



The Regulation and  
Quality Improvement  
Authority

## **PRIMARY ANNOUNCED INSPECTION**

<b>Name of Agency:</b>	<b>Praxis Care Group</b>
<b>Agency ID No:</b>	<b>10829</b>
<b>Date of Inspection:</b>	<b>16 June 2014</b>
<b>Inspector's Name:</b>	<b>Jim McBride</b>
<b>Inspection No:</b>	<b>17513</b>

**The Regulation And Quality Improvement Authority  
9th floor Riverside Tower, 5 Lanyon Place, Belfast, BT1 3BT  
Tel: 028 9051 7500 Fax: 028 9051 7501**

**General Information**

<b>Name of Agency:</b>	Praxis Care Group - Foresthill
<b>Address:</b>	42 Foresthill Conlig Bangor BT23 7FL
<b>Telephone Number:</b>	02891468039
<b>E mail Address:</b>	hilarydoudican@praxiscare.org.uk
<b>Registered Organisation / Registered Provider:</b>	Praxis Care Group Mr Nevin Ringland
<b>Registered Manager:</b>	Mrs Hilary Anne Doudican
<b>Person in Charge of the Agency at the Time of Inspection:</b>	Mrs Hilary Anne Doudican
<b>Number of Service Users:</b>	16
<b>Date and Type of Previous Inspection:</b>	Primary Announced Inspection 5 August 2013, 09.30 – 15.00
<b>Date and Time of Inspection:</b>	16 June 2014 09.00-14.30
<b>Name of inspector:</b>	Jim McBride

## Introduction

The Regulation and Quality Improvement Authority (RQIA) is empowered under The Health and Personal Social Services (Quality, Improvement and Regulation) (Northern Ireland) Order 2003 to inspect supported living type domiciliary care agencies. A minimum of one inspection per year is required.

This is a report of a primary inspection to assess the quality of services being provided. The report details the extent to which the standards measured during the inspection were met.

## Purpose of the Inspection

The purpose of this inspection was to ensure that the service is compliant with relevant regulations, minimum standards and other good practice indicators and to consider whether the service provided to service users was in accordance with their assessed needs and preferences. This was achieved through a process of analysis and evaluation of available evidence.

RQIA not only seeks to ensure that compliance with regulations and standards is met but also aims to use inspection to support providers in improving the quality of services. For this reason, inspection involves in-depth examination of an identified number of aspects of service provision.

The aims of the inspection were to examine the policies, procedures, practices and monitoring arrangements for the provision of domiciliary care, and to determine the provider's compliance with the following:

- The HPSS (Quality, Improvement and Regulation) (Northern Ireland) Order 2003
- The Domiciliary Care Agencies Regulations (Northern Ireland) 2007
- The Department of Health, Social Services and Public Safety's (DHSSPS) Domiciliary Care Agencies Minimum Standards (2011)

Other published standards which guide best practice may also be referenced during the inspection process.

## Methods/Process

Committed to a culture of learning, RQIA has developed an approach which uses self-assessment, a critical tool for learning, as a method for preliminary assessment of achievement of the Minimum Standards.

The inspection process has three key parts; self-assessment, pre-inspection analysis and the visit undertaken by the inspector.

Specific methods/processes used in this inspection include the following:

- Analysis of pre-inspection information
- Discussion with the registered manager
- Examination of records
- Consultation with stakeholders
- File audit
- Evaluation and feedback

Any other information received by RQIA about this registered provider and its service delivery has also been considered by the inspector in preparing for this inspection.

### Consultation Process

During the course of the inspection, the inspector spoke to the following:

Service users	2
Staff	5
Relatives	0
Other Professionals	1

Questionnaires were provided, prior to the inspection, to staff to find out their views regarding the service. Matters raised from the questionnaires were addressed by the inspector in the course of this inspection.

Issued To	Number issued	Number returned
Staff	25	0

### Inspection Focus

The inspection sought to assess progress with the issues raised during and since the previous inspection and to establish the level of compliance achieved with respect to the following quality themes:

The following three quality themes were assessed at this inspection:

- **Theme 1 - Service users' finances and property are appropriately managed and safeguarded**
- **Theme 2 – Responding to the needs of service users**
- **Theme 3 - Each service user has a written individual service agreement provided by the agency**

### Review of Action plans/Progress to Address Outcomes from the Previous Inspection

The agency's progress towards full compliance with the three recommendations issued during the previous inspection of the 5 August 2013 was assessed.

The agency has fully met the recommendations made. The inspector verified compliance by the records made available and during discussions with the Registered Manager.

The registered provider and the inspector have rated the service's compliance level against each good practice indicator and also against each quality theme.

The table below sets out the definitions that RQIA has used to categorise the service's performance:

<b>Guidance - Compliance statements</b>		
<b>Compliance statement</b>	<b>Definition</b>	<b>Resulting Action in Inspection Report</b>
<b>0 - Not applicable</b>		A reason must be clearly stated in the assessment contained within the inspection report.
<b>1 - Unlikely to become compliant</b>		A reason must be clearly stated in the assessment contained within the inspection report.
<b>2 - Not compliant</b>	Compliance could not be demonstrated by the date of the inspection.	In most situations this will result in a requirement or recommendation being made within the inspection report.
<b>3 - Moving towards compliance</b>	Compliance could not be demonstrated by the date of the inspection. However, the service could demonstrate a convincing plan for full compliance by the end of the Inspection year.	In most situations this will result in a requirement or recommendation being made within the inspection report.
<b>4 - Substantially Compliant</b>	Arrangements for compliance were demonstrated during the inspection. However, appropriate systems for regular monitoring, review and revision are not yet in place.	In most situations this will result in a recommendation, or in some circumstances a requirement, being made within the inspection report.
<b>5 - Compliant</b>	Arrangements for compliance were demonstrated during the inspection. There are appropriate systems in place for regular monitoring, review and any necessary revisions to be undertaken.	In most situations this will result in an area of good practice being identified and comment being made within the inspection report.

