

Safeguarding Children and Adults at Risk Annual Report

2019-2020

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Introduction

The following report is the seventh safeguarding annual report of NHS Bury Clinical Commissioning Group (CCG) and its purpose is to provide assurance to both the CCG Governing Body, NHS England, the local safeguarding boards and the public that NHS Bury CCG is serious in meeting its statutory obligations to safeguarding children and adults at risk within the services it commissions.

The CCG meets its obligation via a wide range of activities including:

- Membership of the BISP, Bury Integrated Safeguarding Partnership which was newly formed in September 2019
- Assurance visits to key providers
- Completion of an annual audit of the Greater Manchester safeguarding contractual standards with a number of large and small providers of services to the population of Bury
- Completion of the NHS England CCG safeguarding assurance tool on a quarterly basis
- Supervision and support to health staff across the economy
- By working with the Local Authority and multi-agency partners
- The delivery of a training programme to colleagues in Primary Care
- Ensuring that the CCG meets the requirements of the NHS England Accountability Framework (2015), the Care Act 2014, Mental Capacity Act 2005 and Working Together to Safeguard Children 2018
- Participation in peer reviews, CQC inspections and Ofsted inspections

The following report expands on all the above areas.

1. Statutory Responsibilities

In November 2015 the Governing Body ratified the NHS Bury CCG accountability framework for the new CCG, based on the statutory guidance and legislation in force at the time. New guidance was issued by the Department of Education in 2018 (Working Together to Safeguard Children) and a new accountability Framework in July 2019 by NHS England.

In response to the new guidance the NHS Bury CCG safeguarding team updated the following documents, which are available on the CCG website, following ratification by the Governing Body in January 2020.

- NHS Bury CCG internal Safeguarding Policy
- The NHS Bury Training Strategy
- Safeguarding Accountability Framework

<https://www.buryccg.nhs.uk/your-local-nhs/plans-policies-and-reports/quality-and-safeguarding/>

1.1 Key Roles and responsibilities of the: CCG Governing Body, Clinical Chief Officer/Executive Governing Body Level lead as outlined in Section 11 of the Children Act 2004, NHS accountability framework 2015 and the Care Act 2014.

No	Requirement from NHSE Framework	CCG Lead	Position March 2020
1	A clear line of accountability for safeguarding, properly reflected in the CCG governance arrangements, i.e. a named executive lead to take overall leadership responsibility for the organisation's safeguarding arrangements.	The Chief Operating Officer has overall accountability and this is delegated to the Executive Lead for Safeguarding	
2	Clear policies setting out their commitment, and approach, to safeguarding, including safe recruitment practices and arrangements for dealing with allegations against people who work with children and adults, as appropriate.	The CCG will have a current policy in place that is available to all staff via the website	
3	Training their staff in recognising and reporting safeguarding issues, appropriate supervision, and	Staff are accountable for their own training and their line managers for monitoring compliance Compliance will be reported quarterly to the Quality	

	ensuring that their staff are competent to carry out their responsibilities for safeguarding	and Performance committee and to the Governing Body bi annually The figures for safeguarding training compliance for the organisation have dropped to 76% against a target of minimum of 80%. This has been highlighted to Managers and staff as a priority for action and will be monitored by Head of Safeguarding and Executive Lead for Safeguarding.	
4	Equal system leadership between LA children's services, the police and the CCG is now required under the Working Together to Safeguard Children Statutory Guidance 2018	The CCG is an equal partner within the Bury Integrated Safeguarding Partnership (BISP) The CCG will be represented by the Executive lead the Designated professionals and members of the safeguarding team on the various Boards and committees	
5	Effective inter-agency working with LAs, the Police and third sector organisations, including appropriate arrangements to co-operate with LAs in the operation of safeguarding children's partnerships, Corporate Parenting Boards, SABs and Health and Wellbeing Boards	AS above The CCG will have membership of the Strategic Board of all sub groups and business groups of the BISP	
6	Ensuring effective arrangements for information sharing.	The CCG will share information as required and as outlined in the CCG safeguarding policy in line with GDPR and Information Governance, The Children Acts 1989,2004 and The Care Act 2014	
7	Employing the expertise of designated professionals for safeguarding children, children in care, safeguarding adults and a designated paediatrician for Sudden Unexpected Deaths in Childhood (SUDIC).	The CCG will employ directly a Designated Nurse for Child Protection and Looked after Children, a Designated Dr for Child Protection, a Designated Nurse for Adults and shares the employment of a SUDCI Designated Dr with HMR and Oldham CCG, via commissioning from Pennine Acute Trust (PAT) The Designated Dr for Looked After Children is commissioned from PAT	
8	Effective systems for responding to abuse and neglect of adults.	The CCG will require all its providers to have systems in place to respond to abuse and neglect of adults. The CCG will support the LA where they are investigating abuse and neglect and health is an element The CCG will support the LA in cases where	

