

## Adult A Safeguarding Adult Review Action Plan for Overview Report

Recommendation and scope	Action (s)	Target Date	Lead	Progress/ next steps	Status (RAG) Rating
<p><b>The East Sussex SAB....</b></p> <p><b>In relation to placements:</b></p>	<ul style="list-style-type: none"> <li>East Sussex Clinical Commissioning Groups (CCGs) to link with East Sussex County Council (ESCC) Specialist Placement team regarding database that is in place in order for knowledge to be shared appropriately.</li> <li>The Commissioning Support Unit (CSU) for NHS West Kent CCG (WKCCG) has a generic database for patients in receipt of NHS Continuing Healthcare (CHC), including those with challenging behaviours or mental health needs. NHS WKCCG to seek reassurance that knowledge is shared appropriately.</li> </ul>	Dec 17	East Sussex CCGs	Those with behaviours that challenge or Mental Health needs have these needs highlighted on CHC eligibility requests sent to NHS WKCCG by NEL CSU.	G
<p><b>Recommendation 1:</b></p> <p>Promotes the development of a database of specialist placements capable of managing people with complex needs and challenging forms of behaviour.</p>		Dec 17	West Kent CCG		
<p><b>Recommendation 2:</b></p> <p>Promotes work between relevant CCGs to address the commissioning/market shaping gap relating to provision for people with complex needs and challenging forms of behaviour.</p>	<ul style="list-style-type: none"> <li>The CCGs to routinely share information when placements are found for people with complex needs, providing both positive and negative feedback.</li> <li>Existing networks to be explored and links to be formed regarding specialist providers.</li> <li>NHS West Kent CCG to escalate commissioning and market shaping gap to Sustainability and Transformation Partnership/plan (STP).</li> <li>East Sussex CCGs to escalate to</li> </ul>	Mar 18	East Sussex CCGs	West Kent CCG have confirmed that the CSU shares information regarding specialist placements with fellow CCGs or Local Authorities, which covers 5 CCG areas.	G
		Mar 18	NHS West Kent CCG	Kent integrated workforce business plan includes multi-agency monitoring (Disabled Children, Adults, Learning Disability and Mental	
		Mar 18	East Sussex	Disability and Mental	

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<p><b>Recommendation 3:</b> Seeks reassurance that commissioning processes are robust in identifying the degree to which recommended placements have the capacity and resources to meet an individual's identified care and support needs.</p>	<p>STP.</p> <ul style="list-style-type: none"> <li>Assurance to be gained from East Sussex Continuing Health Care (CHC) teams, linking to CHC Guidance for Assurance Frameworks*.</li> <li>Kent CCGs to work with CHC functions for assurance processes to be established.</li> </ul>	<p>Nov 17</p> <p>Nov 17</p>	<p>CCGs</p> <p>East Sussex CCGs</p> <p>NHS West Kent CCG</p>	<p>Health)</p> <p>All placements greater than £1000/ week must be submitted to WKCCG by CSU for authorisation prior to placement beginning, and a review date of within 3 months for new CHC patients is set. This applies to those patients newly placed Out of Area. WKCCG Nursing &amp; Quality Team undertake quality visits to care home providers to ensure patient safety, spot checks and compliance with regulatory statutes.</p>	<p>G</p>

\*<https://www.england.nhs.uk/wp-content/uploads/2015/03/ops-model-cont-hlthcr.pdf>

