



Rhian Huws Williams
Chief Executive
Care Council for Wales
Southgate House
Wood Street
Cardiff
CF10 1EW

Cambrian Buildings
Mount Stuart Square
Cardiff CF10 5FL

Adeiladau Cambrian
Sqwâr Mount Stuart
Caerdydd CF10 5FL

10 August 2015

Dear Rhian,

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 analyse¹.

In analysing the responses received, I was looking for assurance, through the information provided, that my Requirements for Action will be implemented and the intended outcomes will be delivered for older people.

Your response demonstrates a commitment to delivering the change required that I outlined in my Care Home Review and details action that you have in place or will take to deliver a number of the intended outcomes. I am also pleased that you have provided a clear progress report, as well as detailed future actions, for delivering the required action and securing the desired outcomes.

¹ 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.

Of particular note is the detailed assessment about the extensive engagement that has been undertaken to identify and meet the learning needs of commissioners, as well as the information provided about future work that will be delivered in collaboration with the National Commissioning Board, the Welsh Government and the Association of Directors of Social Services.

This work has identified clear learning objectives that should enable commissioners to recognise good service provision and understand the context and responsibilities of social care commissioning in Wales.

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

On the basis of the evidence provided to me, I am satisfied that your organisation is already complying with two of my Requirements for Action or is committed to taking the action necessary to deliver the required change. However, there are still two areas that require further progress to assure me that the required change and improvement will be delivered for older people.

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 2015. On this date, I will make public my intention to undertake a follow-up Review in 18 months' time. At this stage I will be looking for tangible evidence that the outcomes I expect to see have been consistently delivered across the care home sector.

I will also be making a 'One Year On' statement in November that will provide more information on my planned follow up Review, its scope and the approach I will be adopting.

If it would be helpful for you to meet with me to discuss my analysis of your response, please contact me. 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 prominent initial 'S' and a trailing flourish.

Sarah Rochira
Older People's Commissioner for Wales

Care Council for Wales

The Care Council for Wales welcomes the Older People Commissioner's review on the quality of life and care of older people in care homes in Wales as a significant piece of work, highlighting the need to focus on the quality of life of older people in residential care in Wales.

Requirement for Action 5.1

Final Conclusion - Partial

5.1 A national recruitment and leadership programme is developed and implemented to recruit and train future care home managers with the right skills and competencies

The programme should include accredited continuous professional development for current and future care home managers and should support them to become leaders of practice and champions of a positive care home culture

Annual national reporting on the availability of skilled and competent care home managers in care homes across Wales, including the impact of vacancy levels upon older people's quality of life and care

There are a number of positive commitments and actions that the Care Council has made to ensure the recruitment and training of future care home managers with the right skills and competencies. I welcome these commitments and actions, and in turn, their potential to provide care homes with permanent managers who are able to create an enabling and respectful care culture and support paid carers to enable older people to experience the best quality of life.

For example, the commitment to undertake a long term programme for the development of social care managers and to increase the number of registered managers by 20% over a 3 year period 2015-18, and the

production of a social care manager framework consisting of preparation, qualifying and post qualifying programmes, which will be in place by 2017/18.

I raised a concern in relation to the Care Council's initial response to this Required Action as their initial response aligned current, previous and future planned activities only, rather than focusing on the specific requirements as laid out in my Review. I am therefore pleased that the Care Council has directly responded to this concern, by providing further details on developments to the social care management framework and welcome progression routes for social care workers with an evaluation of impact. This has the potential to be part of the solution to the current lack of care home managers in Wales.

However, while the Care Home Steering Group is highlighted as an opportunity to strengthen partnership working in relation to my Review it is unclear how this strategic group will provide an infrastructure to assist the Care Council in measuring the impact of care home manager vacancy levels upon older people's quality of life and care. I am disappointed that despite clear feedback highlighting the lack of assessment about the impact of care home manager vacancy levels upon older people's quality of life, and care that the importance of this requirement has not been grasped at an organisational or operational level. The impact of not doing this was highlighted in my Review as an increased risk of unacceptable quality of life and care for older people.

