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10 August 2015

Dear Mr Waggett

### **Care Home Review: Analysis of your final response**

I am writing to thank you for providing a final response to my Requirements for Action, which I have now had an opportunity to analyse.

In analysing the response received, I was looking for assurance through the information provided and action in hand or planned that my Requirements for Action will be implemented and the intended outcomes will be delivered for older people.

Your response clearly demonstrates a commitment to delivering the change required that I outlined in my Care Home Review and clearly details action you have in place or will take to deliver the intended outcomes.

I am particularly pleased that your organisation has used the constructive feedback that I provided earlier in the year to improve your response, and all of your responses to my Requirements for Action have now been analysed as 'acceptable'. It is good to see that the Local Authority is working with the Health Board within some Requirements for Action.

Your organisation has proposed the proactive development of new services or processes which have the potential to progress as best practice. For example, you are developing a 'Quality of Life' framework that will improve the Local Authority's ability to understand and monitor quality of life through collating information from residents on the aspects of this framework (Requirement for Action 6.2).

I am therefore satisfied that your organisation is already complying with my Requirements of Action or is committed to taking the action necessary to deliver the required change. However, I would also expect to see the development of clear review and evaluation procedures to provide assurance at a senior level in your organisation that the required outcomes will be delivered.

Please find attached a detailed analysis of the additional information you have provided in response to my request.

As you are aware, I am obliged by the Commissioner for Older People (Wales) Act 2006 to keep a register of responses to my Requirements for Action and therefore all of the responses from the bodies subject to my Review will be published on my website together with the analysis of each response.

As I have already advised, I will be publishing an overall commentary on whether I consider that the change I expect to see on behalf of older people will be delivered across Wales and I intend to make a formal public statement in respect of this and action intended by individual bodies subject to the review. These statements will be made on 11 August.

It is not my intention to seek detailed updates on all of the action you have in hand, because of the level of assurance and commitment you have shown in securing these outcomes. It is therefore my intention to undertake a follow up review in 18 months' time at which stage I will be looking for tangible evidence that these outcomes have been consistently delivered across the care homes in your area (your action has been completed). I will, at a later stage, provide you with information on the scope and approach that I will adopt.

However, there are a number areas for which I will require interim updates and assurance and I will write separately to you in respect of what these are and how I will require this to be provided.

I look forward to continuing to work with you to ensure that older people living in care homes in Wales have the best possible quality of life and receive the highest standards of care.

Yours sincerely

A handwritten signature in black ink that reads "Sarah Rochira". The signature is written in a cursive style with a long, sweeping tail on the final letter.

**Sarah Rochira**  
**Older People's Commissioner for Wales**

# Blaenau Gwent County Borough Council

## Requirement for Action 1.6

### Final Conclusion - Acceptable

1.6 Older people are offered independent advocacy in the following circumstances:

- when an older person is at risk of, or experiencing, physical, emotional, financial or sexual abuse.
- when a care home is closing or an older person is moving because their care needs have changed.
- when an older person needs support to help them leave hospital.

For those with fluctuating capacity or communication difficulties, this should be non-instructed advocacy.

When a care home is in escalating concerns, residents must have access to non-instructed advocacy.

The Local Authority's response to this Requirement for Action includes a number of positive actions and commitments that it will take in order to improve the access that older people in care homes have to advocacy so that older people are able to secure their rights or have their concerns addressed, particularly in situations where they are vulnerable.

For example, I welcome that advocacy is made available when a care home is closing or in Escalating Concerns and that it will be further embedded in the safeguarding process. Furthermore, the Local Authority has committed to increasing staff awareness and understanding of independent advocacy.

I raised a concern in relation to the Local Authority's initial response to this Requirement for Action as it appeared to demonstrate a lack of awareness about the role of advocates. The initial response referred only to the Statement of Purpose (as per National Minimum Standards). There was also little information provided regarding the uptake of advocacy and whether the current funding levels are sufficient. Without this information, it is not possible to understand whether older people can really access

independent advocacy so that their rights can be secured and their concerns addressed.

Therefore, I am pleased to note that the response from the Local Authority provides more comprehensive information detailing the range and availability of current provision. It is good to see that the Local Authority has committed to reviewing its existing advocacy provision in line with the Social Service and Wellbeing Act, and this should expose the reality of access and quality of the current provision.

