

CONSULTATIONS
Healthcare Commission
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12 March 2008

Dear Sir/Madam

Thank you for the opportunity to comment on your plans. In general we are in agreement with the approach you propose. We have chosen not to complete the questionnaire and instead to focus on an issue we have raised with the Commission before – the inclusion of an indicator around implementation of the NPSA's 'Being Open' guidance.

We, and many other patients' organisations and individual patients have repeatedly asked for this. The need to challenge a 'culture of denial' was highlighted in 'Safety First'. Failure to look at this at all as part of the annual health check would be a missed opportunity to send a clear signal about the priority that should be placed on this approach as part of developing an open and fair patient safety culture. It would also send out a worrying message about the willingness of the Commission to be responsive to patients and patients' organisations in its approach to patient safety. This is the single most important thing that we and other groups and individuals have been asking for.

The main argument we have heard against using implementation of Being Open as an indicator is that it would be difficult to measure. We would suggest that two practical aspects that can be easily measured are:

- (a) Has a Being Open policy been adopted which is consistent with the guidance?
- (b) How many staff and which groups of staff have received the Being Open training?

Moreover, we would point out that the Commission has been happy to include 'cultural' issues such as whether NHS bodies are moving towards a no-blame culture regarding its staff before. This is at least as hard to measure. Why should there be no attempt at all to check on how open and fair NHS bodies are being with injured patients?

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I hope you find these suggestions helpful. I would be happy to arrange a meeting to discuss if desired.

Yours sincerely

Peter Walsh
Chief Executive

cc: Sir Ian Kennedy
Ms Anna Walker