

# Unannounced Finance Inspection Report 27 September 2018



## Towell House

**Type of Service: Residential Care Home**  
**Address: 57 Kings Road, Belfast, BT5 7BS**  
**Tel No: 028 9040 1642**  
**Inspector: Joseph McRandle**

[www.rqia.org.uk](http://www.rqia.org.uk)

It should be noted that this inspection report should not be regarded as a comprehensive review of all strengths and areas for improvement that exist in the service. The findings reported on are those which came to the attention of RQIA during the course of this inspection. The findings contained within this report do not exempt the service from their responsibility for maintaining compliance with legislation, standards and best practice.

## 1.0 What we look for



## 2.0 Profile of service

This is a residential care home registered to provide care for up to 84 persons in the categories of care detailed in section 3.0 of this report.

### 3.0 Service details

<b>Organisation/Registered Provider:</b> The Towell Building Trust  <b>Responsible Individual(s):</b> Gillian Sarita Brooker	<b>Registered Manager:</b> Gillian Millar
<b>Person in charge at the time of inspection:</b> Gillian Millar	<b>Date manager registered:</b> 19 January 2015
<b>Categories of care:</b> Residential Care (RC) I - Old age not falling within any other category DE – Dementia PH - Physical disability other than sensory impairment	<b>Number of registered places:</b> 84 Maximum of 10 residents in category RC-DE

### 4.0 Inspection summary

An unannounced inspection took place on 27 September 2018 from 10.30 to 16.30 hours.

This inspection was underpinned by The Residential Care Homes Regulations (Northern Ireland) 2005 and the DHSSPS Residential Care Homes Minimum Standards, August 2011.

The inspection assessed progress with any areas for improvement identified since the last finance inspection and to determine if the home was delivering safe, effective and compassionate care and if the service was well led.

Evidence of good practice was found in relation to: providing a place for residents to deposit items for safekeeping, members of staff involved in managing residents' finances receiving safeguarding training, updating the inventory of residents' property following admission to the home, retaining authorisation forms for members of staff to hold and spend residents' monies, facilitating journeys on behalf of residents, offering support to residents for managing their finances. retaining records of charges to residents, retaining records of amounts paid by residents for fees, recording transactions undertaken on behalf of residents, residents' guide detailing the services included in the weekly fee, written agreements showing current amount of third party payments, informing residents of increases in fees, retaining receipts from transactions and issuing receipts to person depositing monies on behalf of resident.

Areas requiring improvement were identified under standards in relation to: recording evidence that residents' monies were reconciled weekly, retaining signed forms authorising staff to hold and spend residents' monies in all relevant residents files, reviewing system of recording monies deposited at home on behalf of residents.

The findings of this report will provide the home with the necessary information to assist them to fulfil their responsibilities, enhance practice and residents experience.

## 4.1 Inspection outcome

	Regulations	Standards
<b>Total number of areas for improvement</b>	0	4

Details of the Quality Improvement Plan (QIP) were discussed with Gillian Millar, registered manager, as part of the inspection process. The timescales for completion commence from the date of inspection.

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

## 4.2 Action/enforcement taken following the most recent care inspection dated 17 July 2018

The most recent inspection of the home was an unannounced care inspection undertaken on 17 July 2018. Other than those actions detailed in the QIP no further actions were required to be taken. Enforcement action did not result from the findings of this inspection.

## 5.0 How we inspect

Prior to the inspection a range of information relevant to the service was reviewed. This included the following records: recent written and verbal communication received since previous care inspection, notifiable events submitted in relation to finance issues, there were no financial issues identified.

During the inspection the inspector met with the registered manager and the personal assistant to the general manager.

The following records were examined during the inspection:

- six residents' finance files
- four residents' written agreements
- four residents forms authorising staff to hold and manage residents' monies
- cash held on behalf of residents
- a sample of records of safe contents
- valuables held for one resident
- a sample of statements from residents' bank account
- a sample of statements from residents' comfort fund bank account
- a sample of transactions sheets belonging to five residents
- a sample of records of monies deposited on behalf of one resident
- a copy of the residents money policy
- a sample of records of fees paid by three residents
- the residents' guide
- one resident's records of personal property.

A poster indicating that the inspection was taking place was displayed at the entrance to the home and invited visitors or relatives to speak to the inspector. No relatives or visitors chose to speak to the inspector.

Areas for improvement identified at the last finance inspection were reviewed and assessment of compliance recorded as met, not met or partially met.

The findings of the inspection were provided to the registered manager at the conclusion of the inspection.

