



Nick Ramsay AM, Chair Public Accounts Committee

Our Ref: AG/SR/SB

16 November 2016

Dear Mr Ramsay

Recommendation 16 in the Public Accounts Committee report on 'Wider issues emanating from the governance review of Betsi Cadwaladr University Health Board' recommended the Welsh Government and Healthcare Inspectorate Wales (HIW) provide an update on progress achieved against the Marks review recommendations.

Please find enclosed the final response jointly prepared by Welsh Government and HIW that covers all the Marks review recommendations. Progress on some of the operational actions for HIW was included in the response to the report recommendations sent to the Committee in June. They are also included in the final response for the sake of completeness, and updated where appropriate.

Yours sincerely

**Dr Andrew Goodall**  
Director General Health and  
Social Services/NHS Wales Chief Executive  
Health and Social Services Group

**Kate Chamberlain**  
Chief Executive  
Healthcare Inspectorate Wales

Enc

## Public Accounts Committee Report on wider issues emanating from governance review of BCU

### Final Response for PAC on Recommendation 16:

The Committee recommends that Healthcare Inspectorate Wales and the Welsh Government provide an update on progress achieved against the Marks review recommendations, including the identification and delivery of any immediate and more straightforward priorities by March 2016.

This final response has been prepared jointly by the Welsh Government and Healthcare Inspectorate Wales (HIW) and covers all of the Marks review recommendations. Some of the operational actions for HIW have been reported to the PAC previously but are included below for the sake of completeness, and updated where appropriate. Where further work is required, this is indicated and will be taken forward separately.

No	Marks Review Recommendation	Progress	Commentary
1	<p>The Welsh Government should ensure the new NHS Health Standards include a requirement for NHS Wales to take actions which will result in the most efficient and best services being delivered to patients and service users.</p> <p>Where appropriate, HIW and the WAO should jointly scrutinise the governance and leadership of health bodies, in particular measuring the extent to which their activities are driven by the goal of continuously improving services and aspiring to achieve world-class standards.</p>	<p>Accepted and implemented</p> <p>Accepted and implemented</p>	<p>The Health and Care Standards published in April 2015 establish a basis for improving the quality and safety of healthcare services by providing a framework which can be used in identifying strengths and highlighting areas for improvement.</p> <p>HIW has introduced a process of annual reporting to health bodies which draws together their findings and provides feedback on governance and assurance arrangements.</p>
2	<p>HIW should continue to share information and coordinate inspections and reviews with the WAO, Community Health Councils, professional regulators and Medical Royal Colleges</p>	<p>Accepted and implemented</p>	<p>HIW works closely to share information and co-ordinate activity with Wales Audit Office, Community Health Councils (CHC), other</p>

No	Marks Review Recommendation	Progress	Commentary
	in order to avoid duplication and enhance the impact of their activities.		<p>professional regulators and the Medical Royal Colleges through a variety of mechanisms including</p> <ul style="list-style-type: none"> <li>• Inspection Wales Programme</li> <li>• Concordat Forum of bodies involved in the regulation of health and social care</li> <li>• Summits of bodies involved in the scrutiny and assurance of healthcare</li> <li>• Regular bi-lateral meetings</li> </ul> <p>The CHC and Academy of Medical Royal Colleges are also represented on HIW's Advisory Board.</p>
3	HIW should publicise its equality and human rights approach to its inspection activities and protect and promote the interests of people from diverse backgrounds and those who are often marginalised and socially excluded.	Accepted and implemented	<p>HIW already takes equality and human rights into account in its work and will consider what else it can do to publicise its approach. HIW's inspection methodology looks directly at the way in which people experience services through the eyes of patients and relatives.</p> <p>HIW prioritises work, in part, on the vulnerability of the individuals receiving care and have specific responsibilities in this regard relating to mental health. HIW is also a member of the National Preventative Mechanism which is made up of 20 bodies</p>

