



CONSULTATION RESPONSE FORM

**DRAFT STRATEGIC PLAN
ACTIONS FOR DELIVERY
2022-27**

CONSULTATION

Draft Strategic Plan 2022-27

Actions for Delivery

Hello and welcome to our consultation on the RQIA Draft Strategic Plan 2022-27 which sets out the organisation's overall direction for the next five years and actions for the incoming year, thank you for participating. Before you start this consultation response, please note that the full Draft Strategic Plan 2022/27 and actions for delivery can be emailed in PDF format, requests should be sent to info@rqia.org.uk

If you want to know more about the RQIA and its function in Health and Social Care, please visit our website.

The following pages will take you through a high-level overview of the Draft Plan, step by step. You will be asked to provide your response at each of the 6 stages.

This consultation document can be supplied in other languages and other formats such as braille. We also have a Browesaloud function which turns text to speech on our online digital consultation. If you have any questions or wish to receive our consultation materials in another format, you can get assistance by calling 028 9536 1111 or email us at info@rqia.org.uk or writing to us at the address below.

The Regulation and Quality Improvement Authority
7th Floor, Victoria House
15-27 Gloucester Street,
Belfast BT1 4LS

This consultation closes on Thursday 17 November 2022 at 5.00pm.

Registration to take part in this consultation begins here.

We will publish a summary of the consultation responses and, in some cases, the responses themselves but these will not contain any identifiable data. We will not publish the names or contact details of individuals responding. However, we will identify and publish responses on behalf of an organisation representative body, on confirmation of a valid email address.

Please view our Freedom of Information document (*final page in this document*). Have you familiarised yourself with it and are you happy to proceed with the consultation?

Yes

This consultation deals solely with the RQIA's strategic plan. This is not the place to raise safeguarding issues. If you have a safeguarding issue then we would direct you to info@rqia.org.uk. If you wish to proceed with the consultation, please answer 'Yes' below.

Yes

Which of the following categories best describes your engagement with health and social care services?

You can select more than one category.

I work within the independent health and social care sector

As an umbrella charitable organisation representing the learning disability community.

So that we can acknowledge receipt of your comments in our final report, and add you to our stakeholder database, please fill in your name and address or that of your organisation. You may wish to withhold this information and that is your own choice. If you do withhold this information we will not be able to acknowledge your comments, though we will consider your comments in reviewing all the responses received and in making our decisions. Would you like to be acknowledged in our final report?

Yes

Your Information.

Name

Leslie-Anne Newton

The Name of Your Organisation

Association for Real Change (Northern Ireland)

Job Title

NI Director

Email Address *

Leslie-anne.newton@arcuk.org.uk

Phone Number

028 9038 0960

Please tell us what county you live or work in.

I am part of a regional organisation

OVERVIEW

Our Draft Strategic Plan is based on our core purpose, to improve safety and quality in Health and Social Care Services. This is to be achieved through four strategic objectives:

1. REGULATION

Provide an independent view on the quality of health and social care services against required standards through robust regulation including inspection, reporting and enforcement

2. IMPROVING SAFETY AND QUALITY

Improve safety and quality through effective information gathering, involving listening and creating networks to share learning, good practice and adopt improvement

3. BUILDING RELATIONSHIPS

Building relationships and partnerships that expand our knowledge and add expertise to achieving our objectives

4. INFORMING SERVICE TRANSFORMATION

Informing service transformation by using our findings to influence policy decisions, raise standards and shape future services

Within this consultation, we will explain each of our four strategic objectives and actions for the year ahead, giving you the opportunity to comment at each stage.

Please now complete the question that follows on the next page.

What do you think?

Do you agree that the four strategic objectives of RQIA address its core purpose to keep people safe by improving safety and quality in health and social care?

Strongly agree

Please tell us more about your answer:

ARC respects the mandate of RQIA to ensure all regulated services meet legal standards and that improvements to ensure the needs of people are at the forefront of a high quality hsc offer, consistently across Northern Ireland. We recognise that this seesaw of regulating and quality improvement can be a challenging equilibrium for RQIA to manage.

In ARC NI we believe in, and see the value of, breaking down silos and are constantly championing opportunities for the hsc sector to collaborate. We were therefore disappointed and confused to see the reference on page 5 of adherence to standards in certain **independent sector providers**. ARC NI would understand this better if written as adherence to standards in all regulated service types, rather than a targeted approach to the non-statutory sector?

In our view, recurring frustrations from independent providers can be summed up within three areas namely;

- Inconsistent approaches to inspections
- Insufficient collaboration that drives shared learning and system improvements
- Decisions that are not transparently communicated across a whole system, or clearly accounted for which result in significant resource expended across the sector.

