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Karma Healthcare
 1 Moorfield Lane
 Gourock
 PA19 1LN

3 August 2021
 2021383168
 CS2007166441

Dear Sirs

IMPROVEMENT NOTICE – EXTENSION OF TIMESCALE

On 14 July 2021 you were served with an Improvement Notice in relation to Karma Healthcare, 1 Moorfield Lane, Gourock, PA19 1LN, in terms of section 62 of the Public Services Reform (Scotland) Act 2010 (“the Act”). The Improvement Notice stated that unless there was a significant improvement in provision of the service, Social Care and Social Work Improvement Scotland (hereinafter referred to as “the Care Inspectorate”) intended to make a proposal to cancel your registration. The Improvement Notice specified the nature of the improvements to be made, and the period within which they were to be made.

The Care Inspectorate has decided to extend the timescale within which some of the improvements must be made in order to give you a further opportunity to make a significant improvement in the provision of the service. The revised timescales are as follows:

Improvements

1. **By 9 August 2021**, you must ensure that:
 - a) All staff are trained in Infection Prevention and Control measures in relation to Covid-19; (HSCS 3.14) taking account of ‘COVID-19: Information and Guidance for Social, Community and Residential Care Settings (excluding Adult and Older People Care Home settings) Version 1.8.’
 - b) Staff training in Infection Prevention and Control is in line with current guidance as noted (a)

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- c) Accurate records of staff training in this area are in place and processes are in place to ensure accuracy is maintained
- d) Staff practice in relation to Infection Prevention and Control measures is properly evaluated and recorded. This must include evaluation of staff practice in the use and disposal of Personal Protective Equipment (PPE).

This is to comply with:

The Social Care and Social Work Improvement Scotland (Requirements for Care Services) Regulations 2011, (SSI/2011/210) Regulations 4 (1) (a) and 4 (1) (d).

This ensures care and support is consistent with the Health and Social Care Standards which state, 'I have confidence in people because they are trained, competent and skilled, are able to reflect on their practice and follow their professional and organisational codes.' (HSCS 3.14)

- 2. **By 9 August 2021, extended from 26 July 2021**, you must ensure that staff undertake regular Covid-19 tests in accordance with guidance published by Scottish Government, 'Coronavirus (COVID-19): social care and community based testing guidance.'

This is to comply with:

The Social Care and Social Work Improvement Scotland (Requirements for Care Services) Regulations 2011, (SSI/2011/210) Regulations 4 (1) (a).

- 3. **By 9 August 2021, extended from 26 July 2021**, you must improve staff recruitment practices within the service to the standard detailed in the SSSC guidance, 'Safer Recruitment through Better Recruitment (2017).'

In order to achieve this you must ensure:

- a) Recruitment records are in place for all staff and all staff have outstanding pre-employment checks submitted to Disclosure Scotland in line with the Protection of Vulnerable Groups (Scotland) Act 2007.
- b) You must obtain two references in place for each person recruited, one of which must be from their previous employer.
- c) All staff who require to be registered with the SSSC must submit an application to register and retain an active registration.
- d) The service must revise its recruitment policy to meet the standard of safer recruitment and maintain records for all staff members in line with this policy. (HSCS 4.24)

This is in order to comply with:

The Social Care and Social Work Improvement Scotland (Requirements for Care Services) Regulations 2011, (SSI/2011/210) Regulations 9 (1) and 9 (2) (b).

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This ensures care and support is consistent with the Health and Social Care Standards which state, 'I am confident that people who support and care for me have been appropriately and safely recruited.' (HSCS4.24)

4. **By 9 August 2021**, you must improve policies and procedures for medication management to ensure that medication is managed and administered safely.

In order to achieve this you must ensure:

- a) All staff who administer medications are trained in line with Care Inspectorate guidance, 'Review of medicine management procedures: Guidance for care at home services (2017)', and are able to distinguish the different levels of support service users require.
- b) All service users being supported with medication must be risk assessed to identify the appropriate level of support required; i.e. prompt, assist, administer. (HSCS 2.23)
- c) Ensure that processes are in place to regularly assess Staff practice and competency in medication management and records maintained.
- d) Accurate records must be kept for all medications being administered.
- e) Daily work schedules must include the correct information in relation to medication administration support for people using the service.

This is in order to comply with:

The Social Care and Social Work Improvement Scotland (Requirements for Care Services) Regulations 2011, (SSI/2011/210) Regulations 4 (1) (a).

This ensures care and support is consistent with the Health and Social Care Standards which state, 'If I need help with medication, I am able to have as much control as possible.' (HSCS 2.23)

5. **By 9 August 2021**, you must ensure all staff are provided with appropriate training to allow them to undertake their role safely.

In order to achieve this you must ensure:

- a) On commencing employment staff must receive an appropriate induction. This must include training in the following areas: moving and assisting, adult protection, health and safety, personal care, catheter management and continence care.
- b) Observation of care practice and staff competency should be regularly assessed and recorded.
- c) Training and development records must be in place for all staff including supervision and appraisal meetings.
- d) Staff who are working with under 16s must receive accredited training in child protection.

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This is in order to comply with:

The Social Care and Social Work Improvement Scotland (Requirements for Care Services) Regulations 2011, (SSI/2011/210) Regulations 15 (b) (i).

6. **By 9 August 2021, extended from 26 July 2021**, you must ensure all people using the service have a personal plan

In order to achieve this, the provider must ensure:

- a) All service users must have a current personal plan in place.
- b) All new service users must have a personal plan completed within 28 days.
- c) There are adequate processes in place to ensure all personal plans reviewed at a 6-month interval or if a significant change in need occurs.
- d) Specific risk assessments must inform the personal plan this includes the preference to male/female carers.
- e) All personal plans must consider the impact of Covid-19 on the individual.
- f) All personal plans and reviews must evidence involvement of service users or appropriate others.

This is in order to comply with:

The Social Care and Social Work Improvement Scotland (Requirements for Care Services) Regulations 2011, (SSI/2011/210) Regulations 4 (1) (a); 5 (1); 5 (2) (b) (iii).

7. **By 9 August 2021, extended from 26 July 2021**, you must ensure that the service is managed effectively and safely.

In order to achieve this you must ensure:

- a) The manager must ensure that there are adequate processes in place to notify the Care Inspectorate of specific events, or changes within the service as per 'Records that all registered care services (except childminding) must keep and guidance on notification reporting'.
- b) The service must have policies and procedures that respond to any concerns or complaints made to the service and have a record of any investigation and response.
- c) The provider must have an effective system in place to ensure planned visits to service users take place.
- d) Daily visiting schedules must be accurate.
- e) Adequate processes in place to investigate reasons for all missed or late visits should be investigated.
- f) Clear policy and procedures are in place for the management and safe use of key safes.

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The Social Care and Social Work Improvement Scotland (Requirements for Care Services) Regulations 2011, (SSI/2011/210) Regulations 4 (1) (a); 15 (a) and 18.

If there is no significant improvement within the revised timescale, we intend to make a proposal to cancel your registration in terms of section 64 of the Act.

A copy of this notice has been sent to the local authority within whose area the service is provided.

Please contact me if you would like to discuss this letter or if there is anything in the notice you do not understand.

Yours faithfully



Simon Deveney

Team Manager

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