

Ms Heidi J. Connor
Senior Coroner for Berkshire
Reading Town Hall
Blagrove Street
Reading RG1 0QH

[REDACTED]
[REDACTED]
Date: 24 November 2023

Dear Madam,

Re: Regulation 28 Response regarding Ms Lucy Anne Walles

I write in relation to the matter raised in your Regulation 28 letter to Reading Borough Council in respect of the above inquest which concluded on the 16th of June. I am writing to provide you with Reading Borough Council's response to your concerns, listed below under each query.

1. Timescales for review and the triage of safeguarding referrals

The Safeguarding team at Reading Borough Council manages most of the safeguarding referrals (around 80%) which come into the Council through the Council's Customer Contact Centre. If the individual referred has care and support needs and is already known to Adult Social Care Services, the referral is passed directly to the team involved and this accounts for the remaining 20% of referrals that come through this route.

For those referrals coming into the Safeguarding team, they are screened, and a named Safeguarding worker is assigned if the referral requires consideration under safeguarding procedures. When a Safeguarding contact is received which is the responsibility of a neighbouring authority, as in Ms Lucy Anne Walles' situation, the safeguarding team will contact them to inform them and pass on the details. The timescales for the management of the contact and referral process are set out as guidance on the Berkshire Safeguarding Policy and Procedures and Reading Borough Council, along with all the other Local Authorities covered by the West of Berkshire Safeguarding Adults Board, follow these procedures.

Following the death of Ms Lucy Anne Walles and the lack of timeliness of an appropriate safeguarding response to safeguarding contacts in this case, improvements have been made to the safeguarding service in Reading. Those relating to the resourcing of the service, are referred to below. In relation to improvements in processes, where a safeguarding contact contains information which may indicate the individual has suicidal ideation or is at risk of significant self-harm, a priority flag is added at the point of contact on the client recording system for the Safeguarding Team's attention, or the responsible adult social care team

who are dealing with the case. This priority flag highlights the urgency of the case for those allocating work and can be removed or added during further assessment of the individual. This change in process has been required to strengthen the management of high-risk safeguarding referrals, particularly given the volume of safeguarding contacts received, and the resource limitations on the safeguarding team referred to below.

The other improvement in process in the management of safeguarding contacts through the Customer Contact Centre and the Safeguarding Team is that, since the creation of a dedicated senior Safeguarding Lead role for Reading in June this year, there are daily consultations between the Safeguarding Team and the Customer Contact Centre to ensure appropriate referral processes are followed and there is priority flagging of high-risk safeguarding referrals.

The indicative timescale for a member of the safeguarding adults team to triage the referral of a safeguarding concern is within one working day as indicated in the guidelines.¹

2. Requirements to speak to the individual about whom Safeguarding concerns have been raised.

The practice standards for safeguarding in this area are supported by the Making Safeguarding Personal (MSP) initiative led by the Local Government Association and Reading staff are required to follow these standards. Individuals who are the subject of safeguarding concerns should always be made aware about the nature of any safeguarding concern, so they are fully appraised of what information is being shared about them and any actions which are likely to be pursued on their behalf. They should also be given opportunities to express their wishes and feelings. Only in exceptional circumstances where dialogue would increase the risks to them or to others, or where the individual lacks mental capacity, should this not be a requirement and in the latter circumstance, those with power of attorney, who are able to act in the best interests of the individual, should be fully consulted. In the circumstances surrounding Ms Lucy Anne Walles death, Lucy was not made aware by the Council when safeguarding concerns were raised on her behalf and this did not follow the requirements of best practice required in MSP.

There has been significant tightening up of practice by the safeguarding team to ensure that individuals are personally contacted about safeguarding referrals and these improvements are the subject of greater monitoring and audit in safeguarding cases. The Safeguarding Lead and two senior social workers in the safeguarding team ensure that no safeguarding concern is closed without the individual being contacted.

3. Training around section 42 and when a report meets the threshold for neglect or abuse. This training should also consider what options are available if a concern does not meet the threshold for a section 42 enquiry.

Reading Borough Council adopts a comprehensive approach to safeguarding training as outlined below:

All staff in Adult Social Care undertake Level 1 training which focusses on safeguarding awareness and the identification and reporting of abuse and neglect. This includes the

¹ <https://berkshiresafeguardingadults.co.uk/p/4-adult-safeguarding-procedures/43-responsibilities>

requirements for Section 42 enquiries. This is mandatory training and compliance is monitored by the Council. This training is delivered throughout the year.

Level 2 training is aimed at all Adult Social Care front-line staff and external partners such as care home managers and familiarises attendees with the Berkshire West Safeguarding Procedures including use of the procedures, the requirements of “Making Safeguarding Personal”, conducting safeguarding investigations as part of an enquiry, and the legal frameworks including deprivation of liberty and the Mental Capacity Act. Level 2 is mandatory for all staff who undertake any role in safeguarding enquiries and is delivered throughout the year.