## Profile of Service

Praxis Care Group, Foresthill, Conlig, Bangor, is a domiciliary care agency that provides support to 16 service users in 6 locations; three situated in Conlig and three situated in Newtownards. The houses are owned either by Trinity Housing Association or by private landlords. Referrals are accepted from any of the Health and Social Care Trusts, and one service user has been referred from Southern Ireland.

Under the direction of the manager, Mrs Hilary Doudican, the staff provide physical, social, emotional and spiritual support to 16 adult service users. The tenants have an enduring mental health need, a learning disability, acquired brain injury or diagnosis of dementia. The aim is to encourage service users' independence and normalisation, and social inclusion within the local community. No physical personal care is provided by staff to current tenants and the emphasis is on enablement and ordinary living principles.

## Summary of Inspection

The inspection was undertaken on 16 June 2014. The inspector met with the registered manager during the inspection.

The inspector had the opportunity to meet two service users in their own home. Service users who participated in the inspection provided very positive feedback in relation to the quality of care and support they receive from agency staff. Service users advised the inspector that they experience encouragement and support to maintain their independence and to take control of their life.

The inspector spoke to five staff. Staff stated that they had received training in human rights and that all service users have a care and support plan that meets their needs and has been prepared with HSC Trust involvement. Staff also stated that they had received training in the supported living model of care and commented on their understanding of this; comments included: "We promote human rights daily with tenants encouraging their choice and participation."

Records examined show clear evidence that the service is person centred and individual. This was acknowledged within individual care plans examined by the inspector as well as during discussion with the manager, staff and tenants.

It was good to note that the manager has introduced a service users' involvement group. The inspector read the minutes of the past few meetings at which quite a few of the tenants attended.

Discussions within the group shows clear evidence of the manager and the tenants looking at service improvement and how the agency could, with the tenants' involvement, improve the service and staff practice to help improve the lives of the tenants. The inspector has seen clear evidence that staff do promote positive interactions for tenants whilst increasing participation, independence, choice and inclusion within the local community. One tenant stated:-

"Staff help me with activities" and "All staff look after me well." One staff member stated:-  
"We promote community activities."

The manager and staff have shown clear evidence of effective communication with tenants to help and enable them identify their views and experiences and show how best to meet individual needs.

**Tenants' Comments:**

"Staff listen to me and what I want"

"I like living here"

"Staff help me with shopping but I have control of my money"

"Staff help me with activities"

"All staff look after me well"

"I have control over my life and do what I want to do"

"I am aware of my restrictions and I discuss this with the manager each month"

**Staff Comments:**

"Supervision is effective"

"Induction prepared me for the work"

"Staff communicate well with each other"

"We promote community activities"

"We promote human rights daily with tenants, encouraging their choice and participation"

**Detail of inspection process:**

**Theme 1 - Service users' finances and property are appropriately managed and safeguarded**

**The agency has achieved a compliance level of "Not Compliant" for this theme.**

The agency provided supporting evidence of documentation currently in place to ensure each individual service user has in place the following:

- Transport Agreement
- Domiciliary Care Agreement
- Service User Handbook
- Care Support Agreement
- Bills Agreement
- Finance Assessment
- Capacity Assessments

The above arrangements were discussed with the registered manager during the inspection. Service users are provided with a domiciliary care agreement; however it was unclear how the agency contributes to the other utilities costs. It is required that the agency review its procedure and show clear evidence of shared costs within the bills agreements section of individual support plans.

The documentation highlighted above shows evidence of specific terms and conditions in respect of service provision including the amounts and methods of payments, whilst the current statement of purpose describes the nature and range of services provided. The manager stated that staff buy and eat their own food whilst on duty.

## **Theme 2 – Responding to the needs of service users**

**The agency has achieved a compliance level of “Compliant” for this theme.**

The agency has in place comprehensive care/support plans. Reviews and risk assessments were in place and were up to date. The documentation includes a service summary outlining the service philosophy and service delivery. These care plans reflect the input of the HSC Trust and the thoughts and views of the service users and their representatives.

The current care plans focus on goals and outcomes for service users and are regularly reviewed to ensure that interventions are relevant. Care plans show clear evidence that the agency appropriately responds to the assessed needs of service users. It should be noted the ongoing review and user involvement in the areas of restrictive practice. This was further evidenced by one service users who stated: - “I am aware of my restrictions and I discuss this with the manager each month.”

The manager and staff explained the agency’s awareness of human rights and how it is inherent in all its work with service users.

The agency has in place comprehensive risk assessments describing capacity, as well as measuring the ability of individuals to achieve greater independence and choice in daily living.

Staff stated they had received human rights training; the last recorded session was completed on 6 May 2014.

## **Theme 3 - Each service user has a written individual service agreement provided by the agency**

**The agency has achieved a compliance level of “Compliant” for this theme.**

Each service user has in place an individual domiciliary care agreement provided by the agency. Records examined by the inspector show details of the amount and type of care provided by the agency.

The agency has in place referral information provided by the HSC Trust and this information forms part of the overall assessment of need, care plan and service summary.

The service users and their representatives are made aware of the number of hours care and support provided to each service user. Individual care plans state the type of care and support provided including one to one and two to one hours when required.

The manager and staff interviewed by the inspector discussed what care and support was provided to individuals daily. The service is person centred, whilst the needs and preferences of individual service users are set out in their individual care plan.

The agency’s policy on assessment and care planning and their statement of purpose/tenants guide describe how individual service user agreements are devised. The agency’s domiciliary care agreement is consistent with the care commissioned by the HSC Trust.



## **Additional matters examined**

The inspector read a number of monthly monitoring reports in place from January to September 2014. These have been completed regularly and were up to date and include action plans for service improvement.

Records examined show evidence of discussions with:

- Staff x 8
- Service users x 5
- Relatives x 5
- HSC Trust staff x5

The reports include updated information on any action plans in place following RQIA visits, as well as follow up information following the annual quality review. The manager stated that she and the agency's monitoring individual discuss the report following each visit.

### **Charging Survey:**

Prior to inspection the agency were asked to complete and return to the RQIA a charging survey, outlining the procedures and any charges incurred by service users in a supported living scheme. The returned survey shows that no service user is paying for additional care services that do not form part of the HSC Trust's care assessment.