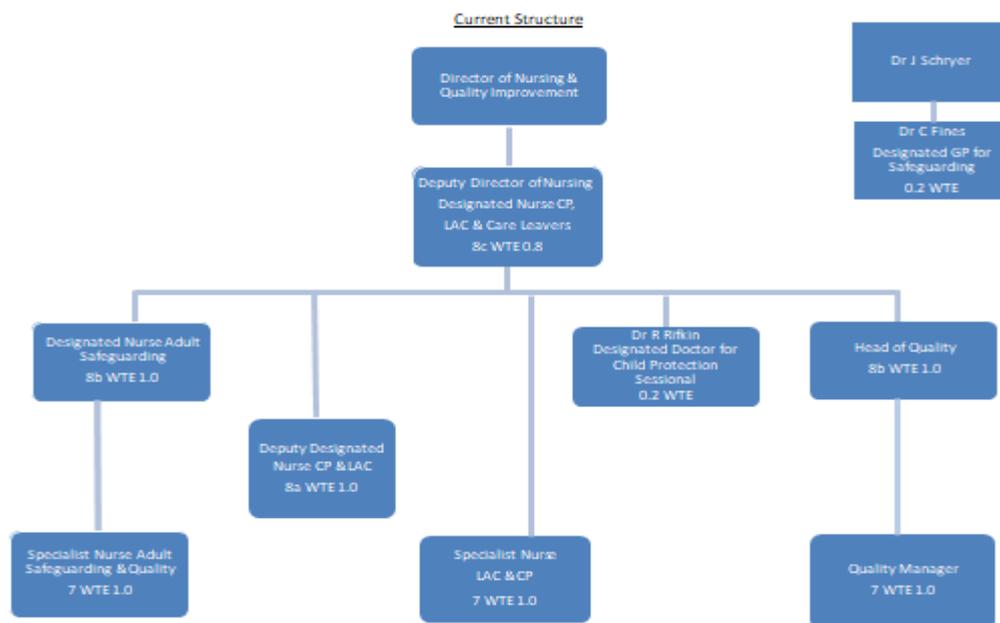
		organisational neglect and abuse are known and suspected	
9	Supporting the development of a positive learning culture across partnerships for safeguarding adults, to ensure that organisations are not unduly risk averse.	The CCG works with and supports its providers with risk management when safeguarding adults via the Serious Incident process and the work of the Bury Integrated Safeguarding Partnership (BISP)	
10	Working with the Local Authority to ensure access to community resources that can reduce social and physical isolation for adults	The CCG and the Local Authority will continue to work towards integrating their commissioning functions which will support ensuring access to community resources for the population	
11	CCGs need to demonstrate that their designated professionals are involved in the safeguarding decision-making of the organisation, with the authority to work within local health economies to influence local thinking and practice.	The CCG will ensure that safeguarding is considered at all points of the commissioning cycle The CCG safeguarding team will work with the providers in respect of assurance of the safeguarding standards and support and challenge as required	
12	For children in care, CCGs have a duty to cooperate with requests from LAs to undertake health assessments and help them ensure support and services to looked-after children are provided without undue delay	The CCG will commission a service from a local provider to ensure that all children receive timely and quality health assessments This will be monitored in respect of performance on a regular basis and quality assurance will be monitored via audits by the CCG safeguarding team The outcomes will be reported annually to both the Governing Body and the Corporate Parenting Board via and the annual report which will be available on the CCG website	
13	CCGs should ensure that adult and children's services work together to commission and provide health services that ensure a smooth transfer for young people and children in care, including a planned period of overlap to avoid the abruptness of a sudden change in clinicians, culture, frequency of appointments and environment	This is a piece of work that requires further development The CCG will work with the LA via the Health of Looked after Children and Care Leavers multi agency group to explore how commissioning can ensure that young people in care experience a smooth transition into adult services	

2. Governance

The Safeguarding Governance and Assurance Group is chaired by the Executive Lead for Safeguarding and meet quarterly. The main providers, Pennine Acute Trust, Royal Bolton Hospital maternity services, Pennine Care Foundation Trust and Bardoc, Out of Hours Primary Care Services Provider; are expected to provide reports to each meeting in respect of a number of key areas including training figures. During 2019-20, the GP Federation are included in the distribution list for information and attend by exception.

The group is accountable to the Quality and Performance Committee of the CCG and the committee receives quarterly reports via a safeguarding dashboard. The dashboard is available to the public via the Governing Body papers.

Structure as of the 31st March 2020



2.1 Assurance

During the last year, we have continued to build on the work of previous years. We continue to assure the providers who we commission to ensure that they provide good quality, safe services for the residents of Bury. This work includes working with large providers, such as Pennine Care Foundation Trust and Pennine Acute Trust, but, we also work with nursing and residential homes where Bury residents live, and, private hospitals within the locality

All contracts with providers include a set of Greater Manchester safeguarding standards and the CCG via an assurance process works with a range of providers to establish the level of adherence to them. NHS Bury CCG is the lead commissioner for Pennine Acute Trust.

NHS Bury CCG

The CCG has in place a safeguarding policy, assurance framework and a training strategy and they are available on the CCG website. The figures for safeguarding training compliance for the organisation at end of Q3 have dropped to 76% against a target of minimum of 80%. This has been highlighted to Managers and staff as a priority for action and will be monitored by Head of Safeguarding and Executive Lead for Safeguarding.

There is an executive lead in place and the safeguarding team has the appropriate staff in post.

Cygnnet

Although Bury CCG do not currently directly commission a service from Cygnnet Bury, as the service is on our patch and houses vulnerable adults and young people it is good practice for us to build relationships and on behalf of GM include the provider in our annual safeguarding assurance programme. The GM Safeguarding Assurance Tool for non NHS providers was completed in December 2019 with only one area rated amber and the rest rated green. This triangulates with the latest CQC inspection report for Bury, published in June 2019, which achieved Good overall.

Priory

The GM Safeguarding Assurance Tool for non NHS providers was completed in December 2019 with all areas rated green. This triangulates with the latest CQC inspection report for Priory Bury, published in May 2019, which achieved Good overall.

General Practice

The CCG safeguarding team have been visiting all GP practices as part of a bi-annual assurance process. The practices complete a self-assessment using a modified Greater Manchester tool. A practice visit is then completed to discuss the assessment and agree any actions required. The visits are supportive and the assessment and any plans remain in the ownership of the practice.

The visits were an opportunity for the safeguarding team to update practices on changes to the multi-agency safeguarding arrangements, introduce new team members, discuss emerging areas of complex safeguarding and to expand the knowledge of the practice staff.

The findings from this series of visits show improvement from the visits in 2017. The 2019/2020 assurance visits to all the practices in Bury provides, along with the CQC ratings, a continued high level of assurance of engagement with the safeguarding agenda for both adults and children. This in addition to the improvement noted or continued achievement within many of the standards, demonstrates that this good practice is well-embedded across

the borough. All the practices welcomed the visits and took the opportunity to explore wider issues than the tool. Occasionally, there were case discussions.

