

# Unannounced Follow Up Finance Inspection Report 02 August 2017



**24 Pettigo Road**

**Type of Service: Residential**

**Address: Letterkeen, Kesh, BT93 1QX**

**Tel No: 02868633132**

**Inspectors: Joseph McRandle and Laura O'Hanlon**

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

Assurance, Challenge and Improvement in Health and Social Care

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 provider 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 that provides care for residents with a learning disability, both under and over 65 years of age.

### 3.0 Service details

<b>Organisation/Registered Provider:</b> Praxis Care Group/Challenge  <b>Responsible Individual(s):</b> Mr Andrew James Mayhew	<b>Registered Manager:</b> Mr Mark McNulty – Acting
<b>Person in charge at the time of inspection:</b> Mr Mark McNulty	<b>Date manager registered:</b> Mr Mark McNulty – application not yet submitted
<b>Categories of care:</b> Residential Care (RC): LD - learning disability LD(E) - learning disability – over 65 years	<b>Number of registered places:</b> 8

### 4.0 Inspection summary

An unannounced inspection took place on 02 August 2017 from 11.00 to 17.30.

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

This inspection was carried out following information received from an anonymous telephone caller. The purpose of the inspection was to identify possible breaches in the Residential Care Homes Regulations (Northern Ireland) 2005.

Concerns were raised in relation to the management of residents' finances within the home.

It is not the remit of RQIA to investigate complaints made by or on behalf of individuals, as this is the responsibility of the registered providers and the commissioners of care. However, if RQIA is notified of a potential breach of regulations or standards, it will review the matter and take appropriate action as required; this may include an inspection of the home.

The concerns raised by the anonymous caller were not substantiated at the time of the inspection. The inspectors were satisfied with the explanation provided by the manager and the records in place verifying the action taken by the home.

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>	3	2

Areas for improvement and details of the Quality Improvement Plan (QIP) were discussed with Mr Mark McNulty, 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 Medicines Management inspection dated 05 June 2017**

No further actions were required to be taken following the most recent inspection on 05 June 2017.

### **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 medicines management inspection, notifiable events submitted in relation to finance issues, there were no financial issues identified. The QIP from the previous finance inspection dated 13 November 2014.

During the inspection the inspectors met with the manager of the home.

The following records were examined during the inspection:

- An incident reported to RQIA
- A sample of records of transactions made from residents' bank accounts
- A sample of records of deposits at the home from residents' bank accounts
- A sample of transactions undertaken on behalf of all residents including payments for holidays and bedroom furniture
- Records of monies held on behalf of one resident
- Financial policies and procedures including the policies for residents' holidays and purchase of furniture.

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

The findings of the inspection were provided to the person in charge at the conclusion of the inspection.

### **6.0 The inspection**

#### **6.1 Review of areas for improvement from the most recent inspection dated 05 June 2017**

The most recent inspection of the home was an unannounced medicines management inspection. No areas for improvement were identified.

**6.2 Review of areas for improvement from the last finance inspection dated 13 November 2014**

RQIA had previously referred the findings from the finance inspection undertaken on 13 November 2014 to the adult safeguarding team at the Western Health and Social Care Trust (WHSCT). A safeguarding investigation was initiated and is still on-going at the time of this inspection.

<b>Areas for improvement from the last finance inspection</b>		
<b>Action required to ensure compliance with The Residential Care Homes Regulations (Northern Ireland) 2005 and the DHSSPS Residential Care Homes Minimum Standards, August 2011.</b>		<b>Validation of compliance</b>
<p><b>Area for improvement 1</b></p> <p><b>Ref:</b> Regulation 5 (1) (a) (b)</p> <p><b>Stated:</b> First time</p>	<p>The registered person must provide updated individual agreements to each resident (or their representative) which detail the current fees and financial arrangements in place in respect to the individual resident.</p> <p>The practice of using correction fluid to update agreements should cease immediately.</p> <p>Individual resident agreements should comply with requirements under Regulation 5 of the Residential Homes Regulations (Northern Ireland) 2005 and meets Standard 4.2 of the DHSSPS Minimum Standards for residential Homes, which detail the minimum components of the agreement.</p> <p>A copy of the signed agreement by the resident or their representative and the registered person must be retained in the residents' records. Where the resident or their representative is unable to, or chooses not to sign the agreement, this must be recorded.</p>	<p><b>Carried forward to the next finance inspection</b></p>
<p><b>Action taken as confirmed during the inspection:</b></p> <p>Action required to ensure compliance with this regulation was not reviewed as part of this inspection and this will be carried forward to the next finance inspection.</p>		

