



The Regulation and
Quality Improvement
Authority

Towell House
RQIA ID: 1660
57 Kings Road
Belfast
BT5 7BS

Inspector: Joe McRandle
Inspection ID: IN023297

Tel: 028 9040 1642
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**Announced Finance Inspection
of
Towell House**

6 August 2015

The Regulation and Quality Improvement Authority
9th Floor Riverside Tower, 5 Lanyon Place, Belfast, BT1 3BT
Tel: 028 9051 7500 Fax: 028 9051 7501 Web: www.rqia.org.uk

1. Summary of Inspection

An announced finance inspection took place on 6 August 2015 from 10:25 to 17:50. Twenty four hours' notice was given prior to the inspection. Overall on the day of the inspection the home was found to be delivering safe, effective and compassionate care in relation to the management of residents' finances. Areas for improvement were identified and are set out in the Quality Improvement Plan (QIP) appended to this report. This inspection was underpinned by the Residential Care Homes Regulations (Northern Ireland) 2005.

1.1 Actions/Enforcement Taken Following the Last Inspection

Other than those actions detailed in the previous QIP there were no further actions required to be taken following the last inspection.

1.2 Actions/Enforcement Resulting from this Inspection

Enforcement action did not result from the findings of this inspection.

1.3 Inspection Outcome

| | Requirements | Recommendations |
|---|--------------|-----------------|
| Total number of requirements and recommendations made at this inspection | 5 | 5 |

The details of the QIP within this report were discussed with Mrs Sarah Grieve, Deputy Manager, and Ms Bronagh Berry, Home Co-ordinator as part of the inspection process. The timescales for completion commence from the date of inspection.

2. Service Details

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|---|--|
| Registered Organisation/Registered Person: Gillian Brooker | Registered Manager: Gillian Millar |
| Person in Charge of the Home at the Time of Inspection: Mrs Sarah Grieve (Deputy Manager) | Date Manager Registered: 19 January 2015 |
| Categories of Care: RC-DE, RC-I, RC-PH | Number of Registered Places: 84 |
| Number of residents on the day of Inspection: 77 | Weekly Tariff at Time of Inspection: £470 - £548 |

3. Inspection Focus

The inspection sought to assess progress with the issues raised during and since the previous inspection and to determine if the following themes have been met:

Statement 1

The home maintains complete and up to date records in respect of the terms and conditions of the provision of accommodation and personal care.

Statement 2

Arrangements for receiving and spending residents' monies on their behalf are transparent, have been authorised and the appropriate records are maintained.

Statement 3

A safe place is provided within the home premises for the storage of money and valuables deposited for safekeeping; clear, up to date and accurate records are maintained.

Statement 4

Arrangements for providing transport to residents are transparent and agreed in writing with the resident/their representative.

4. Methods/Process

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

- Discussion with Deputy Manager and Administrator
- Audit traces carried out on a sample of residents' records
- Audit of residents' individual files
- Spot check on residents' monies and valuables
- Audit of policies and procedures
- Evaluation and feedback.

Prior to inspection the following records were analysed:

- Records of incidents notified to RQIA in the last twelve months.

The following records were examined during the inspection:

- The resident's guide
- Seven residents' individual files
- Records of payment of fees for four residents
- Records of lodgements made on behalf of residents
- Records of purchases made on behalf of eight residents
- Records of payments to hairdresser and podiatrist
- Records of safe contents
- Bank statements from account holding residents' monies
- Consent forms for staff to make purchases on behalf of residents
- Policy and Procedures on residents' finances.

5. The Inspection

5.1 Review of Requirements and Recommendations from Previous Inspection

The previous inspection of the home was an unannounced care inspection dated 30 June 2015. The completed QIP was returned and approved by the care inspector.

5.3 Statement 1 - The home maintains complete and up to date records in respect of the terms and conditions of the provision of accommodation and personal care

Is Care Safe?

A resident's guide was in place at the time of inspection. The guide included a written agreement which was issued to residents when admitted to the home. Review of seven residents' files evidenced that individual written agreements were in place for five of the residents. No agreement was available for the remaining two residents. Discussion with staff confirmed that one of the residents was recently admitted to the home and an agreement was in the process of being issued to the resident.

We noticed that three of the five agreements in place did not show the current weekly fee to be paid by, or on behalf of, the resident. The method of payment for the fee and the details of the person by whom the fee was payable were included in the agreements. All of the agreements in place were signed by the resident, or their representative and a representative from the home.