My expectation is that the Care Council will not only take steps to monitor the impact of their commitments and actions on the social care workforce but, and most importantly, on the quality of life and care of older people in care homes in Wales.

Requirement for Action 5.3

Final Conclusion – Partial

<p>5.3 A standard set of mandatory skills and values based competencies are developed and implemented on a national basis, for the recruitment of care staff in care homes</p>
--

It is clear that the Care Council Wales has and continues to articulate the skills and values based competencies that are needed by care home staff across a range of materials and ongoing work streams such as the Code of Professional Practice for Social Care. However, I am disappointed that no commitment has been made to publish these in a concise and accessible document, to assist providers in the recruitment of care staff in line with my Required Action.

Notwithstanding this, I am pleased to note the work with Job Centre Plus and Careers Wales and a commitment to evaluate the number of people who move into paid employment in social care including care homes. It is positive that an acuity tool is promoted across these networks to identify people with an aptitude for social care. In the absence of a standard set of skills and values based competencies as defined in my required action, my expectation is that the acuity tool would be reviewed, modified and promoted as a tool for providers to identify the suitability of potential recruits - in line with my previous feedback.

I raised a concern in relation to the Care Council's initial response to this Requirement for Action that there was no information provided regarding assessment or evaluation of the effectiveness of Care Council learning resources in terms of their ability to engage social care practitioners and therefore contribute to the creation of a positive care culture, and quality of life outcomes for older people. Without this information, it is difficult to assess the impact of current and proposed actions on older people, and the effectiveness of learning resources in promoting the delivery of compassionate and dignified care. I am therefore pleased to note that the Care Council has invested in a new online learning platform: 'Moodle', which will enable them to systematically monitor and evaluate the use of resources and learning tools that are available to the sector.

This is a positive step forward as an internal appraisal of Care Council resources is essential if the social care workforce is to be equipped to deliver against the ambitions of the Social Services and Wellbeing (Wales) Act and the Regulation and Inspection of Social Care (Wales) Bill.

There are a number of positive actions that the Care Council has and is committed to take/ing to address my previous concerns about whether

Care Council resources were commensurate with ensuring quality of life for residents and challenging the task based culture that I described in 'A Place to Call Home'. I have publically welcomed the social care induction in Wales Award, and the new code of practice for social care practitioners, which highlights the importance of residents' rights such as integrity, dignity and privacy. However I was particularly pleased to see the Care Council embrace new methods of learning to embed values based competencies in the social care workforce through the launch of their Home from Home DVD.

I believe this recent development has demonstrated an ability to engage with the hearts and minds of social care staff through leaving a powerful impression that can be built on, and nurtured by care home managers in their work to develop a positive care home culture. It also demonstrates that the Care Council have begun important work that will need to be continued by Social Care Wales to ensure the completion of my Requirement for Action in full. While a publicity campaign to promote best practice based on these materials is referenced I am unable to assess the impact of this campaign in terms of reach and the potential implementation of best practice as no further information is supplied to support this.

I fully recognise that the mandatory element of this Requirement sits outside of the Care Council's current remit but I am disappointed that no further reference has been made to my initial feedback about the importance of making a strategic business case for the inclusion of mandatory skills and values based competencies in Welsh Government's Regulation and Inspection of Social Care (Wales) Bill. As the statutory body tasked with ensuring that social care practitioners have the right skills and qualifications to work to a high professional standard, I had expected to see the Care Council actively pursue potential opportunities within legislation to do this.

My request for an explicit statement about how the Care Council will pursue opportunities to embed their resources into social care practice, care homes and through its ongoing work, and in collaboration with commissioners and CSSIW has been answered in part through reference to future opportunities as Social Care Wales within the implementation of the Regulation and Inspection of Social Care (Wales) Bill. Whilst I

recognise that the transition from Care Council of Wales into Social Care Wales will demand an element of internal focus, it is essential that strategic partnership work continues with clearly defined organisational objectives and outcomes that will improve the quality of life and care for older people as outlined in my Requirement for Action.

