PRIMARY CARE
WOMEN'S HEALTH FORUM
The Women's Health Hub Toolkit

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CQC registration for primary care organisations fitting and removing LARC

An essential, comprehensive guide to CQC registration for primary care organisations fitting and removing long-acting reversible contraception.

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This article is a comprehensive guide to CQC registration for primary care organisations fitting and removing long-acting reversible contraception (LARC). It covers:

- What is the role of the CQC?
- What does CQC registration involve?
- Amending the registration scope of an existing service to deliver LARC.
- Registering a new service to deliver LARC.
- Training for LARC within an existing service.
- Removal of intrauterine devices.
- Which regulated activities should be considered when registering a women's health service for the first time?

What is the role of the CQC?

The Care Quality Commission (CQC) regulates and inspects health and social care services in England. As a public body of the Department of Health and Social Care, the CQC aims to support and ensure that all health and social care services meet fundamental standards of quality and safety. Everybody who works in health and social care should be aware of the CQC and able to demonstrate that they are providing the best level of care in line with CQC guidance. If you provide health or adult social care activities in England, you will need to be registered with the CQC.

What does CQC registration involve?

Every service provider (whether a general practice or community gynaecology service) must be registered if they provide a 'regulated activity' (such as diagnostic screening or treatment of disease). A list of these activities can be found online at **Scope of registration: Regulated activities – Care Quality Commission (cqc.org.uk)**. A service provider can be an individual, a partnership or an organisation, for example companies, charities, NHS trusts and local authorities.

It is the actual service provider that must register, not the location or care setting (however the location/s must be specified as well). The location can either be a condition of registration or in some cases it can be considered as a satellite or activities may be managed from a HQ or hub site. You can view the location guidance online at **What is a location? – Care Quality Commission (cqc.org.uk)**.

Each organisation will appoint a Registration Manager responsible for the CQC registration who is in day-to-day charge of delivering a service provider's regulated activity. The Registered Manager may manage the regulated activities over more than one location, or the provider can choose to employ a Registered Manager for each location. Each regulated activity requires a Registration Manager; however, they may be responsible for more than one regulated activity.

Once the registration application is received there will be an assessment of fitness to be registered including DBS checks for responsible individuals.

Key point

When registering a service with the CQC, it is the actual service provider that must be registered, not the location (however, locations must also be specified in the application).

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Amending the registration scope of an existing service to deliver intrauterine methods for contraception

If a practice already registered with CQC wishes to deliver intrauterine methods for contraception for the first time, they must amend their Statement of Purpose and apply to the CQC to deliver any additional regulated activities.

A lot of the care provided by general practitioners and healthcare professionals will already come under the regulated activity of: Treatment of disease, disorder and injury (TDDI), for example, prescribing tablets to help with heavy menstrual bleeding. Therefore, existing services are likely to be already registered for TDDI.

It's important to note that the fitting and removal of sub-dermal implants for contraception is covered under TDDI (i.e. a practice does not need to register for family planning services or minor surgery if they are only providing contraceptive implant procedures (and not coils).

Key point

The fitting and removal of sub-dermal implants for contraception is covered under TDDI.

However, if a practice wishes to deliver intrauterine contraception for the first time, they will need to register for Family Planning Services: **Scope of registration: Regulated activities – Care Quality Commission (cqc.org.uk)**. It's worth noting that a practice may assume that they're already registered for Family Planning Services, (as practices often provide contraception in the form of pills and injections), however this CQC regulated activity Family Planning Services is specifically and only for the 'inserting or removing all types of intrauterine contraceptive system or device by, or under the supervision of, a healthcare professional'. What this means is that if a surgery 'ticks' this activity when registering a new service or changing their scope of practice, the CQC will clarify exactly what services the practice is providing and if they do not fit intrauterine contraception, they will be advised that the services they offer will be covered under TDDI. If you are unsure whether your surgery is registered for Family Planning Services, check your registration documentation or with the CQC directly.

If a practice wishes to deliver intrauterine methods for contraception for the first time, they must amend their Statement of Purpose and apply to the CQC to deliver any additional regulated activities

CQC regulated activity Family Planning Services is only for the insertion and removal of coils when fitted for contraceptive purposes and is not required if these devices are being fitted for other non-contraceptive benefits

Key point

Surgeries that offer intrauterine contraception MUST be registered for Family Planning Services

Next steps

If you wish to commence the provision of intrauterine contraception in an existing surgery or service, you must amend your statement of purpose and apply to the CQC to amend your registration. This process usually takes around 4–6 weeks. Once the application is submitted (and all procedures and protocols are in place), you can commence this regulated activity.

