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10 August 2015

Dear Dr Paterson

### 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'. I welcome the inclusion of a position statement alongside an action plan, and 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, you are working with Betsi Cadwaladr University Health Board to develop a dementia 'leadership through coaching' training module for care home managers (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. However, 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 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**

## Wrexham County Borough Council

### 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's response to this Requirement for Action provides a description of the advocacy providers and services that are currently available and also provides details of a number of actions that it has committed to in order to improve the availability that older people have to advocacy.

For example, the Local Authority states that advocacy has been used to support older people when a care home is under Escalating Concerns and also as part of safeguarding processes. Furthermore, a new regional service specification for care homes providing care for people living with dementia requires that access to independent advocacy is enabled. I am disappointed that the response does not explicitly reference the offer of advocacy to older people when they need support to leave hospital. However, my expectation is that this is provided to older people as part of the advocacy service commissioned by the Local Authority.

I raised a concern in relation to the Local Authority's initial response that it was not clear whether the advocacy provision described was available to all residents, regardless of how their placement is funded. Therefore, it is good that the Local Authority has provided clarification that advocacy

services are available to all care home residents regardless of funding method.

The Local Authority has stated that it will amend its contracts with current advocacy providers to ensure that the provision of advocacy within care homes is explicitly included, and that they will use contract monitoring visits to ensure that care home managers and staff are fully aware of the availability and purpose of advocacy. I welcome that the Local Authority has committed to monitor and evaluate the use of advocacy services and address any gaps in the knowledge, process and use of advocacy through improved training and the care home owners forum. This should ensure that the provision and quality of advocacy is improved across the whole area and that weaknesses are identified and acted upon.

I am pleased to see that the actions outlined by the Local Authority have the potential to ensure that older people can secure their rights and have their concerns addressed when they are in potentially vulnerable situations through their access to independent advocacy. The response includes clear timelines for the completion of the actions noted, and also identifies an accountable individual or team. The clarity of this approach should enable the 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.
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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 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 Local Authority's response to this Requirement for Action includes a number of actions and commitments that should ensure that all care home staff understand the physical and emotional needs of older people living with dementia.

For example, the Local Authority states that it invests significantly in training and development and that dementia awareness training is made available to all staff. I welcome that the Local Authority has committed to monitoring attendance at training, and to review the training requirements of the sector to take the necessary action and build any changes into the workforce development plan. This should ensure that issues such as low attendance or improvements in training materials are picked up and actioned swiftly. Furthermore, the Local Authority provides information on a new regional service specification for care homes providing care for people living with dementia and describes how staff members must undertake a planned induction programme which includes approaches and skills needed to care for people living with dementia.

While the response recognises that advanced dementia training has not been delivered for care home managers, it does state that dementia training has been identified as a priority area for care home managers. There are examples provided of the training modules that are already available to care home managers, however I particularly welcome the joint work that the Local Authority describes with the Health Board to develop a new dementia 'leadership through coaching' module for care home managers. It is my expectation that when this work has been piloted and evaluated, for all care home managers in the area to receive this training.

Finally, it is good to see that the Local Authority has committed to including the review of supervision and appraisal documentation within its

contract monitoring to ensure that skills and knowledge in dementia care are evidenced and maintained.

The response includes clear timelines for the completion of the actions noted, and also identifies an accountable individual or team. The clarity of this approach should enable the 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 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 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.