

Policy for Quality and Patient Safety

Health Authority Abu Dhabi (HAAD), January 2017

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ABOUT HEALTH AUTHORITY ABU DHABI (HAAD)

The Health Authority Abu Dhabi (HAAD) is the regulative body of the Health System in the Emirate of Abu Dhabi and seeks excellence in Health for the community by regulating and monitoring the health status of the population. HAAD defines the strategy for the health system, monitors and analyses the health status of the population and performance of the system. In addition, HAAD shapes the regulatory framework for the health system, inspects against regulations, enforce regulations, and encourages the adoption of best practices and performance targets by all health service providers. HAAD also drives programs to increase awareness and adoption of healthy living standards among the residents of the Emirate of Abu Dhabi in addition to regulating scope of services, premiums and reimbursement rates of the health system in the Emirate of Abu Dhabi.

The Health System of the Emirate of Abu Dhabi is comprehensive, encompasses the full spectrum of health services and is accessible to all residents of Abu Dhabi. The health system encompasses, providers, professionals, patients, insurers and the regulator. Providers of health services include public and private services and the system is financed through mandatory health insurance (with the exception to Thiqa) and has three main sources of financing: Employers or Sponsors, the Government and Individuals. The Health Insurance scheme places responsibilities on any Insurer, Broker, Third Party Administrator, Health Provider, Employer, Sponsor (including educational establishments), Limited Income Investors and Insured Persons to participate in the Health Insurance Scheme.

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DEFINITIONS

Best practice: The application of the best knowledge, derived from accepted high quality research, respected expert clinical experience to achieve optimum processes and outcomes of care for patients.

Effectiveness: Effectiveness is the extent to which planned outcomes, goals, or objectives are achieved as a result of an activity, strategy, intervention or initiative intended to achieve the desired effect, under ordinary circumstances (not controlled circumstances such as in laboratory).

Efficiency: Efficiency is the ratio of the output to the inputs of any system. An efficient system or person is one who achieves higher levels of performance (output, outcome) relative to the inputs (resources, time, effort or money) consumed.

Health Facility: a HAAD licensed establishment at which healthcare services are provided by HAAD licensed healthcare professionals/providers. .

Health System Stakeholders: This includes patients, health providers, health insurers, payors, national and local health regulator and other relevant entities.

Structure: Structure entails the components that affect the context in which health services are delivered, and includes healthcare facility structure, equipment, human resources, policy, data systems, administration, environment and the availability of other resources to drive quality and patient safety. Securing structure is fundamental in assuring quality and patient safety and can be linked to the shortcomings in process or outcome measures.

Patient safety: The discipline that applies safety science methods toward the goal of achieving a trustworthy system of health care delivery.

Process: Process includes having in place the appropriate steps to assure health services provided to patients are consistent with clinical care including but not limited to: screening, assessment, diagnosis, treatment, preventive care, information sharing and coordination, learning and feedback, interpersonal, technical and patient education processes. The combination of processes within a health facility creates a system for delivering care to meet patient needs and is therefore closely associated with outcome measures.

Policy: Is a statement of intent on intended direction and is used to define the roles and responsibilities within the health system and their interactions. Policy is obligatory and therefore enforceable.

Quality: The degree to which health services (for individuals and the population) increase the likelihood of desired health outcomes and are consistent with current professional knowledge. They are six dimensions to quality and include:

- Safe: avoiding injuries to patients from the care that is intended to help them.
- Effective: providing services based on scientific knowledge to all who could benefit, and refraining from providing services to those not likely to benefit
- Patient-centered: providing care that is respectful of and responsive to individual patient preferences, needs, and values, and ensuring that patient values guide all clinical decisions
- **Timely:** reducing waits and sometimes harmful delays for both those who receive and those who give care
- Efficient: avoiding waste, including waste of equipment, supplies, ideas, and energy.
- Equitable: providing care that does not vary in quality because of personal characteristics such as gender, ethnicity, geographic location, nationality and socioeconomic status

Outcome: Outcome is understood as the evaluation of patient health, as a result of care received, changes in health status, behaviour and knowledge as well as patient and staff satisfaction and health-related quality of life.

Quality assurance: Planned and systematic activities, which are implemented to fufill the requirements for a product or service in terms of healthcare. This entails undertaking a set of activities that include defining quality standards and assessing, monitoring and improving the quality of services against those standards, so that the care provided is as efficient, effective and safe as possible. There are generally four Principles of Quality Assurance:

- Is oriented toward meeting the needs and expectations of the patients
- Focuses on the systems and processes
- Uses data to analyse service delivery processes
- Encourages a team approach to problem solving and quality improvement

Quality improvement: is a formal approach to analyse and improve performance through organised efforts within the health system or by the healthcare provider. It is a systematic approach that uses specific techniques to improve quality or the processes that affect it. Quality improvement is the ability to benchmark, improve, assess progress, sustain progress and assure progress.

Quality measurement: is the process of utilising data to evaluate health system performance against recognised quality standards. Quality measurement can be used to assess care across the full continuum of health system delivery, from the level of individual physicians right through to the level of health insurance plans.² Quality measurement is undertaken through the application of health system quality indicators and can be used to assess, track, and monitor provider performance across four overarching areas that is, structure, process, outcome and patient experience. Understanding the level of performance enables corrective action to take place where patients may be subject to risk or harm.

^{2.} Families USA (2014). Measuring Health Care Quality: An Overview of Quality Measures.

1. INTRODUCTION

1.1 International Context

In 2014, The Commonwealth Fund Report highlighted that health is no longer about how much funding is allocated to the health system but rather about how quality and patient safety is embedded across preventative and treatment services. There are essentially three pre-requisites for improving healthcare quality and patient safety across the health system:³⁻⁴

- Health service providers need to operate within an appropriate policy environment and robust governance structure for quality, and with a proper understanding of the needs and expectations of those they serve, in order to deliver the best results.
- Decision makers cannot hope to develop and implement new approaches for quality without properly engaging health service providers, communities, and service users.
- Communities and service users need to influence the way in which they receive health services if they are to improve service performance and ultimately their own health outcomes

1.2 Local Context

The Development of the Policy for Quality and Patient Safety was informed by the Abu Dhabi Health System Strategy and through a Situation Analysis on Quality and Patient Safety. The Health System Strategy priorities include integrated continuum of care for individuals, quality and patient safety and patient experience, attracting, training and retaining qualified healthcare professionals, emergency preparedness, wellness and prevention to improve public health, ensuring value for money and sustainability of healthcare spending, including encouragement of private investment in healthcare; and an E-Health programme. To achieve these objectives, HAAD has set out initiatives covering all seven priority areas over the coming five years.

^{3.} WHO (2006). Quality of Care. A Process for Making Strategic Choices in Health Systems.

^{4.} Wharam J. Frank and Sulmasy Daniel (2009). Improving the Quality of Health Care: Who Is Responsible for What? JAMA. 2009;301(2):215-217.

^{5.} HAAD (2015). Abu Dhabi Health Sector Strategy 2015-2020

The Situation Analysis for Quality and Patient Safety was undertaken to provide a snapshot on progress toward quality and patient safety, identify key factors that influence quality and patient safety and provide recommendations. The findings indicate that there has been a great deal of work that demonstrates an improvement in the volume of healthcare services and healthcare professionals. The health system is driving towards excellence through a culture of continuous monitoring, achievement of specified indicators and outcome improvement however; greater efforts are needed to match the pace of change across the health system. The approach to introduce quality and performance measures is an evolving and dynamic concept therefore; it is important that indicators reflect the needs of the population and lessons learned are documented for future planning and implementation. Delivering a comprehensive approach provides the best opportunity to assure high-quality care and patient safety is sustained over the long term. The findings also identified eight factors that influence quality and patient safety which include: Leadership and embedding a culture of learning, Information Technology and Data Management, Organisational capacity and capability, Models of Care, Regulation, Patient and Population Engagement, Finance and Commissioning and Medical Research. Lastly, a policy for quality and patient safety was identified as a key recommendation to drive and sustain improvements within the health system.

1.3 Purpose of this Policy

This Policy underpins a key theme for the healthcare sector strategy for Abu Dhabi 2016. It aims to ensure the fundamental requirements are in place by ensuring that the measures necessary for assuring quality and patient safety are in place in regards to structure, process and outcome. This is coupled with the processes and policies needed to achive a continuous improvement in our healthcare. It will set the base for a value-based health system, engagement and collaboration among all health system stakeholders to achieve our vision of healthier Abu Dhabi. This policy also sets out the implementation arrangements to assure its adoption.

2.0 VISION, GOAL AND GUIDING PRINCIPLES

2.1 Vision

A Healthier Abu Dhabi.

2.2 Goal

Establish a World Class Health Quality and Patient Safety Framework in the Emirate of Abu Dhabi.

2.3 Guiding Principles

The Guiding Principles to this Policy are as follows:⁷

- 2.3.1 **Performance is Focused:** HAAD is the responsible entity to define health quality and safety and will set the performance parameters and indicators by which all Health Facilities in the Emirate of Abu Dhabi should achieve.
- 2.3.2 **Continuous Improvement:** The delivery of high quality and patient safety requires continuous improvement, and the routine, iterative audit, performance measurement, improvement and management by providers, professionals, payers, Regulator and engagement of patients and staff.
- 2.3.3 **Stakeholder Engagement:** The commitment and active participation of all relevant stakeholders are required to advance and coordinate HAADs effort to improve health quality and patient safety.
- 2.3.4 **Accountability:** All health facilities and their staff are accountable where failings and non-compliance have been identified.
- 2.3.5 Requirement for Quality Improvement: Quality improvement requires:
 - Leadership: Only strong leadership can build an organisational culture that supports change, establishes aims for improvement, and mobilises resources to meet those aims
 - Learning: A health care organisation dedicated to continuous improvement must become a learning organisation
 - Organisational change: Not all change is improvement, but all improvement requires change
 - o Community engagement: Service users play a key role in influencing the way in which they receive health services and ultimately their own health outcomes
- 2.3.6 Evidence-Driven Quality: Quality measurement must always be objective, valid, reliable and based on scientific evidence. This will enable the identification of high level performance the evidence based practices that led to its achievement. It will also help identify low performance, where it existed, that resulted from the ignoring of best practice guidelines, pathways and evidence.

^{7.} Shaw D. Charles and Lalo Isuf (2002). A background for national quality policies in health systems. World Health Organisation

3.0 Priority Areas for The Policy on Quality and Patient Safety

Priority 1

Ensure all health facilities meet the minimum requirements for structure.

Priority 2

Ensure all health facilities meet the minimum requirements for process.

Priority 3

Ensure all health facilities meet the minimum requirements for outcome.

Priority 4

Set out the roles and responsibilities to assure implementation.

Note: Appendix 1 illustrates the healthcare quality and patient safety priorities

4.0 POLICY OBJECTIVES AND STRATEGIES

4.1 Structure

Policy Objective 1: Assure the "Structure" components for health facilities are fit for purpose

Policy Strategy 1: Set out the requirements for health facilities and HAAD to assure policy objective for "Structure" is achieved

All HAAD licensed health facilities will:

- Ensure actions to drive quality and patient safety are in accordance with Federal and Abu Dhabi Laws
- Ensure access to health services are consistent with regulations and requirements as set out by HAAD
- Ensure the health facility is licensed by HAAD prior to the commencement of health service provision
- Ensure there is a strategy in place to drive quality and patient safety throughout the organisation which is supported by policies and procedures
- Ensure there are assurances in place at all levels to drive health quality and patient safety
- Ensure a robust governance structure is in place with clear roles and responsibilities, protocols and escalation procedures for high-quality care and patient safety throughout the organisation
- Have in place programmes for:
 - Business continuity
 - o Emergency preparedness and response system
 - o Risk Management
 - Complaints and suggestions
 - Workplace Health and Safety
 - o Environmental Health and Safety
 - Infection Control and Prevention
 - Clinical Audit
 - o Quality Improvement and Patient Safety
- Assure Health Professionals only engage in health practices that are permitted and/or enabled through:
 - HAAD licensure
 - Medical insurance liability
 - o UAE Laws
 - HAAD Policy and Regulations
 - Scope of service
 - Scope of professional practice

- Job description
- o Privileges as granted by the Health facility
- Health facility policy and procedures
- Have in place appropriate provisions to ensure decisions made by staff are not subject to conflicts of interest
- Have in place adequate capacity to produce data and information on quality and patient safety
- Ensure written policies and procedures are in place to drive quality and patient safety
- Ensure treatment programmes are supported by available preventative care initiatives
- Strengthen patient-centered care, transparency and patient choice
- Collaborate with other health facilities to maximise patient outcomes
- Ensure health professionals utilised evidence-based practice and maintain their knowledge and skills to maximise patient safety and patient outcomes

HAAD will:

- Enable the licensing of health facilities through the provisions of application, inspection and audit
- Set out the facility design requirements
- Set out the service provision requirements for the health system
- Enable the licensing of health professionals
- Set out the requirements for health professional continual medical education
- Ensure the financial structure and provisions to deliver health services are enabled
- Audit and inspect the performance of health facilities on the structural requirements that drive quality and patient safety
- Hold health facilities to account where quality and patient safety is compromised or where there are any failings in meeting the health facility structure requirements
- Set out further policy provisions to improve health facility structure

4.2 Process

Policy Objective 2: Assure health facility 'Processes' are Fit for Purpose

Policy Strategy 2: Set out the requirements for health facilities to assure policy objective for "Process" is achieved

All HAAD licensed health facilities will:

- Ensure processes enable quality measurement, improvement and assurance
- Ensure all staff receive sufficient training on processes that relate to their work area(s)
- Ensure all processes are tested and assured through recognised assessment, certification or through internal policy and procedures
- Ensure all processes take into account best practice, risk management and necessary action to mitigate risks and undertaken in a timely manner
- Ensure that the processes are employing the latest best evidence
- Processes should aim to deliver the best quality care to the patients
- Ensure that processes have a clear feedback loop to identify gaps quickly and improve when needed.

Policy Objective 3: Assure health facilities and their processes for data and information are secure, transparent and reliable.

Policy Strategy 3: Set out the requirements for healthcare facilities to assure policy objective and reliability of processes for data and information are achieved

All HAAD licensed health facilities will:

- Have in place processes to ensure data and information is kept confidential and necessary checks are in place to validate data and information safety, integrity, validity and reliability
- Have in place processes for ensuring data and information reliability
- Ensure data and information are valid, reliable, meets the needs of the health facility and supports improvement of quality and patient safety
- Ensure all data requests are submitted to HAAD when requested and within the agreed timeframe

Policy Objective 4: Assure processes are in place to promote effective patient care and continuous learning

Policy Strategy 4: Set out the requirements for health facilities to assure policy objective of promoting effective patient care and continuous learning is achieved

All HAAD licensed Health facilities will:

- Ensure processes measure clinical competence of health professionals
- Ensure processes are linked to patient safety goals and staff development needs on an ongoing basis
- Ensure processes improve the care and management of patients and assure their care needs are not compromised
- Strengthen the process to ensure patient safety goals are achieved such as, avoiding wrong patient, wrong site, wrong surgical procedure and wrong medication
- Assure processes encompass Clinical Care and Support Services
- Strengthen processes to reduce waste and improve efficiency within the health facility as determined by internal assessment and benchmarking

