Draft Corporate Plan 2013-2015

Consultation Feedback Form

28 March 2013

Your feedback is very important to us. We welcome responses to all questions as well as any additional comments you would like to make.

When commenting on a specific section of the draft Plan, it would help if you can identify which element you are commenting on and the relevant page number, for example, the Strategy Map, page 14.

The closing date for consultation is 5pm on Monday 22 April 2013.

You can email your completed form to us to corporateplan@hiqa.ie or you can post it to: Corporate Plan, Chief Executive's Office, Health Information and Quality Authority,, Unit 1301 City Gate, Mahon, Cork. You can also complete and submit your feedback online on www.hiqa.ie.

About you

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Date	22/4/2013

General Information and Questions

You may provide us with feedback on the specific questions (see questions that follow), or alternatively you can provide us with general comments.

Question 1

Are you replying in a personal capacity or on behalf of an institution or organisation?

¨ Personal capacity

¨ On behalf of an institution

X ¨ On behalf of an organisation

Question 2

If you are replying on behalf of an institution or organisation, please enter the name of this institution or organisation:

Irish Medical Organisation (IMO)

Question 3

Do you have any general or specific feedback on the document? In your response, where applicable, please specify the chapter or section to which you are referring.

Please comment

The document outlines HIQA's strategic objectives and outcomes, however in general, there is no specific details on how these are to be achieved.

1.1 Working conditions of Non-Consultant Hospital Doctors (NCHD)s and non-compliance with the European Working Time Directive (EWTD) in HSE hospitals is a patient safety issue and requires investigation by HIQA.

1.1 Specific methodologies of how inspections and guidelines are to be developed and carried out are lacking.

1.1 No detail has been provided on how HIQA is to assume the role of Supervisory Body for recognised Research Ethics Governance (RECs):

- will HIQA's role be to consider ethics applications itself or to regulate the regulators?
- there is a significant difficulty in getting research projects across multiple healthcare sites approved as each site has individual ethics committees and occasionally they disagree. Will HIQA be taking over the role of approving multisite research?
- will HIQA be standardizing composition of ethics committees including

setting minimal expertise requirements for entry onto a research ethics committee?

- will HIQA be standardising the paperwork and ideally introducing a national application form?

The IMO supports the findings of the HSE METR Report on Research Ethics Committees published in 2008 and is calling for the recommendations, including streamlining and standardisation of ethical approval for research, to be implemented as a matter of priority.

The IMO would also like to draw HIQA's attention to the international Alltrials movement and requests that all research ethics committees and pharmaceutical companies in Ireland mandate the publishing of all clinical trial data (as part of the process for receiving ethical approval).

The IMO would welcome a public consultation on the new role of HIQA as Supervisory Body for recognised Research Ethics Governance (RECs).

2.1 The IMO welcomes the introduction of the National Standards for Safer Better Healthcare however there is little reference in the standards or in the guidance to the financial resources required to ensure compliance or specific guidance on how the standards should be applied in General Practice.

3.1 The IMO has through policy papers and submissions called for the urgent development of eHealth interoperability standards and is pleased that HIQA also recognises this as a priority.

3.2 The IMO also

- calls on HIQA and the HSE to establish a secure, confidential and monitored email system , which allows healthcare professionals to communicate more effectively to provide better quality and safer medical care;
- awaits the publication of the Health Information Bill to clarify the legislation in relation to confidentiality, security and access to electronic patient records as well as the secondary use of data.

4.1 The impact of all new technologies in healthcare should be fully evaluated by HIQA.

4.1 Last year, the IMO called on HIQA to carry out HTAs on both pharmaceutical and non-pharmaceutical smoking cessation products and services but has yet to receive a response.

With regard to the Enablers 5-10, it is important that the standards as they apply to healthcare providers also apply to HIQA in thier operations.

9.2 Engagement with frontline clinicians is key to the successful implementation of Quality Assurance programmes. All HIQA decisions which affect doctors should be made with the participation of doctors. As the representative body for all doctors in Ireland, the IMO would welcome greater engagement with HIQA.

10.1 HIQA activities must be backed up by evidence and research.

Question 4

Is the document clear, well-structured and easy to read?

Please comment

The document is laborious in places and lacks detail. While many worthy statements are repeated there is no specification of targets, timeframes and deliverables.

Question 5

Does the Strategy Map clearly convey the structure of the strategy as a whole?

Please comment

No, again there is a general lack of detail as to how HIQA will achieve the stated objectives.

Question 6

Do you think that the key components of the Plan (its outcomes, core activities, strategic objectives, or key enablers) are appropriate and clear?

Please comment

See Response to Question 3 above

Question 7

Are there areas that you think are important and that are not covered by the draft Plan?

Please comment

A key area that requires HIQA's consideration is the financial impact on healthcare providers of implementing the National Standards for Safer Better Healthcare. There may be some disconnect between aspirational aims and the resource limitations on the ground. As mentioned above the IMO supports the implementation of quality standards however the fear for all IMO members is the lack of resources to carry out HIQA's objectives.

The corporate plan does not clarify which of HIQA's guiding principles takes precedence if an issue causes a conflict between them.

There is no detail in the Corporate Plan of the Government's intention to incorporate HIQA into the proposed Patient Safety Authority nor of proposals to merge the functions of the Mental Health Commission (MHC) with the functions of HIQA. The IMO are concerned that any merging of roles of the MHC and HIQA may lead to a reduction of the MHC budget and thus lead to further relative reductions in funding for mental health.

Question 8

Are there any key areas relating to our impact on stakeholders that should be considered in our Plan?

Please comment

See response to Question 7 above

Question 9

Finally, we would welcome any other comments you have on the performance of the Health Information and Quality Authority and how you think we could improve. Please comment, providing as much detail as possible.

Please comment

HIQA's approach to the implementation of quality standards is largely punitive, rather than supportive. As mentioned in Question 3 above, engagement with frontline clinicians is key to the successful implementation of Quality Assurance programmes. All HIQA decisions which affect doctors should be made with the participation of doctors. As the representative body for all doctors in Ireland, the IMO would welcome greater engagement with HIQA.

In the interests of patients/service users HIQA should make representations to the government and/or the HSE on key issues affecting patient safety in particular

- The financial resources required to implement the National Standards for Safer Better Healthcare and;
- The poor working conditions of NCHDs in HSE hospitals and the HSE's non-compliance with the EWTD.

Thank you for taking the time to give us your views.

After the closing date, we will assess all feedback and use it to finalise our final Corporate Plan 2013 - 2015.

If you wish to do so, you can request that your name and/or organisation be kept confidential and excluded from the published summary of responses. Please note that we may use your details to contact you about your responses. We do not intend to send responses to each individual respondent.

Please return your form to us either by email or post to:

corporateplan@hiqa.ie

Corporate Plan
Chief Executive's Office
Health Information and Quality Authority
Unit 1301
City Gate
Mahon
Cork

If you have any questions you can contact the consultation team by calling (021) 2409381

Please return your form to us either by email or post before 5pm on Monday 22 April 2013.

Please note that the Authority is subject to the Freedom of Information Acts and the statutory Code of Practice regarding FOI.

For that reason, it would be helpful if you could explain to us if you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances.