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Dear Dr Jones

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, and that you have detailed what review and evaluation procedures you have in

place to provide assurance at a senior level in your organisation that the required outcomes will be delivered.

Your organisation has proposed the proactive development of new services or processes which have the potential to progress as best practice. For example, you have included feedback from Managers on the benefits that staff experienced from dementia training, including an increase in confidence when communicating and the ability to reflect on practice and behaviour for future improvement (Requirement for Action 3.2).

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.

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

Isle of Anglesey County Council

The Local Authority states that it welcomes the comments and feedback that I was able to provide after its initial response to my Review Report, 'A Place to Call Home?'

I welcome that there are a number of measures listed that should enable the Local Authority to monitor progress against each action, such as a task and finish group to assure implementation and the development of performance measures. Furthermore, it is good to see that for shared actions across the Local Authority and Health Board, progress will be overseen by the local Integrated Delivery Board on a quarterly basis. I would expect that as this programme of work develops, regular reporting takes place through these arrangements, or another appropriate channel, within the Authorities corporate governance structure and to the public.

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 indicated in its initial response to the Requirement for Action that it will contribute to a service commissioned by Gwynedd County Council which will deliver on the specifications noted within the Requirement for Action. However, I raised a concern that there was insufficient detail in the plan to be assured that this would deliver the desired outcomes for older people.

Therefore, I welcome that this response provides a clear action plan to agree a service specification, review the contract and agree ongoing provision. Furthermore, I am pleased to see that the Local Authority has committed to monitor provision on a yearly basis. This has the potential to ensure that older people are able to secure their rights or have their concerns addressed, particularly in situations where they are vulnerable, on an ongoing and long term 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 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 states that multidisciplinary care and reablement support is provided by Mon Enhanced Care and Reablement service, and I was pleased to see a commitment to joint working with the Health Board in the initial response.

I welcome that the response commits to undertaking a piece of demand/capacity work to understand whether the current service provision is able to support older people in care homes to maximise their independence and quality of life, possibly after a period of ill health. Furthermore, there is a clear commitment from the Local Authority to develop an action plan to address any shortfalls that are discovered. It is good to see 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 the demand/capacity work and any resultant actions to be closely monitored by the Local Authority.

I must note that the response would have been strengthened by the provision of details of other specialist services that go into care homes such as community nurses. Furthermore, the ability for the Local Authority to improve the provision of multi-disciplinary care and specialist services to deliver the desired outcomes within this Requirement for Action, rests on the quality of the demand/capacity work and actions for improvement that arise as a result.

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.

The response to the Requirement for Action from the Local Authority states that comprehensive dementia training is available locally, and provides detailed information on the numbers of staff that have attended such training and the details of that training.

The response includes feedback from Managers on the benefits that staff and older people experienced following the training, including an increase in confidence when communicating and the ability to reflect on practice and behaviour for future improvement. This is very welcome, and provides an insight into the impact that dementia training can have on staff ability to understand the physical and emotional needs of older people living with dementia and the positive effect this can have on their quality of life.

I welcome that the Local Authority commits to assessing the current performance against the Requirement for Action and if the provision of training is not sufficient, to implement an action plan in order to achieve compliance. Furthermore, it is good to see that the Local Authority has planned for a reassessment of the provision of dementia training in the future. This should ensure that dementia training is provided to care home staff on an ongoing 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 3.3

Final 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 response to this Requirement for Action provides a detailed overview of current befriending provision within the area. It is clear from the information provided that befriending is heavily biased towards provision within people's own homes, and the response states that there is no specific services focussing on care homes. Furthermore, the information provided does not refer to the importance of intergenerational projects or faith based support. This is important so that older people can continue to interact with the wider community, practice their faith and maintain important cultural links and practices.

However, despite these weaknesses, I welcome that there are a number of positive actions highlighted within the response that should improve the provision of such services and as a result enable older people to maintain meaningful social contact. For example, the Local Authority has committed to discuss the potential expansion of befriending schemes to care homes, states that it will highlight to providers their commitments to maintain faith based relationships, and commits to establishing formal links to the Children & Young People's Partnership.

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. However, given the large gaps in current service provision, I would have welcomed the inclusion of another step in the plan to reassess access to, and quality of befriending schemes in the future with the particular inclusion of faith based support and cultural communities.

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 was previously determined to be acceptable. Therefore no further analysis has been undertaken.

Requirement for Action 6.7

Final 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.