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<b>In relation to case coordination:</b>					
<p><b>Recommendation 4:</b> Seeks reassurance that there is now a system in place for notification of, and monitoring all out of county placements, both those where a) agencies in East Sussex are the placing organisation and b) those where East Sussex is the receiving location, in line with available guidance.</p>	<p>a) ESCC, Kent County Council (KCC) and the CCGs (East Sussex and West Kent) to confirm monitoring arrangements for out of county placements in place.</p> <p>b) Clarification to be sought from regional ADASS with regard to the current arrangements for notification of placements to host authorities.</p>	<p>Dec 17</p> <p>Dec 17</p>	<p>ESCC, KCC, CCGs (East Sussex and West Kent)</p> <p>ESCC</p>	<p>West Kent CCG have confirmed that out of area placements are now monitored by the CHC team in line with the national framework for CHC.</p> <p>Kent and East Sussex Adult Social Care (ASC) departments have monitoring arrangements within existing policies, with master list maintained by commissioning.</p>	G
<p><b>Recommendation 5:</b> Undertakes an audit of out of county placements to identify the volume of such placements and to evaluate whether there are systemic patterns to be addressed.</p>	<ul style="list-style-type: none"> <li>• Proforma audit tool to be devised to consist of names of establishments, local authority area, and length of placement.</li> <li>• Using the proforma: <ul style="list-style-type: none"> <li>- ESCC ASC to undertake audit of Local Authority out of county placements.</li> <li>- East Sussex CCGs to undertake audit for CHC funded placements.</li> <li>- NHS West Kent CCGs (for CHC functions) to undertake this audit.</li> </ul> </li> <li>• KCC have confirmed they have a list of out of county placements.</li> </ul>	<p>Dec 17</p> <p>Dec 17</p> <p>Jan 18</p> <p>Jan 18</p>	<p>ESCC</p> <p>ESCC</p> <p>East Sussex CCGs</p> <p>NHS West Kent CCG</p>	<p>ESCC ASC have undertaken audit of out of county placements; evaluation of this to be completed.</p> <p>NEL CSU requested on 19/9/17 to undertake audit on behalf of WKCCG.</p>	G

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	<ul style="list-style-type: none"> <li>Evaluation of audit to be fed back through the ongoing development as part of recommendation 2 of this action plan.</li> </ul>	Mar 18	ESCC		
<p><b>Recommendation 6:</b> Reviews complex case procedures to ensure that all agencies are aware of when and how to convene a multi-agency review of a complex case, with particular reference to ensuring that all available information is shared across all the agencies involved, with access to advice and guidance from legal practitioners, and agreeing and following through on a multi-agency action plan.</p>	<ul style="list-style-type: none"> <li>Safeguarding leads to report on complex case procedures in place within their agency via the East Sussex Safeguarding Adults Board (SAB) Operational Practice subgroup.</li> <li>Ensure complex case procedures are being followed by way of targeted case file audits to be undertaken, by all agencies involved in the SAR.</li> <li>Kent &amp; Medway SAB (KMSAB) Learning and Development Group to ensure guidance in policy and assessments is being followed consistently.</li> </ul>	<p>Dec 18</p> <p>Mar 18</p> <p>Sep 17 - complete</p>	SAB Operational Practice subgroup members	Learning from KCC Safeguarding audit completed in June 2017 has been shared with Kent & Medway SAB to inform training.	G
<p><b>Recommendation 7:</b> For all care and nursing home residents, promotes the use of one shared record held at the care home by all professionals involved, to ensure that all practitioners are aware when visiting a resident of the key issues within the chronology of the case.</p>	<ul style="list-style-type: none"> <li>Contract amendment to be made to ensure all providers make available one shared record to be used for visiting professionals.</li> <li>Care Home Providers to record actions and interventions in one single record and actively encourage use of shared record by visiting professionals. Implementation to be monitored by way of feedback to the East Sussex SAB via Registered Care Association (RCA) reps on their</li> </ul>	<p>Complete</p> <p>Jan 18</p>	ESCC Contracts and Purchasing Unit/ Registered Care Association (RCA)		G

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	<ul style="list-style-type: none"> <li>use, supported by a survey of registered care home managers.</li> <li>Care Home Providers in Kent to feedback to the Kent &amp; Medway SAB via Kent Integrated Care Association.</li> </ul>		KCC		
<p><b>Recommendation 8:</b> Establishes a task and finish group to review record-keeping and information-sharing between agencies and to make proposals regarding the transfer of information, with particular reference to hospital discharge planning and admissions to care homes, and complex cases involving concerns about self-neglect and mental capacity.</p>	<ul style="list-style-type: none"> <li>Task and Finish Group to be convened with key professionals from ASC, East Sussex Healthcare Trust, Registered Care Association, and CCGs.</li> <li>This group to: <ul style="list-style-type: none"> <li>Review existing arrangements in place.</li> <li>Receive update from the urgent care programme around discharge planning under the 'SAFER' bundle.</li> <li>Seek updates on the Trusted Assessor model implementation for integrated discharge planning.</li> </ul> </li> </ul>	Mar 18	Chair – East Sussex SAB Operational Practice subgroup		G
<p><b>Recommendation 9:</b> Develops a protocol on the management of cross-border cases in partnership with neighbouring Safeguarding Adults Boards, with the aim of ensuring that all agencies are clear about:</p> <ol style="list-style-type: none"> <li>Lead agency responsibility for case management, for supervision of case management and for placement reviews</li> <li>Link persons in the receiving area</li> <li>Escalation processes when there are concerns about placement suitability or</li> </ol>	<ul style="list-style-type: none"> <li>Discuss at Sussex and Surrey SAB Chair meeting in December 17, linking with the Kent &amp; Medway SAB manager.</li> <li>ADASS guidance on Inter-Authority Safeguarding Arrangements is already in place; confirm this is being followed and raise awareness of current local SAB escalation and resolution protocols.</li> </ul>	Dec 17  Mar 18	East Sussex SAB Manager		G

