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17 April 2015

Dear Ms Davies

**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**

## Vale of Glamorgan County Council

### Requirement for Action 1.6

#### Initial 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 response demonstrates a good awareness of the range and availability of advocacy services across the Vale. It indicates that the Local Authority currently commissions advocacy services for individuals in care homes through Age Connects, Cardiff and the Vale and that all care homes in the Vale participate in this scheme. Any issues that arise through this process are shared with the Council where appropriate - specific detail as to appropriateness is not included in the response.

The response states that advocacy arrangements are reviewed on an annual basis and the next review will include a requirement to provide support to individuals where a care home is “experiencing difficulties,” so that residents receive timely information and appropriate support.

Importantly, the response states that the Local Authority will be reviewing all the independent advocacy services it provides once the Welsh Government has made clear, in regulations and codes of practice,

national expectations and standards arising from the Social Services and Well-being Act.

## **Requirement for Action 2.2**

### **Initial 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 appears to demonstrate an understanding of the need for rehabilitation support services. The statement provides some detail of this, but it would be helpful if the Local Authority could expand on some of the examples provided.

The Council currently works in close partnership with the Cardiff & Vale UHB to ensure that individuals have on-going access to specialist services and multi-disciplinary care. Specialist staff, such as dieticians and pharmacists, have attended meetings of the local Care Home Forum to meet with providers and share improved working practices with them.

The response states that there is a multi-disciplinary assessment team in place specifically designed for people in care homes and for individuals with nursing & continuing health care needs. There is also a scheme in place in Penarth that ensures continuity of care in care homes by a named GP and we will be looking to extend this approach throughout the Vale.

The response also highlights the fact that a specialist multi-disciplinary service is in place for older people with mental health problems. This provides not only social care but also a nursing, psychiatry and psychology service.

## **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 the Local Authority undertakes an annual survey of all training providers to ascertain the training requirements of their staff. This information is then used to inform the Social Care Training Programme through which providers are able to book free training courses for their staff.

The response states that Basic Dementia training is standard course on the training programme. In addition, it indicates that the Local Authority is working with the UHB to develop a training programme in relation to dementia services to support the implementation of the Three Year Dementia Plan which operates across Cardiff and the Vale.

Although the response demonstrates an understanding of need, it does not provide specific detail about programme content and practical applications. In addition, timescales are required and detail of who will lead is required.

More information is also required specific to the Commissioner's Requirement for Action which highlights supervision and performance assessment to create and assure of culture change.

## **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, indicating that some homes in the Vale have adopted innovative approaches to ensure that residents have a wide range of social opportunities.

The Local Authority states that it will work with the sector to ensure that this good practice operates throughout all sectors. It will look to promote, both internally and through the Care Home Provider Forum, befriending schemes within care homes.

Whilst this is welcome, further detail about the social opportunities articulated is needed to make an assessment of current provision against the Requirement for Action.

The response refers to a number of initiatives aimed at improving the Quality of Life of residents; however, without an analysis and evaluation of the outcomes these initiatives have and will achieve in the future, it is difficult to judge whether the local Authority will deliver the Requirement for Action in reality.

## **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 response demonstrates a commitment to develop and implement a National Improvement Service. The statement follows up with details of current work that feeds into the NIS.

## **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 an understanding of the importance of listening to the voices of older people and ensuring that the issues raised are acted upon.

There is some indication that the Local Authority uses the voices of residents to inform and influence care home services; for example, the response refers to "routinely consulting with residents" after which the information collected is fed back to the care home and "action plans" are developed.

The statement indicates that commissioned independent advocacy services for individuals in care homes through Age Connects - Cardiff and

the Vale take on a role in representing the individual and collective concerns of residents. The Local Authority also operates its own consultation programme, which reports annually to Scrutiny Committee.

The response states that the Local Authority routinely consults with residents within the care homes it manages regarding their experiences within the home. The information received is reported back to the homes and actions plans are developed to address any concerns raised. Work is currently being undertaken to determine how this approach could be rolled out across the independent sector.

Whilst this information is welcome, it is difficult to judge how older peoples' voices actually influence change in service provision without examples and analysis of current provision, with a clear action plan to address gaps and shortfalls, with a named accountable officer.

## **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 demonstrates willingness and intent to produce AQSs.