



Mr Richard Parry Jones
Chief Executive
Isle of Anglesey County Council
Council Offices
Llangefni
Isle Of Anglesey
LL77 7TW

Cambrian Buildings
Mount Stuart Square
Cardiff CF10 5FL

Adeiladau Cambrian
Sqwâr Mount Stuart
Caerdydd CF10 5FL

17 April 2015

Dear Mr Parry Jones

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.

It is clear from your response that you have given this considerable thought and focussed strongly on the outcomes that I am seeking to secure on behalf of older people.

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

Isle of Anglesey County Borough 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 awareness of the role of advocates and briefly refers to the range of services and providers in the area. The Local Authority's response indicates that from April 2015 it will contribute to a service commissioned by Gwynedd County Council which will deliver on the specification above.

Whilst this is welcome, the Local Authority has not provided any detailed feedback on either current provision or what changes to current provision.

The response would benefit from an analysis of current provision and of any action plans aimed at addressing gaps and shortfalls, which includes clear timelines, and accountable named officers.

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 awareness and an understanding of a range of multi-disciplinary care and specialist services that are currently available. The response indicates that the Local Authority in partnership with the Health Board are making arrangements to ensure that currently existing multi-disciplinary teams will support residents following admission to hospital and return to care homes.

The Local Authority states that depending on the nature of admission an assessment will be made of the rehabilitation potential in each instance. The response identifies two specific teams who are responsible for assessment.

Whilst this is welcome, the response would benefit from a brief analysis of current provision and of any action plans aimed at addressing gaps and shortfalls, which includes clear timelines, and accountable named officers.

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 awareness and understanding of the importance of dementia training and indicates that its training department offer a Dementia Awareness training session which is accessed by all relevant local authority staff, and is available to all staff in local residential and nursing homes.

The Local Authority also indicates that it is aware that training is offered by Bangor University which support local providers. However, the response does not indicate how this is used or at what level the training is pitched.

The Local Authority's response also identifies specific awards at QCF level 2 and 3 which are available to all internal and externally employed staff.

It is welcome that the Local Authority has indicated that as part of its annual monitoring of care homes, it will review uptake of this training and make recommendations where necessary if performance is insufficient.

Whilst there is much to welcome, the response would benefit from an analysis of current provision and of any action plans aimed at addressing gaps and shortfalls, which includes clear timelines, and accountable named officers.

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 an understanding of the importance of befriending, stating

that it publicises current and developing new befriending schemes and that these will be championed in provider forums in the coming 6 months in order to improve access.

The Local Authority also states that it will both encourage such developments and monitor their progress during annual assessments.

The response does not however address the specifics of the Commissioner's Requirements for Action and does not provide any idea of the Local Authority's current service access/provision.

The response would benefit from a brief analysis of current provision and of any action plans aimed at addressing gaps and shortfalls, which includes clear timelines, and accountable named officers.

Can you please confirm when you will be able to report on this outstanding evidence? Information is required by **1 MONTH**.

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's response demonstrates a commitment to implement a National Improvement Service and states that it is supportive of the development of a NIS and welcomes opportunities to be involved in its development.

Requirement for Action 6.2

Initial 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 appears to demonstrate some understanding of the importance of listening to the voices of older people and ensuring that the issues raised are acted upon.

The response indicates that the Local Authority is currently working with Age Concern and that it has trained two lay individuals to act as Peer Monitors in all homes on Anglesey. The response goes on to explain that the Local Authority plans to roll out the programme of training to more individuals.

The Local Authority provides some information relating to an "action plan," stating that lay assessors will be supported to hold informal conversations with care home residents and feedback to all partners in a simple way which does not replicate formal inspections and that a partnership approach including registered providers will be taken.

It is welcome that the response states that feedback provided to care homes and commissioners will be used to inform future developments

and where positive trends are highlighted this will be used to roll out good practice.

A clear timeline has been provided in the response.

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 acknowledges the need to develop Annual Quality Statements and welcomes this initiative.