The registered manager confirmed that agency staff do not act on behalf of service users as appointees but do act as agents and are in receipt of monies for safekeeping ensuring they keep income and expenditure records.

It was unclear how the agency contributes to shared utilities costs. It is required that the agency review its procedure and show clear evidence of shared costs within the bills agreements section of individual support plans. One requirement has been made in relation to charges.

### **Statement of Purpose:**

The agency's statement of purpose was examined and reflected the current nature and range of services provided by the agency at the time of the inspection. The agency's statement of purpose was reviewed in May 2014. However, during discussion with the manager, it was noted that the area of restrictive was not included within the statement of purpose; however, before the end of the inspection the manager had added a further statement that clearly reflects the nature and range of service provided.

**Annual review:**

The agency has a comprehensive Policy Statement, Procedure and associated documentation to ensure that service users' Personal Plans are recorded and maintained. The Procedure allows for additional reviews and/or changes to the Plan to be easily implemented, to reflect any changing need.

Records examined show clear evidence of the annual review of service users' needs having been completed by the relevant HSC Trusts and show evidence of attendance by the agency and representatives of the service users.

The inspector would like to thank the service users and agency staff for their warm welcome and full cooperation throughout the inspection process.

**Follow-Up on Previous Issues**

No.	Minimum Standard Ref.	Recommendations	Action Taken - As Confirmed During This Inspection	Number of Times Stated	Inspector's Validation Of Compliance
1	Standard 1.1	<p>It is recommended that the following is actioned by the registered manager in line with good practice issues in supported living:</p> <ul style="list-style-type: none"> <li>• Each tenant should have in place an agreement specifying the number of support hours available to them individually.</li> <li>• The service user's home must look like his/her home and not look like a workplace for care/support staff. To this end some notice boards and staff and agency information should be removed.</li> <li>• The agency may wish to consider access to the office via the current doorway.</li> </ul>	<p>This recommendation was assessed as fully met; the documentation in place was satisfactory.</p> <p>The inspector read a number of domiciliary care agreements in place that specify the number of support hours available to tenants individually.</p> <p>Notice boards have been removed and only information relevant to tenants is available in their homes.</p> <p>The agency does now use the patio entrance into the office and do not impinge on tenants' privacy.</p>	Once	Fully Met
2	Standard 1.1	The agency should ensure that the human rights of all service users are explicitly outlined in care records. Regulation 14.	This recommendation was assessed as fully met; the documentation in place was satisfactory.	Once	Fully Met

3	Standard 15.(6) (d)	The registered manager should further develop the procedures in place for the holding of individual debit cards and pin numbers. The registered person must ensure that bank and PIN numbers are kept separately in a secure location.	This recommendation was assessed as fully met; the documentation in place was satisfactory.	Once	Fully Met
---	---------------------	--	---	------	-----------

<b>THEME 1 - SERVICE USERS' FINANCES AND PROPERTY ARE APPROPRIATELY MANAGED AND SAFEGUARDED</b>	
<p><b>Statement 1:</b></p> <p><b>The agency maintains complete and up to date records in respect of the terms and conditions of the provision of personal care</b></p> <ul style="list-style-type: none"> <li>• The agency provides to each service user a written guide, including a personalised written agreement detailing the specific terms and conditions in respect of any specified service to be delivered, including the amount and method of payment of any charges to the service user;</li> <li>• The individual agreement details all charges payable by the service user to the agency, the services to be delivered in respect of these charges and the method of payment;</li> <li>• Where service users pay for additional personal care services which do not form part of the HSC trust's care assessment, documentation exists confirming that the HSC trust are aware of any arrangements in place between the agency and the service user;</li> <li>• The individual agreement clarifies what arrangements are in place to apportion shared costs between the agency and the service user(s). This includes those costs associated with any accommodation used in connection with agency business, where this is conducted from the service users' home;</li> <li>• There are arrangements in place to quantify the costs associated with maintaining any unused areas within the service users' home which they do not have exclusive possession of;</li> <li>• The service user guide/ individual agreement clarifies what the arrangements are for staff meals while on duty in the service users' home;</li> <li>• Where the agency is involved in supporting a service user with their finances or undertaking financial transactions on the service user's behalf, the arrangements and records to be kept are specified in the service user's individual agreement;</li> <li>• The agency has a policy and procedure in place to detail the arrangements where support is provided by agency staff to enable the service users to manage their finances and property;</li> <li>• The agency notifies each service user in writing, of any increase in the charges payable by the service user at least 4 weeks in advance of the increase and the arrangements for these written notifications are included in each service user's agreement</li> </ul>	<p><b>COMPLIANCE LEVEL</b></p>

like a workplace for care/support staff.

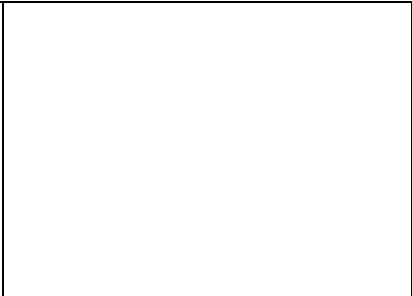
<p><b>Provider’s Self-Assessment</b></p>	
<p>ForesthillUp to date records are completed within the following documents:-Transport Agreement/Support Agreement/Licence Agreement/Occupancy Agreements/Financial Agreement/ Support Agreement/Service User guide agreed by the Statutory Keyworker..The agreements outline charges which are reviewed yearly or as required. All Care plans,reviews,risk assessments are contained in the Service Users file and are reviewed either 6 monthly or yearly. The Office at Foresthill is rented out from Trinity Housing to Praxis Care.</p>	<p>Compliant</p>
<p><b>Inspection Findings:</b></p>	
<p>Documents in place included the service users’ guide, care/support agreements, personal care plans and individual finance summary’s show clear evidence of how service users manage their finances. One service user has an identified appointee who is not part of the agency and documentation clarifying this was in place. Service users do not make any personal contribution to the cost of their care or support.</p> <p>Staff who assist service users with shopping etc. have in place a procedure for recording all transactions with two signatures and regular reconciliations of monies. The manager stated that “Staff provide their own food when on duty.” Service users who participated in the inspection advised the inspector that they are encouraged to personalise their accommodation and that agency staff respect their privacy.</p> <p>The agency stated in their returned review documentation that records of reviews were completed. Records in place verify that the agency has notified each service user in writing, of the increase in the charges payable by the service user at least four weeks in advance of the increase and the arrangements for these written notifications were included in each service user’s agreement and were processed in April 2014.</p> <p>It was unclear how the agency contributes to the other utilities costs. It is required that the agency review its procedure and show clear evidence of shared costs within the bills agreements section of individual support plans.</p>	<p>Not Compliant</p>