## 6.0 The inspection

### 6.1 Review of areas for improvement from the most recent inspection dated 17 July 2018

The most recent inspection of the home was an unannounced care inspection. The completed QIP will be validated at the next care inspection.

### 6.2 Review of areas for improvement from the last finance inspection dated 6 August 2015

Areas for improvement from the last finance inspection		
Action required to ensure compliance with The Residential Care Homes Regulations (Northern Ireland) 2005		Validation of compliance
<p><b>Area for improvement 1</b></p> <p><b>Ref: Regulation 5 (1) (a) (b)</b></p> <p><b>Stated: First time</b></p>	<p>The registered person must provide an updated individual written agreement to each resident (or their representative) accommodated at the home.</p> <p>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.</p> <p>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).</p> <p>Copies of the updated agreements must be retained within residents' files.</p>	<p><b>Met</b></p>
	<p><b>Action taken as confirmed during the inspection:</b></p> <p>A review of six residents' files evidenced that agreements were retained in four residents' files. Discussion with staff confirmed that the remaining two agreements were still to be signed and returned by the residents or their</p>	

	<p>representatives. One of the agreements reviewed did not show the current weekly fee paid by, or on behalf of, the resident.</p> <p>The registered manager contacted RQIA following the inspection to confirm that the agreement for the resident identified during the inspection had been updated to include the current fee.</p>	
<p><b>Area for improvement 2</b></p> <p><b>Ref:</b> Regulation 5 (1) (a)</p> <p><b>Stated:</b> First time</p>	<p>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.</p> <p>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.</p> <p>A copy of the signed statement must be retained in the resident's file.</p> <p><b>Action taken as confirmed during the inspection:</b> A review of files for two residents for which third party payments were made showed that the current amount paid on behalf of the residents was recorded in the residents' agreements. The two agreements were signed by the residents or their representatives and a representative from the home.</p>	<b>Met</b>
<p><b>Area for improvement 3</b></p> <p><b>Ref:</b> Regulation 5 (2) (a)</p> <p><b>Stated:</b> First time</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><b>Action taken as confirmed during the inspection:</b> A review of six residents' files evidenced that copies of correspondence forwarded to the residents to inform them of an increase in fees were retained within the residents' files.</p>	<b>Met</b>

<p><b>Area for improvement 4</b></p> <p><b>Ref:</b> Regulation 19 (2)</p> <p><b>Stated:</b> First time</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"> <li>• The date the transaction took place.</li> <li>• Corresponding amounts listed within invoices and receipts for service provided</li> <li>• Recording of cheque numbers against payment for service provided.</li> </ul> <p>The registered person must ensure that entries are not recorded in pencil.</p>	<p style="text-align: center;"><b>Met</b></p>
<p><b>Action taken as confirmed during the inspection:</b></p> <p>A review of nine transactions undertaken on behalf of six residents evidenced a significant improvement in the recording process. The full details of the transactions were recorded including the date the transaction took place. Corresponding amounts were recorded on the invoices and receipts for services provided e.g. hairdresser. Cheque numbers were also recorded against payments made for the service provided.</p> <p>All of the entries reviewed in the residents' transaction book were recorded in pen. It was noticed however that the entries made in a second book used by the home to reconcile transactions were still recorded in pencil.</p> <p>The home contacted RQIA following the inspection to confirm that the practice of recording in pencil at ceased immediately following the inspection.</p>		
<p><b>Area for improvement 5</b></p> <p><b>Ref:</b> Regulation 19 (2) Schedule 4 (9)</p> <p><b>Stated:</b> First time</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 style="text-align: center;"><b>Met</b></p>
<p><b>Action taken as confirmed during the inspection:</b></p> <p>A review of three payments made on behalf of residents evidenced that receipts were retained for all three transactions.</p>		

<b>Action required to ensure compliance with DHSSPS Residential Care Homes Minimum Standards, August 2011</b>		<b>Validation of compliance</b>
<b>Area for improvement 1</b>  <b>Ref:</b> Standard 21  <b>Stated:</b> First time	<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>	<b>Met</b>
	<p><b>Action taken as confirmed during the inspection:</b>  A review of the policies and procedures evidenced that the policies were updated since the previous finance inspection on 6 August 2015. The financial procedures undertaken by staff on behalf of residents were included in the revised policies.</p>	
<b>Area for improvement 2</b>  <b>Ref:</b> Standard 15.2  <b>Stated:</b> First time	<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>	<b>Met</b>
	<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>	
	<p><b>Action taken as confirmed during the inspection:</b>  A review of six residents' files evidenced that the form authorising members of staff at the home to hold and manage residents' finances was updated to include the items staff were authorised to purchase. The revised forms were signed by the residents or their representatives and a representative from the home.</p>	



