
Healthcare Inspectorate Wales' response to the COVID-19 outbreak – August 2020

Healthcare Inspectorate Wales (HIW) welcomes the opportunity to contribute a briefing paper to the Health, Social Care and Sport Committee as evidence to the Inquiry into the impact of the Covid-19 outbreak, and its management, on health and social care in Wales.

Background

During the COVID-19 pandemic our continued commitment and goal has been to check that people in Wales are receiving good quality care, which is provided safely and effectively, in line with recognised standards.

This document sets out the principles that underpin our approach during this period and the actions Healthcare Inspectorate Wales (HIW) has taken in response to the outbreak. It also sets out how we are adapting our approach to delivering our functions as the pandemic develops, and as restrictions are eased, to ensure it is both proportionate and appropriate.

In summary, our approach has been underpinned by four principles:

1. Reduce the burden and regulatory pressure of our work on healthcare settings at such a pressured time, whilst still delivering our statutory functions.
2. Maintaining an oversight of healthcare services and providing assurance to the public and Minister through a focus on intelligence and working closely with partner organisations.
3. Supporting the NHS, Welsh Government and other organisations directly in responding to the pandemic.
4. Preparing HIW to enable it to continue to deliver its purpose in the face of the current and ongoing challenges, whilst meeting our duty of care to HIW colleagues.

We have recently published [a position statement](#) which sets out how these principles underpin our approach during this period and the actions we have taken in response to the outbreak. The position statement provides further detail on our approach and can be found at Annex 1.

Moving from response to recovery

Prior to the easing of restrictions across Wales we were considering new ways of working which would give us flexibility and agility in delivering our role over the coming year.

We have designed a new approach that uses a three-tiered model of assurance and inspection which reduces our reliance upon onsite inspection activity as our primary method of gaining assurance. The new approach is in line with Welsh Government and Public Health Wales guidance to help limit the spread of COVID-19.

In summary, Tier 1 activity will be a “quality check” conducted remotely and will be used for a number of purposes but, at this stage, primarily where issues cannot be resolved via our [standard concerns process](#) and where the risk of conducting a routine onsite inspection remains high. Our standard concerns process can be found at Annex 2.

Tier 2 will introduce a combination of remote and limited onsite activity whilst Tier 3 will represent a more traditional, and full, onsite inspection.

We always reserve the right to conduct a full inspection at any time, but we expect the majority of our work to be Tier 1 quality checks in the coming months. It is difficult to be exact about how long this phase will last and we will keep it under weekly review and adapt as necessary.

We have had to move quickly to adapt as an organisation and this has not allowed us to engage externally on the new approach in the normal way. We have, however,

made NHS Chief Executives, Welsh Government officials, independent healthcare organisations, professional and partner organisations aware of these changes in good time, giving them an opportunity to raise any issues ahead of starting the new programme of work.

Our new programme of work using our adapted approach commenced in early August the [new approach to assurance and inspection](#) is at Annex 3.

Focus of our work

The focus of our Quality Checks is on three areas: infection prevention and control; governance (specifically around staffing); and the environment of care. This aligns to the key areas set out in the NHS Wales COVID-19 planning framework and represents the areas we already know, through our work and through advice received from our Clinical Advisors, are crucial to safe, effective patient care. Each sector specific methodology will consider these three areas, plus other pertinent areas. So in GP services for example, we will also explore the interfaces between GPs and other parts of the healthcare service. Each methodology also includes specific COVID-19 considerations which will enable us to gain a picture of key issues pertinent to the safe operation of services during this pandemic. Our findings will be reported in the normal way but we also intend to highlight any additional themes that emerge across all of our work by the end of the calendar year.

I would be happy to provide further detail on anything contained within this briefing if required.

Alun Jones, Interim Chief Executive Officer
Healthcare Inspectorate Wales
August 2020

Annex 1

Checking people in Wales are receiving good care during the COVID-19 pandemic

Position statement - Published 19 Jun 2020

During the COVID-19 pandemic it is our continued commitment and goal to check that people in Wales are receiving good quality care, which is provided safely and effectively, in line with recognised standards.

