

Case Study

Homerton University Hospital
NHS Foundation Trust



Improved assurance of compliance with the Hygiene Code and greater confidence in self assessments

Case study contributors:

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All NHS Trusts are required to comply with the Hygiene Code. This has been an essential requirement since the Code was first introduced in 2006 as part of the overall drive to reduce the incidence of healthcare associated infections. The need for compliance was given additional impetus when 100% compliance became a mandatory criterion for registration with the newly formed Care Quality Commission (CQC) in April 2009. Failure to meet any of the registration criteria could result in services being suspended; fines being issued and ultimately result in hospital closure or legal action.

Effective Assurance Frameworks Needed

Compliance statements made by Trusts are largely based on self-assessment, validated by spot checks. However, a report¹ from the Audit Commission in April 2009 concluded that many organisations were treating self-assessment as a 'tick box exercise' without sufficient scrutiny of supporting evidence and implementation of appropriate controls. This was reflected in the Health Care Commission 2008 audits that showed large numbers of inconsistencies between self-declarations and inspection reports, with only 10% of Trusts audited in spot checks in 2008 achieving full compliance with the Code.

“The system provides a very comprehensive view of our compliance status, supporting evidence and outstanding actions, which are then available for additional internal or external scrutiny.”

Homerton's Response

Dr Alleyna Claxton, DIPC at Homerton University Hospital NHS Foundation Trust explains their response to this issue:

“We decided to take a zero-tolerance approach to gathering data and evidence to confirm our

compliance with the Hygiene Code. We want to ensure that our internal assessment is at least as rigorous as that of the external regulator.”

“We only consider that we are fully compliant with an element of the Code once all the appropriate evidence has been identified and recorded, and this evidence stands up to an appropriate level of scrutiny.”

¹Taking it on Trust: A review of how boards of NHS Trusts get their assurance.
<http://www.audit-commission.gov.uk/takingititrust>

"We also want to be able to review our portfolio of compliance evidence on a regular basis and reassess every assurance statement and identify areas for further initiatives where even better assurance processes can be put in place. Infection Prevention and Control is not a static area of practice and we want to ensure that the Trust's practices continue to reflect the latest guidance and good practice."

Building the Evidence Base

The assessment work is being led by Dr Alleyna Claxton and Vickie Longstaff, Infection Control Nurse Consultant on behalf of the Trust's HCAI Task Group:

"We use a software product from Klarient Limited specifically designed for these purposes. It allows us to record scores, evidence and actions for over 150 compliance statements that make up the nine compliance criteria of the Code. Attachments can be added to each statement as supporting evidence, such as policy documents, audit results, meeting minutes, certifications, etc."

"We do not state that we are fully compliant within the system until all the supporting evidence has been loaded in addition to our statement of compliance."

"This ensures that we identify any areas in our current infection control systems where further supporting documentation is required."

"The system provides a very comprehensive view of our compliance status, supporting evidence and outstanding actions, which are then available for additional internal or external scrutiny. The system also provides a working tool for the ongoing process of reassessment to ensure that areas where compliance can be enhanced even further are clearly flagged for future project development."

Achieving a High Level of Confidence

According to Dr Claxton:

"It is vital that not only do we comply and continue to comply with the Hygiene Code, but that the executive team and the Trust Board have a high level of confidence in this Trust self-assessment."

"We can only get this level of assurance by demonstrating rigorous traceability from our self-declarations to supporting evidence and ultimately when external inspections and our self-assessments agree. The use of the Klarient software is key in helping us with this."

References:

Klarient Infection control software

Web: <http://www.saving-lives.co.uk/info>

Tel: 0870 734 8108

Email: info@klarient.co.uk

