



Faculty of Public Health

of the Royal Colleges of Physicians of the United Kingdom

Working to improve the public's health

Response from the Faculty of Public Health to the Care Quality Commission's Review 2009/10 consultation

About the Faculty of Public Health

The Faculty of Public Health (FPH) is the leading professional body for public health specialists in the UK. It aims to advance the health of the population through three key areas of work: health promotion, health protection and healthcare improvement. In addition to maintaining professional and educational standards for specialists in public health, FPH advocates on key public health issues and provides practical information and guidance for public health professionals.

The Faculty of Public Health welcomes the opportunity to respond to the Care Quality Commission's consultation and our comments are noted below in response to specific questions raised in the consultation.

1. Do you agree with our proposals for assessing health commissioning processes using information from the World Class Commissioning assurance process?

We agree that the WCC assurance scheme can be used as a source of information for the CQC assessment, at least during the transition year. However, with regard to the assessment of commissioning for population health improvement, health protection and reducing health inequalities, we would propose that the CQC emphasis should be include more on process evaluation than outcomes. In this way, the CQC would better complement the WCC approach. It would also allow PCTs in areas where the local population has difficult-to-shift social determinants of poor health to demonstrate that they are at least doing the right things even though the outcomes may hardly improve. Many public health outcome measures are based on historical data uninfluenced by new initiatives.

Also, the WCC assessment is a blunt instrument and will require further development and sophistication in order to pick up some of the more subtle aspects of commissioning for public health, particularly with regard to such domains as health promotion, health protection and reducing health inequalities.

2. Do you agree with our proposals for assessing the commissioning of adult social care by councils?

Yes.

3. How should we present our common assessment of primary care trusts and councils – should this be in the form of a ‘grade’ that can be used to inform the Comprehensive Area Assessment?

We agree that the CQC assessment should be used to inform the CAA. A simple grading might be sufficient, but we are concerned that this could be too simplistic – and much useful detail would not be brought to bear.

4. Do you agree with our approach on the assessment of standards for NHS providers?

Yes.

5. Do you support the additional indicator on learning disability?

Yes.

6. Do you agree with our proposals for health and adult social care providers registered under the Care Standards Act 2000?

Yes. We welcome your additional intention to examine and develop the range, quality and robustness of information available to provide us with wider information about the performance of these services.

7. Do you support a single, integrated report on the state of both health and adult social care?

Yes.

8. Should this also include our annual report on the operation of the Mental Health Act?

Yes.

9. From the list of potential topics for special reviews, which would you consider to be the highest priority?

The impact of commissioning and health promotion on health inequalities.

10. What specific issues would you want us to address for any of these topics and how would we best do this?

- Ensuring equity of access to services.
- Targeting of specific groups within the population with particular needs for particular services.
- Tailoring services to meet those needs
- Using social marketing to reach specific groups
- Commissioning to help reduce carbon emissions

WCC assessments could be used for most of these. The last would require a deeper review.