



**South Gloucestershire
Clinical Commissioning Group**

Private & Confidential

Corum 2
Corum Office Park
Crown Way
Warmley
South Gloucestershire
BS30 8FJ
Tel: 0117 947 4400
Fax: 0117 947 2401

By email: request-213216-f830b652@whatdotheyknow.com

www.southgloucestershireccg.nhs.uk

Date: 17th July 2014
Ref: 1415/0038/SGCCG

Dear Mr King

Thank you for your emails of 22nd and 23rd May 2014 in which you requested, under the Freedom of Information Act 2000, information relating to reports held within South Gloucestershire Clinical Commissioning Group (SGCCG) relating to Avon and Wiltshire Mental Health Partnership NHS Trust (AWP). More specifically, information relating to multi-agency Adult Safeguarding meetings involving AWP held by South Gloucestershire CCG, and information relating to the independent investigation report into the alleged falsification and/or alteration of service user records – Avon and Wiltshire Mental Health Partnership Trust.

Under section 1 (1) (a) and (b) of the Freedom of Information Act 2000, I can confirm that South Gloucestershire CCG does hold some of the requested information.

As your request is complex in nature, I have detailed below in a table all of the documentation that we hold and are able to disclose although I appreciate that you may have also obtained this from other organisations if it has been requested. Your request was submitted as follows:

- 1. I am interested in receiving copies of ALL information YOU hold since 01 01 2010 that lead up to 'the Independent Investigation report into the Alleged Falsification and/or Alteration of Service User Records - Avon and Wiltshire Mental Health Partnership NHS Trust', including records of contacts with your other joint commissioners of services, a copy of every draft - interim and final report you hold following your involvement in commissioning this report from Dr Stephen Colgan, Jo Lappin, Steve Pitt, Susan J Sutherland and Mark Underwood. I also wish to see any responses provided to you by the Avon and Wiltshire Mental Health Partnership NHS Trust from the time they were informed of this report being considered then requested by the Commissioners, please include any plan of action or remedial plan (please help me here !) that was prepared by or agreed with AWP MHP NHS T and records showing the progress and developments that have arisen since the dates of the reports.***
- 2. I understand a number of High Level and other Multi Agency Safeguarding Meetings have been held between 01 01 2010 and todays date regarding the Avon and Wiltshire South Gloucestershire CCG – 'Leading you to Better Health'***

Clinical Chair: Dr Jon Hayes
Chief Officer: Jane Gibbs

Mental Health Partnership NHS Trust (not about specific individual patients) but the organisation itself. I know for certain some meetings were held in Bristol and Trowbridge and involved a significant number of agencies. I ask you to supply me with all agendas, notes and minutes and records you hold regarding these meetings please to include correspondence between your CCG and the AWP MHP NHS T relating to safeguarding meetings or issues raised or concerns ,that you hold for the periods between 01 01 2010 and today's date please.

3. *The Independent Investigation Report into the Alleged Falsification and/or Alteration of Service User Records - Avon and Wiltshire Mental Health Partnership NHS Trust - commissioned in part by your predecessor NHS South Gloucestershire states amongst other things :*

"The Investigation was initiated following allegations made under local authority 'Whistle Blowing ' Policies by 30 Social Workers employed by Wiltshire Council but working in Avon and Wiltshire Mental Health Partnership Trust (AWP) that they had been instructed to falsify or alter service user records and/or that records had been amended by NHS staff without the knowledge of Council employees ". "A subsequent Wiltshire Council led investigation carried out in March 2012 clarified that nearly 30 social workers working in either adult community liaison and later life services shared the same concerns". "Wiltshire GPs reported a poor relationship with AWP and distrust of the Trusts ' green ' performance score cards and the reliability of the data ""There has been a recent and significant deterioration in the expected partnership arrangements and relationships between social workers and the AWP at all levels "AWP is unlikely to be processing information in accordance with the Data Protection Act "The report identifies a catalogue of concerns. However, I read the ' AWP Trust Board Papers (Part 1) 30 04 14,' which include the ' Minutes of a Meeting of the AWP NHS Trust Board of Directors ' on 26 March 2014. On pages 2 & 3 of the matters stated by their Chair - Mr Anthony Gallagher it states " With regard to the reference to falsified records, the chair reiterated the assurance that thorough investigations regarding data protection and amendments to patient records have taken place and these allegations have proved to be incorrect ". Please do not be confused by the highlighted strip at the bottom of their report where it states "Minutes prepared for the Part 1 Trust Board dated 26th June 2013 " !! The Board have subsequently approved these minutes as true and correct .I therefore ask to be supplied with all information YOU hold, following on from the above mentioned report in part commissioned by NHS South Gloucestershire where your CCG and the authors of the report have agreed the report is flawed, inaccurate or not fit for purpose IN ANY WAY and where AWP have written to yourselves and/or the authors identifying the areas they do not consider to be correct, and your responses to AWP MHP NHS T regarding this matter please ?