<p><b>Area for improvement 2</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 retained (were possible) from all purchases made on behalf of residents. Where a receipt is not available from a purchase, the record should be annotated to reflect this.</p>	<p><b>Met</b></p>
<p><b>Action taken as confirmed during the inspection:</b></p> <p>A sample of purchases undertaken on behalf of all residents confirmed that receipts were in place from all the purchases reviewed. Where a receipt was not available a note was retained with the record giving details of the purchase. The note was signed by members of staff.</p>		
<p><b>Area for improvement 3</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 the full details of the purchase, including the amount withdrawn to make the purchase are recorded.</p>	<p><b>Met</b></p>
<p><b>Action taken as confirmed during the inspection:</b></p> <p>A sample of purchases undertaken on behalf of all residents confirmed that the full details of the purchase including the amount withdrawn were recorded.</p>		
<p><b>Area for improvement 4</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 the full amounts of monies withdrawn from residents' bank accounts are deposited at the home and recorded appropriately. Records must be updated to show the monies being transferred e.g. for payment of holidays.</p>	<p><b>Met</b></p>
<p><b>Action taken as confirmed during the inspection:</b></p> <p>A sample of records of monies withdrawn from residents' bank accounts confirmed that the corresponding amount was deposited at the home on the same date. Records showed when monies were being withdrawn for holidays.</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 accurate records are kept at all times. Records must not be amended after they have been checked and signed by two members of staff.</p>	<p><b>Partially met</b></p>

	<p>Any errors should be crossed out and a new line completed for the transaction. Two signatures must be recorded along with an explanation for the error.</p>	
	<p><b>Action taken as confirmed during the inspection:</b> A sample of records confirmed that in some instances records were still crossed out without any explanations for the error. This has been restated within the QIP of this report.</p>	
<p><b>Area for improvement 6</b> <b>Ref:</b> Regulation 14 (4) <b>Stated:</b> First time</p>	<p>The registered person must ensure that all staff engaged in any tasks involving residents' monies and valuables are appropriately trained. Written evidence should be available to confirm that the relevant staff have received the training.</p>	<p><b>Carried forward to the next finance inspection</b></p>
	<p><b>Action taken as confirmed during the inspection:</b> Action required to ensure compliance with this regulation was not reviewed as part of this inspection and this will be carried forward to the next finance inspection.</p>	
<p><b>Area for improvement 7</b> <b>Ref:</b> Regulation 14 (4) <b>Stated:</b> First time</p>	<p>The registered person must ensure that the policies and procedures are updated to reflect all practices involved in managing residents' monies and valuables. Written evidence should be available to confirm that staff are aware and understand the policies and procedures in place.</p>	<p><b>Met</b></p>
	<p><b>Action taken as confirmed during the inspection:</b> Review of records confirmed that the policies and procedures had been significantly updated since the previous finance inspection. The policies included the practices undertaken by staff. A record of staff confirming they understood the policies was in place.</p>	
<p><b>Area for improvement 8</b> <b>Ref:</b> Regulation 14 (4) <b>Stated:</b> First time</p>	<p>The registered person must be assured that no resident has suffered any financial loss due to the record keeping found during the inspection.</p> <p>A reconciliation of residents' records should be undertaken to ascertain if any loss has occurred. Residents must be reimbursed for</p>	<p><b>Carried forward to the next finance inspection</b></p>

	<p>any deficits found.</p> <p><b>Action taken as confirmed during the inspection:</b> At the time of the inspection the WHSCT have yet to inform RQIA of the outcome of the safeguarding investigation.</p> <p>Action required to ensure compliance with this regulation/standard was not reviewed as part of this inspection and this will be carried forward to the next finance inspection.</p>	
<p><b>Area for improvement 9</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 a record is maintained of valuables (including bank cards, passports etc.) held at the home on behalf of residents.</p> <p>A record of the items being signed in and out of the home should also be in place.</p> <p>Two signatures along with the dates the items are signed in and out should also be included in the record.</p> <p><b>Action taken as confirmed during the inspection:</b> Review of the safe register confirmed that up to date records were maintained of the items held on behalf of residents. The records showed that the items were checked at least monthly. Two signatures were recorded when the items were removed and returned to the safe place.</p>	<p><b>Met</b></p>

### 6.3 Inspection findings

#### Incident reported 18 July 2017

Review of records confirmed that monies had been withdrawn from a resident's bank account and the corresponding amount was subsequently lodged into a different resident's cash tin. The inspectors were informed by the manager that the monies were mistakenly withdrawn from one resident's bank account however the monies were lodged into the correct resident's cash tin. Records available during the inspection confirmed that the bank had rectified the error by internally transferring the monies back into the account the monies should have been withdrawn from originally. The inspectors were satisfied with the explanation provided by the manager and that the error was rectified by the bank.