No	Marks Review Recommendation	Progress	Commentary
			<p>which monitor places of detention across Scotland, England, Wales and Northern Ireland. This includes police custody, prisons, court custody, immigration and military detention, secure children's homes, and places where people are detained under mental health legislation.</p> <p>The HIW Director of Strategy and Development also sits on the Advisory Board for the NHS CEHR.</p>
4	<p>HIW can make a major contribution to the safety and care of patients by holding boards to account for the clinical performance of doctors through the medical revalidation process.</p> <p>Therefore it should give high priority to working with the General Medical Council to ensure that Health Board leadership and governance of Responsible Officer Regulations is effective.</p>	Accepted and implemented	<p>HIW works closely with the General Medical Council through the Concordat Forum, the GMC Advisory Forum for Wales, and regular bilaterals.</p> <p>HIW also works with the Revalidation Support Unit of the Wales Deanery in their oversight of the development of the revalidation process.</p> <p>The extent to which revalidation is being properly implemented is an important consideration in HIW's assessment of an organisations governance and assurance processes.</p>
5	HIW and the Welsh Government should explore the usefulness of audit tools developed by the Royal College of	Accepted and implemented	Wherever possible, the Welsh Government has incorporated audit tools from a number of

No	Marks Review Recommendation	Progress	Commentary
	Physicians and consider whether they should be built into the new Health Standards which are being developed; and whether they could contribute to HIW's inspection programmes.		<p>sources within the supporting guidance to the Health and Care Standards.</p> <p>When developing the methodology for inspections HIW draws on the established professional best practice from a variety of sources and this would include those tools and checklists developed by the Royal Colleges. Representatives of the Royal Colleges are invited to sit on HIW's Stakeholder Reference Groups when new methodologies are being developed and the Academy of Medical Royal Colleges is represented on the HIW Advisory Board.</p>
6	<p>HIW should develop a proportionate risk-based inspection programme informed by its collation and analysis of intelligence. The inspection programme should include:</p> <p>(i) closer working with CHCs will be essential to ensure the best use of information and intelligence at individual ward level or other settings;</p> <p>(ii) learning lessons of good practice from the Welsh Government's use of spot-check visits to a substantial number of hospital wards which assessed the safety</p>	<p>Accepted</p> <p>Accepted</p>	<p>This approach is already in place.</p> <p>(i) HIW has an agreed Operating Protocol with the CHCs which was formally exchanged in March 2015. A review of this is now underway.</p> <p>(ii) HIW liaised closely with the original spot check programme and a number of the reviewers have now joined HIW's external</p>

No	Marks Review Recommendation	Progress	Commentary
	<p>and quality of care and use these to inform their development of short-form DECI inspections. This would allow a greater number of inspections to be carried out;</p> <p>(iii) continuing with its new approach to cleanliness and infection control to prevent hospital acquired infections. It should remain a top priority and capacity issues should never compromise its ability to deliver this aspect of its work;</p> <p>(iv) finding resources to increase the number of inspections it undertakes of GP practices.</p>	<p>Accepted</p> <p>Accepted, subject to other priorities</p>	<p>reviewer panel. HIW has reviewed the application of short form visits to consider how it can build on these in order to introduce the rigour of evidence capture and reporting necessary that underpins a formal inspection programme.</p> <p>(iii) A specialist task and finish group has been working with HIW to develop a three year approach to supporting the introduction of the new Infection Prevention and Control guidelines and providing assurance on their implementation</p> <p>(iv) HIW has a responsibility to operate within the budget allocated to it by the Welsh Government. The volume of GP inspections undertaken needs to be considered by HIW when it prioritises the way in which this budget is used and the impact on inspection activity elsewhere.</p>
7	<p>HIW should formalise its agreements with the following bodies:</p> <p>(i) The General Pharmaceutical Council, which is the principal regulator of the pharmacy profession in Wales; and report on the effectiveness of pharmacy regulation</p>	Accepted and implemented	<p>This has been adopted or is underway.</p> <p>(i) HIW has agreed a Memorandum of Understanding with the General Pharmaceutical Council.</p>

