates its work with other key bodies, such as the Ombudsman's Office, Wales Audit Office and the Care and Social Services Inspectorate for Wales (CSSIW). The relationship with CSSIW has become increasingly important over recent years in terms of the increasing levels of joint provision between Health, Social Care, the Third Sector and the Independent Sector to ensure that patients and service users receive seamless and integrated care. Therefore, further consideration needs to be given with regard to how the integrated nature of these services will be regulated and inspected and how their performance and quality is assessed going forward. The Health Board is aware of the Concordat that is in place between auditors, inspectors and regulators, but it is still not clear how effective the Concordat has been in sharing approaches, avoiding duplication and providing an integrated approach to inspection and regulation in an environment where increasingly partnership delivery and the requirements of partnership governance are a daily reality.

Therefore, it would be helpful going forward if HIW and the range of auditors, inspectors and regulators could better co-ordinate their reviews. It is suggested that reviews could be themed across these bodies and that collective and joined up activity could be undertaken to contribute to integrated reviews. This would provide better alignment with regard to expected standards and clarity for inspected bodies and services. It would also provide integrated outputs and shared observations, which would triangulate views and enable organisations and services to respond in integrated and whole system ways.

Finally, the Health Board considers that it is crucially important following the publication of the Francis Report in England with regard to the Mid Staffordshire Foundation NHS Trust and HIW's recent work in Wales with

regard to Betsi Cadwaladr University Health Board that securing the future of a clearly independent regulatory role for the NHS in Wales is fundamental and lessons could be learned from the role and activities of the Care Quality Commission in England. Regulation and inspection in Wales needs to be progressive drawing on developmental practice nationally and internationally, especially as the governance systems of the NHS and partners are changing and the visibility of patient experiences and expectations are rightly brought to the fore. It will be important that our regulators and inspectors are ahead of this change and are able to pick up this new intelligence and ways of working to provide a clear framework of standards, expectations and inspections which is clearly focused on getting things right for patients and service users the first time and every time.

The Health Board hopes that these comments are helpful. If you require any additional information with regard to this response, please do not hesitate to contact us.