## Residents' Bank Accounts

Review of records confirmed that the recording of monies withdrawn from residents' bank accounts and subsequently lodged into the residents' cash tins had significantly improved since the previous finance inspection on 13 November 2014. A sample of withdrawals was undertaken for all seven residents. The amounts identified in the bank statements as withdrawn, corresponded with the amounts lodged into the residents' cash tins on the same date.

Good practice was observed as the records of the withdrawals were checked and agreed by a senior member of staff when the bank statements were received by the home. Records also showed that monies held on behalf of residents were reconciled to the records of monies held on a weekly basis. Monies held on behalf of one resident was counted, the amount retained agreed to the balance recorded at the home.

### Areas of good practice

There were examples of good practice found in relation to: reconciling the monies withdrawn from residents' bank accounts and subsequently lodged at the home and the reconciliation of monies held on behalf of residents.

### Areas for improvement

No areas for improvement were identified during the inspection.

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

## Receipts

Review of records and discussion with the manager confirmed that the practice of retaining receipts from purchases undertaken on behalf of residents had significantly improved since the previous finance inspection on 13 November 2014. A sample of purchases undertaken on behalf of all seven residents confirmed that receipts were in place from all of the purchases with the exception of one. Although no receipt was available, a note was retained with the record which gave details of the purchase including the amount. The note was signed by two members of staff.

### Areas of good practice

There were examples of good practice found in relation to retaining receipts from purchases undertaken on behalf of residents.

### Areas for improvement

No areas for improvement were identified during the inspection.

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

## **Records of transactions undertaken on behalf of residents**

Review of records showed that a significant amount of monies were withdrawn from one resident's monies to pay for two concert tickets, records subsequently showed that the monies were paid back to the resident. Discussion with the manager confirmed that the resident was unable to attend the concert and another resident purchased the tickets for the same amount. A note from a member of staff was attached to the record which stated that the tickets were purchased from a member of the public who had originally bought the tickets. During the inspection the manager produced a copy of the details of the original purchase. Discussions also confirmed that due to the assessed needs of the resident the second ticket was for a member of staff to accompany the resident to the concert.

The manager confirmed that the resident's representative had agreed to the purchase however there was no record retained within the resident's file of the outcome of the discussions. Following the inspection the manager contacted RQIA to confirm that the home had reimbursed the resident an amount towards the purchase of the second concert ticket which was in line with the amount permitted to be refunded within the policies and procedures operated at the home.

An area for improvement was identified for records to be retained within residents' files of the outcome of discussions with residents' representatives, including representatives from the Health and Social Care Trusts, prior to purchases of a significant amount made on behalf of residents. A further area for improvement was identified for the home to consider the reasonableness of the amount refunded to the resident in relation to the second concert ticket purchased for the member of staff.

Records from holidays undertaken by residents were reviewed. Receipts from the trips were available at the time of the inspection. Records showed that members of staff accompanied residents on holiday due to their assessed needs and residents had paid the holiday costs, including meals, for the members of staff. Discussion with the manager confirmed that the home reimbursed the resident an amount towards the staff members' food bill or accommodation as in line with the home's policies and procedures.

It was noticed that there was a variance between the amount of monies withdrawn for one resident's holiday and the amount of monies returned to the resident following the expenditure incurred during the holiday. The inspectors could not identify the amount of the variance due to not being aware of the foreign exchange rate at the time the holiday was taken. Following the inspection the manager contacted RQIA to confirm that all records from the holiday had been reviewed which showed that a variance did exist and the resident was reimbursed the monies owed.

An area for improvement was identified for the policy for reviewing all records from residents' holidays to be strengthened with staff in order that residents receive the correct amount of monies remaining from their holidays.

RQIA are currently in discussion with the WHSCT in relation to the policies and procedures operated at the home in relation to holidays.

