

**Response to Public Consultation of the Regulation and Quality
Improvement Authority (RQIA) Draft Corporate Strategy and
Three Year Review Programme 2015-18
Consultation**

Association for Real Change (NI)

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Wildflower Way,
Boucher Road
Belfast
BT12 6TA

BACKGROUND

ARC (NI) welcomes the opportunity to respond to the consultation on the Draft Corporate Strategy and Three Year Review Programme as presented by RQIA.

ARC (NI) is a membership umbrella body, supporting over 35 learning disability providers to put real change into action by providing high quality information, accredited and non-accredited training, conferences, networking opportunities and good practice guidance to promote new ways of working.

1. Draft Corporate Strategy 2015-18

1.1 Is Care Safe, Effective, Compassionate?

ARC welcomes the three specific questions which the strategy is developed around and feels this structured approach promotes inclusion, equality and diversity across geography, provision and person. More importantly the outcomes focus is critical and should enable poor practice to be challenged and best practice promoted.

ARC believes the key priorities addressing these three objectives are relevant and fitting and welcomes the challenges under each that RQIA have stated.

ARC looks forward to more clarity on how RQIA are going to adapt and develop new inspection/review approaches, incorporating a human rights approach, to respond to community based provision in line with the regional strategy 'Transforming Your Care'. ARC would actively seek to contribute.

The draft Mental Capacity Bill is of significant importance, not least in its potential impact on Supported Living provision, but also with regard to restrictive practice & deprivation of liberty. ARC is particularly interested in ensuring these areas are highlighted, challenged and addressed, in particular through the developing 'Code of Practice'.

The challenge of changing landscape in legislation, standards and guidance affects the learning disability sector, particularly aligned with the reality of the funding landscape. ARC strongly advocates this should not impact on the effective care of an individual and will seek proactive opportunities to equip the learning disability sector to contribute and respond.

The voice of people with learning disabilities is critical and multiple methods of engagement need to be implemented to ensure inclusion, particularly those with non-verbal communication. ARC is keen to support RQIA to strengthen the inclusion of user's voice in all elements of their work undertaken.

ARC NI welcomes the values that underpin the purpose and remit of RQIA and sees the opportunity presented by the strategic enablers listed. ARC NI welcomes RQIA's commitment to developing partnerships with independent, voluntary and

community groups and is keen to support this. The value of such work has already been acknowledged and we wish to support the continuation of this.

There is however by the nature of an inspector's role, the opportunity for inconsistency in approach, style and delivery. This has the potential for causing confusion across the sector.

ARC NI is keen that as part of a continuous improvement & review cycle, reflective practice is embedded within the organisation's learning. RQIA staff induction, review of compliance notices and external complaints could inform this to ensure RQIA staff continue to work collaboratively, ensuring a fair and consistent inspection approach.

2. Draft Three Year Review Programme 2015-18

ARC welcomes the methodology of how RQIA has identified future review topics, including focus groups with stakeholders, criteria for shortlisting and balance.

The list of reviews is relevant to people with learning disabilities however it will be critical to ensure that they do not become a forgotten group. For example, safeguarding adults at risk in their own homes with a focus on older people may run the risk of failing to acknowledge the reality that a growing percentage of the population are older adults with learning disabilities living in their own homes. ***ARC advocates that learning disabilities remain a focus of all reviews undertaken by RQIA.***

Whilst acknowledging the DHSSPS review topics are not for consultation, the outcomes and frequent progress reports of such commissioned reviews are relevant. ***ARC advocates the critical nature of keeping the learning disability sector abreast of developments, updates and changes to ensure the sector is best equipped to adhere and apply relevancy.***

3. Feedback from people with learning disabilities

TILII members would like to response to RQIA with the below points and recommendations.

The Telling It Like It Is (TILII) are advocacy groups of men and women with a Learning Disability who come together to speak out about what matters to them.

TILII groups are funded by Belfast and South Eastern Health and Social Care Trust and facilitated by ARC NI. The TILII groups currently work in the Belfast, Lisburn, Bangor, Downpatrick area and in Muckamore Abbey Hospital.

3.1 TILII members strongly agree and are happy RQIA will be focusing on the three outcome of the strategy; Is care safe?; Is care effective?; & Is care compassionate?

3.2 Sourcing Potential Reviews

Patients from Muckamore Abbey hospital stated that they were part of the review process and were very pleased that they were included. The patients commented on how important it was for people with learning disabilities being involved. TILII Muckamore expressed concerns regarding the level of engagement with patients/people with a learning disability that would be moving to the community. They queried if that client group would have the same opportunities to have their say to RQIA, on the care and service they receive?

Patients sought clarity if RQIA will include community groups in the reviews that would be carried out?

3.3 Public Consultation

Many of the TILII members living in the community were unaware of RQIA and the work that they do. It was commented that a workshop or information day specific for people with learning disabilities would be beneficial and helpful.

TILII would like to know how RQIA are going to ensure all service users' voices are heard, especially those that don't attend a Day Centre, live on their own, or cannot easily communicate?

3.4 Management of the programme

The TILII members thought that managing the progress of the review programme was important.

The members would like to know if a person with a Learning Disability is part of the Review Programme Steering Group? If not, can a TILII representative become part of the steering group?

3.5 Improving the patient and client Experience

TILII members are pleased that RQIA view user engagement as essential through the programme. TILII members would like more information/ clarification on the various methods to ensure views and opinions of service users would be. TILII members wish to state the importance of RQIA staff having training and the correct skills to communicate and work with people with a learning disability.

TILII recommends that RQIA staff and inspectors have knowledge of Human Right Legislation and the UNCRPD (United Nations Convention on the Rights of Persons with Disabilities)?

3.6 Is care effective?

Making a difference

TILII are happy that RQIA are using new methods to assess the effectiveness of care delivered by services. The members wish to state the importance of including people with a learning disability and providing accessible summits and learning events for them.

3.7 Is care compassionate?

Making a difference

TILII members are extremely happy that RQIA have recruited people with a learning disability as lay assessors, some of which are members of TILII.

Members wish to comment, that easy read reports are extremely important and are pleased that RQIA are now designing them, however all TILII community members commented that the RQIA website is difficult to use and to find things on and members were unable to find the easy read report.

TILII recommends a more accessible website for people with learning and other disabilities so that they can access information and reports.

Again TILII commented on the statement 'we need to use innovative approaches to engage effectively with the general public' and queried what are those approaches?

TILII members recommend the use of accessible workshops/information events.

Strategic Objectives and key priorities

The document states 'Establish assessment criteria to measure the experience of people who receive care'.

TILII agrees with this but has asked what that assessment criteria would be and if service users and people with a learning disability can be involved in the establishment of the criteria that will be delivered with/to people with a learning disability.

Delivering the strategy

TILII would like to recommend under the point 'recruiting and retaining a skilled and dedicated workforce' if people with a learning disability can be part of the recruitment & induction process when recruiting RQIA staff that will be directly working with service Users?