Level 3 training is aimed at staff who manage safeguarding enquiries, for example Senior Social Workers and Managers, and those who work in specialised roles which involve safeguarding. It is mandatory for such staff and must be refreshed within 3 years. Attendance is monitored departmentally and is reported to the West Berkshire Safeguarding Adults Board.

All three levels of training are run at regular intervals throughout each year and all three levels of training cover what options should be considered if a concern does not meet the section 42 enquiry threshold.

There is also a “Safeguarding for Managers” Course which is run twice a year for relevant managers which looks in more depth at best practice in supervising safeguarding cases, managing risks and lessons from research and from Safeguarding Adult Reviews.

In addition to the core training offer outlined above Assistant Directors in Adult Social Care and the Safeguarding Lead are now providing tailored safeguarding training for Managers to ensure that all senior staff have a consistent approach to safeguarding contacts, referrals and enquiries and are appraised of best practice guidance. All Social Care practitioners have access to the training materials and briefing notes produced by the Safeguarding Adults Board following Safeguarding Adult Reviews (SAR) reports and are given opportunities to attend learning events for SAR recommendations. The SAR findings for Ms Lucy Anne Walles (under the title “Bree” SAR) and the recommendations therein will be the subject of learning events.

4. Systems for making other agencies aware of safeguarding referrals and concerns.

The West of Berkshire Safeguarding Adults Board require Pan Berkshire policies and procedures to be followed in respect of all safeguarding cases which are either related to Reading residents, or to individuals receiving services in Reading. These policies and procedures set the expectation that the outcome of a Safeguarding Concern is required to be communicated to the referrer, with the persons consent wherever possible. Other appropriate action may also be considered for example if the individual is presenting with care and support needs this information would be passed to the appropriate team to assess. Where the Concern is progressed to a Safeguarding Enquiry the Agencies involved are consulted as part of that Enquiry and over any care and protection plan which is then developed.

In the case of Ms Lucy Anne Walles, there had been multi agency discussions led by Wokingham as the responsible Local Authority for the case, but the safeguarding referrals

were received by Reading which did not trigger a multi -agency meeting to consider the collective risks.

The West of Berkshire Safeguarding Adults Board is currently working on strengthening and standardising of the guidance in the procedures, particularly the multi-agency processes being used across the local authorities.

The SAR author has identified this as a gap and has already begun to discuss with representatives from the Safeguarding Adults Board the lack of an agreed and shared multi-agency risk assessment in respect of Ms Lucy Anne Wallis and Reading Adult Social Care is fully involved in the consideration of recommendations and on improving transparency and clarity in this regard.

5. In relation to the above points, whether RBC should reflect the above changes in formal (written) policy, as well as delivering training.

All policy changes in respect of processes and policies relating to safeguarding in Reading are subject to approval by the West of Berkshire Safeguarding Adults Board, in which Reading is a key statutory agency partner and follow the Pan- Berkshire policies and procedures used by all agencies.

The tri- borough arrangements for safeguarding agreed by the Board require consistency of processes and procedures across the Board footprint and therefore Reading only changes formal policy, when agreed through the Safeguarding Adults Board. Revisions and associated amendments of the pan Berkshire procedures are instigated for several reasons including the recommendations of Safeguarding Adults Reviews, best practice guidance, and changes in national safeguarding policies.

Training on Adult safeguarding for Council staff (content outlined above) is delivered locally through the Organisational Development Team, coordinated by a dedicated Workforce Development Officer for Adult Social Care, the Principal Social Worker and Principal Occupational therapist and other senior staff in the Adult Social Care service. In addition, the Safeguarding Adults Board delivers training and learning events on a range of matters relevant to safeguarding practice and the learning from Safeguarding Adults Reviews and thematic safeguarding reviews. The Board also has a responsibility to monitor the delivery of multi-agency learning on matters related to adult safeguarding.

As part of the improvement work being undertaken this year to improve the performance of safeguarding in Reading, Senior Managers in Adult Social Care in Reading have undertaken workshops with all the managers engaged in safeguarding, to strengthen their understanding of the safeguarding processes and the requirements of best practice which we are seeking to deliver as outlined in point 3.

6. Improving the interaction between agencies involved and consideration of the threshold for arranging joint meetings to discuss service users, whether they meet Section 42 thresholds or not. The evidence we heard is that this is being actively encouraged. Should there be written guidance about this somewhat subjective issue?