No	Marks Review Recommendation	Progress	Commentary
	<p>across Wales in its Annual Report;</p> <p>(ii) The General Optical Council, which is the principal regulator of the optical profession in Wales; and report on the effectiveness of optical regulation across Wales in its Annual Report.</p>		<p>(ii) HIW is undertaking a thematic review of Ophthalmology. The General Optical Council is on the stakeholder group for this review and this will provide an opportunity to test the need for a formal MOU.</p>
8	<p>HIW should expand peer, thematic and special reviews as they can improve the quality of care for patients and service users across Wales. Thematic and special reviews in particular should be further developed as they can identify solutions to problems in one service or locality that can be taken up by the whole of the sector. At the same time the regulation and inspection of healthcare services should not be compromised.</p>	<p>Mostly accepted and implemented</p>	<p>It is not the ongoing role of HIW to oversee peer review as this is something to be taken forward by the NHS in Wales. To support this, the Welsh Government has established an All Wales Peer Review Steering Group to embed the process of peer reviews across all services provided by the NHS in Wales.</p> <p>Since 2015-16 HIW has introduced the use of thematic reviews and will continue to undertake special investigations where there are matters of concern.</p>
9	<p>The Welsh Government should:</p> <ul style="list-style-type: none"> <li>Develop healthcare regulations in line with the principles of the White Paper on the regulation of social care services. The regulation and registration of independent healthcare providers should move to a service-based model of registration, instead of the registration of individual premises. This would be a sensible reform and</li> </ul>	<p>Under consideration</p>	<p>These issues, including any future legislation, are being explored following on from the 'Our Health, Our Health Service' Green Paper.</p>

No	Marks Review Recommendation	Progress	Commentary
	<p>create efficiencies for both providers and HIW as well as increasing alignment between the health and care sectors</p> <ul style="list-style-type: none"> <li>• Ensure that only one set of health standards applies across the NHS and independent sectors. HIW should work with NHS Wales, the independent sector and the Welsh Government and all other relevant bodies to develop a coherent set of standards that link with social care standards</li> </ul>		
10	<p>In relation to work in Mental Health and Learning Disability settings HIW should:</p> <ul style="list-style-type: none"> <li>• increase the volume of inspections of NHS inpatient facilities to better protect the interests of patients who have a mental health problem or learning disability</li> <li>• focus its inspection model more on evaluating patient outcomes and less on scrutinising whether appropriate processes have been followed.</li> </ul>	Accepted and implemented	<p>HIW continues to ensure that it undertakes inspections of NHS inpatient facilities.</p> <p>In addition to HIW's core programme it has carried out a thematic review with CSSIW on Learning Disabilities.</p> <p>Where appropriate HIW uses its stand-alone Mental Health Act visits to provide diagnostic information so that it can target full inspections more effectively.</p> <p>HIW's inspection, visit and review approach is already focused on examining the quality of the patient experience. Although HIW also looks at specific process issues (particularly with regard to whether legal requirements have been met) this is done within the context of the care received.</p>

No	Marks Review Recommendation	Progress	Commentary
11	<p>The Welsh Government should remove HIW's responsibility for the following functions:</p> <p>(i) supervision of midwives and the transfer of this function to an alternative host organisation should be progressed with urgency;</p> <p>(ii) carrying out homicide reviews where homicides have been committed by mental health service users. Other healthcare inspectorates across the UK do not fulfil this function, it is recognised that specialist clinical expertise is required, therefore reports are commissioned from equivalent LHB bodies. If the current commissioning arrangements are to continue then the Welsh Government should consider the resource implications</p> <p>(iii) contributing to the investigation of deaths in Welsh prisons. By their nature, these investigations are time-consuming, frequently require specialist clinical expertise and sometimes the resources which need to be allocated to them mean that HIW has had to reduce important inspection activities. The Prisons and Probation Ombudsman could obtain specialist clinical advice from Local Health Boards.</p>	<p>Rejected</p> <p>Rejected</p> <p>Rejected</p>	<p>(i) The statutory supervision of midwives is expected to be removed by the NMC in the near future and there is no benefit to transferring the function in the meantime;</p> <p>(ii) Overall it is felt that the function of homicide review should stay with HIW as it provides valuable information and learning and wider intelligence on the quality of mental health services;</p> <p>(iii) Reviews of deaths in custody are the means by which HIW fulfils its responsibility for testing healthcare provision by health boards to prisoners. This function should therefore remain with HIW.</p>