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case management.					
<b>In relation to safeguarding:</b>					
<p><b>Recommendation 10:</b> Produces briefings to promote and refresh safeguarding literacy in the context of the Care Act 2014, with particular reference to the referral pathways and thresholds for section 42 safeguarding enquiries and the use of complex case procedures and multi-agency meetings in challenging cases, as well as awareness of, and confidence in, understanding factors contributing to self-neglect.</p>	<ul style="list-style-type: none"> <li>• Adult Social Care to co-ordinate multi-agency working group to produce briefings which promote and improve safeguarding literacy, referral pathways and the safeguarding duties. These briefings will reflect linkages to other procedures and the understanding of self-neglect.</li> <li>• Kent and Medway Task and finish group of SAB revised self- neglect policy and guidance September 2017 to improve safeguarding literacy, referral pathways and the safeguarding duties. To be supported by multi-agency safeguarding training and workshops.</li> </ul>	Mar 18	Chair, East Sussex SAB Operational Practice subgroup		G
<p><b>Recommendation 11:</b> Seeks reassurance that practitioners and managers across agencies understand and use pathways for seeking advice from, and escalating concerns to, safeguarding leads within their own organisation, and are able to use appropriately safeguarding referral pathways.</p>	<ul style="list-style-type: none"> <li>• Safeguarding Assurance tool was completed by members of the East Sussex SAB, and actions arising from this are being implemented.</li> <li>• East Sussex SAB Resolution Protocol to be reviewed and disseminated.</li> <li>• Review Kent and Medway current 2016 Escalation Policy.</li> </ul>	Sep 17 – complete  Oct 17  Nov 17	East Sussex SAB   Kent & Medway SAB (KMSAB)	East Sussex SAB Resolution Protocol signed off at October 17 meeting.	G



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	KMSAB to appropriately evaluate best interests' decision making and feed into learning and development.	Dec 17	KMSAB	<ul style="list-style-type: none"> <li>• Learning from SARs and Safeguarding Case Audits completed 2016-17 have informed Kent and Medway multi-agency policy and training.</li> <li>• Outcomes shared at KMSAB and with working groups.</li> </ul>	
<p><b>Recommendation 14:</b> Reviews guidance on mental capacity assessment to include a process for securing multidisciplinary capacity assessment in complex cases where multidisciplinary teams are responsible for decision-making.</p>	<ul style="list-style-type: none"> <li>• Review to be taken forward by the Operational Practice subgroup of the East Sussex SAB. This review to consist of: <ul style="list-style-type: none"> <li>- SAB members sharing guidance that is already in place within their organisation where comparisons can be made.</li> <li>- Evaluation of the guidance and amendments made where required to ensure consistent application across agencies.</li> </ul> </li> <li>• KCC have confirmed a range of policies and documents are in place related to levels of assessments with guides to when complex/multiagency involvement is required.</li> <li>• Quality Assurance Working Group</li> </ul>	<p>Dec 17</p> <p>Mar 18</p> <p>Mar 18</p>	<p>Chair, East Sussex SAB – Operational Practice subgroup</p> <p>Quality</p>		G



