



Ms Sarah Morris
Social Services Strategy and Improvement Division
Health and Social Services Directorate
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

30th May 2012

Dear Ms Morris

Consultation on 'Making Things Better – Improving the ways we deal with complaints and concerns about social services in Wales'

General Comments

1. The Royal Pharmaceutical Society welcomes the commitment of the Welsh Government to strengthen the complaints procedure within social services and extending the Public Services Ombudsman's powers to consider complaints.
2. We support the overall intention of the Welsh Government to simplify the complaints process and bring the social services complaints process in line with the three stages operated across all public service providers in Wales.
3. We agree in principle with the suggestion to consolidate the independent hearing stage of the complaints process and the functions of the Public Services Ombudsman to ensure a more streamlined and efficient complaints process is in place across Wales. As a principle however we would be uncomfortable about losing any aspect of independence in resolving complaints that cannot be resolved by local or formal resolution and therefore support the recommendation that the provision of independent external investigation should be included within the responsibilities of the Public Services Ombudsman for Wales. The only proviso we would have in this respect is about the capacity of the office of the Public Services Ombudsman for Wales to undertake a potentially larger volume of work and we would urge the Welsh Government to consider this very carefully if it wishes to increase efficiency in the complaints process.

4. We support in principle the proposal that CSSIW should not become heavily involved in individual disputes. This is in line with CSSIW's current responsibilities in noting concerns from service users about the services they have been using and following up any concerns as part of urgent or routine inspections. While we accept that CSSIW is not a complaints agency, we advocate however that the intelligence they are able to collect should not be discounted in individual disputes where evidence of breaches of regulatory standards by particular service providers/agencies are of particular relevance to the individual dispute in question. We recommend therefore that some flexibility should be incorporated into the Social Services complaints process which clearly identifies when the call for information from CSSIW should be triggered.
5. We also advocate that CSSIW should also continue to provide signposting to individuals who are seeking resolution or redress for a complaint to the appropriate agency bearing in mind the stage at which the complainant is at in the complaints process.

Specific comments relating to medicines administration

6. One of our main concerns is about how individual complaints on the administration of medicines by social care providers should be dealt with. The use of medicines is commonplace in care homes and other premises providing social care, particularly for older people with complex medical and social care needs. We recommend that advice is included in the social services complaints process on how complaints should be dealt with should they arise against care givers who administer medicines in care settings. This may require joint consideration of the complaint with a Local Health Board for instance. We would advise therefore that the social services complaints process should dove-tail with the NHS complaints process in Wales to ensure clarity about how these complaints should be dealt with.

I trust this information is helpful. If any further information is required please do not hesitate to get in touch.

Yours sincerely,



Mrs Mair Davies
Chair, Welsh Pharmacy Board

About the Royal Pharmaceutical Society (RPS)

The RPS is the professional body for pharmacists in Wales and across Great Britain.

RPS is the only body that represents all sectors of pharmacy. We promote and protect the health and well-being of the public through the professional leadership and development of the pharmacy profession. This includes the advancement of science, practice, education and knowledge in pharmacy. In addition, it promotes the profession's policies and views to a range of external stakeholders in a number of different forums.

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