No	Marks Review Recommendation	Progress	Commentary
	(iv) assessing nurse agencies. Although this will have little impact on capacity within HIW it will help to remove duplication with the work of CSSIW.	Accepted	(iv) Responsibility for assessing nurse agencies is with CSSIW.
12	HIW should refresh its Statement of Purpose to make it patient and citizen focused. The public should clearly understand that its role is to ensure they receive the best quality treatment and care, as well as protect them from being harmed. Also, the Statement of Purpose may want to give greater emphasis to HIW's role of promoting Wales-wide improvements and innovation in healthcare, that it could be much more than an inspector of individual services.	Accepted and implemented	HIW has a clear statement of purpose, values and the outcomes it seeks to achieve which is now included in all its published plans. This has been further clarified with the launch of the new HIW website.
13	<p>As part of the proposals for the Green Paper, Welsh Government should consult on the following:</p> <ul style="list-style-type: none"> <li>• Giving HIW a full range of enforcement powers including putting an NHS healthcare provider into special measures without recourse to the Health and Social Services Minister. This will help enhance HIW's independence and</li> </ul>	Under consideration	These issues, including any future legislation, are being explored following on from the 'Our Health, Our Health Service' Green Paper.

No	Marks Review Recommendation	Progress	Commentary
	<p>assure the public that it is a strong and impartial regulator and inspector.</p> <ul style="list-style-type: none"> <li>The range of options which would make HIW a more independent inspectorate, looking at other models including Estyn, as well as the Auditor General for Wales and the Public Services Ombudsman for Wales.</li> </ul> <p>At the same time, it would be sensible to take into account the possible merger with CSSIW when exploring these options. The public could be consulted on all of these matters including a consideration of the benefits and disadvantages of creating a single regulator with responsibility for health and social care.</p>		
14	<p>HIW should further develop and publish a Communications Strategy, which will allow it to communicate more effectively with the public. It will be able to provide evidence that it is delivering a highly valuable service on their behalf. Increased interaction with patients and service users through multi-media formats will provide valuable information to support target led inspections of services where concerns are raised.</p>	Accepted and implemented	<p>HIW has refreshed its communications strategy resulting in greater and more interactive use of social media. A new website has been launched.</p>
15	<p>HIW should include more information in its Annual Report on the outputs and efficiency of work processes which serve patients, service users and other stakeholders. The number of customer care measures should be minimised, to allow scarce resources to be used to evaluate significant outcomes.</p>	Accepted and implemented	<p>HIW's annual reports are now focusing on themes and findings from its work. HIW do not only produce an Annual Report but also publicises thematic analysis of specific work programmes on a periodic basis. HIW reports openly on its performance targets, including volume and timeliness.</p>