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	<p>(QAWG) of the Kent and Medway SAB reflects East Sussex in its review of guidance:</p> <ul style="list-style-type: none"> <li>- SAB members sharing guidance that is already in place within their organisation where comparisons can be made.</li> <li>- Evaluation of the guidance and amendments made where required to ensure consistent application across agencies e.g. Escalation policy updated November 2016 to be reviewed November 2017.</li> </ul>		Assurance Working Group - Kent		
<p><b>Recommendation 15:</b> Reviews guidance for staff on working with those holding LPA.</p>	<ul style="list-style-type: none"> <li>• This to be included in East Sussex alongside recommendation 14 via Operational Practice subgroup.</li> <li>• KCC: Results from training audit to be fed into training programmes.</li> </ul>	Mar 18	Chair - Operational Practice subgroup  KCC	In Kent & Medway, the Multi-agency safeguarding adults policy, protocols and guidance has recently been reviewed and revised in response to a local Domestic Homicide Review (DHR).	G
<p><b>Recommendation 16:</b> Conducts regular workforce surveys to assess staff confidence in their legal literacy and safeguarding literacy, using the results to inform proposals about further workforce development initiatives.</p>	<ul style="list-style-type: none"> <li>• Safeguarding Assurance recently taken place within Sussex and Peer Challenge event held. Follow up surveys to be planned via the Training and Workforce development (TWD) subgroup.</li> </ul>	Mar 18	Chair – TWD subgroup, East Sussex SAB.		G

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	<ul style="list-style-type: none"> <li>Safeguarding assurance in Kent is managed by Quality Assurance Working Group and informs Learning and Development subgroup of KMSAB. Multi-agency safeguarding training commenced in April 2017 this recommendation will be incorporated into ongoing review with the training provider.</li> </ul>	Mar 18	KMSAB		
<p><b>Recommendation 17:</b> Seeks reassurance through audits that systems are effective for tracking renewals of Deprivation of Liberty Safeguards (DoLS), for monitoring conditions attached to DoLS authorisations, and for ensuring that individuals and their representatives have been notified in a timely way when orders have been made.</p>	<ul style="list-style-type: none"> <li>Report to be provided by DoLS manager in East Sussex to the SAB Operational Practice subgroup outlining: <ul style="list-style-type: none"> <li>- Current situation.</li> <li>- Feasibility and cost benefit of bringing a system in place to track renewals.</li> <li>- Report to make clear it is the Managing Authority that has the responsibility regarding renewals.</li> </ul> </li> <li>KCC to seek reassurance that effective systems are in place by ensuring: <ul style="list-style-type: none"> <li>- DoLS managers log authorisations where complex issues are identified and where conditions need to be closely monitored.</li> <li>- Alert relevant people including RPRs, Managing Authorities and professionals so they are aware of responsibilities to keep DoLS service informed of changes in</li> </ul> </li> </ul>	<p>Dec 17</p> <p>Mar 18</p>	<p>DoLS Manager, ESCC</p> <p>KCC</p>	<p>East Sussex DoLS manager will report to the Operational Practice subgroup on 14<sup>th</sup> December; they have confirmed a system is in place to track renewals.</p> <p>Kent DoLS audit completed in June 2016; renewals tracked on SWIFT (KCC database). Includes notification of DoLS to all Interested Parties within a week. Report of current situation advised as standing item to KMSAB. MCA/DoLS briefing sent in March 2017 incorporated section on Making applications.</p> <p>Out of County</p>	G

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	<p>circumstances.</p> <ul style="list-style-type: none"> <li>- DoLS service to be proactive in following up issues raised so that reviews of authorisations can be undertaken in a timely fashion.</li> </ul>			<p>placements remain a challenge nationally – delay in Relevant Person's Representative (RPR) appointment. Monitored by Senior Practitioner in service.</p>	
<p><b>Recommendation 18:</b> Reviews guidance on legal options for intervening in self-neglect, with and without capacity, to include consideration of the interface between the Mental Health Act 1983 and the Mental Capacity Act 2005, and the use of the Court of Protection and of inherent jurisdiction.</p>	<ul style="list-style-type: none"> <li>• This will be considered as part of the review of the Sussex self-neglect procedures.</li> <li>• Self-neglect policy in Kent under review for December 2017.</li> <li>• Self-neglect will be the focus during Safeguarding Week in Kent 9<sup>th</sup>-13<sup>th</sup> October 2017.</li> </ul>	<p>Mar 18</p> <p>Dec 17</p> <p>Oct 17 - Complete</p>	<p>Sussex Policy and Procedures Review group</p> <p>KCC</p> <p>KCC</p>	<p>Updated procedures in East Sussex due for launch April 2018.</p>	G
<p><b>In relation to advocacy:</b></p>					
<p><b>Recommendation 19:</b> Reviews with commissioners and providers of advocacy services (including PRPRs and IMCAs) measures to address shortfall in the number of available advocates, and monitors further developments in advocacy provision.</p>	<ul style="list-style-type: none"> <li>• East Sussex SAB to receive a report via the Operational Practice Subgroup on the status and performance of advocacy referral rates and response times, split by way of in county and out of county.</li> <li>• Performance of Kent Advocacy Hub monitored via contract reviews led jointly by KCC Commissioning and</li> </ul>	<p>Dec 17</p>	<p>ESCC Advocacy Commissioner</p>	<p>Report being brought to Operational Practice subgroup in December 17.</p>	G