Review of records confirmed that significant amounts of monies were paid by five residents towards furniture for their rooms. The items purchased included wardrobes, dressing tables, mattresses and rugs. One of the resident's files retained a record from the resident's representative authorising the purchase. There was no record of similar authorisation within the remaining four files.

The inspectors discussed the findings with the manager, specifically the policy for Praxis providing furniture to residents as in line with the Residential Care Homes Regulations (NI) 2005. The manager confirmed that Praxis provide adequate furniture as in line with the regulations however residents' representatives had requested that the rooms were refurbished.

As previously stated within this report an area for improvement was identified for records to be retained within residents' files of the outcome of discussions with residents' representatives, including representatives from the Health and Social Care Trusts, prior to the purchase of items of significant value.

Review of records for two residents showed that "loans" were recorded within the residents' transaction books. The inspectors were concerned that vulnerable residents may have been provided with loans. Discussion with the manager confirmed that occasionally the home would pay for holidays or other items on behalf of residents and subsequently recover the monies from residents. The manager agreed that the recording of the term "loan" was inappropriate as loans were not provided to residents. This was identified as an area for improvement.

The inspectors discussed the recording of residents' transactions with the manager. It was noticed that a number of entries had either been written over or scored out. No initials were recorded against the amendments and no explanation for the errors was recorded. The inspectors could not confirm that one resident had received the correct change from purchases made on the resident's behalf due to incorrect recording by staff. The manager contacted RQIA following the inspection to confirm that the records had been reviewed and corrected to show the amounts purchased and the correct change paid back to the resident. The manager also confirmed that the policy for accurate recording of residents' transactions would be strengthened with staff.

This was previously listed within the QIP from the inspection in November 2014 and was listed as an area for improvement for a second time within the QIP of this report.

### **Areas of good practice**

There were examples of good practice found in relation to: the retention of receipts from residents' holidays.

### **Areas for improvement**

Five areas for improvement were identified during the inspection. These related to: retaining records within residents' files of the outcome of discussions with residents' representatives prior to purchasing items of significant amounts of money, consideration given to the reasonableness of the amount refunded to the resident in relation to the concert ticket purchased for a member of staff, the policy for reviewing all records from residents' holidays to be strengthened with staff, implement a system which correctly records the reason for the withdrawal from residents' monies and review the system of recording transactions on behalf of residents.

	Regulations	Standards
Total number of areas for improvement	3	2

## 7.0 Quality improvement plan

Areas for improvement identified during this inspection are detailed in the QIP. Details of the QIP were discussed with Mr Mark McNulty, 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 the 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 to [Agencies.Team@rqia.org.uk](mailto:Agencies.Team@rqia.org.uk) for assessment by the inspector.

RQIA will phase out the issue of draft reports via paperlite in the near future. Registered providers should ensure that their services are opted in for the receipt of reports via Web Portal. If you require further information, please visit [www.rqia.org.uk/webportal](http://www.rqia.org.uk/webportal) or contact the web portal team in RQIA on 028 9051 7500.

## Quality Improvement Plan

### Action required to ensure compliance with The Residential Care Homes Regulations (Northern Ireland) 2005

<p><b>Area for improvement 1</b></p> <p><b>Ref:</b> Regulation 13 (1) (a)</p> <p><b>Stated:</b> First time</p> <p><b>To be completed by:</b> 03 August 2017</p>	<p>The registered person shall ensure that a record is retained within residents' files of the outcome from discussions with residents' representatives, including representatives from the Health and Social Care Trusts, prior to the withdrawal of significant amounts of monies for purchases made on behalf of residents.</p>
	<p><b>Response by registered person detailing the actions taken:</b> Completed. Records are retained. This will be further reinforced with team leaders at meeting on 04/09/17 to ensure that all records are kept up to date regarding discussions around expenditure for service users. Evidence (emails, follow up letters) of discussion will be filed in finance section of service users personal files.</p>
<p><b>Area for improvement 2</b></p> <p><b>Ref:</b> Regulation 13 (1) (a)</p> <p><b>Stated:</b> First time</p> <p><b>To be completed by:</b> 31 August 2017</p>	<p>The registered person shall review the reasonableness of the amount reimbursed to the resident, identified during the inspection, for the concert ticket purchased on behalf of the staff member accompanying the resident.</p> <p>RQIA should be informed of the outcome of the review indicating if a further reimbursement had been made.</p>
	<p><b>Response by registered person detailing the actions taken:</b> Completed. Service user has capacity to consent and made an informed decision regarding the cost of the concert ticket. Reimbursement was made for cost of food and travel. Staffing costs covered by Praxis Care.</p>
<p><b>Area for improvement 3</b></p> <p><b>Ref:</b> Regulation 19 (2) Schedule 4 (9)</p> <p><b>Stated:</b> Second time</p> <p><b>To be completed by:</b> 31 August 2017</p>	<p>The registered person shall implement a robust system for recording residents' transactions in order to improve the accuracy of recording and to facilitate the audit process. Errors should be crossed out and a new line used to record the transaction. A reason for the error should be recorded and initialled by the staff member recording the transaction.</p> <p>The policy for accurate recording of residents' transactions should be strengthened with staff.</p>
	<p><b>Response by registered person detailing the actions taken:</b> Completed. Current policy has been reinforced with all staff. All staff undertake training on management of service users monies. All monies and transactions are audited daily by Team Leader and monthly by</p>