ARC NI has brokered the relationship between learning disability providers and RQIA for over 20 years and has enabled strategic conversations to be had in a safe and respectful space. Therefore when considering this plan and the four strategic objectives, ARC NI strongly agrees that it does address RQIA's core purpose. However we would like to see it strengthened to demonstrate more accountability through SMART objectives which drive and most importantly achieve change at the end of the 5 year plan.

Strategic Objective 1

REGULATION

One of the primary roles of the RQIA is to provide an independent view on the quality of health and social care services being delivered, against the set standards for each service. We publish all our findings and actions taken through our inspection reports, with the exception of our children's reports, and publish these on our website.

We plan to improve regulation in a number of ways, by:

- **Developing more opportunities for service users and their families to be involved in sharing their experiences and concerns about the service they access.**
- **Encouraging service providers to inform their service users that RQIA has completed an inspection and communicate the findings.**
- **Improving how care providers register with RQIA.**
- **Delivering regular inspection programmes across services including care homes, children's services, hospitals, and services for people with disabilities.**
- **Developing a Review Programme and publishing reports on system-wide issues, such as choking, prison healthcare and maternity services.**
- **Bringing forward recommendations to the Department of Health about changes needed to regulation legislation.**

The text above is a summary of our Strategic Objective 1 - Regulation. For full details, please see pages 9-10 of our Draft Strategic Plan.

Please now complete the question that follows on the next page.

What do you think?

A question about Strategic Objective 1:

Do you agree that taking the actions listed above, and detailed in our Draft Strategic Plan, would enable us to provide an independent view of the safety and quality of Health and Social Care services that we regulate in Northern Ireland?

Neither agree or disagree

Please tell us more about your answer:

ARC NI engaged a range of experts by experience (people with a learning disability) to develop an Easy Read questionnaire as a tool for gathering feedback from people supported in regulated services. ARC NI offered this support freely to RQIA. RQIA rolled this out across their inspectors and recently confirmed it as a success. We are supportive of the hsc sector, including RQIA in their commitment to better communication with those who use services and their support networks (family). In ARC NI's view, better means transparency to enable timely information and greater accountability.

Understandably for those who use services and their family, tension is currently high due to two high profile scandals which have resulted in fear and mistrust. ARC NI feels careful and timely coordination of inspection findings to those who use services and their family is required to create an honest flow of information whilst not causing undue concern or fear. To enable this ARC NI feels a Service Level Agreement would be helpful, detailing timeframes for both RQIA to provide report findings and for providers to address any areas of non-compliance or quality improvement. This also promotes the culture of building trusted relationships across all stakeholders by providing an accountability framework.

A register of providers, detailing a full list of all services, across programme of care areas would be beneficially shared via RQIA's website, equally accessible to all stakeholders. ARC NI feels this further promotes the opportunity of individual choice and control.

ARC NI welcomes the commitment to improve the registration process as recent backlogs experienced by providers were as long as 14 months. ARC NI would seek reassurance that accountability mechanisms of RQIA's responsibilities are strengthened to include clear timeframes equally for their delivery.

Strategic Objective 2

IMPROVING SAFETY AND QUALITY

We aim to improve safety and quality by:

- **Collating and publishing key themes and findings which come out of our inspection reports**
- **Sharing good practice across similar services through meetings and events with the voices of service users at the centre of those discussions**
- **Ensure clarity on accountability so that RQIA findings and recommendations about services are required to be implemented by providers**
- **Working closely with other organisations to strengthen our efforts to achieve improved safety and quality**
- **Supporting public inquiries so that lessons are learned and embedded across services, and that it is integrated into RQIA's regulatory work**

The text above is a summary of our Strategic Objective 2 - Improving Safety and Quality. For full details, please see pages 11-12 of our Draft Strategic Plan.

Please now complete the question that follows on the next page.

What do you think?

A question about Strategic Objective 2:

Do you agree that taking the actions set out above, and detailed in our Draft Strategic Plan, will support us in providing an independent view of the safety and quality of the services we regulate and report on in Northern Ireland?

Agree

Please tell us more about your answer:

The learning disability community have had very positive connections with RQIA in the past, through ARC NI facilitating a variety of approaches, including leadership meetings that focus on strategic shared areas of interest and concern, to operational peer networks allowing collaborative thinking on practice that improves quality. ARC NI also facilitated Roadshows for RQIA to liaise directly with the learning disability community who operate across multiple regulated service types.

