

Consumer Focus response

Governance

We would encourage the Commission to change the draft Statement to stipulate that there should be more than one ‘user representative’ on the board, instead of ‘at least’ one. If there is only one person the burden easily becomes disproportionate as users often feel unsupported because they do not have the experience, confidence or expertise to be taken seriously at Board level. Additionally, expectations of these individuals can be unrealistic so it is important to make sure their role and responsibilities are clearly defined. The Commission will also need to make sure that all Board members are fully aware of one another’s role and responsibilities. We agree with the NCC’s recommendations that members should have job descriptions, with a detailed induction and training programme as well as ongoing support. (See the *Route map* for more detail) Well managed buddying programmes can be effective too, with members supporting one another.

The Commission could draw on the good governance standard¹, developed in 2004 by the Langlands Commission, setting out six principles as guidance for public services.

Working together – with people, voluntary or specialist groups, and children

We recognise that the Statement cannot go into detail on implementing strategy but it would be helpful to indicate how the CQC will engage. For example, the Statement should spell out that you will clarify what kind of relationship CQC wants with each of these organisations or groups, as well as how the relationship will be agreed and managed. People like to have a clear idea of what they are being asked to do, and how they will know what difference their contributions have made.

The statement could also indicate that CQC will be open and consumer oriented in all its work, letting people decide how they want to express themselves, and that they will provide a variety of alternative ways for people to communicate with them to optimise inclusion and encourage two-way communication. (See *Involving people in inspection and regulation*², page 8)

CQC will need to make sure it has sufficiently flexible and robust information systems to deal with the variety of inputs it receives – varied in style, language, comprehensiveness and quality. NCC’s work with the Healthcare Commission found that systems were generally set up to deal with quantitative data but there

¹ The good governance standard for public services, OPM and CIPFA, 2004 ISBN 1 898531 86 2

² http://collections.europarchive.org/tna/20080804145057/http://www.ncc.org.uk/nccpdf/poldocs/NCC206pd_better_regulation_and_inspection.pdf

was no easy way of capturing information that came in other forms – for example a video made by a group of homeless men.

The Commission's ambition to be a leader would be enhanced by more emphasis on encouraging user-led initiatives. The draft statement says little about opportunities for people to suggest topics or service areas to be investigated, which involvement methods they think would work best for them, or for a user group to take more of a lead.

Children and young people

The new regulatory arrangements have been weakened because children and young people are not included in the CQC's remit, or in the Local Involvement Networks, excluding a vulnerable and disempowered group from the direct benefits of a more integrated and holistic approach.

CQC will need to develop ways of engaging with children, and to build robust and effective connections with Ofsted and others at a local level to make sure good practice is applied across the board. The Participation Forum, coordinated by Participation Works, includes a number of specialist organisations advocating the right of young people to be involved in decisions that affect them. The Forum will be a useful point of contact and source of expertise for the Commission, both on working with children and young people, and on how to apply human rights based approach. (www.participationworks.org.uk)

Children and young people are especially concerned to be treated with respect and it will be crucial that CQC uses methods, channels and locations that young people feel comfortable with. Clarity about purpose, freedom of expression, valuing their input and being open about what is up for discussion and change are other important factors that CQC will need to take into account.

Staffing and resources

The draft Statement mentions infrastructure and staffing but in order to make sure involvement happens there will need to be a specialist team to champion, coordinate and advise other staff as well as to promote involvement across the organisation. Involvement requires a dedicated budget, resources and a detailed communications plan to support the strategy, as outlined in the NCC's report, *Involving people in policy*³, pages 2 and 7.

Involvement should be written into staff competencies, and assessed against objectives, to help spread good practice and achieve the right culture across the organisation, as recommended in *the route map* for action (see page 5).

As well as making sure staff are trained and supported to make sure involvement is part of the culture at CQC, staff should be recognised as an

³ http://collections.europarchive.org/tna/20080804145057/http://www.ncc.org.uk/nccpdf/poldocs/NCC200a_It_involving_people_in_policy.pdf

important source of information and feedback. (See page 6 of *Intelligent commissioning*⁴.) Staff will also need to be trained in human rights and equalities in order to meet the CQC's objectives in this regard. Beyond this, assessing and rewarding involvement as part of standard performance reviews will demonstrate that CQC values this aspect of people's work.