No	Marks Review Recommendation	Progress	Commentary
16	<p>HIW to evaluate the effectiveness of their inspection and review models, to not only gain a better understanding of the performance of healthcare providers, but also as a means to help them improve the quality of inspection activities.</p> <p>Providers should have the opportunity to give feedback on whether HIW's scrutiny of their service is useful, and to what extent it helps them identify those aspects which need to be improved.</p>	Accepted and implemented	<p>HIW undertakes evaluations of its activities where appropriate. For example, it evaluated:</p> <ul style="list-style-type: none"> <li>• the new model of midwife supervision</li> <li>• learning and themes from homicide reviews</li> <li>• its approaches to dignity and essential care inspections and to mental health reviews.</li> <li>• its approach to GP inspections</li> <li>• the use of stakeholder reference groups to advise and challenge for new and/or significant areas of work e.g. Dental Inspections, GP Inspections, Mental Health activities</li> <li>• a baseline stakeholder survey early in 2014/15.</li> </ul>
17	<p>HIW to measure the outcomes of its most important areas of inspection: showing how its inspections have had a significant impact on the safety and quality of healthcare services by helping providers improve their performance.</p>	Accepted in principle	<p>Attribution of cause and effect is difficult to achieve and has also been the subject of international review without much success as reported through the European Partnership of Supervisory Organisations.</p> <p>However, HIW continues to use the learning from evaluations such as those identified above to develop the way in which its work can help to support improvement.</p>

No	Marks Review Recommendation	Progress	Commentary
18	<p>The Williams Commission recommends that if a standard of good practice is identified it should be adopted by all relevant health bodies across the whole of Wales to bring to an end unnecessary variations in the quality of services. Any departure from this principle would have to be justified. So, it would be highly beneficial for the Welsh Government to include this requirement in the refreshed Health Standards and for it to become part of HIW's regulatory regime.</p>	Accepted in principle	<p>The Health and Care standards ensure best practice is being followed and seeks to reduce variation. HIW assesses organisations against these standards. In addition, the routine sharing of good practice underpins many NHS Wales improvement programmes, including those taken forward by 1000 Lives Improvement.</p>
19	<p>HIW, after consulting with stakeholders, should publish a Statement of Risk outlining its approach to regulation and inspection. It should explain the minimum frequency of inspections and reviews it will carry out of both NHS and independent sector bodies and put this within the context of its capacity to meet these targets.</p>	Accepted and implemented	<p>HIW already sets out, in published plans, how it prioritises its work.</p>

No	Marks Review Recommendation	Progress	Commentary
20	<p>The Welsh Government should:</p> <p>(i) Consider the merits of developing a legal duty to involve service users in the governance and scrutiny programmes of HIW. They will have a say in the design, implementation and monitoring of its regulatory activities. Directly listening to the voices of patients and carers can help identify care which contributes to good health and well-being as well as unsafe and unacceptable care. HIW would be required to report to Welsh Ministers on the involvement of citizens, including children and young people, in its decision making and strategic operations</p> <p>(ii) Reflect the principles of Prudent Healthcare, patient involvement and improved outcomes for patients in the refreshed Health Standards which are in the process of being developed and become part of HIW's regulation and inspection regime. The role of HIW would be to scrutinise whether a health body is delivering outcomes for patients which they believe to be important to their health and wellbeing.</p>	<p>Rejected</p> <p>Accepted and implemented</p>	<p>(i) The Welsh Government does not believe there is a need to introduce a legal duty to ensure HIW involves service users. HIW already uses a variety of methods to ensure patient experience is taken into account, including lay reviewers as part of inspection teams, patient involvement in the development of inspection methodologies and CHC involvement in thematic reviews.</p> <p>(ii) The Health and Care Standards embrace the principles of co-production and prudent healthcare</p>
21	<p>HIW should review the implementation and effectiveness of LHBs and Trusts service user strategies, in line with the Welsh Government's guidance A Framework to Assure</p>	<p>Accepted in principle</p>	<p>This could be considered as a potential thematic review, but would need to be prioritised alongside other proposals.</p>