This statement sets out the principles that underpin our approach during this period and the actions Healthcare Inspectorate Wales (HIW) has taken in response to the outbreak. It also sets out how we are adapting our approach to delivering our functions as we move through the pandemic, and as restrictions are eased, to ensure it is both proportionate and appropriate.

Our approach is underpinned by four principles:

1. Reduce the burden and regulatory pressure of our work on healthcare settings at such a pressured time, whilst still delivering our statutory functions.
2. Maintaining an oversight of healthcare services and providing assurance to the public and Minister through a focus on intelligence and working closely with partner organisations.
3. Supporting the NHS, Welsh Government and other organisations directly in responding to the pandemic.
4. Preparing HIW to enable it to continue to deliver its purpose in the face of the current and ongoing challenges, whilst meeting our duty of care to HIW colleagues.

How we are delivering these principles during the pandemic:

1. Reduce the burden of our work on healthcare settings at such a pressured time, whilst still delivering our statutory functions

a) Inspection and review programme

- A decision was taken to stop our routine inspection and review programme, and communicated on our website on 17 March 2020. This was consistent with a decision taken by statutory regulators across the UK, and arrangements were put in place to ensure the continued delivery of critical business functions. HIW stated at this time that it may still be necessary to use our inspection powers in a very small number of cases where there is clear evidence to do so.
- In the absence of site visits and face-to-face interviews, work on our reviews programme is continuing where possible.
- A report on the work undertaken so far on our National Review of Maternity Services will be produced, which draws on public and staff surveys.
- HIW is also continuing work with Audit Wales on its data review of Unscheduled Care, and will also be contributing to Audit Wales' work looking at Quality Governance across health boards and trusts. Both of these work areas are in early stages and we will provide further updates in subsequent briefings.
- As we moved out of the initial phase of the pandemic, HIW initiated engagement calls with all Chief Executives of Health boards and Trusts across Wales. These conversations explored how

HIW could continue to gain assurance while supporting the services most affected by the pandemic.

- HIW is in the process of planning a new work programme to commence during the summer, concentrating on those areas where we consider there to be the highest risk of quality standards not being met and where we can make the biggest difference. The new plan will also align with the early focus of the NHS Wales COVID-19 Operating Framework on key areas of harm and essential services.

b) Responding to concerns

- If our intelligence monitoring activity identifies serious concerns and indicates that there may be an imminent risk to the safety of people using healthcare services, we will continue to undertake inspection visits
- However, inspection visits will only be undertaken when other means of gaining assurance and evidence have been exhausted
- We are changing the way we work to deliver a robust assurance framework to proactively gain assurance on the quality and safety of healthcare services in a remote way. We will do this by making effective use of technology available to us and providers. We will also be continuing our ongoing and close engagement with providers, Welsh Government and stakeholders
- Where inspection visits are required, we will ensure that our staff are protected and do not pose a risk of infection transmission. This will be achieved in the following way:
 1. Providing training to all inspection staff on key areas relating to the pandemic including infection control and prevention
 2. Using our 'inspection ready' team to undertake any inspection visits
 3. On the date of inspection, all staff attending will undertake a questionnaire and declaration, relating to their health and isolation status. This is to ensure staff who are self-isolating or displaying symptoms do not enter healthcare environments
 4. PPE to the standards set out by Public Health Wales, will be supplied to our inspection team undertaking the visit. They will also have received training in how to don and doff this equipment.

c) Publication of inspection reports

- On 14th April, we announced a pause on publication of reports from inspections at NHS healthcare settings that took place prior to our decision to pause new routine inspections on 17 March. This was to further reduce the immediate burden of the publication process.
- Following dialogue with health board and trust Chief Executives about the reintroduction of the report publication, the process was restarted on 28th May. In the case of reports for primary care settings, we will contact them directly to discuss the most appropriate arrangements
- For independent healthcare settings, including dental practices that are registered to provide private dental services, each inspection report will be considered on a case-by-case basis in consultation with the setting.

