

NHS Patient Survey Programme

Impartiality of patient experience statistics

January 2016

Impartiality of Patient Experience Statistics

The NHS Patient Survey Programme provides feedback on the experiences of patients using NHS hospitals. Results are presented for each NHS trust that participates in a survey, and are aggregated to produce a picture of experiences of care across England. The programme started in 2002.

The Care Quality Commission (CQC) adhere to the [UK Statistics Authority Code of Practice for Official Statistics](#), which sets out the professional standards data producers must meet when producing official statistics. This document sets out how we meet two very important principles in the code:

Principle two: Official statistics, and information about statistical processes, should be managed impartially and objectively.

Principle three: At all stages in the production, management and dissemination of official statistics, the public interest should prevail over organisational, political or personal interests.

We also outline our processes in meeting **Protocol two:** Statistical reports should be released into the public domain in an orderly manner that promotes public confidence and gives equal access to all, subject to relevant legislation.

The relationship between the Head of Profession (HoP) at Department of Health and Care Quality Commission's Lead Official

CQC is an executive non-departmental public body associated with the Department of Health. Our Lead Official has operational and professional oversight of the production and publication of all CQC official statistics.

Our Lead Official is professionally accountable to the National Statistician via the Head of Profession (HoP) on statistical matters, and responsible for compliance with the Code of Practice for Official Statistics.

CQC's Director of Intelligence fulfils the role of Lead Official and is responsible for:

- Keeping senior management within CQC informed of the position and any actions required to ensure required standards are being implemented
- Preparing and publishing an advance publication timetable for official statistics
- Ensuring pre-release access to official statistics is managed in line with the Pre-release Access Official Statistics Order 2008
- Producing and publishing official statistics in line with the Code of Practice, including implementation of standards and good practice in producing official statistics
- Working with the HoP at the Department of Health in considering issues which need to be resolved and where appropriate seeking advice
- Liaising with the HoP at the Department of Health to ensure effective communication with the National Statistician including raising CQC statistical matters to the attention of the Government Statistical Service
- Liaising with the HoP to ensure effective resolution of scrutiny issues arising with the National Statistician and UK Statistics Authority, including complaints about statistics and breaches of the Code of Practice
- Completing and submitting reports of any breaches of the Code of Practice through the HoP to the Authority according to pre-determined procedures
- Liaising directly with the UK Statistics Authority during the Assessment of official statistics produced by their organisation, keeping the HoP informed of progress and any issues arising

Responsibility is delegated as necessary to the relevant manager in CQC's Patient Survey Team.

