Intelligence Unit

Quality Assurance policy

Summary Version

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Contents

Introduction from Emma Rourke, Director of Intelligence

Welcome to the new Quality Assurance (QA) policy of CQC's Intelligence Unit.

This document summarises the content of the detailed QA policy that forms the lynchpin of the work of Intelligence. This policy ensures that our analytical services and outputs (products) are credible and fit for purpose. As analysts, we seek the truth through information and recognise that high-quality analysis is a mark of our professionalism. We must always prioritise quality and clarity of process to ensure we meet this level of quality. Our QA policy is evolving as our workforce, systems and processes change.

QA provides decision makers with key information about analysis and models, and the associated risks and limitations. This is essential if products are to be used with genuine understanding and confidence. We are publishing this summary of our QA policy to be transparent. We want to provide assurance about the QA processes we follow for our analytical products and the supporting QA environment we are building.

Although we create much of our own information, we receive some of the data we use from partners within the sector. We will share our QA framework with them to seek assurances that the information we receive has been through a similarly rigorous QA approach. We will also work collaboratively across the sector to provide support and share learning from our experiences in implementing robust QA.

Emma Rourke
Director of Intelligence
Care Quality Commission

August 2015

Quality assurance framework

We manage the QA of our products through the framework represented above. It consists of five stages. These are all mandatory, but they can be adapted to the product that is subject to QA and the level of risk associated with it.

1. **Plan**: We agree and document the plan for a product's QA processes. The plan sets out the level of QA that will take place for the component parts of the product, and who will carry out the QA, and sign-off roles. It also establishes the confidentiality of the data/information used and the publication and/or sharing/sign-off procedure.

2. **Review**: We carry out detailed QA checks, tests and reviews for the product to ensure its accuracy and fitness for purpose. The review process is carried out independently of the analyst(s) who created the product. We carry out any required remedial action that the reviewer(s) have identified at this stage.

3. **Analytical clearance**: We submit the product to a senior analytical member of staff for clearance. They consider and challenge the outcome of the review and, if appropriate, provide analytical clearance in a statement. They also note any risks or limitations around the analysis and its potential use. The SAO reviews any publication and sharing requirements or limitations to ensure compliance. They also ensures any content or supporting data that contains confidential and personal information has been appropriately handled.

4. **Organisational sign-off**: The senior responsible owner for the product within the organisation, usually a director, considers the clearance statement and decides whether to sign off the product as fit for purpose and suitable for publication.

5. **Learning and feedback**: We run a programme of regular 'lessons learned' sessions and audits to continually improve the effectiveness of our QA processes and the overall quality of our analytical products.

Quality assurance environment

The Intelligence Unit promotes an environment that understands, supports and embraces the importance of QA. To create this environment, we ensure the following actions, processes and behaviours are in place.

Culture

We provide clear leadership on the importance of this policy and the behaviours needed to implement it effectively. We champion a 'no blame' culture where effective and constructive challenge is expected and facilitated. The review process and any feedback take place in the spirit of support, learning and improvement.

We promote transparency in order to enable effective scrutiny. Decision makers must understand and be able to justify the strengths and limitations of their chosen analytical approach. If caveats apply, they need to be clearly communicated.

Capacity and capability

We support all staff within the Intelligence Unit to ensure they have the expertise and experience needed to deliver the QA policy effectively. We provide them with access to all necessary support and training. In our planning we allow for sufficient time to carry out QA. Being able to undertake robust QA is also a key competency within the Intelligence Unit's competency framework.

Control

We put controls in place to ensure and verify that QA has been completed effectively. We identify a single individual with overall responsibility for each product to ensure ownership and accountability.

The QA framework ensures there are appropriate version control procedures and approval processes. There is a clear process for analysts to challenge any concerns they have about quality and/or QA.

Additional guidance for the QA of analytical models

In October 2012, the Cabinet Secretary and the Head of the Civil Service commissioned a review of the QA used specifically for the analytical models that inform government policy. The resulting Macpherson report, *Review of quality assurance of government analytical models*, was published in March 2013. It contains eight recommendations that focus on the 'process' and the 'modelling environment'.

The report defines an analytical model as "a mechanism for analysing or investigating some aspect of the real world. It is usually a quantitative method, system or approach which applies statistical, economic, financial, or mathematical theories, techniques, and assumptions to process input data into quantitative estimates. There are typically three parts to a model:

a) Inputs – in the form of data and assumptions;
b) A processing component – often through calculations; and
c) Outputs – the key figures as well as the risks and limitations of the models."

Macpherson report recommendations

We assess which of our products constitute an analytical model and ensure that we implement the recommendations of the Macpherson report for them. In particular, we focus on the six recommendations in the Macpherson report that are relevant to CQC:

Recommendation 1: All business critical models should have appropriate QA of their inputs, methodology and outputs in the context of the risks their use represents. If unavoidable time constraints prevent this happening then this should be explicitly acknowledged and reported.
Recommendation 2: All business critical models should be managed within a framework that ensures appropriately specialist staff are responsible for developing and using the models as well as quality assurance.
Recommendation 3: There should be a single Senior Responsible Owner for each model through its lifecycle, and clarity from the outset on how QA is to be managed.
Recommendation 4: The Accounting Officer's governance statement within the annual report should include confirmation that an appropriate QA framework is in place and is used for all business critical models.
Recommendation 5: A plan for creating the right environment for QA should be in place.
Recommendation 6: A plan for ensuring there are effective processes (including guidance and documentation) to underpin appropriate QA should be in place.