A requirement is listed within the QIP to this report for written agreements to be in place for all residents at the home. The agreement should show the current contribution to be paid by, or on behalf of, the resident

Residents were charged an additional "Top up" per week. The rate charged depended on the type of room accommodated by the resident. Review of the seven residents' files showed that three residents were paying an additional top up. A statement was issued to the residents detailing the additional amount to be paid each week. We noticed that two of the statements did not show the current additional top up paid by the residents. There was no file available for the remaining resident paying a top up.

A requirement is listed within the QIP in relation to this finding.

Is Care Effective?

Review of records and discussion with the deputy manager confirmed that no member of staff at the home acted as an appointee for any resident, i.e. a person authorised by the Social Security Agency (SSA) to receive and manage the social security benefits on behalf of an individual.

Discussion with the deputy manager also confirmed that no member of staff acted as an agent for any resident, i.e. a person authorised by a resident or their representative to collect social security benefits on the resident's behalf.

Policies and procedures surrounding residents' finances were in place at the time of inspection. The policies included guidance on "Financial Procedures" for residents' monies. We noticed that the policy did not include all of the procedures involved in managing residents' monies e.g. procedure for using the shop located within the home or the various systems of recording transactions made on behalf of residents.

A recommendation is listed within the QIP to this report for the policies and procedures operated at the home to be updated to include all the procedures undertaken in relation to the safeguarding of residents' finances.

Is Care Compassionate?

The resident's agreement included a provision for residents or their representatives to be informed four weeks prior to any increase in their fee. Review of records showed that no residents or their representatives were informed of any previous increase in fees.

A requirement is listed within the QIP to this report for residents or their representatives to be informed prior to any increase in fees as in line with regulation 5 of The Residential Care Homes Regulations (Northern Ireland) 2005.

The resident's agreement included an authorisation form signed by residents or their representatives allowing staff at the home to hold and manage resident's monies. The form included a provision for residents to be informed of the funds held on their behalf "half yearly or upon request". Review of records and discussion with staff confirmed that no residents had previously received notification of the funds held on their behalf.

We noticed that the form did not detail the items for which staff were authorised to purchase on behalf of residents.

A recommendation is listed within the QIP to this report for the form to be updated. A copy of the revised form should be issued to residents or their representatives.

Review of the resident's agreement showed that a provision is included which allows the home to apply an interest charge to residents for late payments of their fee. Discussion with the deputy manager and review of records confirmed that no residents were previously charged for late payments. The deputy manager agreed to review this finding with the consideration of the provision being removed as the majority of residents' fees are paid by the Health and Social Care Trusts.

A recommendation is listed within the QIP in relation to this finding.

Areas for Improvement

A number of issues were identified during the finance inspection in relation to the delivery of safe, effective and compassionate care. The issues identified include:

- Up to date written agreements issued to residents.
- Up to date statements of additional charge issued to residents
- Revised policies and procedures in relation to residents' finances.
- Notifying residents or their representatives of any increase in fee.

- Revision of form authorising the home to hold and manage residents' monies
- The application of an interest charge for late payment of fee.

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|--------------------------------|----------|-----------------------------------|----------|
| Number of Requirements: | 3 | Number of Recommendations: | 3 |
|--------------------------------|----------|-----------------------------------|----------|

5.4 Statement 2 - Arrangements for receiving and spending residents' monies on their behalf are transparent, have been authorised and the appropriate records are maintained

Is Care Safe?

Review of records confirmed that copies of payment remittances from Health and Social Care Trusts were retained at the home. The remittances showed the amount of fees paid by the Trust on behalf of residents and the amount to be contributed by the resident (if any). Review of records of payments made by or on behalf of four residents confirmed that the amounts received for three residents agreed to the amount identified as owed by the residents.

We noticed that the amount listed within the payment remittance from a local Health and Social Care Trust for the remaining resident, did not agree to the amount listed as owed by the resident. The home's administrator agreed to contact the Trust to clarify the amount to be paid on behalf of the resident.

A recommendation is listed within the QIP with regard to this finding.

We also noticed that the weekly fee received from one of the four residents reviewed was less than the fee listed in the resident's agreement. Discussion with staff confirmed that the amount listed in the agreement was incorrect. As stated previously in this report a requirement is listed within the QIP for residents' agreements to show the current fee paid by residents.

Is Care Effective?