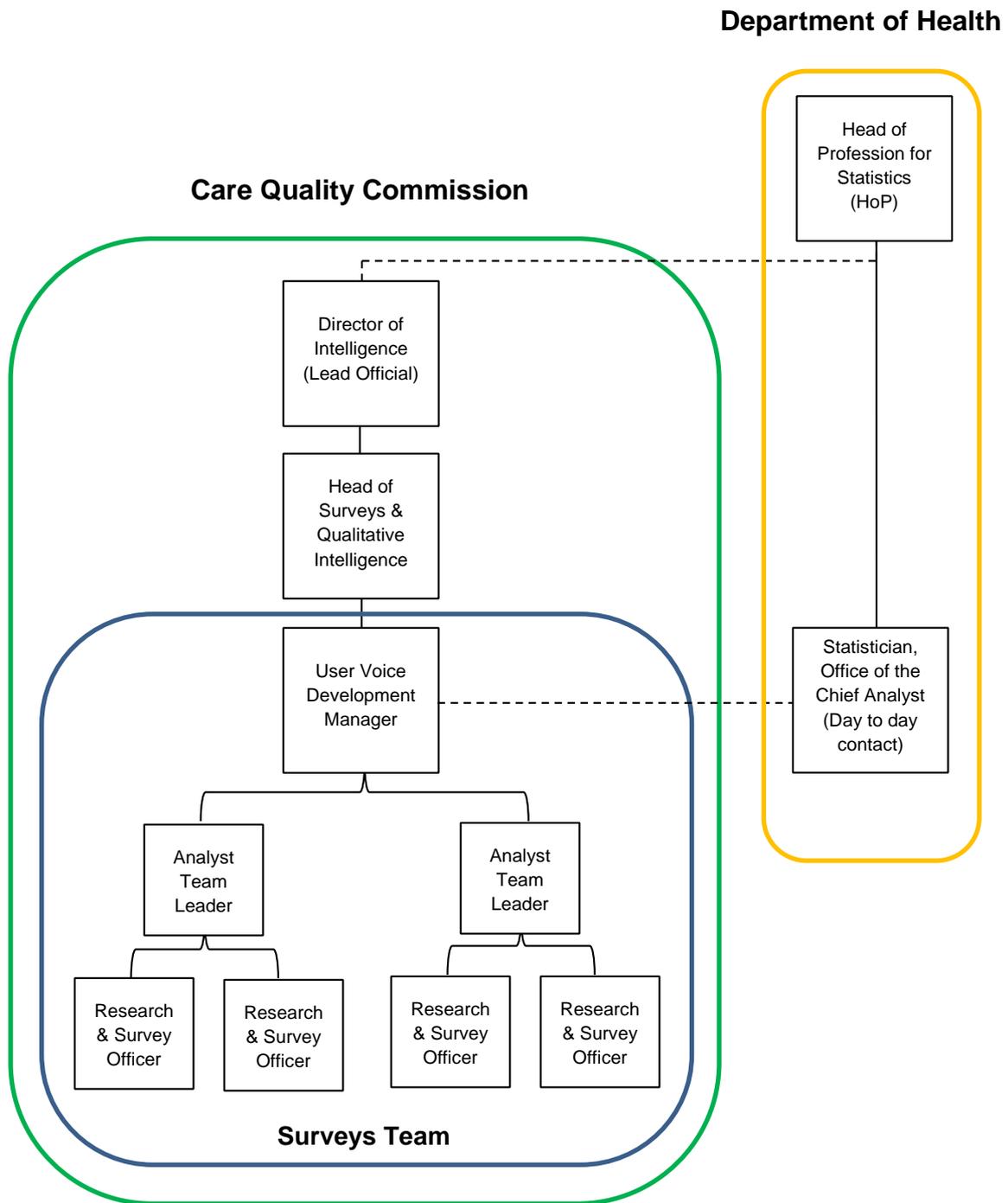
However the Head of Profession (HoP) at the Department of Health is responsible for providing overall professional advice to CQC and support on complying with the Code of Practice for Official Statistics. This may cover:

- Pre Release Access
- Preparing for product assessment
- The principals and protocols within the Code
- Ministerial correspondence
- Communicating developments and emerging good practice in complying with the requirements for official statistics

The HoP is supported in this function by statistical officials in the DH Office of the Chief Analyst.

Such support may encompass ensuring the Surveys Team are able to safeguard impartiality and the adherence to orderly release practices, were this ever to be required. With regards to the day-to-day liaising between CQC and Department of Health for all Official Statistics related business, the relevant contacts within each organisation are in the CQC Patient Survey Team and the DH Office of the Chief Analyst. These relationships are shown visually within figure 1.

Figure 1 – Relationship between Care Quality Commission and the Department of Health



How the independence of the patient survey programme is protected

In order to maintain the impartiality and integrity of the production of patient experience statistics at CQC, several policies and procedures have been implemented. The first of these is the 'code of conduct' which all staff are required to familiarise themselves with on joining the organisation, and continue to act in accordance with for the entirety of their employment.

More specifically to the survey programme, we adhere to the '[The Pre-release Access to Official Statistics Order 2008](#)' which sets out rules regarding pre-release access to any statistical publication, to ensure that no indication of the substance of a statistical report is made public, or given to the media or any other party not recorded as eligible for access before release.