While the response does not refer to the provision of independent advocacy following hospital discharge and the transition into a care home, my expectation is that this issue will be picked up during the Local Authority's planned review of provision.

The response includes clear timelines for the completion of the actions noted, and also identifies an accountable individual or team who will be responsible for completing the actions. The clarity of this approach should enable quality and impact of these services, and any changes made to them to be closely monitored by the Local Authority.

## **Requirement for Action 2.2**

### **Final Conclusion - Acceptable**

2.2 Older people in care homes have access to specialist services and, where appropriate, multidisciplinary care that is designed to support rehabilitation after a period of ill health.

I welcome that the Local Authority's response to this Requirement for Action does provide an overview of the range of multi-disciplinary care and specialist services that are currently provided, and also outlines a number of actions that are being taken to improve access to specialist services and multi-disciplinary care. For example, the Local Authority has developed four reablement intermediate care beds and are developing a reablement pilot in an Extra Care scheme to help inform its approach to reablement in care homes.

I raised a concern in relation to the Local Authority's initial response to this Requirement for Action that appeared to take a more reactive, than proactive approach to the provision of specialist care and multi-disciplinary services to support rehabilitation. Without this proactive commitment to ongoing improvement and development, older people would continue to be at risk of reduced mobility, increased frailty and loss of independence. Therefore, I welcome the recognition from the Local Authority that it needs to develop a much more proactive approach and its commitment to work with partners to achieve this. For example, the Local Authority commits to working with Health colleagues to improve specialist therapy services to older people in care homes.

I welcome that these commitments and actions will enable the Local Authority to better understand the need for such services, and in turn, have the potential to provide older people with full support, following a period of significant ill health, to enable them to maximise their independence and quality of life.

The response includes clear timelines for the completion of some of the actions noted, and also identifies an accountable individual or team who will be responsible for completing the actions. However, I must note that there are some actions that would benefit from greater clarity in terms of timescales, such as the Local Authority's intention to apply lessons from a reablement pilot in an Extra Care Support Housing Scheme to care homes.

### **Requirement for Action 3.2**

#### **Final Conclusion - Acceptable**

3.2 All care home employees undertake basic dementia training as part of their induction and all care staff and care home managers undertake further dementia training on an on-going basis as part of their skills and competency development, with this a specific element of supervision and performance assessment.

I welcome that the Local Authority's response to this Requirement for Action provides a much clearer picture of current provision. Although the response recognises the current resources pressures experienced when trying to meet demand for training in this area, it does demonstrate a clear commitment to prioritising dementia training. This commitment, and the actions included within the response have the potential to ensure that staff working in care homes can understand the physical and emotional needs of older people living with dementia.

I raised a concern in relation to the Local Authority's initial response to this Requirement for Action that the response tended to focus its answer around Local Authority run care homes rather than responding in relation to all of the care home placements that it commissions. This has now been addressed and I welcome that the Local Authority states that 'in care homes throughout the County Borough staff have been offered, and in the main received basic dementia care training'.

This response recognises that not all staff have received such training yet. However, it is good to see that the Local Authority has committed to a future audit of dementia training to ensure that all staff has received this, and will check the appraisals and supervision records of staff to ensure that care home managers are supporting staff to develop such skills. Furthermore, I welcome that the Workforce Development Team have produced a Dementia Training Plan, and would be very interested in the progress of the plan and its impact on the quality of life of older people as it is rolled out.

In relation to senior staff, I welcome that the Local Authority has offered Dementia Care Matters training to commissioned care home providers. However, I am disappointed to note that only one or two providers have sent staff to be trained, and that there is no further information by the Local Authority regarding how this number can be increased.

The response includes clear timelines for the completion of the actions noted, and also identifies an accountable individual or team who will be responsible for completing the actions. The clarity of this approach should enable quality and impact of these services, and any changes made to them to be closely monitored by the Local Authority.

## **Requirement for Action 3.3**

### **Initial Conclusion – Acceptable**

3.3 Active steps should be taken to encourage the use of befriending schemes within care homes, including intergenerational projects, and support residents to retain existing friendships. This must include ensuring continued access to faith based support and to specific cultural communities.

The Local Authority's response to this requirement, whilst recognising the challenges in recruiting volunteers, it does appear to demonstrate an understanding of the importance of befriending. The response provides details of befriending schemes that are currently in care homes such as the Care Home Ask and Talk project that is run in nursing homes by the Health Board and also a Royal Voluntary Service scheme in residential care homes. I welcome these schemes, and recognise that they have the potential to support older people to have meaningful social contact.