Policy Objective 5: Strengthen patient and staff participation in healthcare services

Policy Strategy 5: Set out the requirements for health facilities and HAAD to assure policy objective for strengthening patient and staff participation of healthcare services is achieved

All HAAD licensed health facilities will:

- Utilise processes for patient and staff feedback in order to strengthen quality and patient safety, improve patient and staff awareness and education to inform service improvement plans
- Provide and facilitate ongoing education and training for administrative, clinical, and support staff to ensure culturally sensitive and linguistically competent service delivery

HAAD will:

- Strengthen Abu Dhabi health system data and information exchange and transparency
- Undertake patient and staff satisfaction surveys across all health facilities
- Set out the provisions for consent and patient rights and responsibilities
- Assure the financial structure and provisions to deliver healthcare services are enabled
- Audit and inspect the performance of health facilities on the process requirements that drive quality and patient safety
- Hold health facilities to account where quality and patient safety is compromised
- Set out further policy provisions to improve health facility process

4.3 Outcome

Policy Objective 6: Assure health facilities achieve the desired quality and patient safety 'outcomes'

Policy Strategy 6: Set out the requirements for health facilities, insurers and HAAD to assure policy objective for achieving the desired quality and patient safety outcomes

All HAAD licensed health facilities will:

- Comply with HAAD specified key performance indicators as applicable to the health facility scope of service(s) and professional practice, including but not limited to:
 - Reporting of valid performance reporting of all quality and patient safety indicators
 - o Completeness of all reporting requirements to ensure accuracy of information
 - o Compliance to submission timeframes and timelines
 - o Submit any other information or data requests as determined by HAAD
- Evidence measures taken to improve practice and achievement of international standards where performance indicators have not been set out by HAAD
- Ensure prompt action is taken to address any shortfall or rectify failings as determined by HAAD and including but not limited to:
 - o Failure determined by internal performance thresholds
 - o Failure determined by an accreditor
 - o Failure determined by the health facility board
- Ensure they respond to any requests set out by HAAD
- Ensure billing for Health Services are:
 - \circ Billed in accordance to HAAD billing rules and as per their facility licensure
 - o Billed to the correct billing codes evidenced through documentation and audit

All HAAD authorised health Insurers will:

- Ensure actions to drive quality and patient safety are in accordance with the Health Insurance Law
- Ensure health services are consistent with regulations and requirements as set out by HAAD
- Ensure a robust governance structure is in place with clear roles and responsibilities
- Have in place appropriate provisions to ensure decisions made by staff are not subject to conflicts of interest
- Ensure written policies and procedures for claims and reimbursement are in place to drive quality and patient safety
- Engage and collaborate with relevant health facilities to maximise patient outcomes
- Ensure service provider contracts are aligned to the health facilities scope of practice

- Have in place appropriate systems for data security, confidentiality, management and retention
- As directed by HAAD, apply a sustainable payment framework for health facility quality and patient safety performance

HAAD will:

- Define and publish quality and patient safety indicators
- Audit, inspect and performance track health facilities, providers and professionals through the following but not limited to: frequent reporting of indicators, intelligence available through Knowledge Engine for Health, complaints data, patient and staff satisfaction surveys, health facility and financial audit and inspections
- Ensure the financial structure and provisions to deliver health services are enabled
- Audit, inspect, track the performance and hold to account health facilities on the outcome requirements for quality and patient safety
- Hold health facilities to account where quality and patient safety is compromised
- Publish its findings on health service provider performance to help people choose the best care
- Issuance of Certificate of Authorisation for health insurers
- Provide the health insurance payers information on the health facility quality and patient safety performance to inform negotiations
- Audit, inspect and performance track health facilities and insurers
- Hold health facilities and health insurers to account where quality and patient safety is compromised or when payment does not reflect HAADs payment for quality and patient safety framework
- Ensure the financial structure and provisions to deliver health services are enabled
- Set out further provisions where necessary on a sustainable pay for performance across the health system
- Explore and implement cost-effective and sustainable incentives
- Set out further policy provisions to improve patient safety and quality outcomes