Press releases for patient experience statistics classified as official statistics may only be released alongside the public release of results, rather than given to the media in advance.

Code of conduct

CQC employees must act in line with the seven principles of public life set out by the Standards in Public Bodies Committee.

While recognising that CQC employees do strive to uphold the highest standards, employees who do not uphold the standards set out in the CQC Code of Conduct may be subject to CQC's Disciplinary Policy which could lead to dismissal.

Acknowledging potential conflicts of interest, it is essential that all employees avoid any suggestion of bias or favouritism in any of their dealings with service commissioners, service providers, people who use services, suppliers, employees, or other stakeholders. All employees are therefore required to complete a declaration of interest form upon joining CQC, to identify any potential conflicts of interest from the out-set allowing management to resolve.

This declaration is updated on a quarterly basis, beyond this, all employees who find themselves in a position where they may be seen to be able to influence the outcome of our statistical work, should at this stage immediately declare their interest.

The over ruling themes within these policies are further demonstrated within CQC's culture whereby employees are required to act in accordance with the values of: excellence, caring, integrity and teamwork.

Pre-release access to official statistics

CQC will ensure that no indication of the substance of a statistical report is made public, or given to the media or any other party not recorded as eligible for access before publication. Results are released on the CQC website and the National Statistics Publication Hub at 9.30am on the day of publication.

CQC releases statistical reports according to a pre-announced timetable, so that there is no opportunity, or perception of opportunity, for the release to be withheld or delayed. The decision to publish lies with the Statistical Lead Official (Director of Intelligence). The steps Patient Surveys Team staff are to follow in the event an attempt is made to contravene these principles are detailed within 'CQC procedure for responding to unforeseen political pressures'.

Subject to compliance with the rules and principles on pre-release access set out in legislation, CQC will limit access to official statistics according to the specific principles detailed within 'The Pre-release Access to Official Statistics Order 2008'. These principles include, but are not limited to:

- Granting pre-release access to those who need to provide responses to questions or the making of statements about an official statistic at or shortly after the time of publication of that statistic
- Refusing pre-release access to any individual has not failed to comply with the terms of pre-release access, in relation to a previous grant
- Granting pre-release access no longer than 24 hours prior to the time set for the publication of an official statistic

A full pre-release access list is published alongside survey results.

There is no limitation in access to the document for those deemed to have authorship of it, defined as having made a substantial or essential contribution to production, either by writing, editing or signing off results. The test is whether the data could be released to an appropriate level of quality without this individual's input. Access within CQC also includes individuals necessary for the mechanics of publication, those who assist with quality assuring outputs, and those that require the information for administrative or operational purposes.

Specifically for surveys, authors include but are not limited to: all involved members of the Surveys Team, those in digital communications involved with release on the CQC website, a Senior Publications Officer responsible for report layout, a member of Central Analytical Services at NHS England (who fulfils a further quality assurance role) and the Survey Co-ordination Centre based at Picker Institute Europe, who administer the survey on behalf of CQC. The Surveys Team though has strict control and final decision making over the statistical content and can override any attempt by the other authors to change this. This includes things like: what is reported on, the commentary and the presentation of graphs.

A record of a restricted number of individuals who have access 24 hours prior to release of England level results is published alongside reports on our website. The roles of people on this list are negotiated with NHS England and the Department of Health in advance with numbers of individuals restricted to a minimum in accordance with 'The Pre-release Access to Official Statistics Order 2008'. (The minimum being only those individuals who would be required to provide a response or statement on the official statistics at the time of publication, and those who would be required to act on the information).

Future pre-release access lists published on our website from 2016 onwards will also now include additional information to add clarity around the rules which govern whom is granted access and the reasoning behind the decisions.

In addition to this, any individual wishing to be granted pre-release access is entitled to complete a business case by requesting a form from patient.survey@cqc.org.uk. Their eligibility will then be assessed on a case-by-case basis against the principles detailed within 'The Pre-release Access to Official Statistics Order 2008'.

