



Ms Bronwen Morgan
Chief Executive
Ceredigion County Council
Neuadd Cyngor Ceredigion
Penmorfa
Aberaeron
SA46 0PA

Cambrian Buildings
Mount Stuart Square
Cardiff CF10 5FL

Adeiladau Cambrian
Sqwâr Mount Stuart
Caerdydd CF10 5FL

17 April 2015

Dear Ms Morgan

Formal written notice issued under the Commissioner for Older People (Wales) Act 2006: Additional Information Required

I would like to take this opportunity to thank you again for providing a timely response to my Requirements for Action, which were published alongside the findings of my Care Home Review.

I have now had an opportunity to review all of the responses from the bodies subject to my Review and I enclose my evaluation of your response.

If you raised specific questions with me about my Requirements for Action, please find attached my response to these.

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 outcome will be delivered.

As you will see from my analysis, I have clearly set out whether each element of your response is 'acceptable', 'partial' (further information needed) or 'unacceptable'. Acceptable means that my assurance levels based in the information provided are sufficient, partial and unacceptable means that I require further information to be assured that the

Requirement for Action will be implemented and its intended outcome delivered.

Where I have concluded that an element of your response is either partial or unacceptable, I require further information or a revised approach in order to be satisfied that your organisation is already complying with the Requirement for Action or is committed to taking the action necessary to deliver the required change. This information should be provided to me by **Friday 15 May 2015**, in line with the timescales specified in the Commissioner for Older People (Wales) Act 2006. If you are unclear about any aspect of your response, in particular what would provide the level of assurance that I am looking for, or have any detailed questions regarding the Requirements for Action, you are welcome to contact me.

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. I will also be publishing an overall commentary on whether I consider, based on the further information I receive, that the change I expect to see on behalf of older people will be delivered. In addition to this information being published on my website, I will also be making a formal public statement, both in respect of an overview of action underway and action intended by individual bodies subject to the Review.

If you require any further information, please contact my Director of Wellbeing and Empowerment, Daisy Cole, on 08442 640670.

Yours sincerely



Sarah Rochira
Older People's Commissioner for Wales

Ceredigion County Council

Requirement for Action 1.6

Initial Conclusion - Partial

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 appears to demonstrate an understanding of the types of available advocacy services, referring to IMCAs and IMHAs as well as reference to support for residents during a POVA. However, there is little detail explaining current use against the Requirements for Action.

The response also acknowledges the support available in the 3rd Sector and refers to a number of organisations such as Age Cymru, CAB, Alzheimer's Society, MIND and Shelter.

The Local Authority acknowledges that advocacy support needs to be improved and is currently working on a policy in relation to availability of services specific to care home reconfiguration. Whilst this is welcome, a brief summary about how improvement and alignment to comply with Requirement for Action will be met as well as a clear timeline with named

accountable individuals to provide assurance that the Requirement for Action will be achieved.

Requirement for Action 2.2

Initial Conclusion - Partial

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 appears to demonstrate an understanding of the range of specialist services available such as dieticians, continence nurses, pharmacists and cardiac nurses as required. The Local Authority also indicates that OTs and physiotherapists visit care homes in the county; however, the frequency is not stated.

The response does not identify shortfalls or gaps in provision. This needs to be made clear and the Local Authority should provide a summary of appropriate actions, a timeline, with accountable individuals, and information on any joint work being carried out with the Health Board.

Requirement for Action 3.2

Initial Conclusion - Partial

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.

The Local Authority's response to this requirement appears to demonstrate an understanding of the importance of dementia training and indicates that staff will undertake Dementia Awareness training during the next financial year. It would be helpful if the Local Authority could clarify if this training extends to all care home employees.

The response also indicates that it is hoped that Dementia Champions will be appointed in care homes. It would be helpful if the Local Authority could provide more detail with regard to their understanding of dementia champions.

The response does not provide any further detail and does not identify any gaps and shortfalls in provision or specific timelines with regard to planned training.

Requirement for Action 3.3

Initial Conclusion – Partial

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 appears to demonstrate a lack of understanding of what befriending is, stating that "visitors are welcome at any time." This response provides a narrow perspective on the quality of life that befriending and intergenerational work can bring. However, the response also provides evidence that various clubs and school children visit homes in Ceredigion. This is more encouraging with regard to the range of ways that quality of life can be improved; however, there is no specific detail provided about initiatives to prevent loneliness and isolation and improve quality of life.

The Local Authority response also states that homes have very close links with local communities with residents invited to contribute to local arts and

crafts shows. In addition, family and friends are invited to join in social occasions.

The response also considers spiritual and religious needs, stating that services are held regularly and vicars/preachers visit regularly to speak to residents and that all faiths are accounted for.

The Local Authority also indicates that a project is due to commence for which drama students from a local university will develop performances with care home residents.

Whilst these initiatives are welcomed, they are not specifically linked to befriending. A brief summary of how this will impact the quality of life of residents would be useful in each case.

Requirement for Action 5.6

Initial 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 welcomes the National Improvement Service and clearly demonstrates a willingness to engage and support it.

Requirement for Action 6.2

Initial 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 appears to demonstrate a good understanding of the importance of listening to the voices of residents and using this as a basis for improvement. The response indicates that in order to address quality of life issues in care homes, both ASCOT and SOFI type observation tools are to be introduced. The response could be improved through a timeline and named accountable individual and clarification on the scope of this work.

The response states that providers share Annual Satisfaction Reports with Contracts Team which include residents' views of service provision. It does not state how this information is currently used.

The response states that there is an NQA framework in existence across all Local Authority homes and these are externally audited annually.

Requirement for Action 6.7

Initial Conclusion – Partial

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 does not specifically commit to the Commissioner's requirement. Whilst the Local Authority indicates that existing reporting practice includes an overview of the quality of adult social care, the response acknowledges that this will need to be strengthened to include the NQA Annual Reports for each home, producing a new reporting framework. The response could be improved through a brief summary of the scope of this proposed work and an assurance that the Local Authority will comply with the Requirement for Action.