

CQC factual accuracy for draft reports: Top tips

Before any CQC quality report is published, providers can comment on accuracy of the draft. This can be a missed opportunity to ensure the report contains the fairest judgements. These top tips help to get the best out of the process, save time and reduce the burden of completing the factual accuracy form.

Things to keep in mind:

- Avoid shying away from the process out of fear of looking pedantic or rocking the boat; inspectors want to get it right and **welcome critical feedback**. After all, how the report is written reflects on the organisation when it is made public, even if it is a favourable result.
- Factual accuracy **isn't the forum to challenge the rating**. Inspectors may reconsider ratings, but this will be their decision based on the strength of the response and the evidence submitted.
- It isn't the forum to raise concerns about **how the inspection was undertaken** or the conduct of inspectors. There is a separate forum for this in CQC guidance*
- It is **peer-checked internally at CQC**, so any issues raised will go for second opinion.

Being prepared:

- The draft report and factual accuracy form will arrive in the Nominated Individual's inbox together. This should be about 90 days after the inspection. The NI should be aware it is coming. There are then only **10 working days** to complete and return the form.
- **Extensions** are granted at the inspector's discretion and only with good reason (major incidents, NI being off, IT issues). Always propose a reasonable date this will be submitted by.
- Deciding **who to involve** should be given thought, especially considering the size of organisation and number of services. This should strike a balance between an informed response from key players, with how widely it is sent out making the process unmanageable within the timescales.
 - Divide the report up, omitting the proposed ratings to avoid distraction
 - Concentrate on key points (safety/ regulatory breaches) and involve those accordingly.
 - Give guidance on how to complete the form, emphasising that it is not a forum to air grievances.
- **Internal assurance processes** (such as a senior leader check) are useful but cut into the already tight timescales. Agree timescales and responsibilities/resource beforehand (including who will coordinate), don't wait until the draft arrives.
- **The factual accuracy form is readily available** on the CQC website*. Being familiar beforehand saves time.

Getting down to it:

- Read the report first and **let it digest** before completing the factual accuracy. Avoid being distracted by the rating or any negativity attached to the inspection process.
- The factual accuracy form is split into three main sections (each to be tacked separately)
 - A. Wording and grammar (typographical)- leave this to the end
 - B. Accuracy of the evidence- concentrate on this area
 - C. Additional evidence
- B. Accuracy of evidence- **concentrate on the main body of report**. The summary bullet points at the beginning of the report will be rewritten by the inspector to reflect any changes suggested in the main body, otherwise this is duplicating work. Prompt the inspector by writing "throughout the report" to let them know the issue is covered elsewhere in a summary.

- **Make it as easy as possible for the inspector to follow.** Comments should be short, specific and clearly justified. They should be clearly referenced to the point they support (including page and paragraph). It helps to follow the following format for each comment:
 - CQC said: “*copy text*”
 - Organisation response: “*The sentence is inaccurate because...*”
 - Reference to new/additional evidence: “*Please see attachment 1: X policy*”
 - Suggested new wording: “*The sentence should read...*”
- **Avoid sending reams of evidence** or out of date/draft policies if possible.
- **Ensure a naming convention** for each evidence document and name the file with this.
- Always try to pick a couple of **outstanding areas of practice** to add to section C, especially if they have been overlooked or weren’t communicated at inspection.
- For organisations with **Appendix reports** (the full evidence of the inspection on which the main quality report is based). Concentrate on main public facing quality report and work back into the appendix report where inaccuracies are found. The appendix report is long and full of data, which could take one person 10 days to check alone. This may distract from the key points in the main quality report, so a balance should be found. Although the appendix report will be published and it is important that it is accurate, it is seldom referred to and is tucked away on the CQC website. The quality report should take precedence.

Don’t forget:

- The report reflects a **snapshot in time**; what was seen and said at the time of inspection. Any changes that have been made since the inspection should however be included in the factual accuracy process (along with accompanying evidence). The report won’t be changed retrospectively but might reflect what has been done since.
- **Pay particular attention to what staff and patients have said.** Comments may not reflect practice overall, but these are their views. Ensure to make it clear and evidence if something was in place at time of inspection, but not all staff or patients were aware being a separate matter.

Finally:

- If the report is accurate and there is nothing to add, inform the CQC straight away, allowing the report to be published faster and action planning can get underway.
- When sending back the form, remember to CC the inspector but make sure it goes NCSC address. That way they will see it immediately without having to wait a few days for NCSC to process it.
- There has been some success of organisations writing separate letters to CQC inspectors outside of the factual accuracy process where evidence was inaccurate. This may be worth doing if there is a strong case, but it is not the forum to suggest ratings.
- Although they will provide response to the factual accuracy, the final report will be published regardless. Make sure to check through after and let the CQC inspector know immediately if you are not happy and intend to dispute*

About me: I have worked as a CQC inspector receiving many factual accuracy forms as well as completing them on behalf of multiple providers, so I’ve developed these tips through what worked in practice. This document is written with NHS trusts or large providers with quality functions in mind, although the principles apply across all sectors. I welcome any comments or feedback. Cheers, Graham

*CQC guidance <https://www.cqc.org.uk/guidance-providers/how-we-inspect-regulate/factual-accuracy-check>