Press release

The Official Statistics Code of Practice requires CQC to “issue statistical reports separately from any other statement or comment about the figures” and to “publicise official statistics in ways that enable users to identify and access information relevant to their needs.” It does not specify the style of press releases.

The 'Statistical Release' covers the impartial and objective analysis of the data and provides key findings from the survey. It is published on the CQC patient surveys page <http://www.cqc.org.uk/content/surveys>. In addition there is a separate response from CQC highlighting the regulators view of the results, for example whether the results demonstrate areas of concern or improvement for the treatment of patients by the NHS. This regulatory response links to the main statistical findings but it is made clear this is a corporate view of what results show.

The regulatory press release is produced by the CQC press team with statistical oversight from the Surveys Team as a joint piece of work. The CQC official statistics contact person must be consulted if clarification is required on the application of CQC official statistics policy or the Code of Practice for Official Statistics. As far as possible the press team will aim for continuity of staff in the authorship team, to build up experience of working in this area. Furthermore the press team are briefed extensively as to the changes to their normal practice required by adhering to the code, for example: they are not allowed to pre-release press releases, so this is released only at 9.30am when the results go live on the website. We have accumulated experience from publishing approximately four surveys a year on how to work together whilst adhering to the code of practice. It is acknowledged that this process at times might restrict the penetration of results into news channels, but CQC media colleagues work with the Surveys Team to adhere to this rule. Any breaches in relation to release practices would be reported by CQC to the National Statistician.

CQC procedure for responding to unforeseen political pressures

Compliant with the Code of Practice for Official Statistics, CQC's Statistical Lead Official has the sole responsibility for deciding on statistical methods and procedures, and on the content and timing of statistical reports.

CQC protects the development of findings of the surveys from political pressure by ensuring that details are not shared or discussed with anyone not part of the small team who produce the reports. They are only shared with external individuals on a restricted pre-release access list during the 24 hour pre-release window. No revisions are undertaken once the pre-release period has begun. Therefore the statistical release and benchmark reports that are published following each survey are unaffected by any influence.

Further to this, the Surveys Team at CQC have been trained on the Code of Practice for Official Statistics and briefed on how to deal with any unforeseen political pressure. Whereby on any occasion where they feel they are being influenced on: objective reporting in the 'statistical release', the timing of publication or any other developments in the survey programme. In the first instance they are to challenge this by clarifying with the individual this is unacceptable and in contradiction to the guiding principle that 'at all stages in the production, management and dissemination of official statistics, the public interest should prevail over organisational, political or personal interests'. Further to this, it should be escalated through relevant levels of line management, allowing the issue to be elevated to the Lead Official at CQC, Head of Profession at DH or National Statistician depending on the severity of the pressure.

How CQC promotes an open culture, which encourages statistical experts to comment publicly on statistical issues

At CQC it is important that staff feel empowered to comment freely on statistical issues both inside and outside of the organisation. The following section outlines how CQC have facilitated providing staff with the necessary training and guidance to achieve this objective and provides examples of where staff have contributed to statistical papers which use survey programme data, in order to avoid any misinterpretation of findings.

Knowledge and Intelligence Strategic Framework

CQC has developed a Knowledge and Intelligence Strategic Framework which it published as part of its Board papers in April 2014.

This framework outlines how CQC aims to develop a climate and core competencies which support greater analytical curiosity. In order to facilitate this being put into practice the CQC Academy is supporting staff to develop the right capabilities to maximise their ability to interpret and act upon information. The training offered is customised to individual teams and so the Survey Team will be receiving bespoke training to further support them in developing the necessary skills to comment on statistical issues publicly as well as being empowered to challenge statistical interpretations both internally within CQC and externally.

