

## Notes of meeting with CQC on 18<sup>th</sup> March 2010 – registration application form walkthrough

### *General Points*

The registration regulations have now passed through parliament. CQC's guidance about compliance, essential standards of quality and safety will be updated to reflect this. Further small amendments will be made to the document and it will be re-published in April. A copy will be sent to the provider at every service that is currently registered under the Care Standards Act 2000.

### *How CQC will approach registration*

1. Registration is a 'test of non compliance'. CQC want to ensure that they take a pragmatic and reasonable approach when considering applications for registration for existing registered providers. Evidence will only be called for if CQC has any concern about the validity of any declaration of compliance against the 16 quality and safety regulations (Regulated Activities Regulations 09).
2. CQC have agreed to consider putting 'pdf' version of the application form on their website so that providers are able to see what information they will be asked for. CQC are urging providers to apply electronically because this will be the easiest format for both providers to use and CQC to process. There will be a paper process for those providers who do not have, or are unable to use, a computer.

### *Preparing to apply for registration*

3. In CQC's Guidance about compliance, essential standards of quality and safety, at the beginning of each outcome it sets out what the regulation itself says followed by an outcome statement in a lilac shaded box. To declare compliance against the 16 quality and safety regulations providers should look at both of these and consider whether or not they are meeting each regulation.
4. Providers are not declaring compliance against each of the prompts beneath the regulation and outcome statement. But, this is for this initial registration only (those providers **currently** registered under the Care Standards Act 2000). New applications for registration and ongoing compliance checks

against the regulations **will** be expected to use the prompts as a guide on how to comply with the regulations.

5. If, when the regulation and outcome statement has been considered, providers are still unsure about whether they can confidently declare compliance, the prompts in Stage 2 of CQC's Guidance about compliance – judgement framework should be used. These are the prompts that CQC's assessors/inspectors will use to help them when they are assessing provider applications.
6. Providers should think about what regulated activities they carry out and at what locations.

### ***Updated guidance for providers***

7. New and updated guidance has been published on CQC's website:

#### ***General information:***

<http://www.cqc.org.uk/guidanceforprofessionals/socialcare/careproviders/registration/newregistration.cfm>

#### ***Scope document -***

[http://www.cqc.org.uk/\\_db/\\_documents/PoC2A\\_100001\\_Scope\\_of\\_registration\\_EXTERNAL\\_PUBLICATION.pdf](http://www.cqc.org.uk/_db/_documents/PoC2A_100001_Scope_of_registration_EXTERNAL_PUBLICATION.pdf)

#### ***Guidance about compliance -***

<http://www.cqcguidanceaboutcompliance.org.uk/>

#### ***Locations guidance -***

[http://www.cqc.org.uk/\\_db/\\_documents/RP\\_PoC2A\\_300900\\_20100317\\_v3\\_00\\_Guidance\\_on\\_location\\_FOR\\_EXTERNAL\\_PUBLICATION.pdf](http://www.cqc.org.uk/_db/_documents/RP_PoC2A_300900_20100317_v3_00_Guidance_on_location_FOR_EXTERNAL_PUBLICATION.pdf)

#### ***How to apply booklet -***

[http://www.cqc.org.uk/\\_db/\\_documents/RP\\_PoC2A\\_200071\\_ASC\\_IHC\\_How\\_to\\_apply\\_FINAL.pdf](http://www.cqc.org.uk/_db/_documents/RP_PoC2A_200071_ASC_IHC_How_to_apply_FINAL.pdf)

#### ***CQC How CQC use conditions of registration***

[http://www.cqc.org.uk/\\_db/\\_documents/RP\\_PoC2A\\_100615\\_20100317\\_v1\\_00\\_conds\\_guidance\\_trans\\_IHC\\_ASC\\_applicants\\_FOR\\_EXTERNAL\\_PUBLICATION.pdf](http://www.cqc.org.uk/_db/_documents/RP_PoC2A_100615_20100317_v1_00_conds_guidance_trans_IHC_ASC_applicants_FOR_EXTERNAL_PUBLICATION.pdf) will shortly issue guidance on how to use the application form.

### ***What CQC will do***

8. Will be writing to each provider shortly to confirm with them the email address they want CQC to use for all future communication with them.
9. When they have this address they will use it to:
  - Email the log in and password details so that providers can fill in their application form
  - To send providers their electronic certificate of registration once registration is approved
  - To send all future correspondence, including statutory notices
10. Once CQC have confirmation of the email address to use. They will send providers (through the postal system) a letter telling them their log on information and individual identification number.
11. So that CQC can manage the number of applications that need to be processed, they will use a batch approach. Providers will be given a four week window in which to make their application. CQC will notify each provider of their window. The principles for deciding who goes into which batch are:
  - 1 Less complex providers, likely to be those who currently hold a good or excellent quality rating
  - 2 Corporate providers
  - 3 Poor providers

### **Using the on-line application form**

12. We were taken through the on-line application process. Key points are:
  - The application form will allow providers to identify who will fill in the information for each location. There will be a system that allows those 'authorised' persons to access the form to fill it in for the specified locations. One person can be authorized for more than one location
  - There is a 'save and continue' function. But this function is only active once a whole page as been filled in. It is offered as an option button at the end of each page.
  - The application form can be printed.
  - The document can be saved to a computer. If providers use the save and continue later option then it will be important to make sure that when

going back into the document providers fill in the 'on line' version and not the version saved on the computer.