No	Marks Review Recommendation	Progress	Commentary
	Service User Experience, to determine whether they are genuinely involving patients and carers as a means of improving the safety and quality of services.		HIW reviews consider patients' experience and the extent of patient involvement in their own care as a matter of course.
22	The Welsh Government should place a statutory duty on LHBs, Trusts and CHCs to routinely share complaints information with HIW. This will enhance HIW's ability to fulfil its responsibility to quality assure health bodies performance in relation to dealing with concerns and managing incidents in line with the Doing Well Doing Better – Standards of Health Services in Wales; and to spot serious and systemic failure in health care at an early stage.	Rejected	The Welsh Government does not believe there is a need for a legal duty to routinely share complaints information. HIW can request this information from organisations if required, however we already expect organisations to report this information openly at their Board Quality & Safety committees and publish the papers. Work is already underway on developing all-Wales complaints data set which will allow for ease of sharing of information.
23	<p>The Welsh Government should consider developing tougher and more robust regulations to reinforce the reshaped care standards, applicable to all health care providers in both the NHS and independent sectors.</p> <p>HIW would scrutinise the implementation of the Standards and consideration should be given to increasing its enforcement powers where breaches take place.</p>	Under consideration	These issues, including any future legislation, are being explored following on from the 'Our Health, Our Health Service' Green Paper.
24	The Welsh Government should include an explicit Duty of Candour in the refreshed Health Standards in order that HIW will be able to assess the extent to which service providers are open and honest about their mistakes, why they have occurred, and what they have done to put things right. HIW will also assess whether Local Health Boards are providing	Under consideration	These issues, including any future legislation, are being explored following on from the 'Our Health, Our Health Service' Green Paper.

No	Marks Review Recommendation	Progress	Commentary
	good governance: that information is not only shared with patients, but also with HIW at the earliest opportunity and that safer services are delivered as a result of learning from errors.		
25	HIW should always carry out follow-up actions when inspection results indicate this is necessary and in the most serious instances of service failure, should be more robust in the use of its enforcement powers, and publish data on how it has used these powers in its Annual Report.	Accepted and implemented	HIW has a strategic approach to follow up, including conducting follow up visits. This is set out in the Operational Plan 2016/17. A new process for managing services of concern has been implemented. Tripartite escalation and intervention arrangements are in place for the NHS.
26	<p>The Welsh Government should:</p> <ul style="list-style-type: none"> <li>• Develop regulations to allow HIW to carry out prosecutions where professional healthcare staff provide false or misleading information.</li> <li>• Develop regulations which impose time-limited registration on services which have failed to comply with regulations and standards. This would exert significant pressures on providers to improve their performance.</li> </ul>	Under consideration	These issues, including any future legislation, are being explored following on from the 'Our Health, Our Health Service' Green Paper.
27	HIW should consider the value of developing a framework for assessing the quality and safety of all healthcare services. The framework could reflect significant patient outcomes, and be aligned with new refreshed Health Standards, the self-assurance systems that health bodies use to measure their own performance and clinical indicators used by professional regulators and Royal Colleges. The framework should be common to the work of both HIW and CSSIW as patients and	Accepted in principle	This is a significant piece of work and further consideration needs to be given to this in light of changing service provision and direction such as the development of integrated services. We continue to learn how other bodies are developing their judgment frameworks

No	Marks Review Recommendation	Progress	Commentary
	service users are increasingly receiving integrated health and social care services. Clear information would be provided to members of the public and inspection reports and results would encourage improvement and innovation by providers.		
28	<p>HIW should scrutinise whether:</p> <ul style="list-style-type: none"> <li>• Health bodies are providing the most effective clinical treatments to patients. Patients not only want to benefit from being looked after in line with essential life maintaining care such as being fed, hydrated and being assisted with going to the toilet as necessary, but they also want to receive the best available clinical treatments.</li> <li>• Lessons promoted by the 1000 Lives Improvement programme are being delivered during the course of individual inspections or reviews; or they could be the subject of national thematic reviews.</li> </ul>	Rejected	<p>HIW tests whether care and treatment is provided against the published standards. It is not HIW's role to test the effectiveness of clinical treatments. That is a matter for other bodies, such as NICE.</p> <p>When conducting thematic reviews HIW draws on best practice from a number of sources including 1000 Lives Improvement.</p>
29	<p>The voluntary arrangements which underpin the work of Inspection Wales have not supported effective collaboration and the coordination of work programmes between the 4 AIR bodies and at times this may leave patients and service users at risk because a review is not carried out.</p> <p>The Welsh Government should explore how collaborative working could be strengthened by reviewing current arrangements for cooperation and how they might be reformed through creating a statutory duty. In particular the</p>	Rejected	<p>This work has now moved on considerably with the publication of an Inspection Wales Remit Paper and Information Sharing Guidance. HIW and CSSIW have worked together on a review of services for people with learning disabilities.</p> <p>The Welsh Government does not presently see a need for further statutory duties of collaboration.</p>

