

THE REGULATION AND QUALITY IMPROVEMENT AUTHORITY (RQIA)

FAILURE TO COMPLY NOTICE

Name of Registered Establishment: Corriewood Private Clinic (RQIA ID: 1076)	Name of Registered Persons: Anne Monica Byrne M.I. McGrady
Address of Registered Establishment: 3 Station Road Castlewellan BT31 9NF	
Issue Date: 4 June 2019	FTC Ref: FTC000046
Regulation not complied with: <i>The Nursing Homes Regulations (Northern Ireland) 2005</i> <i>Registered person: general requirements</i> Regulation 10. — <i>(1) The registered provider and the registered manager shall, having regard to the size of the nursing home, the statement of purpose, and the number and needs of the patients, carry on or manage the nursing home (as the case may be) with sufficient care, competence and skill.</i>	
Specific failings to comply with regulations: The unannounced inspection of 21 May - 23 May 2019 raised significant concerns in regards to the overall governance of the home. This includes a lack of effective oversight, monitoring and quality assurance arrangements in the home, which has placed patients at risk of harm. There was an absence of a robust monitoring system to ensure that staff were appropriately registered with their professional bodies. The staff duty rota identified three staff working in roles for which they were not registered. There was also evidence of poor management of care staff registration with the Northern Ireland Social Care Council (NISCC). Ineffective audit processes were established in the home and therefore failed to drive improvement, specifically in relation to care records and accidents/incidents. The monthly governance reports completed in respect of Regulation 29 of the Nursing Homes Regulations (Northern Ireland) 2005 examined during the inspection, failed to identify the serious deficits in practice and secure the required improvements. A failure to appropriately manage medicine supply resulted in long periods of out of stock medicines and this significantly compromised patient health and welfare.	

RQIA raised a number of these matters during previous inspections of Corriewood Private Clinic.

Action required to comply with regulations:

- The registered persons must ensure that systems are in place to advise management when patients do not have a supply of their prescribed medicines
- The registered persons must ensure that the registered manager or her representative delivers services effectively on a day-to-day basis in accordance with legislative requirements
- The registered persons must ensure that RQIA is notified of all incidents/accidents occurring in the home in accordance with Regulation 30 of The Nursing Homes Regulations (Northern Ireland) 2005. This includes retrospective notification of events identified during the inspections on 21/23 May 2019
- The registered persons must ensure that the registered manager establishes, implements and sustains robust quality monitoring and governance systems in relation to the registration of staff with their professional bodies, medication management, care records, falls, accidents and incidents, wounds, restrictive practice, infection prevention and control/environment and complaints.
- The registered persons must ensure that the monthly monitoring reports, are completed in accordance with Regulation 29 of the Nursing Homes Regulations (Northern Ireland) 2005, and contain clear, time-bound action plans, detailing all areas of improvement required. The completed Regulation 29 report should be shared with the manager and the senior management team to ensure that the required improvements are made.
- The registered persons must ensure that a copy of the monthly monitoring reports is submitted on a monthly basis to RQIA until further notice. This should be with RQIA no later than three days after the last day of the month.

The Registered Person may make written representations to the Chief Executive of RQIA regarding the issue of a failure to comply notice, within one month of the date of serving this notice.

Date by which compliance must be achieved: 5 August 2019

Signed...............Director of Assurance

This notice is served under The Health and Personal Social Services (Quality, Improvement and Regulation) (Northern Ireland) Order 2003 and The Nursing Homes Regulations (Northern Ireland) 2005

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Address of Registered Establishment: 3 Station Road Castlewellan BT31 9NF	
Issue Date: 4 June 2019	FTC Ref: FTC000048
Regulation not complied with: <i>The Nursing Homes Regulations (Northern Ireland) 2005</i> <i>Health and Welfare</i> <i>Regulation 13.-</i> <i>(1) The registered person shall ensure that the nursing home is conducted so as –</i> <i>(a) to promote and make proper provision for the nursing, and health and welfare of patients;</i> <i>(b) to make proper provision for the nursing and where appropriate, treatment and supervision of patients.</i>	
Specific failings to comply with regulations: Our previous care inspection of 13 December 2018 identified deficits with regard to the management of falls, wounds and infections. During the inspection of 21/23 May 2019, there was evidence that the care records reviewed continued to fail to accurately reflect the care needs of patients. Deficits were identified in the management of falls in the home. Patients did not have a risk assessment completed following a fall and we found that care plans were not consistently updated as required. In addition clinical and neurological observations were not taken in keeping with NICE best practice guidance. We found evidence in the care records documentation that patients had unwitnessed falls. Consideration was not given to the potential for a head injury. Concerns were identified in relation to wound management. One patient with two wounds did not have appropriate care plans in place to monitor, assess and direct staff in the management of each wound. In addition, whilst the care plan directed nursing staff to monitor the wounds for signs of infection, there was no evaluation of this in the daily notes. No care plan was in place to manage a wound for another identified patient and this wound was not dressed in keeping with NICE best practice guidance.	

Deficits were identified in relation to management of infection for one identified patient. There was no care plan in place to manage an active infection and the generic care plan that was in place made reference to a different patient.

We found that there was not a holistic approach to care planning, and care records were not reviewed to reflect individualised patient centered need.

Significant concerns were raised by RQIA in regard to the provision of sufficient numbers of registered nursing staff available to maintain the care records as required.