d) Field Hospitals

- We are working with Welsh Government colleagues in a supportive function regarding temporary and field hospitals
- We will be supporting them in relation to health and care standards in these facilities, acting as an independent voice to support standards of quality and safety

e) Independent Healthcare

- HIW is committed to supporting the independent sector to continue providing safe and effective care during this pandemic, and enabling independent providers to play their part in maximising the capacity available within their hospitals to support the NHS
- We have been working with NHS partners such as Welsh Government officials to ensure this commitment is realised
- As part of the pandemic response the NHS has been utilising independent acute hospital capacity to support the NHS. HIW has focussed on the practical implications of implementing this arrangement, and the need for guidance for providers on how to maintain regulatory compliance. We have issued guidance on when and how HIW should be notified of planned alterations to service provision so that registration changes can be made
- We have also given a commitment that registration activity related to COVID-19 will be prioritised over other registration activity
- HIW will continue to work with the National Collaborative Commissioning Unit (NCCU) ensuring that enhanced arrangements are in place to monitor patient and staff safety in independent mental health hospitals at this challenging time. This includes assurance on business continuity arrangements and regular updates on staffing levels at all hospitals
- NCCU have established a command centre approach so that hospitals have direct access to support and advice. Any issues arising are shared with HIW
- Private Dentistry is another area where HIW has been playing a key role in ensuring dental practices that offer private only dental treatment are aware of the public health advice available to them. We have provided these dental practices with guidance from the Chief Dental Officer on the operation of urgent access centres so that they have the information they need to refer patients should they need to.
- We have also ensured that the concerns of private dentists are represented in our discussions with the CDO on easing the restrictions on dental practices.

f) Review Service for Mental Health

- We have amended the procedures for Mental Health Act Second Opinion Appointed Doctors (SOADs) during the COVID outbreak, including the suspension of physical visits by SOADs. The updated guidance and amended methodology for the service are available [here](#).

g) Ionising Radiation (Medical Exposure) Regulations (IR(ME)R)

- We have issued guidance jointly with our counterpart regulators in England, Northern Ireland and Scotland. The guidance covered training, equipment testing, the position of temporary or former registrants as duty holders under IR(ME)R, medical physics, notification of significant accidental or unintended exposures and where to go for further information
- This notice is available [here](#).

2. Maintaining an oversight of healthcare services and providing assurance to the public and Minister through a focus on sources of intelligence and working closely with partner organisations.

a) Information and Intelligence

- In the absence of routine inspection and review work, HIW is continuing to monitor and risk assess settings and services through established intelligence feeds. This includes monitoring of performance measures, analysis of serious incidences and public concerns.

- Our first point of contact and concerns functions remain fully operational
- HIW is also working with partners to monitor services in regards to COVID-19, including regular intelligence sources and data analysis
- Welsh Government information and reports are being reviewed alongside data dashboards and modelling to determine the issues and risks being faced by settings and services
- As part of this work we have escalated concerns around provision of Personal Protective Equipment (PPE) for independent healthcare providers and issued a joint statement with CIW on advance care planning and DNACPR use. [The statement can be found on our website.](#)
- Following the submission of local operational plans under the NHS Wales COVID-19 Operating Framework, we have written to all health boards asking them to provide us with details of how they intend to assure themselves that harm in all four areas set out in the framework is being minimised, particularly in relation to essential services.

b) Communications

- HIW has been liaising with Welsh Government and other partners over our communications response to COVID-19. A Communication Strategy has been implemented to support regular communication with key stakeholders and staff, including providers of independent healthcare and private dentists. We have created a special [COVID-19 section on our website.](#)
- Letters have been issued to update NHS Chief Executives on HIW's approach during the pandemic, including the actions taken to minimise our impact on frontline services
- As well as communicating information about our own decisions and activities as outlined above, we've also cascaded information and guidance from the Chief Medical, Chief Nursing and Chief Dental Officers to registered settings
- We will continue to use our Twitter and Facebook channels to share and help amplify public health information from Public Health Wales and the Welsh Government
- HIW has also worked with the NCCU to write and disseminate a letter to independent healthcare providers. This letter included how HIW's work was changing in light of COVID-19 and gave answers to common questions around COVID-19. This letter included links and guidance on topics such as PPE and financial support for businesses.