ARC NI therefore welcomes the commitment to publishing themes to support sectoral learning and collaborative opportunities to share good practice with the voice of people supported at the centre.

ARC NI welcomes the seeking of clarity on accountability, but as described throughout feedback on Objective 1, ARC NI would articulate this as a process equitable to all in hsc, including arm's length bodies. A point to note is the eligibility criteria for a Responsible Individual. RQIA has engaged in conversations with legal experts which has concluded that a Responsible Individual is required to be listed on Companies House. For Charities, with whom their Trustees are volunteers, this may present challenges, not least of willingness to take on this responsibility but most importantly a skill set that requires a clearly defined job role.

ARC NI welcomes the commitment of RQIA to positively and constructively share lessons learnt within areas such as public inquiries. ARC NI also notes that RQIA are an integral part of the Interim Adult Protection Board and a participant on the recently established Serious Case Review subgroup. Whilst analysis and reflection are useful for identifying systemic change to future policy and practice, ARC NI would support the need for better sharing of intelligence and specifically data (where it meets the legislative threshold, GDPR complaint) so as to recognise risk taking as a key element of person-centred support and services across the whole hsc system.

Risk is an area that culturally in Northern Ireland we have left underdeveloped. ARC NI has encouraged conversations around a shared approach to risk taking for over 20 years. Thresholds within the regional safeguarding framework were not equally understood by all stakeholders and frequent conversations by the learning disability community had to champion the inclusion of a human rights framework within decision making of statutory partners, for example the right to make a bad decision.

ARC NI would welcome RQIA transparently sharing their risk framework, including any evaluation and learning of the Risk Adjusted Dynamic and Responsive model (RaDAR).

Strategic Objective 3

BUILDING RELATIONSHIPS

We plan to build relationships with people and other organisations to share information that helps us in the role of regulator and assists other organisations in fulfilling their roles.

We will do this by:

- **Improving the visibility of RQIA with the public, service users and families, building an understanding of our purpose and encouraging people to engage with us. This will help us to improve what we do.**
- **Developing relationships with key organisations including commissioners, professional regulatory bodies and providers as well as with those who represent patients, residents, families, and carers.**
- **Sharing information as widely as possible and actively listening to all those we engage with.**
- **Continuing to grow relationships with universities and organisations that can add expertise through developing our workforce, our skills and knowledge and providing us with specialist expertise in key subjects.**

The text above is a summary of our Strategic Objective 3 - Improving Safety and Quality. For full details, please see pages 13-14 of our Draft Strategic Plan.

Please now complete the question that follows on the next page.

What do you think?

A question about Strategic Objective 3:

Do you agree that taking the actions set out above, and detailed in our Draft Strategic Plan, would help create sustainable relationships and partnerships that expand our reach and add support to achieving our objective of keeping people safe by improving quality and safety in Health and Social Care in Northern Ireland?

Strongly Agree

Please tell us more about your answer:

As previously stated, RQIA and ARC NI have had very positive connections in the past and in light of recent personnel changes we look forward to a re-energised commitment to re-establish this relationship in its fullest form.

The learning disability community is currently under intense scrutiny and is without a shared strategic vision relevant to the transformation required to meet future need which promotes individual choice and control. We look forward to conversations and further more collaborated action with RQIA, and other hsc stakeholders to aid transformation and reform for the lives of people with a learning disability and their family carers.

Strategic Objective 4

INFORMING SERVICE TRANSFORMATION

We plan to raise standards across health and social care by informing the service transformation programme. We will do this by:

- **Focussing on issues that are important to people and undertaking reviews of these services, publishing reports of our findings to support service reform.**
- **Influencing policies on workforce training and development by sharing the findings and recommendations made in our reviews and inspections.**
- **Engaging with political and community leaders to ensure open lines of communication and information sharing.**
- **Hosting collaborative events where we can hear from people, discuss and gain an understanding of the important issues around service transformation.**
- **Seeking to update regulatory legislation so that new ways of working in health and social care are included in our regulation scope, helping us keep people safe.**

The text above is a summary of our Strategic Objective 4 - Improving Safety and Quality. For full details, please see pages 15-16 of our Draft Strategic Plan.

Please now complete the question that follows on the next page.

What do you think?

A question about Strategic Objective 4:

Do you agree that taking the actions set out above, and detailed in our Draft Strategic Plan, would raise standards across health and social care provision through informing and shaping service transformation?

