

How CQC inspects safehouses and outreach services

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SAFEHOUSES AND OUTREACH SERVICES

The Home Office has appointed the Care Quality Commission (CQC) to inspect services provided to survivors of modern slavery. This guidance describes how we inspect safehouse and outreach services delivered under the Modern Slavery Victim Care Contract (MSVCC).

The Single Competent Authority at the Home Office oversees the MSVCC contract. This is currently delivered through The Salvation Army and 12 subcontractors to provide specialist support to survivors of modern slavery.

We define these services as:

“The provision of residential and outreach support services across England and Wales for survivors of modern slavery, under the Home Office’s Modern Slavery Victim Care Contract (MSVCC). In England and Wales, modern slavery includes human trafficking, slavery, servitude and forced or compulsory labour.”

When we inspect, we use our Safehouse Inspection Framework and refer to the requirements in the MSVCC. We developed this based on our assessment frameworks for health care and adult social care services, and the ‘Slavery and Trafficking Survivor Care Standards’ developed by the Human Trafficking Foundation. Our framework reflects our human rights-based approach to inspection. Other stakeholders and services that provide support have also contributed. The Home Office has approved the framework and shared with service providers.

Our inspectors will use their professional judgement, supported by objective measures and evidence, to assess your service against the five key questions that we ask of all services:

- Are they safe?
- Are they effective?
- Are they caring?
- Are they responsive to people’s needs?
- Are they well-led?

Note: When inspecting safehouses, the safe key question will also directly relate to the requirements in the MSVCC contract requirement Sch. 2.3 Annex A.

Unlike most types of service that we regulate, we only have the powers to monitor, inspect and rate for this work. Providing safehouse and outreach services is not a regulated activity so we have no enforcement powers and we cannot register these service providers. However, we will report on the findings of our inspections, which includes highlighting good practice and making recommendations for improvement where necessary. If we find a significant concern, we will escalate this to the Prime Contractor of the MSVCC and the Home Office.

We will carry out an initial programme of inspecting safehouse and outreach services over an 18-month period, until June 2022.

Arrangements during the COVID-19 pandemic

The coronavirus (COVID-19) pandemic has meant that we may decide at any stage to temporarily suspend on-site inspections of safehouses and outreach services. This is because of the potential risks to survivors and staff, and the need to follow guidance from Public Health England. If we need to suspend on-site inspections, we will monitor the information we have about safehouse and outreach services and carry out remote assessments of outreach services where possible. If we do this, we will assess services by telephoning and using other online ways.

We'll let you know the details of our approach when we need to. We're engaging with The Salvation Army and the Home Office to agree an approach to inspecting during COVID-19. We'll continue to monitor and review its effectiveness as restrictions and health advice changes. If this happens, we will start to carry out on-site inspections again when infection risks reduce.

BEFORE INSPECTION

Making contact with you

CQC requires all service providers to identify a lead person and provide contact details for them. This is so we can talk them about the inspection programme. We will contact this person before an inspection and for any other reason related to the programme or if we need information about your services. They will also need to tell us about any changes to the services you provide. You need to tell us if there are any changes to this role, for example the person's name or contact details, so we can contact you quickly when we need to.

We will allocate an inspector to your organisation so that you know who to contact if you have any general queries about the inspection programme. However, your designated inspector may not always carry out the inspections of your services.

Before we carry out a site visit, the lead inspector will contact you to announce the inspection, make any necessary logistical arrangements and to make sure that you are prepared for the inspection process. The lead inspector will telephone you to let you know the planned date of the inspection, and to discuss how we will carry out the inspection. We will make this call:

- 10 working days before the planned date for a safehouse inspection
- 15 working days before the planned date for an outreach service inspection

During the initial call, the lead inspector will confirm:

- that your organisation provides the service we have told you we plan to inspect
- that the safehouse and/or outreach service is open/operating on the planned day of the inspection and that staff and survivors will be available to speak to, or meet with inspectors
- email addresses of staff at the service (including the service manager)
- practical arrangements for the visit such as an allocated space for the inspection team to work in, facilities available, and access to systems and documents.