3. Supporting the NHS, Welsh Government and other organisations directly in responding to the pandemic

- We identified staff from across the organisation who could be released to work for the NHS, to fulfil roles with the pandemic response team for Welsh Government, or released to the Army Reserves
- Our Clinical Director, on secondment from a Welsh NHS Trust, returned to the Trust for a period of three months to provide support.

4. Preparing HIW to enable it to continue to deliver its purpose in the face of the current and ongoing challenges whilst meeting our duty of care to HIW colleagues

- We are revisiting our broader work programme for the year ahead to ensure it is appropriate and recognises that the healthcare system will be responding to COVID-19 demands for some months to come. We are developing new ways of working that will give us further flexibility and agility in delivering our work over the coming year

- We have developed a draft reset plan which covers the restart of all areas of HIW business post pandemic.
- We are accelerating work on a number of key areas of improvement defined in our operational planning so that we can continue to strengthen the organisation.
- We have designed and implemented tailored training packages for all HIW staff on subjects relevant to their roles. This will ensure our people are supported to do the best job possible as the nature of our work evolves
- We have undertaken a robust risk assessment process to ensure that we meet our duty of care to our staff.

Annex 2

Concerns and Complaints about Health Services in Wales

November 2019

About HIW

Healthcare Inspectorate Wales (HIW) is an independent inspectorate. Our role is to regulate and inspect on behalf of Welsh Ministers, NHS services and independent healthcare providers in Wales against a range of standards, policies, guidance and regulations and to highlight areas requiring improvement.

We protect the interests of people whose rights are restricted under the Mental Health Act and other relevant laws.

We also undertake special reviews or investigations where there may be systemic failures in delivering health services to ensure that improvement and learning takes place.

Our other responsibilities include working with:

- The Prisons and Probation Ombudsman on investigations into deaths in Welsh prisons; and
- Her Majesty's Inspectorate of Probation and others on inspections of Youth Offending Teams in Wales.

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

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This booklet and other HIW information can be provided in alternative formats or languages on request. There will be a short delay as alternative languages and formats are produced when requested to meet individual needs. Please contact us for assistance (using the contact details on the back page of this booklet).

Introduction

Although most people don't encounter problems when using health services, sometimes things can go wrong.

This booklet explains what to do if you:

- Are not happy with the care or treatment you or someone else has received
- Have any other concerns about health services that you think we should know about.

It tells you who to contact and how to report a concern or make a complaint. The way to do this will depend on whether the healthcare is provided or paid for by the NHS, is paid for privately or if you are subject to treatment provided under mental health legislation.

This booklet does not explain what to do if you:

- Work in health services and have concerns about the care and treatment provided by your employer
- Think we have got something wrong and want to complain to us about our work.

We have produced separate guidance on these matters. For further information, please contact us directly (using the contact details on the back page of this booklet) or visit our website at www.hiw.org.uk.

HIW's role in relation to concerns or complaints

We are responsible for checking that anyone who provides health services in Wales meets required standards of quality and safety. This includes services provided by the NHS or independent healthcare providers (services run by private or voluntary organisations).

Our statutory role does not routinely include investigating individual concerns or complaints or the particular circumstances of an individual patient's care and treatment. Nor does it include individual complaints about professional misconduct, change to service configurations or specific matters which are subject to legal process.

The exception to this may be complaints from people (or their representatives) whose rights are restricted under the Mental Health Act and other relevant laws about the way healthcare staff have used their powers.

Sharing your experience with us

Even though we cannot normally investigate your individual concern or complaint about health services, we would still like to hear from you if you were not happy about the care and treatment you received.

We keep a record of all the concerns and complaints reported to us and regularly monitor this so that we can establish an overall picture of the quality and safety of health services. We also use the information to check if services are meeting required regulations and standards.

We gather our information and intelligence from a range of sources. This includes our inspection findings, notifications from health services about serious incidents, information from other inspection, audit and regulation bodies, as well as the valuable information we gain from patients, relatives and carers about their experience of health services.

If we receive a number of similar concerns about a health service, this might trigger an unannounced inspection visit. The information may also provide a picture of similar concerns being experienced across Wales, which may lead to us undertaking a special review.