Looked after Children

The Specialist Nurse for Looked after Children and Child Protection has completed an audit of 30 review health assessments, which were completed during Q3. The quality was high with no concerns identified. The report has been shared with the provider and will be incorporated into the Looked after Children's annual report for 2019-2020.

An additional audit is underway into the quality assessments for unaccompanied asylum seeking children, following the introduction of new paperwork. It is hoped the new format will enable the capturing of the complex and often unique needs of this group of children and young people

The work with Looked after Children is expanded in the separate annual report.

Pennine Acute Hospital Trust

NHS Bury CCG leads the safeguarding assurance process on behalf of Oldham, Heywood, Middleton and Rochdale and Manchester CCG's

Safeguarding standards are within all contracts and are agreed annually by the Designated Nurses for Safeguarding across GM, and locally, by the Quality and Performance committee

The CCG safeguarding team meet at least quarterly with PAT to review the 43 standards and any action plan that is required. Currently work on the action plan continued to improve the ratings from amber to green where necessary

The outcomes are reported annually to NHS England in Greater Manchester

The progress had been slow against the action plan and therefore the concerns were escalated within the CCG and PAT and a Director to Director meeting was held with a full review of the challenges and barriers

Timelines were agreed for progress and the plan was reviewed again at the end of Q4 with considerable progress noted.

Prevent

In addition to the safeguarding standards, there is separate reporting on the % of staff trained on Prevent within the Trust.

A prevent compliance briefing report has been updated 23/02/20. Compliance remains below trajectory and has been raised with the respective Care Organisations (CO) for immediate attention. The Q3 compliance data was still at approximately 65%. It is currently 69.5% for the whole of PAHT.

Bury and Rochdale CO: 78.1%

Oldham CO: 69.7%

NMGH: 66%

The CCG felt it was better to have an achievable honest action plan rather than one that sets the Trust up to fail. The action plan was submitted to the Regional Prevent Lead NHSE and shared with colleagues across the North East Sector.

Pennine Care Foundation Trust

Heywood, Middleton and Rochdale (HMR) CCG lead on assurance on behalf of the NE Sector CCG's. The update from HMR CCG is as follows:

PCFT continue to submit quarterly safeguarding assurance, using the agreed GM Safeguarding Assurance Tool, to the Designated Nurse for Safeguarding Children within Heywood, Middleton and Rochdale CCG. The completed tool is distributed to all Pennine Care footprint Designated Nurses for comment prior to an assurance meeting with the PCFT Safeguarding Lead.

At the end of Quarter 4 the following areas of non/ reduced compliance were noted:

- Safeguarding Audit Programme including Looked After Children and Mental Capacity Assessments.
- Access to safeguarding supervision
- System for flagging adults in inpatient care with a Learning Disability/ Dementia
- Communication with health partners
- Engagement/ participation.

Assurance arrangements for 2020-21 will involve submission of evidence by the provider by end Quarter 1 2020-21 followed by a meeting to include representation from Designated Nurses/ Professionals from across the PCFT footprint to agree the areas of non/ partial compliance and to finalise an Action Plan which will be monitored quarterly

Nursing Homes

The Safeguarding Team has worked alongside colleagues from other CCG's in Greater Manchester to review the GM standardised assurance tool to assess the level of safeguarding understanding and compliance within the nine nursing homes in Bury. A series of visits were completed by Specialist Nurse for Adult Safeguarding and Quality with where possible the provider relationship officers at Bury Council from April 2019 to October 2019 as per the CCG's requirement via NHS England to gain assurance that safeguarding processes are appropriately in place and implemented throughout Nursing Homes in Bury, in line with the legislation underpinning this work. The 2019/2020 assurance visits to all the Nursing Homes in Bury provides, along with the CQC ratings, a continued high level of assurance of engagement with the safeguarding agenda for adults. This in addition to the improvement noted or continued achievement within many of the standards, demonstrates that this good practice is well-embedded across the borough.

