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10 August 2015

Dear Ms Morgan

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 responses 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 demonstrates a commitment to delivering the change required that I outlined in my Care Home Review, and details action you have in place or will take to deliver a number of the intended outcomes. I am pleased that your organisation has used the constructive feedback that I provided earlier in the year to improve your response. 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, care home managers will have to report and reflect on the range of befriending and community links that have been

developed and include feedback from residents in their annual 'Quality Review Report' (Requirement for Action 3.3).

I am therefore satisfied that your organisation is already complying with the majority of my Requirements of Action or is committed to taking the action necessary to deliver the required change. However, I must note that there are still two areas which require further work to assure me that the required change and improvement will be delivered for older people. 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 my intention to undertake a follow up review in 18 months' time at which stage I will be looking for tangible evidence that the outcomes I expect to see have been consistently delivered across the care homes in your area. 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, flowing style.

Sarah Rochira
Older People's Commissioner for Wales

Ceredigion County Council

I welcome that the Mid and West Wales Health and Social Care Collaborative, states that it will: “continue to play a key role in disseminating learning and bringing agencies together to address challenges and continue our shared journey of improvement”.

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 response from the Local Authority to this Requirement for Action includes a number of positive actions or commitments that have the potential to ensure that older people are able to secure their rights and have their concerns addressed in situations where they are vulnerable.

The response provides details of the current advocacy provision and I welcome that the Local Authority has commissioned a partner to undertake a consultation exercise to determine which type of advocacy service individuals would prefer.

I am pleased to see that the Local Authority is committed to improving its collaborative working with the Health Board to joint tender for more permanent advocacy support in the area. While the Local Authority does not appear to currently provide independent advocacy in all of the

situations outlined within the Requirement for Action, the response includes a clear plan and timeframe in which the Local Authority will jointly develop and implement a new advocacy specification with the Health Board. I welcome that the response clearly commits to including specific reference to the circumstances outlined within the Requirement for Action in the new advocacy specification. Furthermore, it is good to see that the Local Authority has committed to developing clear guidelines for staff based on the Requirements for Action.

The response includes clear timeframes for the completion of the identified actions, and identifies accountable individuals which should enable the Local Authority to closely monitor the progress and implementation of these actions.

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.

The Local Authority's response to this Requirement for Action stated that the Health Board has contributed to the update for this section. It includes a reference to a number of ongoing or planned reviews of service provision that would support the Local Authority and Health Board to better understand the level of access to specialist, multi-disciplinary care services that support rehabilitation.

For example, the response states that the Local Authority and Health Board are working together to review reablement services, an analysis of gaps will take place on gaps in service through established forums such as the Falls Group, and there is a review of Occupational Therapist/Physiotherapist training. The response recognises that more work is needed in order for it to understand the experiences of service users, and that processes need to be developed in order to capture experiences.

I welcome these, as without truly understanding whether individuals can access such services, the Local Authority and Health Board will not be able to shape provision in order to provide full support to older people following ill health, that will enable them to maximise their independence and quality of life.

The response sets a clear timescales for implementation of this work to commence, and also names an accountable lead individual. I welcome the collaborative approach that has been taken to improve access to multidisciplinary care and specialist services and the use of an integrated services board to oversee progress. 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 and Health Board.

Requirement for Action 3.2

Final Conclusion - Partial

<p>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.</p>
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I welcome that the response from the Local Authority demonstrates a clear commitment to prioritising access to basic dementia training for care home staff.

For example, the response states that basic dementia awareness training is one of a suite of mandatory training courses for all care staff of all Local Authority care homes and that the Local Authority care home staff have access to a two day course run by the Alzheimer's Society. While these actions relate to Local Authority run care homes, there are other positive actions that relate to all care homes in the area. Such as, a target for fifty percent of all staff to become Alzheimer Society Dementia Friends, the introduction of dementia champions and for all care home providers to demonstrate that all of their staff have participated in basic dementia awareness training.

These actions do have the potential to ensure that care staff are able to understand the physical and emotional needs of older people living with dementia. Furthermore, I welcome that there are clear timescales for the completion of these actions, identified accountable individuals and also identified links with the Health Board.

However, the response does not provide sufficient demonstrable evidence that all care home managers will have further dementia training included as a specific element of supervision and performance assessment.

Therefore, despite the clear commitment and actions being taken by the Local Authority to provide dementia awareness to staff, I cannot have full assurance that the training will change practice in care homes and that the Requirement for Action will be fully met.

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.

I welcome that the Local Authority's response to this Requirement for Action has demonstrated an understanding of the importance and benefits of befriending opportunities. For example, the response states that activities can 'enhance the engagement of residents and sense of belonging and achievement'.

There are a number of actions that the Local Authority has committed to taking which have the potential to improve the access that older people in care homes have to befriending and meaningful social contact. The volunteering opportunities for the care home League of Friends and the Ceredigion Association of Volunteering Organisations will be explored. The Local Authority Social Care Plan has activities development as an objective, and all care homes will be encouraged to expand their community activities. This is essential to reduce the risk of older people in care homes becoming lonely and socially isolated.

It is good that care home managers will have to report and reflect on the range of community links that have been developed and include feedback from residents in the annual 'Quality Review Report'. This should develop their awareness of where schemes or initiatives have been successful or need improving. Furthermore, I welcome that the ASCOT Care Homes Tool will be used to measure the success of community links and befriending initiatives on quality of life, for Local Authority homes. However, I would expect a similar approach to be taken to enable the Local Authority to fully understand the impact that befriending can have on the quality of life of individuals living in independent care homes.

The response sets a clear timescales for implementation of this work to commence, and also names an accountable lead individual, this should enable any changes made to these services 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, Local Authoritys 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 – Partial

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 includes information on a number of methods that it uses to gain the views and experience from older people and their families.

For example, the response references an annual questionnaire that is undertaken and describes how care home managers must include within their Annual Quality Review Report what improvement actions they have taken in response to this. Furthermore, the response describes how the ASCOT toolkit and SOFI type visits are being used to improve how the Local Authority understands quality of life.

I welcome these clear commitments to improve the Local Authority's understanding of quality of life, and to demonstrate how care home managers have changed services as a result of listening. The response sets a clear timescale for implementation of this work to commence, and also names an accountable lead individual, this should enable any changes made to these services to be closely monitored by the Local Authority.

However, I must note that these appear to be formal methods of gathering feedback from older people. Apart from a brief mention to 'regular residents meetings' and 'individual feedback', there is no information provided on the informal and on-going way that the Local Authority listens to the voices of older people to develop a thorough understanding of day to day quality of life. By relying on formal methods only, there is a potential that opportunities to make small changes that can make a

significant difference to quality of life are missed and they then become significant, impactful and costly to remedy.

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.

I welcome that the Local Authority's response commits to complying with the Requirement for Action and including information on the quality of life and care of older people living in commissioned and Local Authority run care homes in an Annual Quality Statement. This will ensure that older people have access to relevant and meaningful information about the quality of life and care provided by or within individual care homes, and there is greater openness and transparency in respect of the quality of care homes. I am pleased to see a number of actions that the Local Authority will take in order to support the development of the AQS, such as improvements in the current Quality Review Reports for care homes and 'overview report from combined reports by service managers.