Discussion with the deputy manager and review of records confirmed that a transaction book ("main cash book") was maintained to record all transactions made on behalf of residents. Individual books for each resident were also retained and updated with the transactions recorded in the main cash book.

We reviewed records of eleven purchases made on behalf of eight residents by staff, including payments to the hairdresser and podiatrist. The inspector had difficulty reconciling the records available at the time of inspection. This was due to the date recorded in the residents' individual books not corresponding with the dates recorded in the main cash book. Records showed that an invoice issued by the podiatrist for providing a service on a specific date was significantly less than the receipt issued by the podiatrist for the same date.

Review of records and discussion with staff confirmed that the hairdresser and podiatrist were paid by the home and residents were subsequently charged for the service provided. We noticed, however that on three occasions the dates of treatment by the podiatrist recorded in the main cash book did not correspond with the date of the receipts received from the podiatrist. In one instance the records showed that the date of payment was prior to the podiatrist providing the service.

The inspector also had difficulty reconciling receipts from five of the purchases reviewed as the dates on the receipts did not correspond with the dates recorded in the transaction books. We noticed that a receipt was unavailable for one of the purchases.

The inspector was concerned that all of the entries in the main cash book were recorded in pencil.

Review of records and discussion with staff confirmed that newspapers were provided to residents by a local newsagent. The newsagent invoiced the home at the end of each month. The invoice was paid by the home and residents were subsequently invoiced for the newspapers. The inspector was able to reconcile the amounts invoiced to residents to the invoices received from the newsagent.

Requirements are listed within the QIP in relation to the recording of transactions and the retention of receipts.

We noticed that records of transactions made on behalf of residents were retained in three separate locations within the home. One of which was a shop which is available for residents to purchase certain items e.g. toiletries and treats. The inspector could not access the records from the shop as the staff member responsible for the records was not on duty at the time of inspection.

A recommendation is listed within the QIP for the system of recording transactions and the retention of records from the transactions to be reviewed in order to aid the audit process.

Discussion with staff and review of records confirmed that when monies were deposited at the home on behalf of residents, the person depositing the monies was issued with a receipt.

Discussion with staff and review of records confirmed that a bank account is operated at the home for the retention of residents' monies. Records also confirmed that the monies held within the bank account were reconciled on a monthly basis. The name of the account identified that the monies belonged to residents.

Is Care Compassionate?

Discussion with the deputy manager confirmed that no assessed restrictions were in place for any resident receiving their monies.

As previously stated in this report, no member of staff acted as an appointee or agent on behalf of residents.

Areas for Improvement

A number of issues were identified during the finance inspection in relation to the delivery of safe, effective and compassionate care. The issues identified include:

- Recording of transactions made on behalf of residents
- Retention of receipts from purchases made on behalf of residents
- Amount received for the weekly fee for one resident
- A review of the system in place for recording transactions and the retention of records.

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| Number of Requirements: | 2 | Number of Recommendations: | 2 |
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5.5 Statement 3 - A safe place is provided within the home premises for the storage of money and valuables deposited for safekeeping; clear, up to date and accurate records are maintained.

Is Care Safe?

A safe place was provided within the home for the retention of monies and valuables belonging to residents. We noticed that it is policy at the home to maintain a float of residents' monies. We counted the monies held on behalf of residents, the amount retained agreed to the balance recorded at the home. We were satisfied with the controls around the physical location of the safe place and the staff members with access.

No valuables were held on behalf of residents at the time of the inspection. We noticed that the monies held on behalf of residents were reconciled on a regular basis. As in line with best practice the record was signed by the staff member undertaking the reconciliation and countersigned by a second member of staff.

Is Care Effective?

Discussion with the deputy manager and review of records confirmed that an inventory of residents' property was maintained at the home. The inventory was updated when items were brought into the home by or on behalf of residents.

Is Care Compassionate?

A safe place is provided to enable residents to deposit monies and valuables when required. A lockable facility was also provided in each resident's room.

Areas for Improvement

There were no areas of improvement in relation to this statement.

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| Number of Requirements: | 0 | Number of Recommendations: | 0 |
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5.6 Statement 4 - Arrangements for providing transport to residents are transparent and agreed in writing with the resident/their representative

Is Care Safe?

At the time of inspection the home did not operate a transport scheme.

Is Care Effective?

At the time of inspection the home did not operate a transport scheme.

Is Care Compassionate?

At the time of inspection the home did not operate a transport scheme.

