

**Action Plan for Safeguarding Adults Board in respect of:  
Independent Management Review of 2 independent sector residential care homes – March 2014**

Background: This report was commissioned by the Chair of the Safeguarding Adults Board as a response to a request by the Leader of Plymouth City Council. The circumstances concerning the decommissioning of two independent sector care homes in Plymouth was of sufficient gravity and concern to warrant a management review in order to revise policy and practice to take into account lessons learned.

	Recommendations	Actions / update	Timescales
14.1	The current safeguarding procedures should be reviewed and consideration given to creating a procedure that can deal with a situation similar to which happened at the homes.	Review whole investigation process in light of report writer's comments.	April 2014
14.2	In line with current 'large scale procedures', a manager should be identified to co-ordinate and manage all the safeguarding and commissioning activity, should a similar situation occur again.	The policy review will reinforce the role of the Responsible Operational Manager (ROM) for large scale investigations and that of the commissioner in line with 14.1 to ensure that operational activity and commissioning activity is co-ordinated and implemented.	1 <sup>st</sup> May 2014
14.3	A system should be introduced so that time scales within the safeguarding process can be monitored.	The ROM will ensure that investigations are conducted within timeframes. This will be monitored in weekly Safeguarding Overview Meetings and through Performance meetings with the Operational Head of service.	1 <sup>st</sup> May 2014

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14.4	Consideration should be given as to whether the safeguarding and associated procedures need to be revised in the light of the Davis judgement.	Legal to review Davis v West Sussex County Council (2012) EWHC 2152 (QB), (2012) MHLO 83	May 2014
14.5	Within this procedure, there needs to be a process that ensures that a proper record is kept of information relating to the incident, including a running log of activity.	The procedure will set out requirements around standards for record keeping and storage including individual case records on Carefirst and the requirement to capture and record chronologies.	April 2014
14.6	The whistleblowing policy in relation to people who are not directly employed by the Council should be reviewed. The review should also consider whether some form of support can be provided to staff employed or formerly employed by contractors.	This action will be referred to our legal services for consideration and any policy updated accordingly.	May 2014
14.7	Whilst acknowledging the considerable progress that has been made within the Council, some work is needed to look at the roles and responsibilities of the social work staff and their managers, and QAIT. There needs to be a clear separation between the QAIT team and the Adult Social Care Staff who have overall responsibility for safeguarding individuals.	At the time of the incident, ASC did not have a safeguarding team. Since May 2013, there is a Safeguarding Pathway made up of social workers and Advanced Practitioners which has distinctly separate roles from quality assurance team (QAIT). We will reinforce the importance of this distinction of roles and responsibilities within operational policy.	Completed May 2013
14.8	Regular meetings that reflect an ongoing constructive relationship between the Council and CQC needs to be	Quarterly business relationship meetings have	Established 2011 – ongoing. CQC is responsible for

	established. Such meetings should be recorded.	been held since 2011	administration of these meetings. The business relationship meetings involve CQC, Health Commissioners, Local Area Team and Safeguarding Manager. Providers of concern and compliance information are discussed. Minutes have been the responsibility of CQC however we will also ensure that we routinely hold minutes. Timeframe – immediate .
14.9	Whenever a home is contracted to the Council is without a registered manager for more than three months, some form of review should be undertaken by the Council to risk assess the situation.	Providers of concern are discussed at CQC business relationship meeting. CQC are aware of all care homes without Registered Managers and monitoring arrangements are in place. This performance information has started to be shared routinely by CQC.	We will work co-operatively with CQC to manage this area of risk and use contract levers as necessary.  Timeframe – ongoing
14.10	Safeguarding is an area of work that is growing and this is likely to increase in future years. Whilst recognizing the difficult financial position that the Council is in consideration should be given to appointing a safeguarding manager to focus solely on safeguarding.	A Safeguarding Manager exists in the Safeguarding Unit and reports to the Head of Safeguarding and QA .This post has been in place since May 2013. A review will be undertaken as a result of the departure of this post holder.	April 2014