

Niche – Our independence 2021-22

As a firm, we value our independence and integrity to the utmost. We have built a solid, long-standing reputation for delivering independent investigations, reviews and evaluations which can be trusted by our clients and regulatory bodies nationally. Niche is a wholly owned (by its Directors), independent consultancy. We have no external shareholders, and no contractual or other relationships with any other organisation which would compromise our independence. Our Directors and senior staff have no conflicting interests in any other organisation and we ask them to make regular declarations in this regard.



It is crucial that our clients, regulators and families that we work with can be assured that we will take an independent view, regardless of the bill-payer and consequences of our findings. When we consider bidding for a potential project, we always undertake a “Decision to Bid” analysis. This explicitly includes consideration of any conflicts of interest which we have, or might be perceived to have, with either the organisation inviting tenders or any relevant partners or proxies of that organisation. This process sometimes results in our not bidding for work for which we would otherwise be qualified – for example if we have a contract with a commissioner of mental health services to develop its strategy, and are then asked by a provider to help them seek work from that commissioner.

During the course of project delivery, we always resist actions which could compromise the independence of our analysis or advice. Evaluation, governance and strategic advice form the major part of our work, and we do at times experience pressure to emphasise particular points over others in our findings. We always make clear that we welcome corrections of factual accuracy in our work, but we are wholly and independently responsible for our findings, conclusions and recommendations. No other agency – including our client – has the authority to “sign off” our report, or to insist on a particular form of finding, and we would escalate to senior staff any effort to influence our conclusions in this way.

Within our firm we adopt different approaches to independence, as one single approach cannot be universally applied, depending on the service-line undertaking the work. Each service-line has devised a working statement on independence as follows:

- **Investigations** – Our investigations practice adopts the highest level of independence allowable within the contract and scope of the work. In most instances we contract directly with NHS England as the over-arching bill-payer; this ensures we are not perceived at any point to have reduced independence as the result of payments or disbursements. When we contract directly with clients we ensure we are always mindful of our perceived independence.

We understand, through all investigations that there is often more than one accountability, even where there is a single 'bill-payer'. Other accountable parties include:

- **Families and carers party to the investigation**
- **Staff at the Trust**
- **HM Coroner**
- **NHS England**
- **Crown Prosecution Service**
- **Other agencies involved**
- **The public**

During our investigations we apply routine checks and balances, we also regularly work with staff and associates who are professionally registered, such as nurses and doctors who are also obligated to uphold probity under their licence conditions.

- **Assurance** – As we are not FCA regulated, our governance practice works in line with audit principles, but provides a non 'opinion' based advisory support. Our advice is given principally from multiple years' industry experience as well as research and primary evidence interpretation from our fieldwork activities. We routinely undertake large-scale national evaluations with multiple clients and proxy clients. Many of these we have worked with on previous occasions. At the outset of each engagement, we examine our independence carefully and we assess whether there is the potential for conflict or inducement.

All of our evaluation activities are undertaken in line with principles which are designed to minimise the introduction of bias into our programme design and principles. Where it is necessary, we will ensure that we have appropriate ethical approval prior to undertaking our research or evaluation work.

In all of our evaluation work we consider the risks of bias and take steps to prevent this, for example, we would use different fieldwork teams, and in some cases, we might use a different Niche Partner to lead the review. We highlight any potential concerns to our clients and we provide a plan to mitigate any risks so as to avoid any later queries about our work.

- **Improvement Analytics** – With many of our modelling and analytics projects we are dealing with multiple thousands of data points across several different client groups. We are, in all instances seen as the data handler and not as controller. This means that we do not verify or analyse the data we are given in line with any UK or other auditing standards. The view of our analysts is derived only from the data provided by the client upon which we can only undertake minimal 'cleansing' and validation. Wherever possible, we seek data in its rawest form, to permit us to validate the accuracy of any data reports, and not to rely on clients' or partners' internally analysed or aggregated data.

Before entering into client engagements, we review the potential for conflicts (see information on conflicts) and inducements, taking action in line with those described above. Our work is of the highest professional standards and all work is covered under a contract scope, to be defined by the client. All work is conveyed under a 'letter of transmittal' and clients are asked to reflect if the work we have produced is sufficient to meet the terms of reference for the review. All work is assessed using our professional standards review approaches.

Where we are working with multiple client groups (even if there is only one 'bill-payer') we take additional care to ensure candid engagement throughout the lifespan of the project. This involves ensuring all parties have visibility on our assumptions and have the opportunity to query and question our models and strategic frameworks.

Niche health and Social Care Consulting, 2021