All the homes welcomed the visits and took the opportunity to explore wider issues than the tool. Occasionally, there were case discussions. Where the standards have been partially met or not met, this is applicable to one home only. The registered manager is new in post and employed following a very unsettled period for the home. The new registered manager

has a proven record of experience within care home management and is highly motivated to ensure improvements in quality of care. The CCG and Local Authority Provider Relationship Officer will continue to offer support and gain assurance that this goal is achieved.

The assurance visits were again, considered alongside attendance at the CCG Nursing Home Quality and Safeguarding Forum and the regular contact with the team for advice.

Although, there remain some minor points of learning, they do not reflect any unsafe practice. Nursing Homes were asked to action their own assessments of Amber and Red and the Specialist Nurse will follow up in a review meeting/visit later in the year.

2.2 Supervision

The CCG safeguarding team provides clinical supervision and safeguarding supervision to a number of local providers who deliver care to vulnerable patients; this includes the PCFT team who support Military Veterans and senior staff working at Bury Hospice, Cygnet Hospital, Greater Manchester Mental Health Trust (Prestwich Hospital), Virgin Healthcare, Sexual Health Services staff and the Priory.

The Safeguarding and Quality Forum for Nursing Homes continues to meet every 2 months and promotes the sharing of ideas, good practice and to review safeguarding experiences.

2.3 Training

The Safeguarding Team continue to deliver a calendar of training to Primary Care in Bury, and on behalf of Health Education England to GP trainees across the North East Sector. In addition to recognition and response to adult abuse and child protection training, we have delivered a range of training on a variety of topics, including MCA (Mental Capacity Act) Prevent (preventing radicalisation of vulnerable people), Neglect, the impact of ACES (Adverse Childhood Experiences) and the emerging concerns around complex safeguarding.

3. Partnership Working

3.1 React to Red

React to Red is now embedded in practice with Bury residential and domiciliary care providers. An annual training session is now facilitated by the team to capture new providers and staff, to cascade new information and good practice, and to offer ongoing support.

3.2 Red Bag Scheme

The Red Bag Scheme is designed to support care homes, ambulance services and the local hospital in improving the transition between inpatient hospital setting and community or care homes. A red bag is used to transfer standardised paperwork, medication and personal belongings and stays with the resident throughout their hospital episode and is returned home with resident. In 2019 the scheme was expanded to the Priory Elton Unit with further

plans to extend throughout the wider organisation. The red bags have proven invaluable in transporting essential equipment to hospital for patients with very complex needs.

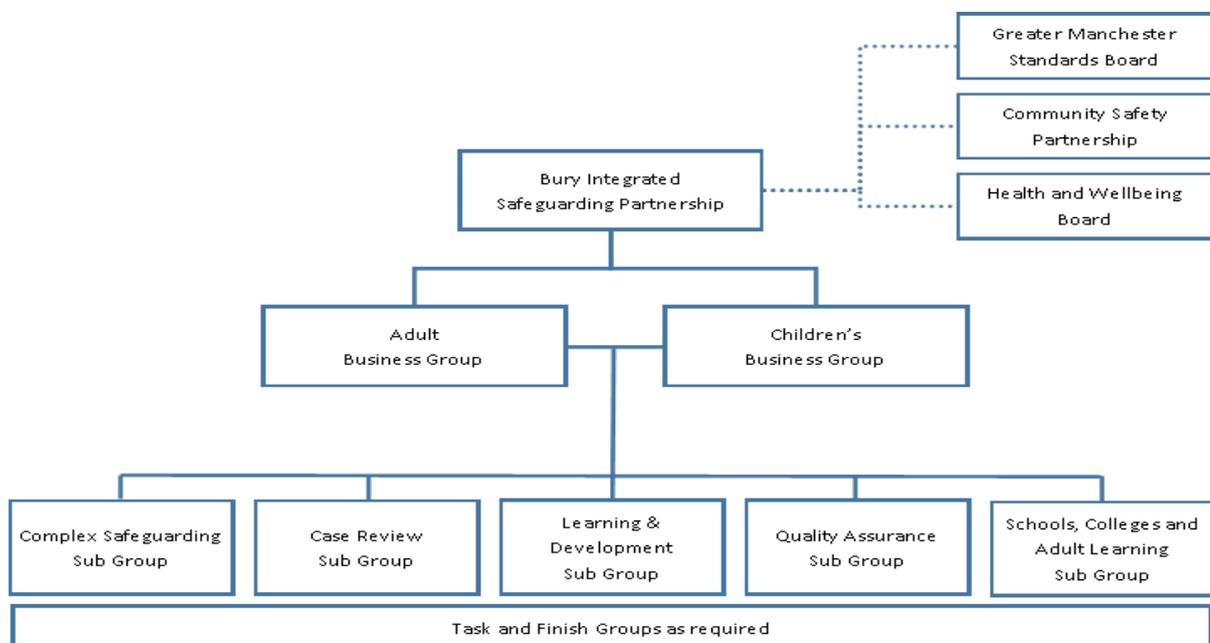
A concern raised by a care home manager regarding the reporting of pressure ulcers and multiple safeguarding referrals saw a group established to develop a process in order to ensure all relevant medical and care history accompanied a person throughout their journey. The red bag scheme has been identified as a conduit to ensure this information is received in a timely manner as a person enters services. This work commenced in December 2019 but has been temporarily suspended due to COVID 19 and will recommence when the situation allows.