When we become aware of concerns or complaints we may also ask the health service provider to keep us informed of the outcome of their investigation so that we can be sure that your own concern or complaint has been appropriately dealt with.

There may be circumstances when the information you make us aware of indicates that a patient may be in danger of imminent harm or has been harmed. In this situation we will take immediate action to ensure their safety and also share this information with other agencies such as the Police.

How to raise a concern or make a complaint

NHS services

In April 2011, a new procedure for raising concerns about the NHS was introduced in Wales, called 'Putting Things Right'. This means that all NHS organisations in Wales must deal with your concern with openness and honesty, conduct a thorough and appropriate investigation and provide you with a prompt acknowledgement and detailed response about how the matter will be taken forward.

Full guidance on how to complain to the NHS is available to download from the Putting Things Right website www.puttingthingsright.wales.nhs.uk. You can also request a copy of the

Putting Things Right guidance from your Local Health Board, NHS Trust or any Welsh Government office.



If you have a concern about NHS services you have received from your hospital, General Practitioner (GP), dentist, pharmacist or optician the best place to start, if you feel able to do so, is by talking to the staff who were involved with your care and treatment. They can try to sort out your concern immediately.

If this doesn't help or if you do not want to speak to staff who provided the service, then you can contact a member of the Concerns Team in your Local Health Board or the relevant NHS Trust. Details are available on the Useful Contacts page of this booklet.

Helping you to raise a concern

If your concern is about something that has happened to you, you can raise the concern yourself. If you prefer, a carer, friend or relative can represent you, but you will be asked to agree to this.

You may also ask your local Community Health Council (CHC) to help you. Your local CHC can provide a free and independent advocacy service to help you or the people acting for you to raise a concern. Details are available on the Useful Contacts page of this booklet.

Independent health care paid for by the NHS

If the NHS funds your care in an independent healthcare setting, the NHS is responsible for the quality of your care. If you are not happy about the care and treatment you have received you can raise your concern with the staff involved. If you have raised your concern and you are not happy with the response, or you do not feel able to raise it with the staff you can raise it with a member of the Concerns Team in your Local Health Board.

If you are not happy with the response you get

If you are unhappy with the response you receive from your Local Health Board or Trust you can ask the Public Services Ombudsman for Wales (PSOW) to look at your concern. The Ombudsman has legal powers to consider and investigate complaints about public services in Wales and can look into complaints that you have been treated unfairly or received a bad service through some failure on the part of the body providing it.

You can also contact the Ombudsman if you have raised a concern but think that the NHS organisation is taking too long to deal with it. For most complaints this will be thirty working days and should never exceed a maximum of 6 months. The service is free of charge, impartial and independent of all government bodies.

Details are available on the Useful Contacts page of this booklet.

Independent Healthcare

If you want to make a complaint about an independent healthcare service, you should contact the person or organisation that provides the service. By law, they must have a procedure for dealing efficiently with patients' complaints.

You may also share your concerns with us. Although we cannot investigate your complaint, we will check that the service is meeting the regulations and standards set as a requirement of registration with HIW.

If you are not happy with the response to your complaint, you can contact The Independent Healthcare Providers Network Wales (IHPN) formally known as The Welsh Independent Hospitals Association (WIHA), which is a voluntary membership association of independent acute, mental health and learning disability hospitals in Wales. Additionally the Independent Sector Complaints Adjudication Service (ISCAS) also consider complaints about subscribing providers.

The Dental Complaints Service is an independent service established by the General Dental Council to assist private dental patients and dental professionals resolve complaints about private dental services.

Details of these organisations are available on the Useful Contacts page of this booklet.

Treatment provided under mental health legislation

Through the work of our Mental Health Review Service, we protect the rights and interests of people who are detained in hospital or are subject to supervised community treatment. If you have concerns about a decision made in relation to your detention or your community treatment order under mental health legislation you should take the following steps.

If you are unhappy about a decision to detain you

If you wish to complain about a decision to detain you, you should contact your Hospital Manager. The Hospital Manager will decide whether you should remain at the hospital. They will also advise you what you can do next, including how to apply to the Mental Health Review Tribunal for Wales for a review of your detention.

