Consultation on Display of ratings and minor amendments to guidance for providers

1. The RCGP welcomes the opportunity to respond to the CQC’s consultation on ‘Display of ratings and minor amendments to guidance for providers’.

2. The Royal College of General Practitioners (RCGP) is the largest membership organisation in the United Kingdom solely for GPs. Founded in 1952, it has over 49,000 members who are committed to improving patient care, developing their own skills and promoting general practice as a discipline. We are an independent professional body with expertise in patient-centred generalist clinical care.

Summary

3. While we welcome the opportunity to respond to this consultation, as stated in our response to the previous consultation on compulsory display of ratings, the RCGP has significant concerns around the use of summary ratings by the CQC as a means to indicate the level of care provided within GP surgeries. Summary ratings do not take into account differences between practices, including age of the practice population, deprivation and population mobility, which have a fundamental affect on the level of care that can and should be provided. As such we are strongly opposed to the compulsory display of CQC ratings within GP surgeries, as we have no confidence in the way in which the ratings are reached and therefore hold that their display would only confuse and concern patients with no benefit to the service or the patients themselves.

4. As an alternative to these ratings the RCGP proposes that the existing data collected and published by NHS England as part of their Primary Web Tool should be used to both provide information to patients around the level of care delivered within their practice and allow practices themselves to compare their activity to that of other similar practices. This would enable them to reflect, discuss and improve the service they provide to patients. Practices could choose to display this information within their surgeries and/or on their website.
5. In addition, we are concerned about the possibility of fines being imposed on GP surgeries which fail to comply with these regulations. General practice is struggling to provide care with decreasing resources in the face of increasing demand. As such, any financial penalty being applied, runs the risk of further demoralising GPs and decreasing investment for patient care within general practice.

6. Moreover, while we welcome the fact that GPs will have access to accompanying information regarding the rating, we do not think that the information given would provide sufficient context as to how and why the ratings have been reached. As such, even if the RCGP had faith in the concept of summary ratings, it is difficult to see how the display of the ratings as they are currently given could inform patients in a meaningful manner about the standard of their care.

7. The RCGP also has concerns that the CQC will require doctors to display their rating even if they are in the process of formally disputing the CQC's decision. As with any inspection regime, mistakes will be made, and there have been some high profile cases of the CQC applying an incorrect rating that has since been withdrawn. Forcing GPs to display ratings that have the potential to be changed risks damaging the reputation of a GP surgery and the confidence of its patients for no identifiable reason, this is especially true given the wide publicity that a negative rating often attracts.

**Detailed response**

*Please note that we have responded only to the questions that are relevant to the work of the RCGP.*

**Question one.** Is the guidance clear? Yes/No If no – are there any areas that are confusing? Is anything missing?

8. The guidance is clear in its current form. However, as discussed above the RCGP has concerns about the fact that GP surgeries will be expected to display their rating even if they are in the process of formally disputing the CQC's decision. We consider that forcing practices to display information that could conceivably be incorrect would be detrimental to the reputation of many GPs and the trust of their patients, without reasonable cause.

**Question two.** Does the guidance make it clear that providers must display their rating conspicuously to people who use the service? Yes/No If no – what would make it clearer?

9. This aspect of the guidance is clear.

**Questions three, five and six:**

10. The RCGP has concerns that the use of overly prescriptive regulations could lead to confusion among GP practice staff, and the imposition of fines for infringements that have no impact on the actual visibility of the ratings. Practices should be free to use their own initiative when it comes to the display of ratings, and we view the current regulations as providing sufficient information for this. However this must be done in the knowledge that inspectors will not themselves take an overly cautious approach to judging whether or not the practice ratings are correctly displayed.