

Stage 4: Final review

Enforcement priorities and management review

Enforcement priorities are a final check to assist decision-making about what enforcement action we should take.

They can set expectations as part of our overall approach to enforcement. Although they do not dictate decisions under this approach, they are factors to be considered in our decision-making, as they can:

- enable transparent messaging as guidance on broad issues of current interest to CQC's Board: for example, to build our capability in using new powers at a manageable pace, or to spread learning from examples such as using an enforcement case to 'send a message' and influence all providers.
- enable colleagues to be aware of areas of recurrent concern, which they are likely to come across over the year, so they can help to improve standards: for example, absences of registered managers, or failure to submit timely notifications.
- enable CQC's Board to ensure that colleagues are carrying out the Board's priorities: for example, if colleagues do not appear to be using the full range of powers available to them or if there is unexplained variation in the time taken to carry out certain procedures.

A final decision on civil enforcement action and further consideration of criminal enforcement should be taken at either a Decision-making meeting (DMM) or Management review meeting (MRM). These should review the decision making by colleagues at each stage and decide:

- whether civil enforcement action should be taken and if so in what form
- whether criminal enforcement action should be pursued.

The DMM or MRM is the audit trail of the decision-making process for all stages.