The CCG has considered your request and has identified 4 distinct areas of enquiry:

- Information relating to the independent investigation about allegations of falsification of records in AWP
- Information held on any Safeguarding meetings with Wiltshire Council relating to the above
- Communications with other Commissioners
- Copies of any remedial action plans

To put this response in context, the investigations you refer to occurred at a time when the former Primary Care Trusts were clustered and known as the Bristol, North Somerset, South Gloucestershire (BNSSG) PCTs. A BNSSG Executive team led on a number of quality work streams during that period up to 31st March 2013. AWP issues were therefore managed and monitored by the BNSSG Cluster, and supported by South Gloucestershire, as the lead commissioner for AWP. From April 2013, this role has transferred to North Somerset CCG. During the transition to becoming a CCG, a great deal of information was archived and is no longer held by the CCG.

The CCG has reviewed existing electronic files and have been able to source some information relevant to your FOI request and we are happy to provide this for you.

In response to the above requests South Gloucestershire Clinical Commissioning Group is providing copies of the following documents:

Document Number	Document Date	Document Description	Comments
1.	30.04.2012	Letter – to NHS Bath and North East Somerset from NHS Wiltshire	Redacted to remove personal information under exemption 40 of the Freedom of Information Act
2.	30.04.2012	Agenda 04.05.12 – South West Strategic Health Authority – Multi Agency TOR's – External Investigation into Record Keeping and Safeguarding at Avon and Wiltshire Partnership	Redacted to remove personal information under exemption 40 of the Freedom of Information Act
3.	02.07.12	Agenda 10.07.12 – South West Strategic Health Agency – Independent Investigation Steering Group Meeting	Redacted to remove personal information under exemption 40 of the Freedom of Information Act
4.	19.04.2012	Agenda 20.04.12 – South West Strategic Health Authority – Multi Agency TORs – External Investigation into Record Keeping and Safeguarding at Avon and Wiltshire Partnership	Redacted to remove personal information under exemption 40 of the Freedom of Information Act
5.	22.06.2012	Agenda 25.6.12 – South West Strategic Health Authority – Independent Investigation Steering Group Meeting	Redacted to remove personal information under exemption 40 of the Freedom of Information Act
6.	08.06.2012	Agenda – 11.06.12 – South West Strategic Health Authority – Independent Investigation Steering Group Meeting	Redacted to remove personal information under exemption 40 of the Freedom of Information Act
7.	24.05.2012	Agenda – 28.05.12 – South West Strategic Health Authority – Independent Investigation Steering Group Meeting	Redacted to remove personal information under exemption 40 of the Freedom of Information Act
8.	14.05.2012	Minutes – South of England Strategic Health Authority – Independent Investigation Steering Group	Redacted to remove personal information under exemption 40 of the Freedom of Information Act
9.	19.04.2012	Minutes – NHS South Gloucestershire, Wiltshire Council, NHS South of England	Redacted to remove personal information under exemption 40 of the Freedom of Information Act
10.	27.04.2012	Minutes – South of England Strategic Health Authority, NHS Gloucestershire, Wiltshire Council, NHS South of England	Redacted to remove personal information under exemption 40 of the

South Gloucestershire CCG – 'Leading you to Better Health'

Clinical Chair: Dr Jon Hayes
Chief Officer: Jane Gibbs

			Freedom of Information Act
11.	28.05.2012	Minutes – South of England Strategic Health Authority	Redacted to remove personal information under exemption 40 of the Freedom of Information Act
12.	30.04.2012	Letter – to MH Commissioners from Deputy Director Quality and Governance BNSSG PCT Cluster	
13.	30.08.2012	Independent Investigation Report into the Alleged Falsification and/or Alteration of Service User Records – Avon and Wiltshire Mental Health Partnership NHS Trust	Provided, however this is already in the public domain.
14.	28.05.2012	Appendix 1 to report – Terms of Reference	Provided, however this is already in the public domain.
15.	27.04.2012	South of England Strategic Health Authority – First draft of Terms of Reference	Provided, however this is already in the public domain.
16.	17.09.2012	Letter – AWP to Investigation Steering Group – NHS South	Redacted to remove personal information under exemption 40 of the Freedom of Information Act
17.	26.04.12	Process Map – Commissioning Framework for Independent Inquiry	Redacted to remove personal information under exemption 40 of the Freedom of Information Act

I hope this provides you with some of the information you are seeking, however if you have any further queries, require any clarification, or have any concerns regarding the handling of your request and/or to request an internal review, please do not hesitate to contact the FOI Manager at the above address or email FOI@southgloucestershireccg.nhs.uk

Please use the reference number above in any future correspondence.

If you were not content with the outcome of an internal review, you would have the right to apply directly to the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Yours sincerely



Jane Gibbs
Chief Officer