The lead inspector will also:

- explain how we send the formal announcement letter to confirm our inspection
- explain what information we need you to send to us before the inspection and how to send it to us
- explain the inspection process

- agree a provisional inspection timetable
- discuss and agree arrangements to speak to managers and your staff
- explain about giving survivors the opportunity to provide feedback to inspectors through the survey, focus groups or interviews
- ask for contact details for local services that you regularly liaise with that provide support to survivors for example, GPs, community nursing services, legal advisors, police (we may contact these services during our off-site inspection work)
- explain how we will engage with survivors and ask you about any support they will need during the inspection, such as a quiet area to talk and how to arrange interpretation needs

If the lead inspector needs to confirm the inspection plan or answer your questions about the process, they will arrange a follow-up call with you.

Provider Information Return

Before an inspection, we will ask you to complete a Provider Information Return (PIR). This helps us to understand more about the service you provide. The PIR will ask you for information about:

- the services you provide to survivors
- external services that you liaise with
- staffing arrangements and numbers of staff
- how many survivors use your service
- how you monitor the quality of the services you provide, including the results of audits
- adverse incidents and complaints
- feedback you have collected from survivors
- policies and procedures.

This is not a full list, and we may ask for other information if we need it. You will have five working days to complete and respond to our request. We will tell you how and when to submit the information, and who to contact if you have any questions.

At any stage during the inspection process inspectors may need to ask you for some additional specific information to clarify queries or strengthen the evidence they have collected. We will keep track of these extra requests to avoid duplication and to make sure that we only request information that we need, which is not available elsewhere.

Engaging with survivors

We will use different ways to engage with survivors to gather their views about your service. It's important that they have the opportunity to give feedback on their experiences.

Survivor survey

We have developed a survey for survivors to complete, available in different languages. You have a contractual obligation to distribute the questionnaire to survivors on CQC's behalf. This applies to both safehouse and outreach services. We'll tell you how to do this.

When we receive responses, our analysts will manage the information confidentially and we will use this feedback to help us to understand your service.

Interviews/focus groups

During on-site inspections, our inspectors will speak to survivors who are willing to share their experiences. This can be an individual conversation in a private space, or through focus groups. We can also speak to survivors on the telephone, or through online digital apps, such as Microsoft Teams, during the inspection. This may be particularly useful for people using outreach services.

Cooperating with the inspection team

You need to cooperate with all aspects of the inspection regime, as a requirement of the MSVCC contract; Sch. 2.2, KPI 10 and 11.

INSPECTION

The inspection team

Each inspection will be led by a CQC Health & Justice inspector or inspection manager. The lead inspector/manager will be your direct point of contact throughout the inspection process. The size of your service will determine how long we spend visiting you, the number of inspectors on the team and who they are. For example, if you provide both safehouse accommodation and outreach services, we may inspect over two days or over separate inspections. We'll confirm this information when we call you to announce the inspection.

Site visits

As part of the inspection, the inspection team will visit your services. They will meet with the service manager, talk with staff and review systems, documents and records for survivors. We will try to make sure that our inspection visit does not affect the delivery of services to survivors.

Introductory meeting

At the start of the visit, the inspection team will hold an introductory meeting with the service manager. This will introduce the inspection team and provide an opportunity to explain:

- the purpose and scope of the inspection
- how we will give feedback and/or escalate any concerns that we may identify
- how we will communicate our findings

During this meeting you will have an opportunity to:

- include any staff you feel will contribute to the meeting
- tell us about the service, including the context in which it operates
- share any examples of notable or innovative practice
- tell us about any concerns or challenges for the service, and how you are addressing them.

We encourage you to be open and honest and it's helpful if the service manager can tell the lead inspector about any concerns or other relevant information that may affect the inspection as soon as possible.