No	Marks Review Recommendation	Progress	Commentary
	model of the Local Government (Wales) Measure 2009 which supports collaborative working by the AIR bodies in their review of the performance of local authorities may have relevance to the health sector.		
30	The collaborative information system consists of Concordat Cymru, Healthcare Summits and the NHS Wales Escalation Arrangements and there may be scope for clarifying how they complement each other as well as assessing whether there is any overlap and duplication of effort. HIW, Welsh Government and other bodies should consider if the current information system is as streamlined and efficient as it could be. Also, it will be useful in future to take stock and evaluate the success of the information sharing system and determine whether any changes are needed.	Accepted and implemented	Concordat arrangements have been refreshed and working practices strengthened. The NHS Wales Escalation and Intervention Framework involving the collective arrangements in place between the Welsh Government, the Auditor General for Wales and HIW, allows for an effective sharing of intelligence and coordinated action.
31	The collaborative early warning system should become the central organising principle of the work of Concordat Cymru. It must have high status and profile amongst all members and its aims and methods of working should be published across the whole of the health and social care sector.	Rejected	This is the purpose of the NHS Wales Escalation and Intervention Framework.
32	HIW should evaluate the effectiveness of the early warning system and include this in its Annual Report.	Rejected	HIW is a part of the NHS Wales Escalation and Intervention Framework and it would therefore not be appropriate for it to undertake an evaluation of its effectiveness.
33	HIW should increase collaboration with third sector	Accepted and	HIW continues to liaise and network with the

No	Marks Review Recommendation	Progress	Commentary
	organisations which offer advice and advocacy to patients and carers to gather more information about any concerns they may have about the quality of healthcare services e.g. Carers Wales, MIND Cymru and Citizens Advice Cymru.	implemented	third sector to keep up to date with the unique information of special associations and interest groups such as RNIB and AHL. Where HIW conducts thematic and/or specialist reviews HIW includes the third sector within its review advisory/steering groups.
34	HIW and CHCs to hold listening events in local communities as well as involve experts by experience in their inspection teams when an in–depth review of a particular hospital or LHB is taking place.	Accepted and implemented	HIW has a closer working relationship with the CHC since signing the Operating Protocol. This includes HIW placing reliance on the CHCs’ intelligence gathering from different sources. Lay reviewers are used in HIW’s inspections to ensure the patient perspective is captured. HIW is still exploring the idea of holding listening events and will discuss this further with CHCs when they have been able to progress further in the development of their corporate strategy, planning and standards.
35	<p>The Welsh Government should consider reforming the work of CHCs in the following ways:</p> <ul style="list-style-type: none"> <li>• CHCs must prioritise their patient advice and advocacy service and reduce waiting times.</li> <li>• The remit of CHCs should extend their advice and advocacy role to provide seamless support to people who use both health and residential social care services.</li> </ul>	Under consideration	<p>These issues, including any future legislation, are being explored following on from the ‘Our Health, Our Health Service’ Green Paper.</p> <p>As mentioned above, the Welsh Government does not believe there is a need for a legal duty to routinely share complaints information. Work is already underway on</p>