The response provides strategic timelines for the completion of the actions noted, and also identifies positive feedback from care home managers about the impact of the Home from Home DVD, but it does not provide sufficient assurances about how the Care Council will develop, and drive engagement with the social care workforce to maximise the change that I require to see as Commissioner. In the absence of mandatory requirements action in these areas this is essential as is ongoing monitoring and evaluation of resources.

Requirement for Action 5.4

Final Conclusion – Acceptable

5.4 A national mandatory induction and ongoing training programme for care staff is developed and implemented. This should be developed within a values framework and should include:

- The physical and emotional needs of older people, including older people living with dementia
- Adult safeguarding, emotional neglect and ‘never events’
- How to raise concerns
- Good communication and alternative methods of communication for those living with dementia and / or sensory loss
- Supporting without disabling
- The rights and entitlements of older people
- Care, compassion, kindness, dignity and respect

I welcome the Care Council’s commitment to achieve all aspects of this Requirement. In particular their honesty in acknowledging that some resources such as the Safeguarding training pack will need to be reviewed to reach the new benchmark set by my Review and changes in the current legislative programme. As well as current work developing a

‘Learning and Development Framework to set out the knowledge and skills needed for the workforce who might support people living with dementia. That will have values and rights at its core, drawing from the code of professional practice for social care and the declaration of rights for older people’.

I strongly welcome the approach through which the framework is being developed in consultation with care home managers, key stakeholders, and social care practitioners across the sector. This way of working has the potential to capture and reflect, real-life experiences that will challenge the ‘us and them culture’ that I highlighted in my Review.

I also welcome the commitment to evaluate the impact of the Home from Home DVD and online learning resource on managers and social care workers in April 2016. While the resource is accessible and highly engaging being able to measure and evaluate its impact in terms of the delivery of life outcomes for older people in Wales is vital, and I would expect this to be an explicit element of any evaluation.

By reflecting on the need to review pertinent training resources, evaluating a new resource, and, pledging to consult more widely to fully understand the challenges of social care in terms of practitioners, care home managers, and dementia champions, the Care Council has provided me with assurances that poor practices have the potential to be challenged by a range of appropriate training resources that they have researched, developed and commissioned.

I therefore welcome the commitment to strengthen partnership working with those agencies responsible for regulating, commissioning and contracting services to ensure that these resources are embedded in practice, as well as workshops with Registered Managers.

However, rather than ‘a commitment to explore the development of a network of dementia care practitioners and champions across the social care sector including care homes as a means of building and sharing expertise in the sector’. My expectation is that creating opportunities for good practice in dementia care to be shared should be a standard offering as part of the Care Council’s remit to both professionalise the workforce and safeguard older people from poor cultures of care.

Requirement for Action 6.11

Final Conclusion - Acceptable

6.11 A national, competency based, training programme is developed for commissioners, to ensure that they understand and reflect in their commissioning the needs of older people living in care homes, including the needs of older people living with dementia

I welcome the Care Council's response to this Requirement for Action which provides a detailed assessment about extensive engagement undertaken to identify and meet the learning needs of commissioners, and future work to be achieved in collaboration with the National Commissioning Board, Welsh Government and the Association of Directors of Social Services.

This work has identified clear learning objectives which will enable commissioners to recognise good service provision and the context and responsibilities of social care commissioning in Wales. I am particularly pleased to note the progress report, which provides a clear analysis of the learning needs of commissioners as well as clear themes for development such as engaging and developing the market, and the need for standards addressing the population needs assessment.

I raised a concern in relation to the Care Council's initial response to this Requirement for Action that there that was no timeline or milestones for the completion of this work or clarity about commitment from key partners. The Care Council has responded with a clear aim to work with a learning provider to develop training and / or qualifications by the end of 2015, and evidence of strategic buy-in from key players. Without which there was a risk that action may not have been sufficiently prioritised.

Whilst the response does not provide a detailed timeline, the clarity of the Care Council's approach to commissioning (in terms of learning objectives) should enable the delivery of a quality product that will reflect the needs of commissioners and build their understanding about the context and responsibilities of commissioning care home placements.