<b>THEME 1 - SERVICE USERS' FINANCES AND PROPERTY ARE APPROPRIATELY MANAGED AND SAFEGUARDED</b>	
<p><b>Statement 2:</b></p> <p><b>Arrangements for receiving and spending service users' monies on their behalf are transparent, have been authorised and the appropriate records are maintained:</b></p> <ul style="list-style-type: none"><li>• The HSC trust's assessment of need describes the individual needs and capabilities of the service user and the appropriate level of support which the agency should provide in supporting the service user to manage their finances;</li><li>• The agency maintains a record of the amounts paid by/in respect of each service user for all agreed itemised services and facilities, as specified in the service user's agreement;</li><li>• The agency maintains a record of all allowances/ income received on behalf of the service user and of the distribution of this money to the service user/their representative. Each transaction is signed and dated by the service user/their representative and a member of staff. If a service user/their representative are unable to sign or choose not to sign for receipt of the money, two members of staff witness the handover of the money and sign and date the record;</li><li>• Where items or services are purchased on behalf of service users, written authorisation is place from the service user/their representative to spend the service user's money on identified items or services;</li><li>• There are contingency arrangements in place to ensure that the agency can respond to the requests of service users for access to their money and property at short notice e.g.: to purchase goods or services not detailed on their personal expenditure authorisation document(s);</li><li>• The agency ensures that records and receipts of all transactions undertaken by the staff on each service user's behalf; are maintained and kept up-to-date;</li><li>• A reconciliation of the money/possessions held by the agency on behalf of service users is carried out, evidenced and recorded, at least quarterly;</li><li>• If a person associated with the agency acts as nominated appointee for a service user, the arrangements for this are discussed and agreed in writing with the service user/ their representative, and if involved, the representative from the referring Trust. These arrangements are noted in the service user's agreement and a record is kept of the name of the nominated appointee, the service user on whose behalf they act and the date they were approved by the Social Security Agency to act</li></ul>	<p><b>COMPLIANCE LEVEL</b></p>



<p>as nominated appointee;</p> <ul style="list-style-type: none"> <li>• If a member of staff acts as an agent, a record is kept of the name of the member of staff, the date they acted in this capacity and the service user on whose behalf they act as agent;</li> <li>• If the agency operates a bank account on behalf of a service user, written authorisation from the service user/their representative/The Office of Care and Protection is in place to open and operate the bank account,</li> <li>• Where there is evidence of a service user becoming incapable of managing their finances and property, the registered person reports the matter in writing to the local or referring Trust, without delay;</li> </ul> <p>If a service user has been formally assessed as incapable of managing their finances and property, the amount of money or valuables held by the agency on behalf of the service user is reported in writing by the registered manager to the referring Trust at least annually, or as specified in the service user’s agreement.</p>	
<p><b>Provider’s Self-Assessment</b></p>	
<p>Each individual Care Plan/Finance agreement outlines support given by the Agency.          Financial Capacity Assessments are completed by Service Users and Keyworkers and agreed by Statutory Keyworkers.          An income record is kept which Service Users and Statutory Keyworkers receive a copy annually or as requested.          Expenditure records are kept which includes invoices and receipts.          A reconciliation of expenditure is completed regularly (at least quarterly)          Written authorisation is sought from the Service User to act as an appointee or agent.          Written communication is completed when there are concerns around the Service User capacity and sent to Statutory Keyworker</p>	<p>Compliant</p>
<p><b>Inspection Findings:</b></p>	
<p>The inspector examined a number of finance assessments, capacity assessments and domiciliary care agreements in place. The documents outline the individual responsibilities of the service users as well as staff and show clear procedures to be followed when handling service users’ monies. Records in place show receipts and signatures as well as regular reconciliations in line with procedures. The staff on duty stated that they have received training on the handling of service users’ monies. The manager stated this training is part of the induction process. One service user has been assessed by the relevant authority as lacking the capacity to take responsibility for their finances and their monies are handled by the office of care and</p>	<p>Not Compliant</p>

protection. The inspector examined the relevant documents in place. Annual reviews completed by the HSC Trust show evidence of finance arrangements in place. The manager stated that service users have the support of their family members to help manage their finances. The agency maintains a record of the amounts paid by/in respect of each service user for all agreed itemised services and facilities, as specified in their domiciliary care agreement; However, it was unclear how the agency contributes to the other utilities costs. It is required that the agency review its procedure and show clear evidence of shared costs within the bills agreements section of individual support plans.



<b>THEME 1 - SERVICE USERS' FINANCES AND PROPERTY ARE APPROPRIATELY MANAGED AND SAFEGUARDED</b>	
<p><b>Statement 3:</b></p> <p><b>Where a safe place is provided within the agency premises for the storage of money and valuables deposited for safekeeping; clear, up to date and accurate records are maintained:</b></p> <ul style="list-style-type: none"> <li>• Where the agency provides an appropriate place for the storage of money and valuables deposited for safekeeping, robust controls exist around the persons who have access to the safe place;</li> <li>• Where money or valuables are deposited by service users with the agency for safekeeping and returned, a record is signed and dated by the service user/their representative, and the member of staff receiving or returning the possessions;</li> <li>• Where a service user has assessed needs in respect of the safety and security of their property, there are individualised arrangements in place to safeguard the service user's property;</li> <li>• Service users are aware of the arrangements for the safe storage of these items and have access to their individual financial records;</li> <li>• Where service users experience restrictions in access to their money or valuables, this is reflected in the service user's HSC trust needs/risk assessment and care plan;</li> </ul> <p>A reconciliation of the money and valuables held for safekeeping by the agency is carried out at regular intervals, but least quarterly. Errors or deficits are handled in accordance with the agency's SVA procedures.</p>	<b>COMPLIANCE LEVEL</b>
<p><b>Provider's Self-Assessment</b></p> <p>Procedures for the storage of money and valuables is recorded within the Service Users File.            Safe Records are maintained as per agency policy.            Income and Expenditure records are kept as per agency policy.            Service users are aware of the procedures in place and have access to their individual financial records. Restrictions of money and valuables is reflected in the Service User Financial Plan.            Regular reconciliation of money and valuables are audited by the manager monthly. Staff audit the monies daily and the Administrator audits weekly.</p>	Compliant