<p><b>Area for improvement 3</b></p> <p><b>Ref:</b> Standard 4.2</p> <p><b>Stated:</b> First time</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>	<p><b>Met</b></p>
<p><b>Action taken as confirmed during the inspection:</b></p> <p>A review of the resident's agreement evidenced that the terms and conditions for applying the interest charge for late payment of fees for care managed residents had been amended to state that the Health and Social Care Trusts would be liable for the interest charge for these residents.</p>		
<p><b>Area for improvement 4</b></p> <p><b>Ref:</b> Standard 15.4</p> <p><b>Stated:</b> First time</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>	<p><b>Met</b></p>
<p><b>Action taken as confirmed during the inspection:</b></p> <p>A review of the resident's records showed that the Health and Social Care Trust had amended their remittances to show the correct amount paid to the home on behalf of the resident.</p>		

<b>Area for improvement 5</b> <b>Ref:</b> Standard 21 <b>Stated:</b> First time	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: <ul style="list-style-type: none"> <li>• The recording of payments for all services e.g. hairdressing service</li> <li>• Records retained centrally within the home</li> <li>• Reduction in the number of recordings for the same service</li> </ul>	<b>Met</b>
	<b>Action taken as confirmed during the inspection:</b> A review of records evidenced that the system for recording transactions on behalf of residents had significantly improved since the last finance inspection on 6 August 2015. Records were retained centrally which reduced the number of recordings for the same service provided to residents.	

### 6.3 Inspection findings

#### 6.4 Is care safe?

#### **Avoiding and preventing harm to patients and clients from the care, treatment and support that is intended to help them.**

A safe place was provided within the home for the retention of residents' monies and valuables. At the time of the inspection there were satisfactory controls around the physical location of the safe place and the members of staff with access to the safe place. Monies held on behalf of residents were counted, it was noticed that a small variance existed between the monies held and the records of monies held. Following a discussion with staff and a further review of records the inspector was satisfied that the variance was the result of a recording issue. This was discussed with the registered manager and identified as an area for improvement.

A safe contents book was in place and up to date at the time of the inspection. Valuables held on behalf of one resident were examined. Records agreed to the items held in the safe place. Records showed that the items held were checked on a regular basis. Two signatures were recorded against the records examined.

Policies and procedures for the management and control of residents' finances were in place at the time of the inspection. The policies and procedures reflected the financial operational areas of the home.

Discussion with the registered manager confirmed that members of staff involved in managing residents finances had received training in relation to adult safeguarding.

Discussion with staff confirmed that there were no finance related restrictive practices in place for any resident.

**Areas of good practice**

There were examples of good practice found in relation to: providing a place for residents to deposit items for safekeeping and members of staff involved in managing residents’ finances receiving adult safeguarding training.

**Areas for improvement**

An area for improvement was identified under standards in relation to the records of monies held on behalf of residents.

	Regulations	Standards
<b>Total number of areas for improvement</b>	0	1

**6.5 Is care effective?**

**The right care, at the right time in the right place with the best outcome.**

Discussion with the registered manager and review of records confirmed that no member of staff was the appointee for any resident i.e. a person authorised by the Social Security Agency to receive and manage the social security benefits on behalf of an individual.

Discussion with the registered manager also confirmed that no member of staff at the home 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.

Discussion with staff confirmed that reconciliations between the monies held on behalf of residents and the records of monies held were undertaken on a weekly basis. Discussion with staff also confirmed that a bank account was operated at the home for the retention of residents’ monies and that the monies held within the bank account were also reconciled weekly. A review of a sample of records showed that there was no recorded evidence to confirm that the residents’ monies were reconciled as in line with standard 15.12 of the DHSSPS Residential Care Homes Minimum Standards (2011). This was discussed with the registered manager and identified as an area for improvement.

A review of a sample of bank statements from the account confirmed that the name of the bank account referred to residents’ monies. Review of records also confirmed that as in line with regulation 22 (1) of The Residential Care Homes Regulations (NI) 2005 the bank account was not used in connection with the carrying on or management of the home.

Discussion with staff confirmed that a comfort fund was operated on behalf of residents. Monies for the fund were held within a bank account at the time of the inspection. Discussion with staff also confirmed that purchases from the fund were for the benefit of all residents. A review of records for the comfort fund showed that there were no transactions made from the fund within the last two years.

Discussion with staff confirmed that an inventory of residents' property was maintained when residents were admitted to the home. Discussion with staff also confirmed that the records were updated with items acquired and disposed of after admission for which staff had been made aware of.