You are also entitled to help and support from an independent mental health advocate who will help you to prepare and make your application to the Tribunal.

Should you wish to apply for a review of your detention by the Mental Health Review Tribunal you are able to get the help of a solicitor. This is usually free of charge under the Legal Aid scheme.

The hospital can provide you with contact details of independent advocates and solicitors.

Details of the Mental Health Review Tribunal and legal aid organisations are available on the Useful Contacts page of this booklet.

If you are unhappy about your care and treatment for mental health issues

If you wish to raise a concern about the way somebody has used their Mental Health Act powers, our Review Service for Mental Health may be able to help you, but we will expect you to have raised your concern locally first. To do this, or to raise a concern or make a complaint about general issues relating to the care and treatment you have received, you should follow the procedures in “NHS Services” or in “Independent Healthcare” earlier in this section. As well as the support available described above to help you do this, you are entitled to help and support from an independent mental health advocate. The hospital can provide you with contact details of the local service.

We have published a separate booklet that provides further details about our Review Service for Mental Health. For more information, contact us directly or visit our website at: www.hiw.org.uk.

If you have concerns about a health care professional

Health care professionals include:

- chiropractors
- dentists
- doctors
- midwives
- nurses
- opticians
- osteopaths
- paramedics
- pharmacists; and
- physiotherapists

To practice in one of these professions in the UK a person must be registered with one of the regulators below:

- General Chiropractic Council (GCC)
- General Dental Council (GDC)
- General Medical Council (GMC)
- General Optical Council (GOC)
- General Osteopathic Council (GOsC)
- General Pharmaceutical Council (GPhC)
- Health Professions Council (HPC)
- Nursing and Midwifery Council (NMC)

All health care professionals must meet the standards given in their code of conduct or code of practice for their profession.

They must:

- have the right skills to treat or care for you
- treat you with dignity and respect, and
- act professionally and with integrity.

If you have concerns about the ability or behaviour of someone who has treated or cared for you, you should raise your concern at the place where you received the care or treatment. You may want to talk to the person involved, or to their employer, to see if they can put things right.

However if you think that what has happened is so serious that it questions a professional's ability to provide safe treatment or care, you may want to contact the appropriate health professional regulator who can investigate and take action for you.

Further details about the regulators and the professions they regulate are available in the Council for Healthcare Regulatory Excellence (CHRE) leaflet "Who regulates health and social care professionals?". Details are available on the Useful Contacts page of this booklet.

Useful Contacts

Here are some organisations that can give helpful advice and support about raising a concern or making a complaint about health services:

► The Children's Commissioner for Wales

The Children's Commissioner for Wales protects and promotes the rights and welfare of children and young people in Wales. The Advice and Support service is free and confidential. It is a source of help and support if children, young people or those who care for them feel that a child has been treated unfairly. Officers can either point people in the right direction to another organisation best placed to help or the Commissioner has the power to look at individual complaints.

Contact the Children's Commissioner at:

Oystermouth House
Phoenix Way
Llansamlet
Swansea
SA7 9FS

Phone: 01792 765600
Fax: 01792 765601

Penrhos Manor
Oak Drive
Colwyn Bay
Conwy
LL29 7YW

Phone: 01492 523333
Fax: 01492 523336

Children & young people's freephone number: 0808 801 1000

Email: post@childcomwales.org.uk

Website: www.childcom.org.uk, www.complantcymru.org.uk

► Citizens Advice

The Citizens Advice service aims to provide the advice people need for the problems they face. The service provides free, independent, confidential and impartial advice to everyone on their rights and responsibilities.

Advice is available online, by phone and face-to-face at a Citizens Advice Bureau.

Contact the Citizens Advice service at:

Phone: 0844 477 2020

Website: www.adviceguide.org.uk/wales.htm

► Community Health Councils (CHCs)

CHCs provide free, independent advice and support to help you or the people acting for you to raise a concern, including putting you in touch with specialist advocacy services if you need them.

