

Mr Ian Trenholm  
Chief Executive, Care Quality Commission  
Sent by email only



4 March 2021

Dear Ian,

Thank you for the opportunity to provide PHSO's views on CQC's draft corporate strategy.

PHSO supports CQC's commitment to continuous improvement which is evident in the draft strategy. The COVID-19 pandemic has been a catalyst for change across health and public services and has highlighted the importance of supporting NHS organisations, Government departments and other public services to learn from both successes and challenges. PHSO has been publicly calling for an independent lessons-learned review into the response to COVID-19 as learning and improvement are essential if public services are to strengthen their approach to future pandemics and emergencies.

### **People and communities**

The strong emphasis that the draft strategy places on the value of listening to service users and enabling them to give feedback and share their concerns is one PHSO supports. This will be a key focus of the NHS Complaint Standards, which PHSO will publish later this month. I would like to take this opportunity to thank you for the support that CQC has offered in helping develop this work. By creating a positive feedback culture, patients, their families and carers will find it easier to discuss their views and experiences in an open and responsive environment and be more confident their feedback will be acted on by staff.

PHSO welcomes the draft strategy's focus on enabling people to give feedback in different ways, especially those who experience poorer outcomes and are less likely to give feedback or make a complaint. Meaningful collaboration with patients, their families and carers is critical to ensure that services are designed to meet patients' needs effectively. It is therefore important to have appropriate mechanisms in place to listen to people's experiences and ensure their feedback improves the quality and safety of services.

We also support CQC's commitment to reduce inequalities in people's outcomes by ensuring that everyone is able to develop the necessary skills and tools to provide feedback. This aligns with a commitment in PHSO's own draft strategy that we consulted on last year, and which aims to explore how best to reach those who do not currently bring complaints to PHSO. Although we were unable to secure funding for this work as a result of the truncated Comprehensive Spending Review, it is an issue we will revisit as part of our funding bid next year assuming that we revert to a 3-year, rather than annual, process. It is important to improve how feedback is recorded and



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analysed to quickly identify how to drive up the quality of care. Learning must be acted on quickly to reduce the number of patient safety incidents and improve the quality of care and patients' experiences.

### **Smarter regulation**

PHSO welcomes the draft strategy's focus on taking a more flexible and targeted approach to responding to risk. We also support the move to assessing quality of care continuously and ensuring that provider ratings convey up-to-date views on the quality of care.

It is important to promote a culture of psychological safety so that staff and patients feel comfortable speaking up when things go wrong. Feedback and complaints are a valuable source of insight to understand what is happening at a provider. It will be important, therefore, that the final version of the strategy demonstrates CQC's commitment to proactively seeking feedback and concerns in order to respond to them effectively. PHSO will begin to publish its casework decisions from April 2021, which will provide valuable additional insight on the quality of care that is delivered by NHS services, and augment the information that organisations like the CQC itself publishes.

### **Safety through learning**

PHSO particularly welcomes the draft strategy's focus on improving safety through learning. Fostering a culture of learning from mistakes is critical to improving services. PHSO supports the draft strategy's aim to define what is meant by safety across services and health and social care. We look forward to contributing to this discussion through our ongoing working relationship.

We support the draft strategy's focus on an open and honest culture. Concerns and complaints are a vital opportunity for an organisation to develop and improve its service. PHSO's casework shows that a culture of learning is essential in supporting improvement in patient safety. The draft strategy aligns with the key principles of the forthcoming NHS Complaints Standards, which emphasise viewing complaints as an opportunity to drive improvement, as well as welcoming and being open to learn from feedback. Our 2016 report *Learning from Mistakes* focused on building a culture of learning in the NHS - and, crucially, taking accountability for putting that learning into practice - and informed our approach when developing the NHS Complaint Standards.

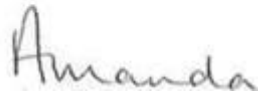
PHSO is also pleased to see the focus the draft strategy places on good leadership as key to creating safety cultures. PHSO's casework shows the importance of effective leadership and governance to drive improvements in patient safety. We have previously highlighted the importance of culture and effective leadership in our recent reports. In *Missed Opportunities: What lessons can be learned from failings at the North Essex Partnership University NHS Foundation Trust*, for example, we recommended that NHS system leaders should consider how they can provide collective and collaborative leadership to create a positive, just culture in which leaders and staff in every NHS organisation feel confident to openly raise concerns, ask questions, investigate issues and report, learn and improve patient safety.

## **Accelerating improvement**

Finally, PHSO welcomes the draft strategy's aim to establish and facilitate national sector-wide improvement coalitions and partnerships. PHSO is keen to explore how we could contribute to learning alongside other organisations by using the unique evidence base from our own casework.

I look forward to hearing about how the work on your strategy is developing at our next meeting.

Yours sincerely,

Regards,  


**Amanda Amroliwala CBE**  
**Chief Executive Officer**  
Parliamentary and Health Service Ombudsman