Inspection Findings:	
<p>Service users have individual safe storage areas for their monies within their own homes, no restrictions are in place for access. Records in place show signatures and receipts in place as well as regular reconciliations and balances of income and expenditure for those service users who may need help. Two tenants interviewed stated: "We have our money and decide how to spend it."</p>	<p>Compliant</p>

**THEME 1 - SERVICE USERS' FINANCES AND PROPERTY ARE APPROPRIATELY MANAGED AND SAFEGUARDED**

**Statement 4:**

**Arrangements for providing transport to service users are transparent and agreed in writing with the service user/their representative:**

**COMPLIANCE LEVEL**

- The needs and resources of the individual service user are considered in conjunction with the HSC Trust assessment;
- The charges for transport provision for an individual service user are based on individual usage and are not based on a flat-rate charge;
- Service users have the opportunity to opt out of the transport scheme and the arrangements for opting out are detailed within the agency's policies and procedures;
- Written agreement between the service user and the agency is in place, detailing the terms and conditions of the transport scheme. The agreement includes the charges to be applied and the method and frequency of payments. The agreement is signed by the service user/ their representative/HSC trust where relevant and a representative of the service;
- Written policies and procedures are in place detailing the terms and conditions of the scheme and the records to be kept;
- Records are maintained of any agreements between individual service users in relation to the shared use of an individual's Motability vehicle;
- Where relevant, records are maintained of the amounts of benefits received on behalf of the service user (including the mobility element of Disability Living Allowance);
- Records detail the amount charged to the service user for individual use of the vehicle(s) and the remaining amount of Social Security benefits forwarded to the service user or their representative;
- Records are maintained of each journey undertaken by/on behalf of the service user. The record includes: the name of the person making the journey; the miles travelled; and the amount to be charged to the service user for each journey, including any amount in respect of staff supervision charges;
- Where relevant, records are maintained of the annual running costs of any vehicle(s) used for the transport scheme;
- The agency ensures that the vehicle(s) used for providing transport to service users, including private

<p>(staff) vehicles, meet the relevant legal requirements regarding insurance and road worthiness. Where the agency facilitates service users to have access to a vehicle leased on the Motability scheme by a service user, the agency ensures that the above legal documents are in place;</p> <ul style="list-style-type: none"> <li>Ownership details of any vehicles used by the agency to provide transport services are clarified.</li> </ul>	
<p><b>Provider’s Self-Assessment</b></p>	
<p>Service User needs are discussed with the Service User and HSC. A transport agreement is completed if required and signed annually with the Service User. A written log of journeys taken by the service user is recorded through a Vehicle Log Book or Staff Expense Form. Records of DLA Mobility is recorded in the Financial Plan of each Service User. All Documentation in relation to Insurance/Driving Licence/MOT cert./Ownership/Rental Company are kept and reviewed regularly. Currently no service users share a vehicle under the Mobility Scheme</p>	<p>Compliant</p>
<p><b>Inspection Findings:</b></p>	
<p>The charges for transport provision for an individual service user are based on individual usage and are not based on a flat-rate charge. Written policies and procedures are in place detailing the terms and conditions of the scheme and the records to be kept.</p>	<p>Compliant</p>

<p><b>PROVIDER’S OVERALL ASSESSMENT OF THE AGENCY’S COMPLIANCE LEVEL AGAINST THE STANDARD ASSESSED</b></p>	<p><b>COMPLIANCE LEVEL</b></p>
	<p>Compliant</p>

<p><b>INSPECTOR’S OVERALL ASSESSMENT OF THE AGENCY’S COMPLIANCE LEVEL AGAINST THE STANDARD ASSESSED</b></p>	<p><b>COMPLIANCE LEVEL</b></p>
	<p>Not Compliant</p>

<b>THEME 2 – RESPONDING TO THE NEEDS OF SERVICE USERS</b>	
<b>Statement 1:</b>	<b>COMPLIANCE LEVEL</b>
<p><b>The agency responds appropriately to the assessed needs of service users</b></p> <ul style="list-style-type: none"> <li>• The agency maintains a clear statement of the service users’ current needs and risks.</li> <li>• Needs and risk assessments reflect the input of the HSC Trust and contain the views of service users and their representatives.</li> <li>• Agency staff record on a regular basis their outcome of the service provided to the individual</li> <li>• Service users’ care plans reflect a range of interventions to be used in relation to the assessed needs of service users</li> <li>• Service users’ care plans have been prepared in conjunction with the service user and their HSC Trust representative(s) and reflect appropriate consideration of human rights.</li> </ul>	
<b>Provider’s Self-Assessment</b>	
<p>A individual Care plan is completed for all service users which identifies their needs,risks,care and restrictions taking into consideration the Human Rights of each Service User.                      A Comprehensive Risk Assessment is completed by the HSC Trust when appropriate. Service Users provide feedback to the HSC Trust at their reviews.                      Personal Development Plans and Monthly Synopsis outline achievements completed monthly                      A range of interventions are recorded in the service users care plan to meet or address identified needs and risks..</p>	Compliant
<b>Inspection Findings:</b>	
<p>HSC Trust referral information informs the individual care plans and risk assessments in place. The inspector read four care plans and these clearly show that the service is person centred whilst discussing outcomes and personal goals. The current care plans focus on goals and outcomes for service users and are regularly reviewed to ensure that interventions are relevant. Records in place show the involvement of the HSC Trust and service user representatives in the process. It was good to note that human rights considerations are implicit in the agency’s documentation and include specific human rights articles relevant to the service users. Staff stated they had received human rights training; the last recorded session was completed on the 6 May 2014. Care plans show clear evidence that the agency appropriately responds to</p>	Compliant

the assessed needs of service users. Records examined show a range of interventions practiced in the care and support of individuals.	
---	--