Areas for Improvement

There were no areas of improvement in relation to this statement.

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| Number of Requirements: | 0 | Number of Recommendations: | 0 |
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5.7 Additional Areas Examined

No additional areas were examined during this inspection.

6 Quality Improvement Plan

The issue(s) identified during this inspection are detailed in the QIP. Details of this QIP were discussed with Mrs Sarah Grieve, Deputy Manager, and Ms Bronagh Berry, Home Co-ordinator, as part of the inspection process. The timescales commence from the date of inspection.

The registered person/manager should note that failure to comply with regulations may lead to further enforcement action including possible prosecution for offences. It is the responsibility of the registered person/manager to ensure that all requirements and recommendations contained within the QIP 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.

6.1 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, The Residential Care Homes Regulations (Northern Ireland) 2005.

6.2 Recommendations

This section outlines the recommended actions based on research, recognised sources and The Residential Care Homes Minimum Standards. They promote current good practice and if adopted by the registered person may enhance service, quality and delivery.

6.3 Actions Taken by the Registered Manager/Registered Person

The QIP should be completed by the registered person/registered manager and detail the actions taken to meet the legislative requirements stated. The registered person will review and approve the QIP to confirm that these actions have been completed. Once fully completed, the QIP will be returned to finance.team@rqia.org.uk and assessed by the inspector.

It should be noted that this inspection report should not be regarded as a comprehensive review of all strengths and weaknesses that exist in the home. The findings set out are only those which came to the attention of RQIA during the course of this inspection. The findings contained within this report do not absolve the registered person/manager from their responsibility for maintaining compliance with minimum standards and regulations. It is expected that the requirements and recommendations set out in this report will provide the registered person/manager with the necessary information to assist them in fulfilling their responsibilities and enhance practice within the home.

Quality Improvement Plan

Statutory Requirements

Requirement 1

Ref: Regulation 5 (1)
(a) (b)

Stated: First time

To be Completed by:
18 September 2015

The registered person must provide an updated individual written agreement to each resident (or their representative) accommodated at the home.

The agreement must comply with the requirements under regulation 5 of The Residential Care Homes Regulations (Northern Ireland) 2005 and meet standard 4.2 of the DHSSPS Residential Care Homes Minimum Standards.

The agreements must detail the current amount to be paid by the Health and Social Care Trust and the contribution to be paid by the resident (if any).

Copies of the updated agreements must be retained within residents' files.

Response by Registered Person(s) Detailing the Actions Taken:

All written agreements in place with financial arrangements specified and signed copies are held in residents personal files once returned. Copies of covering letters confirming issue of agreement also held on file.

Requirement 2

Ref: Regulation 5 (1)
(a)

Stated: First time

To be Completed by:
18 September 2015

The registered person must ensure that the statements of the additional top up for residents are updated to include the current amount paid by or on behalf of the residents.

The statement must be signed by the resident or their representative (if resident lacks capacity to understand the agreement) and a representative from the home.

A copy of the signed statement must be retained in the resident's file.

Response by Registered Person(s) Detailing the Actions Taken:

All statements relating to additional top up have all been re-issued and covering letter confirming this held on file.

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| <p>Requirement 3</p> <p>Ref: Regulation 5 (2) (a)</p> <p>Stated: First time</p> <p>To be Completed by: next increase in fees</p> | <p>The registered person must ensure that residents' or their representatives are informed in writing at least 28 days in advance of any increase in fees. A copy of the correspondence should be retained in residents' files.</p> <p>Response by Registered Person(s) Detailing the Actions Taken: Home policy states 28 days advance notice. But due to the lateness of some trusts remittance showing any increase we have been on occasions unable to comply. Home Policy has now been amended to state that residents will be sent a letter in March advising of the possibility of pending increases to fees for the new financial year. This will be followed up with an additional letter/appendix once the new tariff has been set by the local trusts.</p> |
| <p>Requirement 4</p> <p>Ref: Regulation 19 (2)</p> <p>Stated: First time</p> <p>To be Completed by: From the date of inspection.</p> | <p>The registered person must ensure that all transactions made on behalf of residents are recorded accurately, this should include</p> <ul style="list-style-type: none"> • The date the transaction took place. • Corresponding amounts listed within invoices and receipts for service provided • Recording of cheque numbers against payment for service provided <p>The registered person must ensure that entries are not recorded in pencil.</p> <p>Response by Registered Person(s) Detailing the Actions Taken: Central invoice ledger is now in place detailing residents name, amount of transaction, invoice and cheque number for ease of cross referencing of group payments. All entries now recorded in ink.</p> |
| <p>Requirement 5</p> <p>Ref: Regulation 19 (2) Schedule 4 (9)</p> <p>Stated: First time</p> <p>To be Completed by: From date of Inspection</p> | <p>The registered person must ensure that receipts are obtained (where possible) from all purchases made on behalf of residents.</p> <p>Where a receipt is not available, the record should be annotated to reflect this.</p> <p>Response by Registered Person(s) Detailing the Actions Taken: All money transactions are only paid on production of receipt or documented evidence of purchase. This is reinforced by new measures put in place with central record keeping.</p> |