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	Kent Mental Capacity Act DoLS Service.				
<b>In relation to disseminating the learning from this review:</b>					
<p><b>Recommendation 20:</b> Produces briefings for agencies that summarise the learning from this case, with an accompanying feedback template so that East Sussex SAB can be informed how all agencies have disseminated the learning by means of team meetings, learning events and/or workshops.</p>	<ul style="list-style-type: none"> <li>Briefings to be developed by East Sussex SAB Quality Assurance officer.</li> <li>Agencies to complete feedback template by February 2018.</li> <li>Learning from this case will be shared with KMSAB learning and development working group.</li> <li>Multi-agency MCA/DOLS workshops during Safeguarding Week will further disseminate the learning – Feedback will be shared with KMSAB and East Sussex.</li> </ul>	<p>Nov 17</p> <p>Feb 18</p> <p>Oct 17</p> <p>Oct 17</p>	<p>Quality Assurance Officer, East Sussex SAB</p> <p>Chair, KMSAB Learning and Development Group</p>		G
<p><b>Recommendation 21:</b> Reconvenes a learning event one year on from the publication of its action plan to report on progress made and learning embedded in practice.</p>	<ul style="list-style-type: none"> <li>East Sussex SAB will reconvene a follow up learning event and invite representatives from Kent &amp; Medway SAB.</li> </ul>	June 18	SAB Manager, East Sussex SAB		G
<p><b>Recommendation 22:</b> Sends this review to Kent and Medway SAB with a request that it considers the above recommendations and advises East Sussex SAB regarding what action it also</p>	<ul style="list-style-type: none"> <li>SAR Report and action plan to be taken to Kent and Medway SAB at next available meeting in 2017.</li> </ul>	Dec 17	SAB Manager, East Sussex SAB	Report and action plan shared with KMSAB members; to be fully discussed at meeting on 30 <sup>th</sup> October 2017.	G

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proposes to take to ensure that lessons are translated into service and practice development.					
<p><b>Recommendation 23:</b> Shares this review with neighbouring West Sussex SAB, Brighton and Hove SAB and Surrey SAB to inform their consideration of cases relating to out of county placements, mental capacity and self-neglect.</p>	<ul style="list-style-type: none"> <li>To be taken to next Sussex and Surrey SAB Chairs meeting in December 17.</li> </ul>	Dec 17	SAB Manager, East Sussex SAB	Neighbouring SABs have been notified of this review; to be formally discussed at Sussex and Surrey SAB Chairs meeting in December 17.	G

**Key to RAG ratings:**

**Green:** Objective completed or on target

**Amber:** Work in progress/further actions planned or required

**Red:** Objective not completed or target not met

**Key to acronyms/abbreviations used:**

**ASC:** Adult Social Care

**CHC:** NHS Continuing Healthcare

**CSU:** Commissioning Support Unit

**DoLS:** Deprivation of Liberty Safeguards

**East Sussex SAB:** East Sussex Safeguarding Adults Board

**ESCCGs:** East Sussex Clinical Commissioning Groups

**IMCA:** Independent Mental Capacity Advocate

**ADASS:** Association of Directors of Adult Social Services

**KCC:** Kent County Council

**LPA:** Lasting Power of Attorney

**MCA:** Mental Capacity Act

**RCA:** Registered Care Association

**RPR:** Relevant Person's Representative

**STP:** Sustainability & Transformation Partnership/Plan

**TWD:** Training & Workforce Development

**WKCCG:** West Kent Clinical Commissioning Group

**KMSAB:** Kent & Medway Safeguarding Adults Board