5.0 IMPLEMENTATION ARRANGEMENTS

5.1 Roles and Responsibilities

Policy Objective 7: Assure engagement of all health system stakeholders

Policy Strategy 7: Set out the roles and responsibilities for health system stakeholders to assure policy objective of assuring engagement of all health system stakeholders is acheived

Health Authority Abu Dhabi:

- HAAD is responsible to regulate the health system and ensure all regulatory provisions are enabled to address service gaps, inefficiencies, malpractice or unfairness
- HAAD is responsible for having in place governance arrangements to protect
 patients and advance the interests of the health system including, the delivery of
 high-quality and safe care
- HAAD will provide the necessary stewardship and assure the requirements set out
 in this Policy are met through its regulatory powers and where necessary, set out
 further regulatory measures to address and current and future health system needs

Healthcare Providers:

- Healthcare providers must take on a flexible approach to meet patient expectations and ensure the provision of high quality safe and effective care is delivered every time a patient and/or their carer comes into contact with their service
- Healthcare providers must put in place appropriate measures to strengthen engagement of patients and their carers
- Healthcare providers must have in place service plans to ensure the human and physical resources are adequate for effective service provision. Furthermore, business continuity plans must also be in place to ensure services are not disrupted when they are most needed
- Healthcare providers are responsible for ensuring the requirements set out in this policy and relevant UAE rules and regulations are met

Health Insurers:

- Health insurers must put in place appropriate measures to strengthen collaboration among healthcare providers themselves and patients
- Health insurers ensure that payment is encouraging the adoption of best practice and high quality and safe care
- Health insurers must also adopt measures to ensure claims, reimbursement and payment mechanisms are in accordance with the Abu Dhabi Health System
- Health Insurers are responsible for ensuring the requirements set out in this policy and relevant UAE rules and regulations are met

Patients and the Public:

- Patients must ensure they adhere to their rights and responsibilities as set out by HAAD
- Where the delivery of high quality and safe care is compromised, patients must play their part in raising such failures through the available channels to the Provider, Insurer and Regulator
- Where possible, patients should take on an active role and seek out opportunities to engage with the health system stakeholders through patient groups (and the like) to ensure their valued experiences inform future service provision and decision-making

5.2 Escalation and Enforcement

Policy Objective 8: Assure escalation and enforcement of Quality and Patient Safety

Policy Strategy 8: Set out HAAD approach for escalation and enforcement to assure policy objective for escalation and enforcement of Quality and Patient Safety is achieved

HAAD will:

- Consider complaints, review the performance, investigate possible breaches of duty,
- Escalate and take all appropriate actions where it determines that a breach of duty has occurred
- Exercise its powers in a flexible manner to ensure that regulatory action is targeted where it is needed
- Ensure high-quality care and patient safety
- Bring to an end any failure to comply with this Policy
- Prevent any such failure from being repeated in the future
- Restore the situation (as far as possible) to what it would have been if the failure had not occurred

HAAD will administer its investigative process in order to determine any breach of Laws or Regulations. Where a breach has been determined, HAAD will undertake the necessary escalation procedures. Once HAAD has undertaken its investigation appropriate enforcement will be subject to HAADs determination of the level of breach or non-compliance and may include the following measures with specified timescales for compliance and/or action:

- Provide Advice
- Set out a remedial action plan
- Refer the matter to the Competent Committee with a view to:
 - o Issue a reprimand, notice or warning
 - Issue notice of suspension
 - Withdrawal of licensure
 - Recommend legal proceedings
 - Any other appropriate action

The health facility, professional or insurer may seek to appeal a HAAD decision subject to satisfying the requirements of HAAD appeal grounds, rules and process.