Action required to comply with regulations:

- The registered persons must ensure that registered nursing staff are provided with training relevant to their role and responsibilities in relation to the completion and management of patient care records
- The registered persons must ensure that patients care records are individualised, accurately reflect their assessed needs and are kept under review
- The registered persons must ensure that falls are managed in accordance with best practice, regional guidelines and protocols
- The registered persons must ensure that an accurate record of falls occurring in the home is maintained
- The registered persons must ensure that any patient with an infection has an up to date care plan in place to direct staff in the management of the infection
- The registered persons must ensure that any patient with a wound and/or pressure ulceration has an up to date care plan in place to direct staff in the provision of wound care
- The registered persons must ensure that individual patient records reflect the wound care recommendations of the multi professional team
- The registered persons must ensure that accurate records are maintained in relation to the number, type and status of wounds in the home
- The registered persons must ensure that there are sufficient registered nursing staff available to assure the health and well-being of patients. A skill mix of 35% registered nurses and 65% care assistants should be maintained over a 24 hour period.

The Registered Person may make written representations to the Chief Executive of RQIA regarding the issue of a failure to comply notice, within one month of the date of serving this notice.

Date by which compliance must be achieved: 5 August 2019

Signed..........**Director of Assurance**

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Address of Registered Establishment: 3 Station Road Castlewellan BT31 9NF	
Issue Date: 4 June 2019	FTC Ref: FTC000049
Regulation not complied with: <i>The Nursing Homes Regulations (Northern Ireland 2005)</i> <i>Health and Welfare of Patients</i> <i>Regulation 13.—</i> <i>(4) Subject to paragraph (5) the registered person shall make suitable arrangements for the ordering, storage, stock control, recording, handling, safe keeping, safe administration and disposal of medicines used in or for the purposes of the nursing home to ensure that –</i> <i>(b) medicine which is prescribed is administered as prescribed to the patient for whom it is prescribed, and to no other patient; and</i>	
Specific failings to comply with regulations: The unannounced medicines management inspection undertaken on 21 May 2019 raised concerns regarding the governance arrangements and medicines management within the home. We found evidence that the audits of medicines undertaken were not effective in identifying shortfalls in the management of medicines and as a consequence, identified patients had not received their medicines as prescribed. We found that seven patients had missed more than one dose of at least one prescribed medicine during April and May 2019. There was no evidence that this had been escalated to the registered manager or the prescriber. RQIA had not been notified. Discrepancies were noted in the controlled drugs record book. One analgesic patch had been transferred between patients as the patient did not have a supply when the patch was due to be changed. The transfer of the patch between patients had not been recorded in the controlled drugs record book. The date of receipt of the new	

supply of patches had been amended in the controlled drugs record book so that it appeared that the patch had not been out of stock.

We observed that the lunchtime medicines were being pre-dispensed for several patients by the registered nurse. This practice is unsafe as it increases the likelihood that medicines may be administered to the wrong patient.

Action required to comply with regulations:

- The registered persons must ensure that systems are in place so that patients have a continuous supply of their prescribed medicines.
- The registered persons must ensure that robust auditing systems are developed and implemented which identify deficits in the availability of prescribed medicines and evidences the corrective action taken.
- The registered persons must ensure that systems are in place to ensure that RQIA is notified when prescribed medicines are not available for administration.
- The registered persons must ensure that the controlled drug record book must be fully and accurately completed.
- The registered persons must ensure that medicines are not pre-dispensed.

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Address of Registered Establishment: 3 Station Road Castlewellan BT31 9NF	
Issue Date: 4 June 2019	FTC Ref: FTC000050
Regulation not complied with: <i>The Nursing Homes Regulations (Northern Ireland) 2005</i> <i>Fitness of workers</i> <i>Regulation 21. —</i> <i>(1) The registered person shall not employ a person to work at the nursing home unless –</i> <i>(a) the person is fit to work at the nursing home;</i> <i>(b) subject to paragraph (5), he has obtained in respect of that person the information and documents specified in paragraphs 1 to 7 of Schedule 2;</i> <i>(c) he is satisfied on reasonable grounds as to the authenticity of the references referred to in paragraph 3 of Schedule 2 in respect of that person.</i> <i>(2) Paragraph 1 applies to a person who is employed by a person (“the employer”) other than the registered person.</i> <i>(3) Paragraph 1 applies to a position in which a person may in the course of his duties have regular contact with patients at the nursing home.</i> <i>(4) The registered person shall not allow a person to whom paragraph (2) applies to work at the nursing home in a position to which paragraph (3) applies, unless – confirmed in writing to the registered person that he is so satisfied.</i> <i>(5) For the purposes of paragraphs (1) and (4), a person is not fit to work at a nursing home unless –</i> <i>(i) each of the matters specified in paragraphs 1 to 7 of Schedule 2;</i> <i>(6) The registered person shall ensure that all health care professionals are covered by appropriate professional indemnity.</i>	

Specific failings to comply with regulations:

During the care inspection of the 23 May 2019 significant concerns were raised in regards to the registration of a number of staff on the staff duty rota. The registered person confirmed that three staff identified as registered nurses did not hold active registrations with the Nursing and Midwifery Council (NMC). We required immediate action be taken to ensure that the identified staff on the registered nursing staff duty rota were no longer working in this role. This was later confirmed in writing, thus ensuring that patients were not placed at further risk of harm.

A number of care staff were also evidenced to be either in the process of registration or not appropriately registered with the Northern Ireland Social Care Council (NISCC). One recruitment file examined failed to evidence that an appropriate pre-employment health check had been completed.

The management of recruitment and selection of staff and the monitoring of the professional status of staff was unsatisfactory.

Action required to comply with regulations:

- The registered persons must ensure that all staff are recruited and employed in accordance with relevant statutory employment legislation and mandatory requirements
- The registered persons must ensure that all care staff are registered with the appropriate professional body
- The registered persons must ensure that all registered nursing staff are appropriately registered with the Nursing Midwifery Council (NMC).

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