Infrastructure

The draft Statement is not clear on the importance of making resources available for training and support for staff, service users and carers. CQC will need to allocate adequate financial resources to this, and to making sure the organisation has the right systems in place to capture and process the learning, as well as making use of feedback effectively, allowing time and space for it to make a difference. It is also important to let people and staff know what a difference their involvement has made.

The checklist on page 6 of *Involving people in policy* provides a framework for an effective involvement strategy which the Commission could adapt for its own use.

Consultation

To make consultation really effective CQC needs to have a clear strategy and clear aims for each time it seeks to involve people. The draft Statement is a good start but it should give greater priority to building in communications and feedback, and ensuring there is time, expertise and resource to take the findings on board so they actually do make a difference.

Avoiding consultation overload and duplication helps to make sure people have time to be involved. We found in our research for the route map that there was little coordination or awareness of other requests for information so that, for example Public Participation Forums reported they had to deal with the same deadlines for producing their annual reports and 'external' consultations which had a negative impact on the quality of their responses.

Our research shows that people do want to contribute to policy decisions as well as to discussions about their experiences of service quality. Deliberative techniques can be especially useful for in-depth policy questions to help participants build up their knowledge and test their ideas. NCC and Involve, who specialise in public participation, produced a set of *Nine principles for deliberative public engagement*⁵ which CQC will find helpful when exploring potential research methods.

⁴ http://collections.europarchive.org/tna/20080804145057/http://www.ncc.org.uk/nccpdf/poldocs/NCC175b_lt_intelligent_commissioning.pdf

⁵ http://collections.europarchive.org/tna/20080804145057/http://www.ncc.org.uk/nccpdf/poldocs/NCC208_nine_principles_engagement.pdf

We believe it is useful to involve people through the whole process of making and implementing policy, making it open to user comment and scrutiny, and giving service users and carers an opportunity to influence key decisions that affect quality and outcomes. People need to be involved right at the start, before it is too late to make any changes, and to make sure that human, or softer, factors are written into core requirements and specifications rather than being overlooked or taken for granted⁶.

Local Involvement Networks (LINKs)

Because there is no national body for LINKs, and they differ greatly from one another, there will be no ‘one-size-fits-all’ approach to engaging with LINKs. CQC will need to develop a customised approach, finding out about each individual LINK, especially the quality and extent of community outreach and how well connected they are locally.

The Route map suggests some ways of keeping in touch with LINKs and fostering continuous collaboration, for example by online forums, briefings and joint events. (See pages 7 to 8)

It will be useful for CQC to develop a communications strategy that spells out the kind of relationship they wish to have with LINKs, what their aims are, and what will be required to make the relationships effective.

Communication

As mentioned in other sections, CQC should develop a detailed communications plan to support their involvement work, which should include awareness raising internally and externally, and two-way contacts with the full range of stakeholders, including staff, partners, service users and carers.

Our work with consumers shows that people don’t have a single preference for communication channels. It varies with the subject and context, so CQC should consider providing multiple channels so that people can choose which is most appropriate.

CQC should also consider providing more scope for ‘bottom-up’ communication so that service users, carers, staff and members of the public can suggest topics or services for the Commission to look into. The Commission could encourage more interactive mechanisms, user-generated initiatives, consultations, petitions, and local ‘calls to action’. CQC may also wish to explore the potential for a user-led and managed website, or establish a chat-room as part of their web-based communication.

Measuring success and assessing involvement

Any evaluation needs to involve the people who were part of the exercise, including the people who participated, who were affected or who had to apply

⁶ Intelligent commissioning, NCC, 2008

Care Quality Commission consultation on their draft Statement of involvement: Voices for power – putting people at the centre of care quality

the findings. The key is to make sure involvement is done well, to know and communicate what happened as a result of the exercise, otherwise it can be an alienating experience, as well as a waste of time.

Evidence of success includes improved staff morale, better outcomes for individuals, and a greater demand for involvement as the benefits become well-known through its impact and via word of mouth. There may also be an extension of 'civic involvement' as people move into more formal roles and activities as they develop skills and confidence.

Alison Hopkins, Communities and Public Services, Consumer Focus
March 2009