

Recorded Delivery

BUPA Care Homes (CFHCare) Limited
Bridge House
Outwood Lane
Horsforth
Leeds
LS18 4UP

05 November 2013
2013319294

Dear Sirs

IMPROVEMENT NOTICE SECTION 62 PUBLIC SERVICES REFORM (SCOTLAND) ACT 2010 ("the Act")

Social Care and Social Work Improvement Scotland ("SCSWIS" and hereinafter referred to as the "Care Inspectorate") has concluded that Pentland Hill Nursing Home, 23/27 Gylemuir Road, Edinburgh EH12 7UB is not operating in accordance with requirements or conditions imposed by or under the Act, or the requirements of Regulations made under the Act. The Care Inspectorate hereby gives you notice that unless there is a significant improvement in provision of the service, it intends to make a proposal to cancel your registration in terms of section 64 of the Act. The nature of the improvements to be made, and the period within which they must be made, are specified below.

1. Medication

(A) By 28 November 2013, you must put in place a system to ensure that:

- a) medication is administered as prescribed; this must include administering the preparation as prescribed and following any specific instructions when a covert medication pathway is prescribed. In any circumstances when medication is not given as prescribed, the reason for this must be clearly recorded;
- b) the Medication Administration Records are signed each time medication is given;
- c) enough medicine is available for service users to receive medication as prescribed;
- d) "as required" medicine instructions are clear for staff to follow, detailing the reason for administration, the maximum dose and minimum time between doses;
- e) appropriate arrangements are in place for securing the medicine trolley for safe storage of medicines;
- f) there is a safe method of recording and storage of medicines for return to pharmacy.

This is in order to comply with the Social Care Social Work Improvement Scotland (Requirements for Care Services) Regulations 2011, SSI/2011/210 regulation 4(1)(a).

2. Food/Fluids and Nutritional Care

By 28 November 2013, you must put in place a system to:

- a) accurately calculate and record the Body Mass Index of service users according to assessed need;
- b) ensure that where there is identified weight loss, the Malnutrition Universal Screening Tool (MUST) guidance is followed, including weighing individuals according to need;
- c) review, record your findings and update each care plan as so required to ensure that each service user who needs assistance to eat, drink or maintain their nutritional status has a care plan that describes the specific interventions for that individual;
- d) ensure that all service users receive support at mealtimes to meet their assessed needs;
- e) ensure service users dietary and fluid likes and dislikes are recorded and these are used to help identify meal preferences for any service user who may be unable to indicate or verbally express choices;
- f) ensure that food and fluid charts are completed for those service users who require them;
- g) ensure that the content of food, fluid and weight charts are evaluated and the information is used to plan care;

This is in order to comply with the Social Care Social Work Improvement Scotland (Requirements for Care Services) Regulations 2011, SSI/2011/210 regulation 4(1)(a).

3. Training

(A) By 18 September 2013, you must develop a staff training programme with dates for implementation for:

- a) management and leadership, for staff in such roles, who are involved in the provision of the care service;
- b) prevention and management of pressure ulcers, including best practice guidance for tissue viability;
- c) the calculation of Body Mass Index and use of the Malnutrition Universal Screening Tool (MUST);
- d) food, fluids and nutritional care;
- e) creating a positive mealtime experience taking account of best practice documents such as, NHS Scotland (2002) Nutrition for physically frail older people best practice statement, and providing assistance with eating and drinking;

- f) person-centered care taking account of best practice documents such as, Scottish Executive (2006) Delivering Care, Enabling Health, and the development of appropriate care planning;
- g) the safe administration of medication;
- h) calling for medical assistance in the event of resident illness or injury;
- i) caring for people living with dementia;
- j) moving and handling;
- k) hand hygiene.

(B) By 25 September 2013, you must provide a copy of the above training programme to the Care Inspectorate.

(C) By 28 February 2014, you must provide written confirmation to the Care Inspectorate that all identified training has been completed.

