

## Response ID ANON-PE5H-3K1G-8

Submitted to **Scope of performance assessments of providers regulated by the Care Quality Commission**

Submitted on **2016-10-13 09:24:36**

### Introduction

#### 1 What is your name?

**Name:**

Beth Barnes

#### 2 What is your email address?

**Email:**

beth.barnes@rcophth.ac.uk

#### 3 What is your organisation?

**Organisation:**

The Royal College of Ophthalmologists

#### 4 Independent community health providers - Is this sector one where a rating is necessary to help you make an informed decision about which service to use?

**Multiple choice:**

Strongly Agree

#### 5 Independent community health providers - Is there sufficient variation in performance across the sector for ratings to give a clear indication of which providers are good and which are poorly performing?

**Multiple choice:**

Agree

#### 6 Independent community health providers - Will ratings of this sector enable the public, patients and commissioners to draw meaningful comparisons with services in hospitals and other sectors already rated by CQC?

**Multiple choice:**

Agree

#### 7 Cosmetic surgery providers - Is this sector one where a rating is necessary to help you make an informed decision about which service to use?

**Multiple choice:**

Strongly Agree

#### 8 Cosmetic surgery providers - Is there sufficient variation in performance across the sector for ratings to give a clear indication of which providers are good and which are poorly performing?

**Drop down menu of options from strongly agree to strongly disagree:**

Agree

#### 9 Cosmetic surgery providers - Will ratings of this sector enable the public, patients and commissioners to draw meaningful comparisons with services in hospitals and other sectors already rated by CQC?

**Multiple choice dropdown menu:**

Agree

#### 10 Independent ambulances - Is this sector one where a rating is necessary to help you make an informed decision about which service to use?

**Multiple choice dropdown menu:**

#### 11 Independent ambulances - Is there sufficient variation in performance across the sector for ratings to give a clear indication of which providers are good and which are poorly performing?

**Multiple choice dropdown menu:**

**12 Independent ambulances - Will ratings of this sector enable the public, patients and commissioners to draw meaningful comparisons with services in hospitals and other sectors already rated by CQC?**

Multiple choice dropdown menu:

**13 Independent dialysis units - Is this sector one where a rating is necessary to help you make an informed decision about which service to use?**

Multiple choice dropdown menu:

**14 Independent dialysis units - Is there sufficient variation in performance across the sector for ratings to give a clear indication of which providers are good and which are poorly performing?**

Multiple choice dropdown menu:

**15 Independent dialysis units - Will ratings of this sector enable the public, patients and commissioners to draw meaningful comparisons with services in hospitals and other sectors already rated by CQC?**

Multiple choice dropdown menu:

**16 Refractive eye surgery - Is this sector one where a rating is necessary to help you make an informed decision about which service to use?**

Multiple choice dropdown menu:

Agree

**17 Refractive eye surgery - Is there sufficient variation in performance across the sector for ratings to give a clear indication of which providers are good and which are poorly performing?**

Multiple choice dropdown menu:

Neither

**18 Refractive eye surgery - Will ratings of this sector enable the public, patients and commissioners to draw meaningful comparisons with services in hospitals and other sectors already rated by CQC?**

Multiple choice dropdown menu:

Neither

**19 Substance misuse centres - Is this sector one where a rating is necessary to help you make an informed decision about which service to use?**

Multiple choice dropdown menu:

**20 Substance misuse centres - Is there sufficient variation in performance across the sector for ratings to give a clear indication of which providers are good and which are poorly performing?**

Multiple choice dropdown menu:

**21 Substance misuse centres - Will ratings of this sector enable the public, patients and commissioners to draw meaningful comparisons with services in hospitals and other sectors already rated by CQC?**

Multiple choice dropdown menu:

**22 Substance misuse centres - Will ratings of this sector enable the public, patients and commissioners to draw meaningful comparisons with services in hospitals and other sectors already rated by CQC?**

Multiple choice dropdown menu:

**23 Termination of pregnancy - Is this sector one where a rating is necessary to help you make an informed decision about which service to use?**

Multiple choice dropdown menu:

**24 Termination of pregnancy - Is there sufficient variation in performance across the sector for ratings to give a clear indication of which providers are good and which are poorly performing?**

Multiple choice dropdown menu:

**25 Termination of pregnancy - Will ratings of this sector enable the public, patients and commissioners to draw meaningful comparisons with services in hospitals and other sectors already rated by CQC?**

**Multiple choice dropdown menu:**

**26 Do you have any concerns about the impact of any of the proposals on people sharing protected characteristics as listed in the Equality Act 2010? (The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.)**

**Free text box:**

**27 Do you have any further comments?**

**Please add your comments:**

Outside specialist teaching hospital centres in which therapeutic laser and implant based refractive surgical treatments are performed to correct irregular astigmatism (post infective, post surgical, keratoconus) and post operative anisometropia, almost all refractive surgery is performed in the self-pay, elective surgical sector. So comparisons between independent providers and sectors already regulated by the CQC (question 18) are less relevant for refractive surgery than, say, ambulance services.

The Royal College of Ophthalmologists Refractive Surgery Standards Working Group (RSSWG) is currently updating professional standards in refractive surgery in response to the 2013 Keogh Report. Our standards document builds on advice from the GMC and CSIC issued in April 2016, and is currently in public consultation. In the absence of legislation to enforce these standards, we will be reliant on support from the CQC and the GMC. Section 4 of the standards document on a Safe Environment is particularly relevant to the CQC, and we would welcome any input you may have at this stage.

<https://www.rcophth.ac.uk/standards-publications-research/refractive-surgery-standards/refractive-surgery-standards-consultations/>

Independent community health care providers- there does need to be the same rigours as inspections and ratings. Inherently though there is a potential bias. Community centres tend to treat the less complex cases and patients who have less co-morbidity. Therefore comparing them to NHS hospitals may not be representative of the standards and quality of the service. There should be a level playing field in terms of how CQC rate i.e. case mix should be considered. There is a need to include any community providers and this should include optometric practices that now offer eyecare.

Cosmetic surgery providers- that this includes most private hospitals as well as high street providers. Again, the same standards should be expected. All providers should hold the practitioners to the GMC's newly published guidelines on Cosmetic Surgery.