I raised a concern in relation to the Local Authority's initial response to this Requirement for Action that there was insufficient detail on whether active steps are taken to encourage residents and providers to use these schemes. In addition, there was no reference made to befriending/intergenerational work and no indication as to how the Local Authority might encourage the implementation of projects with local schools and community groups, as well as to ensure access to specific cultural communities. Without access to social contact, older people are at risk of being lonely and socially isolated, and their ability to practice their faith and important cultural practices could be lost.

Therefore, I am pleased to note that the Local Authority's final response provides greater clarity on these matters and recognises that such links or projects are not consistent across the area. I welcome that the Local Authority has committed to monitor intergenerational work, access to faith based support and specific cultural communities during the next 12 months through monitoring visits – and that the outcomes of such monitoring will be reported to the Social Services Scrutiny Committee on an annual basis.

The response includes clear timelines for the completion of the actions noted, and also identifies an accountable individual or team who will be responsible for completing the actions. The clarity of this approach should enable quality and impact of these services, and any changes made to them to be closely monitored by the Local Authority.

## **Requirement for Action 5.6**

### **Final Conclusion – Acceptable**

5.6 A National Improvement Service is established to improve care homes where Local Authorities, Health Boards and CSSIW have identified significant and/or on-going risk factors concerning the quality of life or care provided to residents and/or potential breaches of their human rights.

The national improvement team should utilise the skills of experienced Care Home Managers, as well as other practitioners, to provide intensive and transformational support to drive up the standards of quality of life and care for residents as well as to prevent and mitigate future safeguarding risks.

This service should also develop a range of resources and training materials to assist care homes that wish to improve in self-development and on-going improvement.

The Local Authority's response to this Requirement for Action was previously determined to be acceptable. Therefore no further analysis has been undertaken.

## **Requirement for Action 6.2**

### **Final Conclusion – Acceptable**

6.2 Care home providers, commissioners and CSSIW should develop informal and systematic ways in which to ensure they better understand the quality of life of older people, through listening to them directly (outside of formal complaints) and ensuring issues they raise are acted upon.

Annual reporting should be undertaken of how on-going feedback from older people has been used to drive continuous improvement (see action 6.10).

The Local Authority's response to this Requirement for Action provides comprehensive information on the actions that the Local Authority takes in order to listen to the voices of older people, and to use this to drive continuous improvement in the quality of life, and care of older people in care homes.

The Local Authority has clearly described its current approach to collating information about quality of life which includes the use of both formal, and informal methods. For example, the use of a quarterly report from Age Cymru's Independent Advocacy Service, as well as utilising Commissioning and Contract Monitoring Team visits where the views of residents are actively sought. Furthermore, I welcome that the Local Authority is currently seeking permission for the Commissioning and Contract Monitoring Team to attend care home resident meetings to listen to their views and experiences.

The response also describes the development of a Quality of Life framework that will improve the Local Authority's ability to understand and monitor quality of life through collating information from residents on the aspects of this framework. I welcome the regional introduction of the online 'trip advisor style feedback' system. This has the potential to give residents and their families the opportunity to feedback to the care home and Local Authority in real time. However, while I recognise that this initiative is in early stages, I would expect that older people themselves

are supported to access this feedback system through a variety of means and that evidence of impactful change and improvement on quality of life can be demonstrated as a result.

These methods and commitments have the potential to ensure that older people's views about their care and quality of life are captured and shared on a regular basis and used to drive continuous improvement.

While there is no clear timeline provided, assurance is provided in detail about how the Local Authority intends to collate quality of life information which suggests internal deadlines are in place.

### **Requirement for Action 6.7**

#### **Initial Conclusion – Acceptable**

6.7 Annual Quality Statements are published by the Director of Social Services in respect of the quality of life and care of older people living in commissioned and Local Authority run care homes. This should include:

- the availability of Independent Advocacy in care homes
- quality of life and care of older people, including specific reference to older people living with dementia and/or sensory loss
- how the human rights of older people are upheld in care homes across the Local Authority
- the views of older people, advocates and lay assessors about the quality of life and care provided in care homes
- geographic location of care homes

Further details of reporting requirements should be included as part of the Regulation and Inspection Bill.

The Local Authority's response to this Requirement for Action was previously determined to be acceptable. Therefore no further analysis has been undertaken.