No	Marks Review Recommendation	Progress	Commentary
	<ul style="list-style-type: none"> <li>• There should be a statutory duty for both CHCs and HIW to share information about complaints and other intelligence with each other.</li> <li>• In future CHC members should provide the lay element of HIW inspections.</li> </ul>		developing all-Wales complaints data set which will allow for ease of sharing of information.
36	<p>HIW should carry out more national thematic reviews of healthcare services. All providers across Wales should be following international benchmark standards of good care and HIW's role would be to scrutinise whether each health body is implementing them; and if they are continuously self-assessing their performance in order to drive up standards of care. It would be testing whether the self-assessments of performance are valid or not and by working with Public Health Wales and other expert bodies, identify lessons from highly successful providers which could benefit all patients and service users if implemented across the whole of Wales.</p>	Accepted and implemented	HIW has implemented a programme of national thematic reviews. These have been set out in the HIW Strategic and Operational Plans.
37	<p>The Welsh Government should include an evaluation of culture of health bodies in the revised Standards for Health Services in Wales. This would require an assessment of governance and leadership of Boards and allow HIW to consider whether Boards are empowering and supporting staff to deliver excellent standards of care.</p>	Accepted and implemented	Governance, leadership and accountability already form part of the Health and Care Standards. HIW consider how services are managed and led and whether the workplace and organisational culture supports the provision of safe and effective care.
38	<p>Where appropriate HIW should give priority to carrying out joint reviews with the WAO of the governance, leadership and</p>	Accepted and implemented	HIW works closely with the WAO to co-ordinate their corporate assessment work

No	Marks Review Recommendation	Progress	Commentary
	performance of LHBs and Trusts; and consider asking the PSOW to offer his expertise.		with its reviews of corporate governance. WAO performance leads meet regularly with HIW relationship managers. Where significant concerns arise, joint review work is undertaken.
39	<p>The Welsh Government, LHBs, Trusts, HIW and others should:</p> <ul style="list-style-type: none"> <li>• Agree on a common data collection and information system, to be used at the local level, to cover the whole of the NHS in Wales. This will result in the Boards of LHBs and Trusts receiving sound and easier to understand information; as well as more informed data being fed into the various elements of the Welsh Government's performance management framework and information provided to HIW. It will also allow for comparisons of performance and lessons learnt to be disseminated across Wales.</li> <li>• The local data collection system should include a suite of clinical outcomes in line with national audit requirements which will enable citizens to understand how well services are being delivered locally.</li> </ul>	Accepted in principle	The Digital Health and Social Care Strategy for Wales sets out a 'Once for Wales' approach which will create a solid platform for common standards and interoperability between systems and access to structured, electronic records in all care settings to join up and co-ordinate care for service users, patients and carers. The health and social care system in Wales will make better use of available data and information to improve decision making, plan service change and drive improvement in quality and performance.
40	HIW should validate whether Health Boards and Trusts are following benchmarks of best practice and performance managing healthcare services to the highest possible standards.	Accepted and implemented	HIW reviews draw on established published standards and best practice in developing methodologies for standard inspections and for thematic reviews.

No	Marks Review Recommendation	Progress	Commentary
41	<p>HIW and CSSIW should work together to develop an integrated inspection framework to scrutinise the performance of health and social care organisations. The aim would be to assess the quality of integrated care, whether people are receiving seamless services when they move between primary care, hospitals and social care in registered settings.</p>	Accepted and implemented	<p>HIW and CSSIW work together on a theme by theme basis developing approaches appropriate to the subject.</p> <p>The inspectorates undertake joint work in (Deprivation of Liberty Safeguards) DOLS and publish a joint report. They have worked together on a joint review of Learning Disability Services. HIW also involves CSSIW where appropriate in its Homicide Reviews.</p> <p>The possibility of further integration may be explored following on from the 'Our Health, Our Health Service' Green Paper.</p>
42	<p>The Welsh Government should consider the issue of a merger between the two inspectorates. The coming years will see a transformation in the delivery of both health and social care services. As both the NHS in Wales and local government will experience reorganisation, patterns of delivery and commissioning will change, and once settled the possibility of a merger could be explored. A thorough cost benefit analysis should be undertaken on whether a merger is appropriate.</p>	Under consideration	<p>These issues, including any future legislation, are being explored following on from the 'Our Health, Our Health Service' Green Paper.</p>