

Ron Myers:

Hi there, this is Ron Myers from The Consulting Room, and today it's my pleasure to introduce to Taruna Chauhan, who's an expert in Care Quality Commission registration. And I thought this would be really useful for our members, particularly in lockdown as well, because a number of them do have questions around whether they should be or shouldn't be CQC registered, and the processes as to how they go about getting registered.

Ron Myers:

So Taruna's is the Director of Chauhan Consultancy. Her work involves supporting businesses in both the healthcare and social care sector, who undertake a regulated activity with the Care Quality Commission. And she also mentors and coaches the sector right from the start of their journey with the CQC application, and then provides ongoing support to be inspection-ready, using her Continuous Quality Success framework. So Taruna, it's a pleasure to talk to you today. How are you?

Taruna Chauhan:

I'm fine, thank you. I work from home, so I'm still working and I'm busy. So that's a good thing. And I'm keeping well, and getting used to having the family around working from home as well.

Ron Myers:

Okay, lovely. Well, I really appreciate your time. Thank you, because I know you're busy. So what I wanted to do was really get into, I think especially something that a lot of our members became aware of last year, revolving around the question of threads and thread lifts. And the fact that they weren't actually registrable up until the end of last year, and now it looks as though they are deemed to be a regulated procedure. So I just wonder if you could give me your input around threads in particular in our industry please?

Taruna Chauhan:

So that's an interesting question, because I suddenly started having some queries about this from those who did a thread lift. So I actually rang up the CQC to find out what was happening. And the information I was given was that the CQC had reviewed thread lifts, and they said because it involves something being inserted into the body, so in this case, the face, they deemed that it should be classed as a surgical procedure for registration purposes, as it involves instruments or equipment being inserted into the body. So that's what I was told. Then obviously if that's the case, then it's deemed a regulated activity.

Taruna Chauhan:

So the other regulated activities are cosmetic surgeries that include breast surgery, facelifts, buttock or thigh lifts, eyelid or brow surgery, nose surgery, all those kinds of things. As well as liposuction, refractive eye surgery, and obviously they've added PDO thread lifting to that as well.

Ron Myers:

Okay, fine. So it's really just, I think they deem them to be more invasive than they originally thought?

Taruna Chauhan:

It is, yeah. It's about that invasiveness of the procedure, and that's why they've added it into their scope of a regulated activity.

Ron Myers:

Yeah. Are there any other treatments as well that you think need to be included that are relatively commonly done by aesthetic clinics, especially medically led ones?

Taruna Chauhan:

Yeah, so the sort of thing would be weight management, slimming clinics, those kind of things. Anybody who deals with bioidentical hormones, so those deal with things like testosterone and also hyperhidrosis, because you're giving Botox injections. So those need to be included if you're doing that as well as the PDO thread lifting.

Ron Myers:

And I think that's quite an interesting thing because there are many, many clinics out there that are offering hyperhidrosis injections. I think from what I understand as well, a lot of this sort of relates to whether or not there's a diagnosis around hyperhidrosis, which there rarely is, or whether or not you're promoting it for excessive sweating that is seen as a cosmetic treatment, rather than a medical treatment. It's an interesting point there I think.

Taruna Chauhan:

It is. Then yeah, when I did my research it is about that. Has it been officially diagnosed? And if it has, then I think you have to deem that it comes under regulation with the CQC. If it's not diagnosis and they're just worried about excessive sweating, then I think you could deem that as a cosmetic procedure. So I think that there is that little grey area that you have to be mindful of.

Ron Myers:

So what does CQC registration actually entail?

Taruna Chauhan:

The first thing I would say is you really need to understand what the CQC expect of you. So I always say to people you really need to go on the CQC website and have a look at the handbook that's related to healthcare, and understand what the standards are.

Taruna Chauhan:

The handbook is a hefty document, so I really don't recommend printing it off. What I do recommend is going through it step by step, and looking at what CQC are looking for to see if it aligns with what you're doing.

Taruna Chauhan:

The other thing it entails obviously is, CQC want to know how you are going to meet the Health and Social Care Act. And the way you're going to show that is by looking at what they call is the key lines of inquiry.

And that's the other area you should be looking at. So they've got a whole section on new providers on the CQC website. And if you look at that, that gives you step by step information about what CQC are looking at for a new provider when they're going for registration.

So it's about doing your homework, doing some groundwork and prerequisite work, before you even think about applying to the CQC.

Ron Myers:

Okay. That's great. And what sort of information do you need to provide to the CQC for the application?

Taruna Chauhan:

So when I was looking at this, the easiest way I can explain it is, when you're looking at the CQC application, they've got modules within the application, which are called who, what, where, when, how documents review and declaration.

Now declaration's easy. Basically you're signing to say who you are, and that you agree to the terms of CQC standards. The who, what and where, it's quite easy because it talks about who the people are. Who is the nominated individual. If you run a limited company, who is going to be the registered manager? The what is, what are you going to be doing and what is the regulatory procedure that you're doing?

So for aesthetics, it actually comes under treatment. And you'd also perhaps have consultation as well. So that's a couple that you would check. The where is where your location is. And then underneath where there's a few other questions they ask about whether it's your own premises or a landlord and things like that.

The when is when you're going to open. So if you're already running a clinic, you are already open. So basically you have to say when you're going to start doing the regulated activity.

How is the bit that people always get stuck on. Because that's where they ask you about the key lines of inquiry. The key lines of inquiry are five areas that they ask you about, which are safe, caring, responsive, effective, and well led. And this is where people get stuck, because they may not have done all the homework beforehand and looked at what CQC are looking for. Or they're not really sure what depth of information CQC are looking for.