	managers.Financial policy and procedure to be further reinforced in team meeting on 05/09/17.
<b>Action required to ensure compliance with the DHSSPS Residential Care Homes Minimum Standards, August 2011</b>	
<b>Area for improvement 1</b> <b>Ref:</b> Standard 20.14 <b>Stated:</b> First time <b>To be completed by:</b> 31 August 2017	<p>The registered person shall ensure that the current policy for recording residents' holidays is strengthened with staff in order that residents receive the correct amount of monies remaining from the holidays.</p> <p><b>Response by registered person detailing the actions taken:</b>  Completed.  Current policy has been reinforced with team leaders and mangement.  This will be further strengthened at next staff meeting on 05/09/17</p>
<b>Area for improvement 2</b> <b>Ref:</b> Standard 20.14 <b>Stated:</b> First time <b>To be completed by:</b> 31 August 2017	<p>The registered person shall cease recording the term "loan" within residents' transaction books. A system should be implemented which correctly records the reason for the withdrawal from residents' monies.</p> <p><b>Response by registered person detailing the actions taken:</b>  We no longer use this term. We will ensure that monies are requested from family in respect of this service user in a timely fashion.</p>
<b>Carried forward regulations or standards</b>	
<b>Area for improvement 1</b> <b>Ref:</b> Regulation 5 (1) (a) (b) <b>Stated:</b> First time <b>To be completed by:</b> 13 March 2015	<p>The registered person shall provide updated individual agreements to each resident (or their representative) which detail the current fees and financial arrangements in place in respect to the resident.</p> <p>The practice of using correction fluid to update agreements should cease immediately.</p> <p>Individual resident agreements should comply with requirements under Regulation 5 of the Residential Homes Regulations (Northern Ireland) 2005 and meets Standard 4.2 of the DHSSPS Minimum Standards for residential Homes, which detail the minimum components of the agreement.</p> <p>A copy of the signed agreement by the resident or their representative and the registered person must be retained in the resident's records. Where the resident or their representative is unable to, or chooses not to sign the agreement, this must be recorded.</p> <p><b>Action required to ensure compliance with this regulation was not reviewed as part of this inspection and this will be carried forward to the next finance inspection.</b></p>
<b>Area for improvement 2</b> <b>Ref:</b> Regulation 14 (4)	<p>The registered person shall ensure that all staff engaged in any tasks involving residents' monies and valuables are appropriately trained. Written evidence should be available to confirm that the relevant staff have received the training.</p>

<p><b>Stated:</b> First time</p> <p><b>To be completed by:</b> 13 March 2015</p>	<p><b>Action required to ensure compliance with this regulation was not reviewed as part of this inspection and this will be carried forward to the next finance inspection.</b></p>
<p><b>Area for improvement 3</b></p> <p><b>Ref:</b> Regulation 14 (4)</p> <p><b>Stated:</b> First time</p> <p><b>To be completed by:</b> 13 March 2015</p>	<p>The registered person shall be assured that no resident has suffered any financial loss due to the record keeping found during the inspection.</p> <p>A reconciliation of residents' records should be undertaken to ascertain if any loss has occurred. Residents must be reimbursed for any deficits found.</p> <p><b>Action required to ensure compliance with this regulation was not reviewed as part of this inspection and this will be carried forward to the next finance inspection.</b></p>

*\*Please ensure this document is completed in full and returned to [Agencies.Team@rqia.org.uk](mailto:Agencies.Team@rqia.org.uk) from the authorised email address\**



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