<b>THEME 2 – RESPONDING TO THE NEEDS OF SERVICE USERS</b>	
<p><b>Statement 2:</b></p> <p><b>Agency staff have the appropriate level of knowledge and skill to respond to the needs of service users</b></p> <ul style="list-style-type: none"> <li>• Agency staff have received training and on-going guidance in the implementation of care practices</li> <li>• The effectiveness of training and guidance on the implementation of specific interventions is evaluated.</li> <li>• Agency staff can identify any practices which are restrictive and can describe the potential human rights implications of such practices.</li> <li>• The agency maintains policy and procedural guidance for staff in responding to the needs of service users</li> <li>• The agency evaluates the impact of care practices and reports to the relevant parties any significant changes in the service user’s needs.</li> <li>• Agency staff are aware of their obligations in relation to raising concerns about poor practice</li> </ul>	<b>COMPLIANCE LEVEL</b>
<p><b>Provider’s Self-Assessment</b></p> <p>All staff receive regular mandatory training and additional training which reflects the needs of the service users. Ongoing guidance is provided through regular supervision, team meetings and staff meetings. Staff are aware of restrictive practice and can reflect on the Human Rights Act with service users through monthly meetings.. Staff are aware of the policies and procedures which support good practice ie service user charter, management of challenging behaviours, the whistleblowing policy/ n.i.s.c.c. code of conduct/ untoward events./service user involvement strategy/Risk Ass and Management Policy for Service Users/Safeguarding Adults Procedure/Service Support Standards/Risk Management Strategy Reviews take place regularly which evaluates the care provided to each Service User.</p>	Compliant

<b>Inspection Findings:</b>	
<p>The inspector examined a number of training records, staff competency assessments and evaluation records in place. The manager and staff stated that training completed shows that they have the appropriate level of knowledge and skill to respond to the needs of service users. The manager discussed with the inspector the on-going competency assessments of staff and shared the written records in place. Records in place show that training is evaluated and discussed during supervision and appraisal with staff this was also verified by staff during discussions. The inspector discussed with the manager and staff, reporting procedures if they had any concerns about poor practice, staff were clear about the reporting procedures and were able to explain in detail how they would take these concerns forward. Agency staff described their understanding of restrictive practice and identified the use of a restrictive practice in the homes of service users, i.e. having alarms on one service users 'door at night.</p>	<p>Compliant</p>

<b>THEME 2 – RESPONDING TO THE NEEDS OF SERVICE USERS</b>	
<p><b>Statement 3:</b></p> <p><b>The agency ensures that all relevant parties are advised of the range and nature of services provided by the agency</b></p> <ul style="list-style-type: none"> <li>• Service users and their relatives and potential referral agents are advised of any care practices that are restrictive or impact on the service users’ control, choice and independence in their own home.</li> <li>• The agency’s Statement of Purpose and Service User Guide makes appropriate references to the nature and range of service provision and where appropriate, includes restrictive interventions</li> <li>• Service users are advised of their right to decline aspects of their care provision. Service users who lack capacity to consent to care practices have this documented within their care records.</li> <li>• Service users are provided with a copy of their care plan (in a format that is appropriate to their needs and level of understanding) and receive information in relation to potential sources of (external) support to discuss their needs and care plan.</li> <li>• The impact of restrictive practices on those service users who do not require any such restrictions.</li> </ul>	<b>COMPLIANCE LEVEL</b>
<p><b>Provider’s Self-Assessment</b></p> <p>The Statement of Purpose outlines the range and nature of the services provided by the agency. Restrictive practices are highlighted in the Care Plans and are reviewed regularly.. A Service User Guide highlights the provision of care available to them.All Service Users are consulted and included in their care provision package. Information is available to service users in making decisions or seeking help from outside agencies.</p>	Compliant

<b>Inspection Findings:</b>	
<p>Each service user has in place a care plan the inspector examined four of the records in place and the manager stated restrictive practices are currently in place. The tenants guide and the statement of purpose describe the nature and range of the service provided. Information is available to service users about independent advocacy services available to them and their representative. Care plans in place are relevant to the individual and are in a format suitable to individual need. Service users are advised in their tenants' handbook of their right to decline aspects of their care provision.</p>	<p>Compliant</p>

<b>THEME 2 – RESPONDING TO THE NEEDS OF SERVICE USERS</b>	
<p><b>Statement 4</b>  <b>The registered person ensures that there are robust governance arrangements in place with regard to any restrictive care practices undertaken by agency staff.</b></p> <ul style="list-style-type: none"> <li>• Care practices which are restrictive are undertaken only when there are clearly identified and documented risks and needs.</li> <li>• Care practices which are restrictive can be justified, are proportionate and are the least restrictive measure to secure the safety or welfare of the service user.</li> <li>• Care practices are in accordance with the DHSSPS (2010) Circular HSC/MHDP – MHU 1 /10 – revised. Deprivation of Liberty Safeguards. (DOLS) – Interim Guidance.</li> <li>• The agency evaluates the impact of restrictive care practices and reports to the relevant parties any significant changes in the service user’s needs.</li> <li>• The agency maintains records of each occasion restraint is used and can demonstrate that this was the only way of securing the welfare of the service user (s) and was used as a last resort.</li> <li>• Restraint records are completed in accordance with DHSSPS (2005) Human Rights Working Group on Restraint and Seclusion: Guidance on Restraint and Seclusion in Health and Personal Social Services.</li> <li>• The agency forwards to RQIA and other relevant agencies notification of each occasion restraint is used</li> <li>• The registered person monitors the implementation of care practices which are restrictive in nature and includes their on-going assessment of these practices within the monthly quality monitoring report</li> </ul>	<b>COMPLIANCE LEVEL</b>
<b>Provider’s Self-Assessment</b>	
<p>Audits of restrictive practices are reviewed monthly with service users and six monthly with Statutory keyworkers.                      Restrictive practice is discussed with staff at supervision or at staff meetings.                      Restrictive practice is implemented through multi-disciplinary agreement. Service Users Human rights are considered throughout this process                      Policies and procedures are in place in relation to untoward reporting, managing challenging behaviours,</p>	Compliant