Inspection visit

During the inspection visit, the inspection team will:

- interview staff at all levels (including managers, residential support workers, outreach workers, administration staff)
- interview survivors and/or conduct focus groups
- review a sample of cases
- review documentary evidence
- check accommodation (safehouses only).

We expect you to support inspectors to complete these activities. This will include:

- arranging times for interviews and/or focus groups
- facilitating interpreting services
- ensuring that the staff and survivors who wish to speak to inspectors during the inspection are available.

You should also arrange for the inspection team to have access to necessary records and safehouse accommodation.

Feedback on the visit

At the end of the on-site visit, the inspection team will meet with the service manager, and any other members of staff who the manager has invited, to provide summary feedback. This usually includes:

- explaining our findings to date, including any issues that we need to escalate
- any plans for follow-up or additional site visits if necessary
- explaining how we make our assessments, including how we analyse any evidence after the inspection
- explaining the next steps, including the timeline for reporting
- answering your questions about the process.

Assessment framework

To direct the focus of our inspection, our teams will use a set of Key Lines of Enquiry (KLOEs) that directly relate to CQC's five key questions (are services safe, effective, caring, responsive and well-led?)

For safehouse and outreach service inspections, we will use our Safehouse Inspection Framework.

The framework contains tailored KLOEs relevant to the services you provide, and questions (called prompts) that inspectors will consider as part of their assessment of services.

When preparing for the inspection, our inspection teams will consider the information and data they gather, such as from the PIR and responses from the survivors survey, to decide which of the prompts they will use to help them make judgements on the KLOEs.

Mental Capacity Act

If your service provides care or support for adults who have (or appear to have) difficulty making informed decisions about their care, treatment or support, you may need to refer to the Mental Capacity Act 2005.

The Mental Capacity Act helps to safeguard the rights of people aged 16 and over who lack (or may lack) mental capacity to make decisions. This may be because of a lifelong learning disability or a more recent short-term or long-term impairment resulting from injury or illness. This includes decisions about whether to consent to care or treatment.

If a person's capacity is (or is likely to be) impaired, staff must know how to ensure that decisions made on the person's behalf are in their best interests.

AFTER INSPECTION

Your inspection report

After each inspection we produce a report about the service. This presents a summary of our findings and judgements. The report focuses on what our findings mean for survivors using your services. It gives details of our judgements on whether services are providing people with support that is safe, effective, caring, and responsive, and whether the service is well-led.

When we find examples of good practice during the inspection, we describe them in the report to support learning and improvements. Our reports will also identify any areas for improvement and may contain associated recommendations.

Making judgements

Unlike the registered services that CQC regulates, we do not have the legal powers to **require** providers of safehouse or outreach services to make improvements.

However, the inspection team will make a judgement on whether your service is meeting expectations. This is based on our assessment of the evidence we gather against our KLOEs during the site visit, from the PIR, and from what survivors and other stakeholders tell us. Our judgements will also be influenced by the requirements of the MSVCC contract, which are cross-referenced to the KLOEs within the inspection framework.

When making our judgements, we consider the weight of each piece of relevant evidence. In most cases we aim to verify our evidence with other sources to support our findings. When we have conflicting evidence, we will consider its source, how robust it is, and which piece of evidence is the strongest. We may conclude that we need to gather additional evidence or get specialist advice to make a judgement.

Quality checks

Before finalising our reports, we check the quality and consistency to ensure that our judgements are consistent. This includes checking at internal quality panels where we discuss and ratify our reports.

Factual accuracy check

When we have completed and checked the quality of the draft inspection report, we will send you a copy to review. We will ask you to check the factual accuracy and completeness of the information that we have used to reach our judgements. The factual accuracy checking process allows you to tell us:

- where information is factually incorrect
- where our evidence in the report may be incomplete

The factual accuracy process gives inspectors and providers the opportunity to ensure that they see and consider all relevant information that will form the basis of CQC's judgements. The factual accuracy process does not deal with complaints about CQC or challenges to proposed recommendations.