5.3 Monitoring and Evaluation

Policy Objective 9: Assure monitoring and evaluation of this Policy.

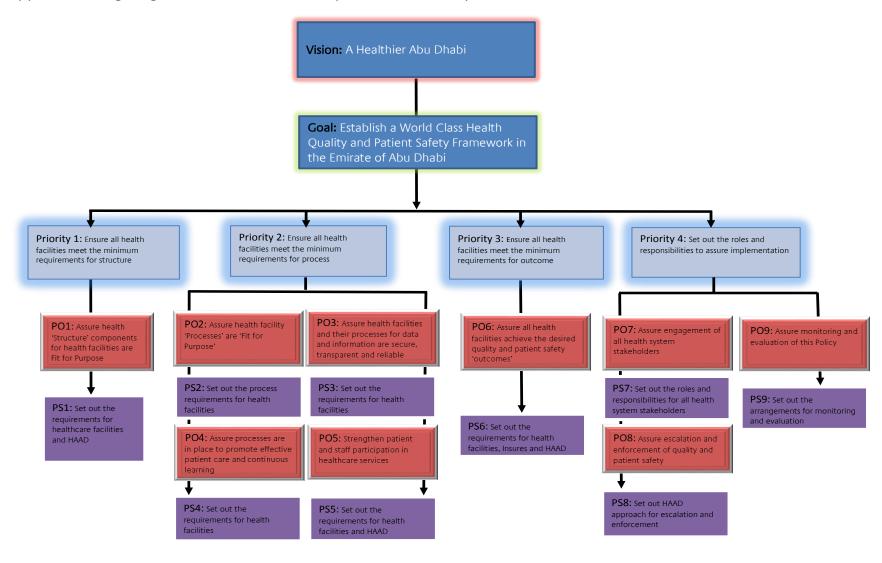
Policy Strategy 9: Set out the arrangements for monitoring and evaluation to assure policy objective of monitoring and evaluation of Policy is achieved

A monitoring and evaluation framework will be developed to monitor the implementation and impact of this Policy.

Note: Appendix 2 Sets out the Laws related to this Policy

6.0 APPENDIX

Appendix 1. Organogram for Healthcare Quality and Patient Safety Priorities



Appendix 2. Laws Related To This Policy

- 1. Abu Dhabi Law No. (1) of 2007. Concerning the Establishment of Health Authority Abu Dhabi.
- 2. Federal Law No. (7) of 1975. Concerning The Practice of Human Medicine.
- 3. Federal Law No. (4) 2015 of Concerning Private Healthcare Facilities.
- 4. Federal Law No. (5) of 1984. Concerning the Practice of Some Medical Professions by Persons other than Physicians and Pharmacists.
- 5. Federal Law by decree No. (4) of 2016 Concerning Medical Liability.
- 6. Cabinet Decision No. (33) of 2009. Issuing the Implementing Regulation of Federal Law No. (10) of 2008 Concerning Medical Liability.
- 7. Law No. (23) of 2005 concerning Health Insurance in the Emirate of Abu Dhabi. and the implementing Regulation.
- 8. The UAE Constitution 1971 with amendments through 2004, Article 31.
- 9. Federal Law 3, 1987 and its amendment The Penal Code (article 378-380) The Penal Code (article, 377) and consumer information.
- 10.Federal Law No. 14 2014 concerning the prevention of communicable diseases.
- 11. Federal Law no. 8 of 1980 for Labour and its amendments (article 53&54).
- 12.Federal Law No. 2 of 2006 The Prevention of Information Technology Crimes and Federal Laws No.3 and No.5 of 2012, that establishes the National Electronic Security Authority (NESA) to combat cyber crimes.
- 13. Federal Law by Decree 3, 2003 (as amended) and Telecommunications Regulatory Authority (TRA).