



Background/FAQ to Medical Practitioners Assurance Framework (MPAF)

Why has this framework been developed?

While robust systems of governance and clinical oversight exist in the majority of the independent healthcare providers, the sector has come together to support the Medical Practitioners Assurance Framework (MPAF) in recognition that greater consistency is needed in this area. This echoes the findings of the Care Quality Commission's (CQC) "State of Care" report from 2018 which highlighted the need for greater standardisation in medical governance within independent hospitals, as well as the then Secretary of State for Health's letter to the sector in May 2018 which raised concerns around transparency and the monitoring of practising privileges arrangements. The issues highlighted through the ongoing Ian Paterson Inquiry also fundamentally relate to the way in which medical practitioners work with independent providers within the independent sector and we believe warrant a sector-wide response.

Who is the framework for?

The framework reflects a contemporary consensus view on expected practice and the responsibilities of both independent healthcare providers and individual medical practitioners (who either work through practising privileges or on an employed basis) in delivering safe patient care. However, in acknowledgement that the independent sector does not work in isolation and that medical governance spans NHS organisations and other agencies, the framework also references governance responsibilities of payors or commissioners of services in the independent sector, and NHS organisations whose medical practitioners also work in the sector.

The framework is focused on all medical practitioners working in independent healthcare settings through practising privileges or on an employed basis. Individual organisations will have different structures and the framework does not require those structures to be replaced, but rather requires providers to consider the principles and to be able to demonstrate how their individual systems and processes meet the expectations of the framework. While it has been developed in the context of the English healthcare system, the framework will be modified, with translation, for use in the devolved nations.

What areas does the framework address?

The framework sets out expected practice for healthcare providers and medical practitioners in four key areas:

1. Clinical governance structure for medical practitioners
2. Patient safety, clinical quality and encouraging continuous improvement
3. Whole practice appraisal
4. Raising and responding to concerns

This includes what the framework is trying to achieve, and the responsibilities for both providers and medical practitioners in meeting the expectations around:

- The role of clinical governance leads at executive and non-executive level.
- Application for and reviewing of practising privileges across the sector.
- How new procedures and innovative techniques are introduced in the sector
- The role of Medical Advisory Committees or their equivalents
- Supporting whole practice appraisal and peer review.
- Identifying and acting on concerns about medical practitioners.

Why is this framework needed? Isn't there already clear guidance on medical governance and oversight of clinicians in the independent sector?

As in the NHS, medical practitioners working in the independent sector must act in accordance with the guidance issued by the General Medical Council on clinical, medical and ethical issues, and follow accepted best clinical practice. The MPAF is therefore designed to align with existing legal and regulatory frameworks and work towards them being better implemented across the whole sector, rather than adding more bureaucracy or making the system even more complicated.

With the support of the CQC, General Medical Council and NHS England-Improvement, IHPN believes that the MPAF can help support providers and medical practitioners to strengthen the assurance processes that enable medical practitioners to deliver quality care to patients being treated in the independent healthcare sector.

Is it mandatory for providers to implement the framework? How will it be ensured that independent providers actually follow the principles it sets out?

All 28 acute IHPN members, representing over 200 individual sites hospitals, have signed up to adhere to the principles in the MPAF. As part of our work to ensure its effective implementation, we have been working closely with the Care Quality Commission (CQC) who have committed to considering the effective and robust implementation of the framework's principles as evidence of good governance and will inform the judgement they make about how well led a service is.

The MPAF has been developed as to provide the most up to date view of expected practice around medical governance. It was therefore designed to be iterative with an inbuilt review process and should be viewed as a starting point for the sector from which to build. As such, the framework will also be reviewed annually to ensure the principles remain in-keeping with current best practice around medical governance in the health system.

How does the framework relate to NHS Private Patient Units?

While the framework was developed with regards to medical practitioners working in independent healthcare providers, the MPAF will be publicly available and we welcome any provider of privately-funded treatment, including Private Patient Units, to consider the principles and to be able to demonstrate how their individual systems and processes meet the expectations of the framework.

Does the framework just apply to consultants or does it apply to nurses and other AHPs as well?

The MPAF only applies to individual medical practitioners who work through practising privileges or on an employed basis in the independent healthcare sector. This does mean that it largely applies to consultant doctors. It is not the purpose of the document, however it is recognised that elements of the framework's principles may be seen to have wide applicability to other professionals.

Do the principles in the framework reflect the same standards/expectations as in the NHS?

Principles of professional regulation of medical practitioners apply across both sectors, and as in the NHS, medical practitioners working in the independent sector must act in accordance with the guidance issued by the General Medical Council on clinical, medical and ethical issues, and follow accepted best clinical practice. However, the MPAF specifically focuses on the independent healthcare sector and certain concepts are particular to the sector, notably the use of practising privileges.