We will send the draft report to you by email. Our email will include:

- a copy of the draft report
- a factual accuracy form for you to submit a response to CQC
- instructions about the deadline to send any comments

Once you have received the email with the draft report, you have 10 working days from the date of the email to return the form with any comments. You are responsible for making sure that the factual accuracy of the draft report has been checked by the appropriate person and that any factual accuracy comments regarding the draft report have been approved and submitted.

The draft report includes the draft judgements. If the inspector corrects any factual details in the report or accepts any additional evidence, they will amend the draft report. They will determine whether this has an impact on a judgement and will explain any changes in writing.

If you do not wish to submit a response, please tell us immediately. We will then be able to complete the final report.

How we share inspection information

Once the factual accuracy of the inspection report has been agreed, we will email a copy of the final report to you, as well as the Home Office and The Salvation Army. We will **not** publish inspection reports for Safehouse and outreach services on CQC's website or make them available to the public.

Independent report on the services provided to survivors

In addition to service-level inspections, our agreement with the Home Office requires us to publish an annual report on what we find from the inspection programme and through engaging with providers and other stakeholders. We will publish this in 2022

at the end of the initial inspection programme. The report will focus on the themes we identify in relation to survivors' experiences and will include examples of good practice and details of any areas where improvements are needed.

Governance of the inspection regime

We will have regular meetings with the Home Office to monitor how the inspection programme is being carried out.

Complain about CQC

We aim to provide the best possible service, and we welcome your feedback to help us improve our services and ensure we are responding to your concerns as best we can.

If you have a complaint, you should make it to the person you have been dealing with at CQC as they will usually be the best person to resolve the matter. If you feel unable to do this, or you have tried and were unsuccessful, you can contact our National Customer Service Centre by phone, letter or email.

Post

CQC National Customer Service Centre
Citygate
Gallowgate
Newcastle upon Tyne
NE1 4PA

Telephone: 03000 616161

Email: enquiries@cqc.org.uk

Opening hours: 8.30am to 5:30pm, Monday to Friday

What will happen next?

Your complaint will be forwarded to our National Complaints Team who will contact you to discuss your concerns and confirm how CQC will respond to them. We will try to resolve your complaint informally within seven working days so that we can address the concerns as soon as possible. If a formal investigation is needed, we will propose a date for response (usually within 30 working days) and agree this with you. Your complaint will be investigated by someone not connected to the issues and the process will be overseen by the National Complaints Team. You will then receive a report detailing our findings and if appropriate, what we have done, or plan to do, to put things right.

INSPECTION SCHEDULE FOR SAFEHOUSE AND OUTREACH SERVICES

This timeline provides a guide to our activity during the inspection process.

Activity	Timescale
We will telephone outreach services to announce our inspection	15 working days before the on-site inspection
We will telephone safehouse services to announce our inspection	10 working days before the on-site inspection
We will email outreach services a letter to confirm the inspection and a provider information return (PIR) form	15 working days before on-site inspection
We will email safehouse services a letter to confirm the inspection and a provider information return (PIR) form	10 working days before on-site inspection

Your staff should use this period to offer survivors an opportunity to give feedback to inspectors either through the survey, focus groups, interviews etc.

We carry out the on-site inspection of outreach services	The time spent on site will depend on the size and geographical spread of the service. We will confirm this when we telephone you to announce the inspection.
We carry out the on-site inspection of safehouse services	One to two days, depending on the size of the service. We will confirm this when we telephone you to announce the inspection.
Outreach/safehouse service submits any additional information (if we ask for it)	Two working days after the on-site inspection

During this time, we carry out internal quality assurance processes, including review by an independent panel.

We send the draft inspection report to you by email for factual accuracy check	20 working days after the end of the on-site inspection
Deadline for outreach/safehouse services to return factual accuracy comments	10 working days from the date you receive the draft inspection report

We consider your comments and amend the report if we accept them, and review by independent quality panel if necessary.

<p>We email final report to the provider or location, The Salvation Army and the Home Office.</p>	<p>On or before 50 working days after the end of the on-site inspection.</p>
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