Find out about your local CHC by contacting the Board of Community Health Councils in Wales at:

Board of Community Health Councils in Wales

2nd Floor

33-35 Cathedral Road

Cardiff

CF11 9HB

Phone: 0845 644 7814 / 029 2023 5558

Email: enquiries@waleschc.org.uk

Website: www.communityhealthcouncils.org.uk

► The Council for Healthcare Regulatory Excellence (CHRE)

The Council for Healthcare Regulatory Excellence (CHRE) is an independent organisation that is accountable to Parliament. Its main job is to promote the health, safety and well-being of patient and other members of the public in England, Northern Ireland, Scotland and Wales. CHRE oversees the eight healthcare regulators who are listed on page 13, working with them to improve the way that professionals are regulated. To contact CHRE, phone 020 7389 8030 or go to www.chre.org.uk.

Details of all the health professional regulators are available on the CHRE website at: www.chre.org.uk/regulators/

► Dental Complaints Service

The independent Dental Complaints Service is funded by the General Dental Council. It assists private dental patients and dental professionals to resolve complaints about private dental services.

Contact the Dental Complaints Service at:

Dental Complaints Service
Stephenson House
2 Cherry Orchard Road
Croydon CR0 6BA
Phone: 08456 120 540
Fax: 0208 263 6100
Email: info@dentalcomplaints.org.uk
Website: www.dentalcomplaints.org.uk

► Information Commissioner's Office (ICO)

The ICO in Cardiff provides a local point of contact for members of the public and organisations based in Wales. As well as operating an advice service to address general enquiries on data protection and freedom of information, it promotes good practice in information rights by raising awareness of organisational responsibilities across all sectors.

Contact the Information Commissioner at:

Information Commissioner's Office – Wales

2nd Floor

Churchill House

Churchill Way

Cardiff

CF10 2HH

Phone: 029 2067 8400

Fax: 029 2067 8399

Email: wales@ico.gsi.gov.uk

Website: www.ico.gov.uk

► Local Health Boards and NHS Trusts

Full contact details for Local Health Boards and NHS Trusts in Wales can be found on the website www.wales.nhs.uk or by calling NHS direct on 0845 4647.

► Mental Health Review Tribunal for Wales

The Mental Health Review Tribunal for Wales (MHRT for Wales) is an independent judicial body. It hears applications and references for people subject to the Mental Health Act 1983, particularly:

- detained patients;
- conditionally discharged patients;
- supervised community treatment patients; and
- guardianship patients.

The MHRT for Wales is obliged to follow the procedure laid down in the Mental Health Review Tribunal for Wales Rules 2008.

Contact the MHRT for Wales at:

The Mental Health Review Tribunal for Wales
4th Floor
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ
Phone: 029 2082 5328
Fax: 029 2082 6331

Should you wish to apply for a review of your detention by the MHRT you are able to get the help of a solicitor. Contact details for the Legal Services Commission or Community Legal Advice are below:

► Legal Services Commission (LSC)

The Legal Services Commission (LSC) runs the legal aid scheme in England and Wales.

The LCS works in partnership with solicitors and not-for-profit organisations to provide information, advice and legal representation to people in need.

Contact the LSC Wales Office at:

Legal Services Commission

Marland House

Central Square

Cardiff

CF10 1PF

Phone: 0300 2002020

Welsh callers: 0845 609 9989

Fax: 029 2064 7173

Email: cardiff@legalservices.gsi.gov.uk

► Community Legal Advice (CLA)

Community Legal Advice (CLA) is a free and confidential advice service in England and Wales paid for by legal aid.

Contact the CLA at:

Phone: 0845 345 4345

Text 'legalaid' and your name to 80010 and CLA will call you back within 24 hours.

Website: www.communitylegal.org

► Older People's Commissioner for Wales

The role of the Older People's Commissioner for Wales is to ensure that the interests of older people in Wales, who are aged 60 or more, are safeguarded and promoted. The Commissioner's office can provide information, advocacy and support.

Contact the Older People's Commissioner at:

Older People's Commissioner for Wales

Cambrian Buildings

Mount Stuart Square

Butetown

Cardiff

CF10 5FL

Phone: 08442 640670 or 029 2044 5030

Email: ask@olderpeoplewales.com

Fax: 08442 640680

Website: www.olderpeoplewales.com

► Public Services Ombudsman for Wales (PSOW)

The Public Services Ombudsman for Wales has legal powers to look into complaints about public services in Wales. The Ombudsman is independent of all government bodies, and has a team of people who help him consider and investigate complaints. The service provided is impartial and free of charge.