Contributing to statistical papers

The Surveys Team regularly contributes, providing comments, feedback and ongoing support to researchers producing journal articles or other pieces of secondary analysis of the data generated via the survey programme. The overarching purpose for CQC's contribution is to ensure that findings are correctly interpreted. Recent examples of these papers include:

- Older people's experiences of dignity and nutrition during hospital stays: Secondary data analysis using the Adult Inpatient Survey

<http://sticerd.lse.ac.uk/dps/case/cr/casereport91.pdf>

- Snapshot Report NSW Patient Survey Program – Outpatient Survey Results 2014
[http://www.bhi.nsw.gov.au/_data/assets/pdf_file/0004/285934/0090_Snapsh
ot OPS Survey Final.pdf](http://www.bhi.nsw.gov.au/_data/assets/pdf_file/0004/285934/0090_Snapsh
ot OPS Survey Final.pdf)
- Taking Healthcare to the Patient 2: A review of 6 years' progress and recommendations for the future
[http://aace.org.uk/wp-content/uploads/2011/11/Taking-Healthcare-to-the-
Patient-2-REPORT.pdf](http://aace.org.uk/wp-content/uploads/2011/11/Taking-Healthcare-to-the-
Patient-2-REPORT.pdf)

CQC contract a 'Survey Co-ordination Centre' based at the Picker Institute Europe, to design and co-ordinate surveys on our behalf. Staff at the Institute frequently publish journal articles using patient experience statistics from the programme, such as the recently published article *'Find the right way to listen: the importance of getting down with the kids'*.

<http://www.hsj.co.uk/comment/find-the-right-way-to-listen-the-importance-of-getting-down-with-the-kids/5087366.fullarticle>

They undertake independent research and CQC encourages them to share results and comments widely with external audiences. For example they will also publicise and discuss results at conferences, via social media and through work with stakeholders. An example of where Picker have conducted independent analysis on survey data and presented this to a public audience can be found here: <http://www.kingsfund.org.uk/press/press-releases/inpatient-survey-modest-improvements-patient-experience>. See <http://www.pickereurope.org/> for more information.

Liaising with the media

CQC have taken the necessary steps for ensuring statisticians are equipped to liaise with the media, for example the current Lead Official has received media training and is therefore capable of being the spokesperson for all official statistics related business. In addition to this, 24 hours prior to the publication of all official statistics, the authors conduct an in-depth briefing with members of the CQC media team; who function as the first point of contact for external queries. and where they are unable

to provide an appropriate answer can forward these on to the Surveys Team, where members will .

Throughout this process CQC will take opportunities to advance public understanding of published statistics and statistical issues. Responding as far as is practicable to clarify misunderstandings of statistical issues, and to address misleading interpretations of statistics. The patient.survey@cqc.org.uk team mailbox is cited as a contact point on the main surveys web page and is included along with a contact name within the statistical release.

Encouraging equality of access

In line with protocol 2 of the Code of Practice for Official Statistics, in order to promote equal access to all, every effort has been made to maximise the visibility and accessibility to official statistics produced by CQC. The organisation is therefore committed to using multiple communication channels; adopting Twitter and YouTube alongside the more traditional options to generate interest in survey results. For example during publication of the NHS 2014 Children and young people's survey, the traffic and number of hits on the CQC social media page was at its highest levels seen to date, when the team were 'Tweeting' the published results and made use of a Pinterest page.

We have recently published an [Engagement Strategy](#) which sets out how we work with the wider community on an ongoing basis. Patients, the public and others are invited to contribute to survey programme planning and decision making using mainly online methods.

Appendix A - Current post holders

Care Quality Commission

- Director of Intelligence – Emma Rourke
- Head of Surveys & Qualitative Intelligence – Liz Owen
- User Voice Development Manager – Paul Williamson
- Analyst Team Leaders – Tamatha Webster and Karen Hallt
- Research and Survey Officers – Juliette Harrison, Stacey Smith, Steyn Crous and Chris Sutherland

Department of Health

- Head of Profession for Statistics - Mark Svenson
- Statistician, Office of the Chief Analyst - David Canham