Multi Agency Safeguarding Arrangements

The three statutory Safeguarding Partners as set out in Working Together 2018 are the **Local Authority**, the **Clinical Commissioning Group** and the chief officer for the **Police**. They have a shared and equal duty to make arrangements to work together to safeguard and promote the welfare of all children in the local area. Bury's Integrated Safeguarding Partnership (BISP) has brought together the partners working with adults at risk and children.

The model in Bury was agreed and the CCG safeguarding team participated in its formulation. The aim is to reduce duplication via a Joint Strategic Board, for adults and children, and joint sub committees, while ensuring the voice of adults and children are maintained by having separate business groups for children and adults.

The CCG has membership at each level of the structure.



In September 2019, both the Bury Safeguarding Children Board and the Adult Safeguarding Board ceased to exist.

The arrangements were published and came into effect on the 29th September 2019

Another key element that changed was the arrangements for the Child Death Overview Panels (CDOP)

The arrangements were the responsibility of the BSCB, but now are under the remit of the LA and the CCG.

Bury are part of an arrangement with Rochdale and Oldham Clinical Commissioning Groups and Local Authorities.

Locally, the governance is into the Health and Well Being Board

The new arrangements for safeguarding and CDOP can be found at the following links:

<https://burysafeguardingpartnership.bury.gov.uk/CHttpHandler.ashx?id=20167&p=0>

<http://www.buryccg.nhs.uk/download/CDOP-BRO-June-2019.pdf.pdf>

Participation enables and supports the CCG to discharge its statutory duties as laid out in the Children Acts 1989 and 2004, and, the Care Act 2014.

3.3 Bury Integrated Safeguarding Partnership (BISP)

In September 2019, both the Bury Safeguarding Children Board and the Adult Safeguarding Board ceased to exist.

The local Multi Agency Safeguarding Arrangements were agreed The CCG is one of three safeguarding partners, along with the Local Authority and the Police

The arrangements were published and came into effect on the 29th September 2019

Another key element that changed was the arrangements for the Child Death Overview Panels (CDOP)

The arrangements were the responsibility of the BSCB, but now are under the remit of the LA and the CCG.

Bury are part of an arrangement with Rochdale and Oldham Clinical Commissioning Groups and Local Authorities.

Locally, the governance is into the Health and Well Being Board

The new arrangements for safeguarding can be found at the following link

<https://burysafeguardingpartnership.bury.gov.uk/CHttpHandler.ashx?id=20167&p=0>

And for CDOP, the link is below

<http://www.buryccg.nhs.uk/download/CDOP-BRO-June-2019.pdf.pdf>

There have been a number of serious case reviews during 2019-2020 for children and the reports can be found on the Safeguarding Board website:

<https://burysafeguardingpartnership.bury.gov.uk/index.aspx?keyword=serious+case+reviews+&returnarticleid=8876&articleaction=newsearch&articleid=8880>

There have been no Domestic Homicide Reviews or Serious Adult Reviews Completed and published however there are ongoing cases that the team are involved in.