Contact the PSOW at:

Public Services Ombudsman for Wales
1 Ffordd yr Hen Gae
Pencoed
CF35 5LJ
Phone: 0845 601 0987 (local call rate)
Fax: 01656 641199
E-mail: ask@ombudsman-wales.org.uk
Website: www.ombudsman-wales.org.uk

► Independent Healthcare Providers Network & Independent Sector Complaints Adjudication Service

Independent Healthcare Providers Network Wales (IHPN) and
Independent Sector Complaints Adjudication Service (ISCAS)
can be contacted at the following:

Independent Healthcare Providers Network
Floor 15 Portland House
Bressenden Place
London SW1E 5BH

020 7799 8678

Email

ihpn.admin@nhsconfed.org

Independent Sector Complaints Adjudication Service
70 Fleet Street
London
EC4Y 1EU

020 7536 6091

Email:

info@iscas.org.uk

Healthcare Inspectorate Wales

Welsh Government Rhydycar Business
Park Merthyr Tydfil
CF48 1UZ

Phone: 0300 062 8163

Fax: 0300 062 8387

Email: hiw@gov.wales

Website: www.hiw.org.uk

Annex 3

COVID-19 response and our approach to assurance and inspection - published 17 Jul 2020

Alun Jones, our interim Chief Executive, has issued a letter to the NHS, independent healthcare settings in Wales and other stakeholders, about how we continue to respond to the changing COVID-19 situation and our approach to assurance and inspection over the coming months.

Read on to find out more about what we've been doing and what we plan to do.

During the COVID-19 pandemic, it is our continued commitment and goal at Healthcare Inspectorate Wales (HIW) to check that people in Wales are receiving good quality care, which is provided safely and effectively, in line with recognised standards. We recently [published a position statement](#) that sets out the principles that underpin our approach during this period and the actions we have taken in response to the outbreak. It also sets out how we are adapting our approach to delivering our functions as we move through the pandemic, and as restrictions are eased, to ensure it is both proportionate and appropriate.

Over the past few months we have been considering new ways of working which will give us flexibility and agility in delivering our role over the coming year and I am now at a point where I can share more detail of this approach.

We are planning and refining our routine work programme on an ongoing basis and will be piloting our new way of working for the three month period from August to October. Towards the end of this period we will evaluate the approach to ensure it is appropriate and is meeting its aims and objectives.

I'm acutely aware that we have had to move quickly to adapt as an organisation and this has not allowed us to engage with you about our approach in the way I would have wished. That said, our core role of checking whether standards and regulations are being met continues to be central to our approach. The new methodology and inspection approach will allow us to deploy our resource in a more agile way, responding to specific risks and issues whilst taking account of revised operating models during the pandemic.

A key feature of our new approach will be the use of a three-tiered model of assurance and inspection that reduces the reliance on onsite inspection activity as our primary method of gaining assurance.

Tier 1 activity will be conducted entirely offsite and will be used for a number of purposes but, at this stage, primarily where issues cannot be resolved via our [standard concerns process](#) and where the risk of conducting an onsite inspection

remains high. Tier 2 will introduce a combination of offsite and limited onsite activity, whilst Tier 3 will represent a more traditional onsite inspection.

We always reserve the right to conduct a full inspection at any time, but we expect the majority of our work to be Tier 1 throughout August and September. For this activity, where work is announced, there will be a shorter lead in time (at least 7 working days), a smaller inspection team with most of the assurance work being completed through a request for information, and a follow-up phone or video call with key personnel. Following a short period of factual accuracy checking, there will be a written summary and, where required, an improvement plan. We will publish the summary report as soon as possible after the activity has taken place and the accuracy checking has been completed.

This approach will enable us to seek assurance from services at a time when on-site inspection visits are far more challenging for both healthcare settings and ourselves. It also provides an incremental approach that in future will provide more flexibility by offering a wider range of methods for conducting our work.