Interestingly, the CQC regulated activity Family Planning Services is only for the insertion and removal of coils when fitted for contraceptive purposes and is not required if these devices are being fitted for other non-contraceptive benefits such as for heavy menstrual bleeding or

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endometrial protection (for hormone replacement therapy). Therefore, if a coil is fitted for a non-contraceptive purpose it would come under TDDI.

In practice intrauterine systems are, of course, often fitted for both contraceptive benefits as well as other extended benefits, so if a service wishes to offer intrauterine devices (IUDs) for contraceptive benefit then clearly, they must register for Family Planning Services.

However, if a provider wished to commence a service solely for non-contraceptive use, then technically this provision could be incorporated under TDDI.

Ultimately, the role of the CQC registration is to support the safe provision of care for patients and providers. If you have any queries regarding your registration, it is always best to speak to the CQC directly for advice and clarification.

Registering a new service to deliver LARC

The initial registration for any new service involves submitting a Statement of Purpose. A Service Type must be declared eg 'Doctors Consultation Service' and 'Doctors Treatment Service'. Of note, currently there is no service type specifically for a nurse-led clinical service (other than district nursing/health visiting) hence the need to use one of the two mentioned.

When a new service is registering for the first time, it must register for all of the regulated activities it intends to carry out. **Scope of registration: Regulated activities – Care Quality Commission (cqc.org.uk)**.

If you are registering a completely new LARC service, you must await approval from the CQC before the service can begin. For example, if commencing a full LARC service covering the insertion and removal of implants and intrauterine methods, then both TDDI and Family Planning will need to be applied for.

Key point

If you are registering a completely new service to deliver LARC for the first time, you must await approval from the CQC before the provision of LARC can begin.

Ultimately, the role of the CQC registration is to support the safe provision of care for patients and providers

Training for LARC within an existing service

If an existing service wishes to commence delivery of intrauterine methods for contraception for the first time, they should amend their Statement of Purpose and apply to the CQC for the addition of the necessary Regulated Activities as described above ie apply for Family Planning as a regulated activity to cover the insertion and removal of coils for contraception.

However, healthcare professionals can still be trained within the practice or service whilst awaiting the approval of the additional Regulated Activities.

As mentioned previously, it is the service not the location that must register with the CQC. Therefore, if an existing service (such as a general practice or community gynaecology clinic) is already registered for under TDDI (this is worth checking, but will virtually always be the case), then training can commence whilst awaiting approval of the change of registration from the CQC. The reason for this, is because training for insertion of intrauterine techniques incorporates both insertion for contraceptive and non-contraceptive purposes (the latter, non-contraceptive purposes already being covered under TDDI, whilst awaiting the Family Planning approval to cover intrauterine contraception).

Key point

When an existing service wishes to commence delivery of intrauterine methods for contraception for the first time, training for new LARC fitters can commence onsite (under TDDI) whilst awaiting CQC approval for the change of registration.

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Removal of intrauterine devices

There is no requirement to achieve any kind of formal certification for routine IUD removals. Devices that have expired (or are no longer required) can be safely removed under TDDI without the need for amending CQC registration status.

Whilst the counselling and considerations for removal of IUDs is outside the scope of this article, it is important that the clinician removing the device recognises the importance of counselling regarding:

- Pregnancy risk;
- Return of menstruation;

and (where appropriate)

- Endometrial protection (this is especially relevant with the rise in use of intrauterine systems for hormonal replacement therapy).

There is no requirement to achieve any kind of formal certification for routine IUD removals

Key point

Where appropriate, intrauterine devices can be removed under 'Treatment of disease, disorder and injury' without the need for amending CQC registration status.

Which regulated activities should be considered when registering a women's health service for the first time?

If you are setting up a new women's health service, you need to consider registering for the following Regulated Activities:

- TDDI including fitting and removal of sub-dermal implants for contraception, treatment of menstrual disorders and menopause (including fitting and removal of intrauterine methods for non-contraceptive purposes).
- Family Planning services, this category only applies to the fitting and removal of intrauterine methods for contraceptive purposes, under the supervision of a healthcare professional.
- Surgical procedures.
- Diagnostic and screening procedures ie blood tests.
- Maternity and midwifery services.

For a full list of these services, please visit:
Scope of registration: Regulated activities – Care Quality Commission (cqc.org.uk).

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