<p>whistleblowing, safeguarding vulnerable adults.                  Untoward - Incident reports are completed and copied to all relevant parties as per the agency policy including where restraint has been implemented as a last resort.</p>	
<p><b>Inspection Findings:</b></p>	
<p>As stated by the agency in their self-assessment there are restrictive measures in place. This was verified by the manager and staff interviewed during discussion. One tenant who is subject to restrictions stated "I am aware of my restrictions and I discuss this with the manager each month." Care practices which are restrictive are undertaken only when there are clearly identified and documented risks and needs.</p> <p>Care practices which are restrictive can be justified, are proportionate and are the least restrictive measure to secure the safety or welfare of the service user. This was discussed with the service user and the manager. Care practices are in accordance with the DHSSPS (2010) Circular HSC/MHDP – MHU 1 /10 – revised. Deprivation of Liberty Safeguards. (DOLS) – Interim Guidance. Agency staff who met with the inspector described their understanding of restrictive practice and identified the use of a restrictive practice in the homes of service users, i.e. locking a door at night.</p> <p>The agency evaluates the impact of restrictive care practices and reports to the relevant parties any significant changes in the service user’s needs. This was in evidence the inspector reviewed the comprehensive records of the review and evaluation in place within the agency.</p> <p>Staff were able to describe the training in place both in challenging behaviour and human rights and how they uphold individual rights.</p>	<p>Complaint</p>

<b>PROVIDER'S OVERALL ASSESSMENT OF THE AGENCY'S COMPLIANCE LEVEL AGAINST THE STANDARD ASSESSED</b>	<b>COMPLIANCE LEVEL</b>
	Provider to complete
<b>INSPECTOR'S OVERALL ASSESSMENT OF THE AGENCY'S COMPLIANCE LEVEL AGAINST THE STANDARD ASSESSED</b>	<b>COMPLIANCE LEVEL</b>
	Compliant

<b>THEME 3 - EACH SERVICE USER HAS A WRITTEN INDIVIDUAL SERVICE AGREEMENT PROVIDED BY THE AGENCY</b>	
<p><b>Statement 1</b></p> <p><b>Evidence inspected confirms that service users/representatives have written information and/or had explained to them the amount and type of care provided by the agency</b></p> <ul style="list-style-type: none"> <li>• Service users/representatives can describe the amount and type of care provided by the agency</li> <li>• Staff have an understanding of the amount and type of care provided to service users</li> <li>• The agency’s policy on assessment and care planning and the statement of purpose/service user guide describe how individual service user agreements are devised.</li> <li>• The agency’s service user agreement is consistent with the care commissioned by the HSC Trust. The agency’s care plan accurately details the amount and type of care provided by the agency in an accessible format.</li> </ul>	<b>COMPLIANCE LEVEL</b>
<b>Provider’s Self-Assessment</b>	
<p>Service Users and staff can describe the process of Assessment &amp; Care Planning. Service Users all have a Service User guide and can access the Statement of Purpose within their own home. Staff have an understanding of the amount and type of care provided to service user.</p>	Moving towards compliance
<b>Inspection Findings:</b>	
<p>Records examined by the inspector show clear details of the amount and type of care provided by the agency. A breakdown of care and support hours is included in the records available for inspection these are individual to each service user depending on assessed care and support needs.</p> <p>The agency has in place referral information provided by the HSC Trust and this information forms part of the overall assessment of need. The service users and their representatives are made aware of the number of hours care and support that is available to them. Care plans state the type of care and support provided. The manager and staff interviewed by the inspector were able to describe what care and support was provided to</p>	Compliant



individuals daily. The service is person centred whilst wishes, preferences and choice is included in the care plan. The agency's policy on assessment and care planning and their statement of purpose/service user guide describe how individual service user agreements are devised. The agency's care plans are consistent with the care commissioned by the HSC Trust. The agency's care plan information accurately details the amount and type of care provided by the agency in an accessible format.

**THEME 3 - EACH SERVICE USER HAS A WRITTEN INDIVIDUAL SERVICE AGREEMENT PROVIDED BY THE AGENCY**

Statement 2	COMPLIANCE LEVEL
<p><b>Evidence inspected confirms that service users/representatives understand the amounts and method of payment of fees for services they receive as detailed in their individual service agreement.</b></p> <ul style="list-style-type: none"> <li>• Service users/representatives can demonstrate an understanding of the care they receive which is funded by the HSC Trust</li> <li>• Service users/representatives can demonstrate an understanding of the care which they pay for from their income.</li> <li>• Service users/representatives have an understanding of how many hours they are paying for from their income, what services they are entitled to and the hourly rate.</li> <li>• Service users/representatives have an understanding of how to terminate any additional hours they are paying for from their income</li> <li>• Service users/representatives have been informed that cancellation of additional hours they are paying for from their income will not impact upon their rights as a tenant.</li> </ul>	
<b>Provider's Self-Assessment</b>	
<p>Service Users can describe their care package.                      Service Users are aware that they can purchase additional services which are not detailed in their support agreement. The agency will complete an authorisation form detailing costs which is agreed by the Service User and Statutory Keyworker</p>	<p>Compliant</p>

<p><b>Inspection Findings:</b></p>	
<p>Each service user has in place a domiciliary care agreement that states the type and amount of care to be provided and what costs are being paid by the HSC Trust for care and support. This payment structure is also stated in the agency’s self-assessment. Records in place examined during inspection shows that no service user makes a contribution from their personal income towards their care and support. It was unclear what this payment was for; it is required that the agency review all care/support costs and ensure that the domiciliary care agreements are updated to reflect all costs and payments made by the HSC Trust and individual tenants.</p> <p>Domiciliary care agreements show evidence that the costs and service provided have been discussed with service users and their representatives as well as the HSC Trust. The documentation in place was signed off by the service users’ representatives, HSC Trust staff and agency staff. Each service user has in place a breakdown of the hours of care and support they will receive.</p>	<p>Compliant</p>