So that's where I do a lot of my work, is actually honing into how what they do aligns with what CQC want, against the key lines of inquiry. And to keep it easy to remember I have a mnemonic that I use, which is SCREW, because that just keeps it simple to remember what the key lines of inquiry are.

So basically under the key lines of inquiry, they want you to show how are you going to meet those areas? How are you going to keep people safe? How are you going to be caring for them? How are you going to be responsive? How are you going to be effective? What processes are you going to have in place? Well led is actually about leadership. So how well do you lead your clinic? So that's important.

In terms of the documents section, they expect you to have policies and procedures in place, but they want to have a look at some key documents, and they ask you for those. So one of the key documents is around safeguarding. The other one is governance. They ask you what your quality assurance system is.

They also want to know ... if you're a limited company, you have to have a registered manager. So they want to know and have the supporting information for that registered manager. So you have to make sure you have all those documents in place as well.

Ron Myers:

OK.

Taruna Chauhan:

And obviously things like infection control come into it as well, health and safety. So all the things you'd expect of a good quality assurance system. So basically that's all the information you need for the application.

Ron Myers:

Okay. And then once you've submitted that, how long does the registration process normally take?

Taruna Chauhan:

So once you've submitted it, it can take up to 10 weeks. So that's because it's like a two-step process. So once you click the submit button, now the thing to remember is doing a new provider application, if you're a limited company, you also have the second part, which is the registered manager application. Those two parts together make the whole complete application that goes to CQC head office.

Head office have a team that look at the fitness of the application itself. Have you attached all the right policies? Have you written a robust key lines of inquiry in the how module? If you haven't, they'll reject it. If you have and head office are happy, then they send it to the regional inspector. And it's the regional inspector that gets in touch with you as a new provider, for your initial interview with them.

Ron Myers:

That's great. So you've really got to plan ahead there and especially if you're thinking of opening up a new clinic, or providing a new service that's registrable. You've got to be looking at probably a three month timeframe then?

Taruna Chauhan:

Oh, absolutely. Maybe even longer, to give you that bit of leeway.

Ron Myers:

Yeah. Okay. That's useful to know. Also what are the fees payable to the CQC?

Taruna Chauhan:

Yeah, the fees sometimes surprise people. They don't expect to pay a fee to CQC. Sadly you do. You have to pay the annual fee once you're validated. I can't give you a precise figure, because they have an algorithm they use to work out the fee for your particular organisation. There is actually a fees calculator on their website. If you go on the CQC website and search for fees calculator, it'll come up. And then you can put your details in, and it gives you your estimated figure. So that's always a good place to look. So at least you know what to budget for.

Ron Myers:

What's, in your experience, the lowest fee?

Taruna Chauhan:

The ones I've seen for the clients I worked with, it's been in the region of £1,100 to £1,500 per annual fee.

Ron Myers:

Okay. So once clinics are registered, how often do you think clinics are inspected on average?

Taruna Chauhan:

So what happens is once they've validated you and they're happy, they send you a certificate to say you have a CQC certificate which you put up in your clinic.

The first time they'll come and see you is after 12 months of validation. This is to give you time to embed all your processes and things in place, and make sure your quality assurance system is up to scratch.

When they come and inspect you, it depends on what your rating is.

If you get Inadequate then they would come and see you within six months. If you get Requires Improvement, it would be normally within 12 months of publishing the last inspection report.

If you get Good or Outstanding, depending on the level of risk, then at least one inspection within five years. However, they will ask you for an annual report to make sure you are keeping on track.

So it really depends on what your inspection outcome is.

Ron Myers:

Yep. Okay. And so that's been really useful Taruna. And so where can people find more information and help with this process if they need need it?

Taruna Chauhan:

Right. So the first port of call would be the CQC website under the provider section. Because I think that gives you the basic information you need to start with.

However, the other thing I have, I have 30 copies of my book to give away to the first 30 people who send me an email in the subject line Writing Podcast.

To my email, which is taruna@tchauhanconsultancy.co.uk.

The other way you can find out about the CQC process is by listening to my podcast, which I'm launching on the 30th of April on all major channels.

Ron Myers:

Wonderful.

Taruna Chauhan:

And that's based all around and aligns with my book, about the CQC process. And also if you're a new business, also about what you need to think of, what your why is, business strategy, things like that as well.

Ron Myers:

Yeah. Well I think that's fantastically useful and very generous of you Taruna as well. Thank you very much for that. I was involved in running a Healthcare Commission Registered clinic back in 2005, and then afterwards with the CQC for 15 years.

So I know how much there is involved in this process. I've personally been involved in inspections as well. And I really understand the need for that help and guidance there from someone who has expertise. Because it can be quite tricky and quite involved. And you know, I think having someone like

yourself there to help guide you through the process can save you an awful lot of time, and an awful lot of headaches when you're trying to register your business for CQC registration. So I really appreciate that and the offer. And is there anything else you want to add?

Taruna Chauhan:

Just wanted to add that if they do email me, I do need a physical address, because I'm actually going to send you a hard copy of my book so you can write in it, write notes in it and use it.

Ron Myers:

Wonderful. That's brilliant. Thank you very much. Okay Taruna, well I wish you good luck over the next few weeks, and thank you again for your time.

Taruna Chauhan:

Thank you. Thank you for having me on your podcast.

To get a copy of Taruna Chauhan's book "Outstanding – a Leaders Guide to Effective CQC Registration":

Please email your address to: taruna@tchauhanconsultancy.co.uk



www.tchauhanconsultancy.co.uk



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