This is in order to comply with the Social Care Social Work Improvement Scotland (Requirements for Care Services) Regulations 2011, SSI/2011/210 regulation 4(1)(a) and regulation 15(b)(i) Staff training.

Note: You have already complied with 3 (A) & 3(B) above.

4. Monitoring staff practice

By 28 November 2013, you must:

- a) put a system in place to audit and monitor staff practice and competency to ensure that you are making proper provision for the health and welfare needs of service users and to protect them from avoidable risk of harm.
- b) ensure this system must make provision for, but not be limited to:
 - a. care planning, reviews and other accompanying documentation
 - b. safe storage of medicines and medicines administration
 - c. food, fluid and nutrition and the mealtime experience
 - d. pressure area care
 - e. calling for medical assistance in the event of resident illness or injury.
 - f. moving and handling
 - g. management and leadership
 - h. hand hygiene
 - i. staff supervision and clinical observation of practice
- c) ensure you have a system to record where you identify any unsatisfactory practices, including the action to be taken to effectively remedy any such practices.
- d) carry out a review of staffing, including skill mix and deployment of staff, to ensure that you make proper provision for the health and

welfare needs of service users and provide a copy of the review to the Care Inspectorate.

This is to comply with The Social Care and Social Work Improvement Scotland (Requirements for Care Services) Regulations 2011 (SSI 2011/210), regulation 4(1)(a) and 15 (a).

5. Management and Leadership and Quality Assurance

By 28 November 2013, you must put in place a system to ensure that:

- a) management and leadership practices are checked on a regular basis by a suitably qualified and competent person not involved in the day to day operation of the care service. Checks should be recorded and reported to the provider;
- b) where you identify any unsatisfactory practices, you keep a record and effectively remedy these;
- c) problems identified through any quality assurance audits are rectified.

This is to comply with The Social Care and Social Work Improvement Scotland (Requirements for Care Services) Regulations 2011 (SSI 2011/210), regulation 4(1)(a).

6. Care Plans

By 28 November 2013, you must put in place a system to:

- a) ensure that all service users' personal plans (care plans) and other necessary, accompanying documentation including relevant risk assessments are reviewed and updated to include a full assessment of the health and welfare needs of each individual service user together with details of how these are to be met, including all aspects of physical and mental health. This must include but is not restricted to:
 - a. medication
 - b. nutrition
 - c. tissue viability including use of pressure relieving aids and take
 - d. account of sitting for long periods
 - e. moving and handling
 - f. information from accidents and incidents
 - g. guidance from health care professionals
 - h. mental health stress and distress
 - i. oral hygiene
 - j. hand hygiene
- b) ensure that care plans accurately reflect the outcome of any
- c) assessment and that where risks are identified, appropriate risk,

- d) reduction measures are in place;
- d) ensure care plans are regularly and comprehensively evaluated to meet individual need;
- e) ensure care plans are reviewed with the resident and/or their representative(s) at least once in every six month period.
- f) ensure care plans contain sufficient information to inform staff of the correct equipment to be used and assistance required in all areas of assessed need.
- g) correct equipment to be used and assistance required in all areas of assessed need.

This is in order to comply with the Social Care Social Work Improvement Scotland (Requirements for Care Services) Regulations 2011, SSI/2011/210 regulation 4(1)(a) and regulation 5(a)(b)(c)(d).

Please also note that where more than one improvement is specified, failure to demonstrate compliance with any one of the improvements within the required timescale may result in us proceeding to make a proposal to cancel registration.

A copy of this notice has been sent to the local authority of the area in which the service is provided as required by section 62(2) of the Act.

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

Yours faithfully



PP Donna Gilmour
Team Manager
Care Inspectorate
Tel: [REDACTED]

cc. Kirsty Dace, Director Partnerships North and Scotland, BUPA Scottish Regional Office, 39 Victoria Road Barrhead, Glasgow, G78 1 NQ
Bernadette Thornley Regulation of Care Manager City of Edinburgh Council
Comments and Complaints Co-Ordinator Care Inspectorate

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