| Recommendations | |
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| <p>Recommendation 1</p> <p>Ref: Standard 21</p> <p>Stated: First time</p> <p>To be Completed by: 30 September 2015</p> | <p>It is recommended that the registered person updates the policies and procedures operated at the home to include all of the financial procedures undertaken by staff on behalf of residents.</p> <hr/> <p>Response by Registered Person(s)Detailing the Actions Taken: Policy now amended providing more detail in the procedures operated within the home in relation to financial procedures undertaken by staff.</p> |
| <p>Recommendation 2</p> <p>Ref: Standard 15.2</p> <p>Stated: First time</p> <p>To be Completed by: 18 September 2015</p> | <p>It is recommended that the registered person reviews the form for authorising the home to hold and manage residents' monies. This should include the procedure for informing residents of the amount held on their behalf as identified within the form.</p> <p>The form should be updated to include the items staff are authorised to purchase on behalf of residents.</p> <p>The revised form should be issued to residents or their representatives. A signed copy of the form should be retained in the residents' files.</p> <hr/> <p>Response by Registered Person(s)Detailing the Actions Taken: The form has been amended and re-issued to all residents and/or next of kins. A copy of the covering letter that accompanied the amended form will be held on file until the signed original has been returned.</p> |
| <p>Recommendation 3</p> <p>Ref: Standard 4.2</p> <p>Stated: First time</p> <p>To be Completed by: 18 September 2015</p> | <p>It is recommended that the registered person reviews the resident's agreement in relation to the application of an interest charge for late payments.</p> <p>The revised agreement should be issued to residents or their representatives. A signed copy of the updated agreements must be retained within residents' files.</p> <hr/> <p>Response by Registered Person(s)Detailing the Actions Taken: The policy regarding interest charges for late payments will not change however the decision to apply it remains at the discretion of the General Manager. No change has been made to agreement/contract and no re-issue has taken place.</p> |
| <p>Recommendation 4</p> <p>Ref: Standard 15.4</p> <p>Stated: First time</p> <p>To be Completed by: 18 September 2015</p> | <p>It is recommended that the registered person contacts the relevant Health and Social Care Trust to seek clarification in relation to the amount to be paid on behalf of the resident identified during the inspection.</p> <hr/> <p>Response by Registered Person(s)Detailing the Actions Taken: This was an error by the trust funding the particular resident's placement and was amended on the subsequent remittance. This would</p> |

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| | be standard practise for such adjustments with all trusts on remittance slips. |
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| <p>Recommendation 5</p> <p>Ref: Standard 21</p> <p>Stated: First time</p> <p>To be Completed by: 30 September 2015</p> | <p>It is recommended that the system of recording transactions on behalf of residents and the system for the retention of records from the transactions is reviewed in order to aid the audit process including:</p> <ul style="list-style-type: none"> • The recording of payments for all services e.g. hairdressing service • Records retained centrally within the home • Reduction in the number of recordings for the same service |
| | <p>Response by Registered Person(s) Detailing the Actions Taken:</p> <p>All records of transactions made on behalf of residents for services provided are now recorded in a central invoice duplicate book for ease of cross referencing. All transactions are also recorded into residents own individual accounts. These are reconciled weekly.</p> |

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| Registered Manager Completing QIP | Gillian Millar | Date Completed | 16/09/15 |
| Registered Person Approving QIP | Jill Brooker | Date Approved | 16/09/15 |
| RQIA Inspector Assessing Response | Joe McRandle | Date Approved | 13/11/15 |

Please ensure the QIP is completed in full and returned to finance.team@rgia.org.uk from the authorised email address

Inspector's comments

RQIA have contacted Towell House for further clarification in relation to recommendation no. 3