<p><b>THEME 3 - EACH SERVICE USER HAS A WRITTEN INDIVIDUAL SERVICE AGREEMENT PROVIDED BY THE AGENCY</b></p>	
<p><b>Statement 3</b>  <b>Evidence inspected confirms that service users’ service agreements, care plans are reviewed at least annually confirming that service users/representatives are in agreement with the care provided and the payment of any fees.</b></p> <ul style="list-style-type: none"> <li>• Service users/representatives confirm that their service agreement, care plans are reviewed at least annually by the commissioning HSC Trust, and confirm that they are in agreement with the care provided and the payment of any fees.</li> <li>• Records and discussion with staff confirm that the agency contributes to the HSC Trust annual review.</li> <li>• Records and discussion with staff confirm that reviews can be convened as and when required, dependent upon the service user’s needs and preferences.</li> <li>• Records confirm that service users’ service agreements, care plans are updated following reviews.</li> </ul>	<p><b>COMPLIANCE LEVEL</b></p>

Authorisation from the HSC Trust and consent from the service user/representative is documented in relation to any changes to the care plan or change to the fees paid by the service user.	
<b>Provider's Self-Assessment</b>	
Service Users agreements are reviewed yearly or when required with the Statutory keyworker and Service User.. Records show a multi-disciplinary meeting is held yearly or as required. All changes are discussed at the Annual Reviews or when required, notifying all involved.	Compliant
<b>Inspection Findings:</b>	
Prior to inspection the agency were asked to forward to the RQIA details of service users annual reviews. The information received and the records examined by the inspector shows clear evidence that annual reviews have taken place and the records were in place. It was clear from records and discussion with the manager that the agency staff are in regular contact with the HSC Trust and that changing needs and risks are discussed on an on-going basis	Compliant

<b>PROVIDER'S OVERALL ASSESSMENT OF THE AGENCY'S COMPLIANCE LEVEL AGAINST THE STANDARD ASSESSED</b>	<b>COMPLIANCE LEVEL</b>
	Provider to complete

<b>INSPECTOR'S OVERALL ASSESSMENT OF THE AGENCY'S COMPLIANCE LEVEL AGAINST THE STANDARD ASSESSED</b>	<b>COMPLIANCE LEVEL</b>
	Compliant

## **Any other areas examined**

### **Complaints**

The agency has had five complaints during the last year; this was verified by returns sent to RQIA and examination of records held on site. Discussion with the manager and records examined show that all complaints were resolved satisfactorily.

### **Quality Improvement Plan**

The details of the Quality Improvement Plan appended to this report were discussed with Mrs Hilary Doudican, the registered manager, as part of the inspection process.

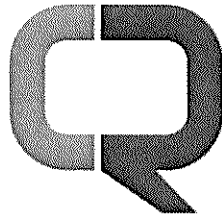
The timescales for completion commence from the date of inspection.

The registered provider/manager is required to record comments on the Quality Improvement Plan.

Matters to be addressed as a result of this inspection are set in the context of the current registration of your premises. The registration is not transferable so that in the event of any future application to alter, extend or to sell the premises the RQIA would apply standards current at the time of that application.

Enquiries relating to this report should be addressed to:

**Jim Mc Bride**  
**The Regulation and Quality Improvement Authority**  
**9th Floor**  
**Riverside Tower**  
**5 Lanyon Place**  
**Belfast**  
**BT1 3BT**



The Regulation and  
Quality Improvement  
Authority

## Quality Improvement Plan

### Announced Primary Inspection

#### Praxis Care Group - Foresthill

16 June 2014

The areas where the service needs to improve, as identified during this inspection visit, are detailed in the inspection report and Quality Improvement Plan.

The specific actions set out in the Quality Improvement Plan were discussed with Mrs Hilary Doudican the registered manager both during and after the inspection visit.

Any matters that require completion within 28 days of the inspection visit have also been set out in separate correspondence to the registered persons.

**Registered providers / managers should note that failure to comply with regulations may lead to further enforcement and/or prosecution action as set out in The HPSS (Quality, Improvement and Regulation) (Northern Ireland) Order 2003.**

It is the responsibility of the registered provider / manager to ensure that all requirements and recommendations contained within the Quality Improvement Plan are addressed within the specified timescales.

Matters to be addressed as a result of this inspection are set in the context of the current registration of your premises. The registration is not transferable so that in the event of any future application to alter, extend or to sell the premises the RQIA would apply standards current at the time of that application.

**Statutory Requirements**

**This section outlines the actions which must be taken so that the Registered Person/s meets legislative requirements based on The HPSS (Quality, Improvement and Regulation) (Northern Ireland) Order 2003 and The Day Care Settings Regulations (NI) 2007**

No.	Regulation Reference	Requirements	Number Of Times Stated	Details Of Action Taken By Registered Person(S)	Timescale
1	15 (6) (d)	<p>The registered person shall specify the procedure to be followed where an agency acts as agent for, or receives money from, a service user. This refers to the charges made from personal income. In relation to the following costs:</p> <ul style="list-style-type: none"> <li>• Utilities bills</li> </ul> <p>The service user's individual financial/bills agreements will have to be further developed to reflect any payments made by them for utilities costs and any reimbursements received.</p> <p>This requirement is in relation to the agency's arrangements for documenting in detail the nature of all charges made to service users.</p>	Once	The Registered Manager will ensure that all details in relation to individual costs associated with additional support costs will be clearly described and defined in the Bills Agreement and understood by the Registered Manager and the Service User.	3 Months from inspection date.- 16 September 2014

Please complete the following table to demonstrate that this Quality Improvement Plan has been completed by the registered manager and approved by the responsible person / identified responsible person:

<b>Name of Registered Manager Completing Qip</b>	Hilary Doudican
<b>Name of Responsible Person / Identified Responsible Person Approving Qip</b>	Andy Mayhew on behalf of Irene Sloan

QIP Position Based on Comments from Registered Persons	Yes	Inspector	Date
Response assessed by inspector as acceptable	Yes	<i>J. McHale</i>	8/12/14
Further information requested from provider			