Disagree

Please tell us more about your answer:

There are many policy drivers that are of critical importance to members of ARC NI, not least workforce (including 'Power to People'), adult protection (COPNI & Muckamore reports) and reform of adult social care, including learning disability services (CPEA & Review of Resettlement reports). Hence we welcome the commitment within this strategic plan to focus on issues that are important to people who work in services and those who use services. However we feel the strategic plan does not make clear the accountability measures of RQIA's influence of Departmental policy.

We welcome the analysing of intelligence and the proposed collation by service, theme, and programme of care. In our view, this, combined with data held elsewhere in the HSC system may add value and present an alternative picture e.g. emerging workforce crisis. ARC NI would like to see the linking of this analysis piece within Objective four, to the utilisation of it within policy change, as described above.

Finally, ARC NI feels an opportunity has been missed within this objective to inform the transformation of Supported Living, through the development of regulations and standards for this type of support. The recent pandemic emphasised the bespoke nature of this support with guidelines for visiting etc having to take into consideration human rights. Historical conversations across stakeholders including Department of Health, NI Housing Executive, RQIA and providers acknowledged the need to address this. Unfortunately however, progress has not been achieved. Since Adult Social Care Reform refers to increasing this type of support, ARC NI feels RQIA has a leading role in advocating for a modern and transformational regulatory framework based on an approach which provides individuals with an opportunity to live the life they want, where, how and with whom.

ENABLING ACTIONS

How we will achieve our 4 Strategic Objectives

We have outlined our 4 strategic objectives;

- **Regulation**
- **Improving Safety and Quality**
- **Building Relationships**
- **Informing Service Transformation**

For us to be able to deliver the benefits of these for everyone, as an organisation we are committed to:

- **Excellence in collective leadership and promoting a culture of safety, openness and compassion**
- **Developing a confident, competent and supported workforce**
- **Ensuring effective management of our resources including finance, information technology and accommodation**

The text above is a summary of our 'Enabling Priorities' - Improving Safety and Quality. For full details, please see pages 17-20 of our Draft Strategic Plan.

Please now complete the question that follows on the next page.

What do you think?

A question about our 'Enabling Actions':

Do you agree that RQIA should: invest in and develop its staff; work to ensure collective leadership and good governance; ensure we use our resources effectively including finance, information technology and buildings we have access to?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

I don't know

Please tell us more about your answer:

ARC NI agrees in full with the principle of each and every enabling priority, however we hold some queries linked to our feedback above.

ARC NI raised the frustration of providers at the inconsistent approach adopted by individual inspectors. We note within Enabling Priority 2 the refreshing of an effective self-service induction. In our experience providers can be at the mercy of an individual' opinion and on many occasions this results in confusion, sector chaos and inappropriate use of resource. This statement therefore raises a question of how RQIA can account for and govern, consistent application of the inspection framework/approach by each and every inspector. ARC NI is aware that RQIA hold internal meetings to discuss consistency of approach however it remains a challenge.

Linked here is the Performance and accountability arrangement which will support staff to see how their role contributes to the wider work of RQIA. ARC NI would champion that this needs to go further and link the contribution their role makes to services and most importantly the people who use services. Only with this holistic

approach, will the culture of power become refocused to address the best outcome for a person in receipt of a service and support.

Thank you!

Thank you for participating in this consultation.

Your feedback is hugely important to us as we shape and develop our Strategic Plan which allows us to improve safety and quality in health and social care.

Further to this online feedback opportunity you also are welcome to attend online consultation events which we will be hosting and these will be promoted through our website, social media and correspondence with key stakeholders and organisations.

The consultation period runs for a total of 12 weeks and closes on Thursday 17 November 2022 at 5pm.

All responses will be analysed and considered by RQIA. This information will inform our revised Strategic Plan which we will present to the RQIA Authority for approval prior to publication on our website.

Thank you once again.

Please now return your response form.

By attaching the word or a PDF version of document and email to info@rqia.org.uk

Or by Post to:

The Regulation and Quality Improvement Authority
7th Floor, Victoria House
15-27 Gloucester Street
Belfast BT1 4LS

Freedom of Information Act (2000)

Freedom of Information Act (2000) The RQIA will publish an anonymised summary of the responses received following the consultation process. However, under the Freedom of Information Act (FOIA) 2000, particular responses may be disclosed on request, unless an exemption(s) under the legislation applies.

Under the FOIA anyone has the right to request access to information held by public authorities; the RQIA is such a public body. RQIA decisions in relation to the release of information that the RQIA holds are governed by various pieces of legislation, and as such the RQIA cannot automatically consider responses received as part of any consultation process as exempt. Confidentiality issues will be carefully considered before any disclosures are made.