Greater Manchester Health and Social Care Partnership

The CCG safeguarding team supports the work of the GMH & SCP via membership of the safeguarding networks (Adults, Children, Looked after Children). All three networks support the assurance processes across the GM health economy

Inspections and Peer Reviews

In September 2018, NHS Bury CCG coordinated a Children Looked After and Safeguarding (CLAS) inspection of the local health economy, following a notification of inspection from the Care Quality Commission. The inspection was extensive with a range of services being inspected. The services are commissioned by both the CCG and Public Health and an action plan was developed and monitored by both the CCG and the CQC

The plan had been monitored via the NHS Bury CCG internal Safeguarding Assurance and Governance meetings and via one to one sessions between the Designated Nurse for Child Protection & Looked after Children with the safeguarding leads in the providers. Additionally, there have been a number of visits and short audits completed to assess on-going improvements

The CQC have acknowledged the progress of the actions and the lead inspector will formally handover monitoring of the action plan to regulatory inspectors so that they can follow up in line with their own individual conversations with discrete providers

There have been no further inspections of the whole health economy in 2019-2020

3.4 Priorities for 2019-2020 - update

1. Supporting the integration agenda of the CCG and LA

The CCG team have been actively involved with the integration agenda and are supporting the establishing of arrangements for the governance of safeguarding within the new emerging One Commissioning Organisation.

2. To support the work of the Multi Agency Integrated Safeguarding Arrangements for Bury

The CCG safeguarding team and the Executive Lead for Safeguarding were integral to the work that was completed on the new arrangements, as outlined within the report

3. Following on from 2017/18 GP Practice Assurance process, all practices in Bury will be visited during 2019/20. The visits will be an opportunity to update on changes to the multi-agency safeguarding arrangements, introduce new team members, discuss emerging areas of complex safeguarding and to expand the knowledge of the practice staff.

The visits to GP practices commenced as planned before Christmas of 2019 and were almost completed by the end of March with one outstanding visit. The process was not completed due to the Covid -19 work that became the priority. A report will be written and shared within the CCG via the Quality and Performance Committee during 2020.

4. Liberty Protection Safeguards system under the Mental Capacity (Amendment) Act 2019 is intended to come into force on 1 October 2020. CCG Safeguarding Team will be working with Bury Local Authority DoLs team to ensure that the CCG are meeting their statutory responsibilities.

There have been delays to the implementation and preparatory work nationally in relation to LPS. This has been due to Brexit and more recently COVID 19

5. To continue to monitor the action plan following the CQC inspection

The plan continues to be monitored by the Safeguarding Governance and Assurance Group.

Priorities for 2020-2021

1. **To support the ongoing integration within the OCO, specifically in relation to the governance and assurance processes, including statutory requirements**
2. **To continue to support the Bury Integrated Safeguarding Partnership (BISP)**
3. **To monitor the implementation of health action plans that emerge/have emerged from Serious Case Reviews for Children, Domestic Homicide Reviews and Serious Adult Reviews**
4. **To continue the assurance cycle of the providers where the CCG commissions services**
5. **Liberty Protection Safeguards (LPS) system under the Mental Capacity (Amendment) Act 2019 is intended to come into force on 1 October 2020. The CCG will become a responsible body under the Mental Capacity Amendment Act (2019). The CCG as a responsible body will identify, assess and authorise a deprivation of liberty under the LPS. CCG Safeguarding Team will be working with Bury Local Authority DoLs team and Head of Adult Safeguarding to ensure that the CCG are meeting their statutory responsibilities.**

Clare Holder, Designated Nurse for Adult Safeguarding

Maxine Lomax, Head of Safeguarding, Designated Nurse for Child Protection and Looked after Children, Deputy Director of Nursing

June 2020