- Information can be 'cut and pasted' into the form. For example, an action plan prepared in a *word* programme can be cut and pasted into the application form.
- Some information about the provider will be pre-populated into the application form.

## **Form set up**

- The first part of the form is called 'form set up'. This is where each regulated activity is identified and for each activity the locations where it is carried out. There is a 'submit' button at the end. It is important not to press 'submit' until providers are absolutely certain that all the activities and their locations have been entered. Once 'submit' is selected providers will not be able to go back in and add or delete activities or locations.
- Information you enter into other parts of the form can be edited later it is only the 'form set up' section that cannot be edited once the submit button for that section is selected.
- In 'form set up' the name you enter for a location will appear on the certificate and on the website. For example, a care home may be known as The Old Rectory, but on the website, to aid people searching for services, it might be better if it appeared as The Old Rectory Care Home . If so, it needs to be entered as the latter as it is this entry that will trigger the website and certificate detail.
- For each activity providers will need to declare whether or not they are compliant with the 16 quality and safety regulations. This is a yes/no selection and needs to be done for each location. Once you have filled in the 'form set up' providers the form automatically sets up the location forms to be filled in.

## **Statement of purpose (SoP)**

- Statement of purpose is not sent in with the application, it will be asked for some time after the 1<sup>st</sup> October 2010. In the new regulations the SoP is now a document for CQC's use. There is a current CQC project looking at how the SoP should be presented and how CQC will use the data within it.

## Respecting people who use services/ Equality, Diversity and Human Rights

- There are a set of 3 questions to answer for each topic. 2000 characters/300 words allowed for each question

## Registered managers

- For each location there is a section to fill in about the registered manager. If there is no registered manager this can be selected, even if a current application is in progress. Any changes to registration under the Care Standards Act will be recorded and linked to the application to ensure that the inspector/assessor has the information at the point they assess the application.
- In this section the registered manager will be asked for their email address. This is the address of the service **NOT THE PERSONAL EMAIL address** of the registered manager. Where the service/location does not have access to the internet, the email address of the organisation should be used.
- Once the whole application form is completed a separate form is produced with all the managers' names on. Separate signatures for all managers are needed. The application form can be submitted without this document but it should follow soon after. At the meeting we emphasised that for a large organization getting all managers to sign a single document would be very difficult. Although having one document per application would be better for CQC they have acknowledged the difficulty with this proposal and are looking into how this can be resolved. Our preferred approach is one signature sheet per location.

## Partnership applications

- Once the application form is completed a separate sheet will be produced for all partners to sign to confirm their agreement with the information within the application form.

## Service types

- The service types **DO NOT** form part of the statutory registration. Registration is for the regulated activity only.
  - o The services types, ie Domiciliary Care (DCC\*), Care Home without nursing (CHS\*) Supported living (SLS\*) etc have been used in CQC

Guidance about compliance essential standards of quality and safety to help those traditional models of service delivery identify where there might be some additional prompts in the guidance for their particular service. (\*codes used in CQC's guidance about compliance)

- o Providers will be asked to identify which service type they think they fall into. For example, if providers currently view their model as a Supported Living service then that is the box to tick. Looking at the additional prompts for a service type in the CQC guidance should also help confirm which one to select.
- o Inspectors and assessors will use this information when assessing services for ongoing compliance, but providers should not be too concerned if they have selected the wrong service type this can be discussed with inspectors after registration and during compliance checks.
- o The service types selected will not be reflected on the registration certificate or on CQC's website

### **Service user band**

- This section of the form will ask providers to identify the types of needs that their service meets. It includes age ranged, children, adults, and types of care needs, for example, learning disability, dementia, sensory impairment.
- These will not be routinely used to restrict a service. By selecting a service type, for example dementia care, providers are confirming that they are able to meet the needs of people. For example, adequate staffing, accommodation and staff training.
- It is the primary needs of the people using the service that should be selected. For example, it is accepted that many older people in a care home may have some form of dementia or physical disability. The primary need is personal care with accommodation due to old age. Therefore dementia and physical disability need not be selected and should only be selected if the service is providing a specialist service for people with dementia or people with a physical disability.
- CQC will expect that any of the types of need selected in this section to appear on the statement of purpose.

### **Declaring compliance with 16 quality and safety regulations for each location**

- If providers carry out more than one activity at a location, the declaration of compliance with the 16 quality and safety regulations will need to be done for each activity. So if the two activities 'personal care' and 'accommodation with nursing or personal care' are carried out at a location, two declarations of compliance with the regulations will need to be made. Those forms will be automatically generated in the application document.
- Where no compliance is declared the form will automatically ask for an action plan. There are 3 questions, why the location does not comply, what they are going to do about it and in what timescale. 2000 characters/300 words per answer.
- Non compliance is at the date you make the formal declaration - the date the form is submitted to CQC. If a provider intends to be compliant by 30<sup>th</sup> September 2010 then this is the date that needs to be entered into the action plan.

### **Conditions on registration**

- There are two types of conditions:
  - o **Restrictive conditions** – these are routine and will say what regulated activities providers are registered to carry out and the locations where they are carried out.
  - o Bed numbers will be a restrictive condition of registration. The numbers are not asked for on the application form but will be taken from the current registration information.
  - o **Compliance conditions** – will be applied where CQC have a concern about non-compliance. They will require providers to make improvements to their service.

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