Multi agency meetings occur as part of the safeguarding processes. However, multi-agency meetings are arranged to discuss many forms of risk and the care and support needs of

individuals, not only those who meet the section 42 threshold. When the threshold for Section 42 enquiry is not judged to have been met, any agency can refer for a Multi-Agency Risk Meeting (MARM) or the lead authority can call a MARM meeting, and this is outlined in the procedural documentation for the West of Berkshire Adult Safeguarding Board.

7. Whether the resourcing of the service is adequate and safe?

Safeguarding services in Reading, in line with all other parts of the UK have been experiencing and continue to experience increases in the number of reported safeguarding concerns, which have resulted in significant service pressures over the last three years. In 20/21 for example there were 1598 concerns reported to Reading, whereas in 21/22 this had risen to 2969. There have been difficulties in recruiting and retaining permanent staff to work in safeguarding, in part because of national workforce shortages, but also because of the high-level demands in skills and experience needed to work with very vulnerable individuals in crisis situations.

The Council continues to review the required organisational structure to see which is best able to meet the increased demand in order to deliver adequate and safe resourcing of adult safeguarding in Reading and has made changes as a result.

Following the appointment in June 2023 of a Senior Safeguarding lead, 3 additional full time safeguarding staff were appointed, and this has provided a 30% increase in dedicated staff resource for managing safeguarding referrals. The Senior Safeguarding Lead is accountable to, and works with, the Assistant Director for Safeguarding, Quality and Practice. This has strengthened the managerial oversight of the delivery of the safeguarding service and continues to report performance of safeguarding to the Departmental Management Team, led by the Executive Director.

These increases in safeguarding resources described above have been delivered despite resource pressures effecting the Council, in recognition of the importance of safeguarding for the residents of Reading. However, workforce challenges in social care are being felt by all Local Authorities in the UK at the current time particular in respect of shortages of skilled and experienced staff throughout the adult care service which continue to challenge the resourcing of safeguarding systems across health and social care.

8. What are the systems for auditing and what happens if auditing reveals on going issues?

As noted earlier the West of Berkshire Safeguarding Adults Board provides the framework policies and procedures for all safeguarding in Reading and staff must adhere to those and operate to those, with due regard to the requirements for safeguarding set out in the Care Act (2014) and other legislation and guidance. Any issues identified with the procedures and policies are picked up through the SAB as described in 5 (above) and any individual skills deficits with individual workers are addressed through managerial oversight and guidance as work is subject to auditing of cases and worker supervision which has been strengthened in Reading in the last 6 months. Themes from audits and the learning from them are shared with staff in “Learning Together” sessions which are led by the Principal Social Worker and Principal Occupational Therapist.

Learning from SARs and other reviews of Safeguarding are overseen by the Safeguarding Review Panel of the SAB and recommendations from that panel to commission external

reviews, thematic learning reviews, appreciative enquiry, training and other forms of learning from practice, are made to the Board and supported by senior representatives from the 3 Councils and partner agencies. The “Bree” SAR will form the basis of learning events and other opportunities for dissemination of recommendations for improvements in safeguarding and support of vulnerable individuals at risk of suicide.

In June this year the creation of a senior management post to lead safeguarding practice in Reading, is enabling challenges in the delivery and resourcing of effective safeguarding to be brought to the attention of senior managers in Adult Social Care and in the wider Council. The postholder also oversees the work of the Safeguarding Team, undertakes auditing and reviewing of safeguarding cases and provides expertise in management of complex Section 42 enquiries.

In July 2023 Adult Social Care in Reading introduced a Quality Assurance Framework for the service which includes an audit programme which supports auditing of safeguarding referrals, not just at team level but also incorporating wider auditing by managers and some external commissioned audits undertaken by specialists. The individual learning from these audits is fed back to workers and their managers and any themes for learning which emerge, form the subject of workshops with appropriate staff. This Quality Assurance Framework systematises case audit in a more thorough form from previous auditing activity and allows for more rigorous consideration of any gaps in processes, policies or practice skills. The Departmental quality assurance process is led by the Executive Director under the title “Striving for Excellence” which is following the framework provided for inspection of adult social services by the Care Quality Commission (CQC), who are in the process of inspecting all local authority adult social care services. This includes the performance, delivery and outcomes of safeguarding services as a key part of their inspection.

The explanation outlined above under each point aims to provide reassurance around progress in relation to the specific actions that were for the Council to address. In overall conclusion the Council will continue to work to improve its response to safeguarding concerns drawing on support from agency partners represented on the Safeguarding Adults Board and will give full consideration of recommendations from the Safeguarding Adults Review concerning the tragic death of Ms Lucy Anne Walles. The findings of the Safeguarding Adults Review will contribute to the improvement work particularly in respect of how we respond across health and social care services to vulnerable people at risk of abuse, neglect and harm and those at risk of suicide.

Yours sincerely

A large black rectangular redaction box covering the signature of the Executive Director.

Executive Director of Communities and Adult Social Care Services