### Areas of good practice

There were examples of good practice found in relation to updating the inventory of residents' property following admission to the home.

### Areas for improvement

An area for improvement was identified under standards in relation to recording evidence that residents' monies were reconciled weekly.

	Regulations	Standards
<b>Total number of areas for improvement</b>	0	1

#### 6.6 Is care compassionate?

**Patients and clients are treated with dignity and respect and should be fully involved in decisions affecting their treatment, care and support.**

Good practice was observed as forms were retained within residents' files authorising the home to hold and spend resident's monies on essential items when required e.g. toiletries. A review of six residents' files showed that authorisation forms were retained within four of the files. The forms retained were signed by the resident, or their representative, and a representative from the home. There was no evidence of signed forms retained within the remaining two residents' files. This was discussed with the registered manager and identified as an area for improvement.

Discussion with staff confirmed that the Health and Social Care Trust forwarded monies to the home on behalf of one resident. A sample of records for the resident was reviewed; the corresponding amounts of monies received by the home were credited to the records of monies held on behalf of the resident. Records also confirmed that the resident was handed over their personal allowance monies forwarded by the Health and Social Care Trust when required. Good practice was observed as the resident receiving their personal allowance monies had signed the records along with a member of staff.

The home did not provide a transport scheme. Discussions with staff confirmed that alternative arrangements were in place to support residents wishing to undertake journeys; this included the use of taxis which were paid for by the residents or their representatives.

Discussion with staff confirmed that arrangements were in place to offer support to residents for managing their own monies.

## Areas of good practice

There were examples of good practice found in relation to retaining authorisation forms for members of staff to hold and spend residents' monies, facilitating journeys on behalf of residents and offering support to residents for managing their finances.

## Areas for improvement

An area for improvement was identified under standards in relation to retaining signed forms authorising staff to hold and spend residents' monies in all residents files for which monies are held.

	Regulations	Standards
<b>Total number of areas for improvement</b>	0	1

### 6.7 Is the service well led?

**Effective leadership, management and governance which creates a culture focused on the needs and experience of service users in order to deliver safe, effective and compassionate care.**

Review of records confirmed that copies of payment remittances from the health and social care trusts showing the weekly fee charged for each care managed resident were retained at the home. The remittances also showed the amount of fees paid by the trust on behalf of residents and the contribution owed by residents towards their fee. Records were also available showing the weekly fee charged to private residents.

Review of records showed that details of the amount of fees paid by, or on behalf of, residents were retained at the home. Review of a sample of payments made by three residents showed that the amounts paid agreed to the contribution owed by each resident. Discussion with staff confirmed that residents were not paying an additional amount towards their fee over and above the amount agreed with the health and social care trusts.

A residents' guide was in place at the time of the inspection. The guide included the details of the services provided to residents as part of their weekly fee. The residents' guide also included a written agreement which was issued to residents on admission to the home. A review of six residents' files evidenced that copies of signed written agreements were retained within four of the files. Discussion with staff confirmed that the remaining two agreements were still to be signed and returned by the residents or their representatives. One of the agreements reviewed did not show the current weekly fee paid by, or on behalf of, the resident. The registered manager contacted RQIA following the inspection to confirm that the agreement for the resident identified during the inspection had been updated to include the current fee.

Review of records confirmed that a weekly third party contribution (top up) was paid on behalf of care managed residents. Discussion with staff confirmed that the third party contribution was not for any additional services provided to residents but the difference between the tariff for Towell House and the regional rate paid by the Health and Social Care Trusts.

As in line with regulation 5 (1) of The Nursing Homes Regulations (NI) 2005 the written agreements reviewed showed the current amounts of the additional third party contributions paid on behalf of the residents.

Discussion with staff confirmed that a book was maintained to record all transactions made on behalf of residents. A review of the transaction book showed 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 charged for the newspapers. Two payments to the newsagent were reviewed, the amounts deducted from two residents' monies agreed to the amounts listed on the invoices from the newsagent. Two signatures were recorded against each of the written entries in the transaction book.

Discussion with staff confirmed that the hairdresser and podiatrist were paid by the home and residents were subsequently charged for the service provided. The hairdresser and podiatrist provided invoices after providing the service to residents. A review of records of two payments to the hairdresser and one payment to the podiatrist showed that name of the residents receiving the service, the service provided to the residents and the amount charged to each resident was recorded on the invoices. The amounts deducted from the residents' monies agreed to the amounts listed on the invoices from the hairdresser and podiatrist. Two signatures were recorded against each of the written entries in the transaction book.

All of the entries reviewed in the residents' transaction book were recorded in pen. It was noticed however that the entries made in a second book used by the home to reconcile transactions were still recorded in pencil. This was identified as an area for improvement during the previous finance inspection on 6 August 2015. The home contacted RQIA following the inspection on 27 September 2018 to confirm that the practice of recording in pencil at ceased immediately.

Two records of monies deposited at the home on behalf of two residents were reviewed. The amounts deposited were recorded in the residents' transaction sheets. In line with good practice receipts were issued to the person depositing the monies. Records for one of the deposits showed that one signature was recorded against the entry in the transaction book, discussion with staff confirmed that the signature belonged to the member of staff issuing the receipt for the deposit. This was discussed with the registered manager and identified as an area for improvement.

### Areas of good practice

There were examples of good practice found in relation to: retaining records of charges to residents, retaining records of amounts paid by residents for fees, recording transactions undertaken on behalf of residents, residents' guide detailing the services included in the weekly fee, written agreements showing current amount of third party payments, informing residents of increases in fees retaining receipts from transactions and issuing receipts to person depositing monies on behalf of resident.

### Areas for improvement

An Area for improvement was identified under standards in relation to reviewing the system for recording monies deposited at home on behalf of residents.

	Regulations	Standards
<b>Total number of areas for improvement</b>	0	1

## 7.0 Quality improvement plan

Areas for improvement identified during this inspection are detailed in the QIP. Details of the QIP were discussed with Gillian Millar, registered manager, as part of the inspection process. The timescales commence from the date of inspection.

The registered provider/manager should note that if the action outlined in the QIP is not taken to comply with regulations and standards this may lead to further enforcement action including possible prosecution for offences. It is the responsibility of the registered provider to ensure that all areas for improvement identified 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 the residential care home. The registration is not transferable so that in the event of any future application to alter, extend or to sell the premises RQIA would apply standards current at the time of that application.

## 7.1 Areas for improvement

Areas for improvement have been identified where action is required to ensure compliance with The Residential Care Homes Regulations (Northern Ireland) 2005 and DHSSPS Residential Care Homes Minimum Standards, August 2011.

## 7.2 Actions to be taken by the service

The QIP should be completed and detail the actions taken to address the areas for improvement identified. The registered provider should confirm that these actions have been completed and return the completed QIP via Web Portal for assessment by the inspector.

## Quality Improvement Plan

### Action required to ensure compliance with DHSSPS Residential Care Homes Minimum Standards, August 2011

<p><b>Area for improvement 1</b></p> <p>Ref: Standard 20.14</p> <p><b>Stated:</b> First time</p> <p><b>To be completed by:</b> 28 September 2018</p>	<p>The registered person shall ensure that records of monies held for residents are reconciled to the actual monies held in order to explain the variance identified during the inspection.</p> <p>Any monies identified as owed to the residents should be reimbursed.</p> <p>Ref: 6.4</p> <p><b>Response by registered person detailing the actions taken:</b> Weekly reconcillation identified any variation investigated and remedied.</p>
<p><b>Area for improvement 2</b></p> <p>Ref: Standard 15.12</p> <p><b>Stated:</b> First time</p> <p><b>To be completed by:</b> 28 September 2018</p>	<p>The registered person shall develop and implement a system for recording the reconciliations of monies and valuables held on behalf of residents in order to facilitate the audit process.</p> <p>The record of the reconciliations should be signed by the person undertaking the reconciliation and countersigned by a senior member of staff to evidence that they have taken place.</p> <p>Ref: 6.5</p> <p><b>Response by registered person detailing the actions taken:</b> Reconcillation carried out weekly, printed and counter checked by a manager and both sign this off.</p>
<p><b>Area for improvement 3</b></p> <p>Ref: Standard 15.2</p> <p><b>Stated:</b> First time</p> <p><b>To be completed by:</b> 25 October 2018</p>	<p>The registered person shall ensure that signed forms authorising the home to hold and make transactions on behalf of residents are retained in all relevant residents' files.</p> <p>Ref: 6.6</p> <p><b>Response by registered person detailing the actions taken:</b> All authorisations to hold personal monies for residents are in place and the authorisation form is now included in the admission pack.</p>
<p><b>Area for improvement 4</b></p> <p>Ref: Standard 15.6</p> <p><b>Stated:</b> First time</p> <p><b>To be completed by:</b> 20 October 2018</p>	<p>The registered person shall review the system for recording monies deposited at the home on behalf of residents to ensure that two signatures are recorded at all times.</p> <p>Ref: 6.7</p> <p><b>Response by registered person detailing the actions taken:</b> No transaction will be recorded until two management staff are available to sign off.</p>

*\*Please ensure this document is completed in full and returned via Web Portal\**





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