



Dr Helen Paterson
Chief Executive
Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Cambrian Buildings
Mount Stuart Square
Cardiff CF10 5FL

Adeiladau Cambrian
Sqwâr Mount Stuart
Caerdydd CF10 5FL

17 April 2015

Dear Dr Paterson

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

Wrexham 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 services in use and providers in the area, additionally stating that Independent Advocacy is funded via 2 services – Dewis CIL and Independent Advocacy Works.

In terms of specific detail, the response provides a useful summary of the types of available provision, stating that Dewis CIL provides Independent Advocacy to all people using services commissioned by the Local Authority. It is unclear whether this extends to self-funders.

The response addresses the Commissioner's requirements and states that Independent Advocacy is regularly used during the safeguarding process and when care homes are closing.

In addition, the response points out that Independent Advocacy Works provides Independent Advocacy for those with fluctuating capacity or communication difficulties.

The response also summarises actions designed to monitor the use of Independent Advocacy services within care homes. It 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 and an assurance that the Requirement for Action will be achieved in reality.

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 awareness of the range of multi-disciplinary care and specialist services currently available. The response refers to positive outcomes achieved by their Re-ablement Team, allowing people to move from a care home and back into their own home.

The response also states that the Local Authority has expanded its falls service to work with care home residents to prevent avoidable admissions to hospitals and also to support timely discharge from hospital.

It is welcome that the Local Authority plans to work with the Local Health Board to ensure all care home residents have access to specialist services as part of the continued development of intermediate care services.

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 states that it currently provides "good" Dementia Awareness Training to all staff across the sector and that all staff will undertake an induction programme that includes the skills and approaches needed when working with people with dementia.

In addition, further specialist training is available based on Skills for Care Knowledge Set for Dementia. It appears that training is embedded in the Local Authority's approach to staff development.

The Local Authority also identifies plans to monitor the take up of dementia training and to roll training out more widely. Timelines and leads have been identified.

To fully address the Commissioner's requirement, evidence could be provided that all Care Home Managers receive additional dementia training as part of their on-going development as this is not fully addressed in the Local Authority's response – it does state an action to review and build in training requirements into the workforce development plan going forward; however, it does not specifically state that all Care Home Managers will be fully dementia trained.

The response does not address issues of supervision and performance assessment. The response would benefit from a provision of assurance in this regard, that the Local Authority will achieve the Requirement for Action in reality.

Requirement for Action 3.3

Initial 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 appears to demonstrate some understanding of the importance of befriending, stating that there are befriending schemes available in the region; however, the Local Authority is unclear on what level of activity takes place. The response is therefore lacking in evidence on how befriending in care homes encourage intergenerational links, support residents to retain and develop friendships and links with specific cultural communities – all things identified in requirements.

There is a peer support programme for care home owners to try to improve the level of activity but there is no detail on what actions have developed from this group to improve befriending.

Good practice is identified through the use of Community Agents to help tackle social isolation of older people and the response states the potential for this work to identify positive links with Care Homes. A lack of detail on whether this service currently works within care homes detracts from the effectiveness of the response.

The Local Authority indicates that it plans to audit befriending services, evaluate outcomes of work taking place within care homes and extend the Community Agents initiative. Leads and timelines are identified.

The response demonstrates a commitment to deliver the Requirement for Action within a specified timeframe, although it is not currently delivering outcomes for older people in all specified areas.

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 willingness to comply with the requirement and assist in the development of a National Improvement Service.

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 an understanding of the importance of listening to the voices of older people and ensuring that the issues raised are acted upon. The Local Authority talks about an initiative currently in place to identify quality of life, namely, the 'Getting Engaged' strategy that includes older people being trained as peer reviewers to help ensure quality of life issues are addressed. This is good practice but has not yet been extended to care homes.

The response states that quality of life is currently included in the annual review process and that there is direct dialogue with residents and their families as part of this process. However, by its own admission, the Local Authority acknowledges that the use of the data provided from resident feedback could be better.

It is welcome that work on improving data sharing between the Local Authority and the Health Board is underway and that the Local Authority has identified engaging with older people as a priority for action

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 appears to commit to producing Annual Quality Statements. The response expresses support in principle and indicates a willingness to work on this and progress AQS development.

Both timeline and lead are identified.

Appendix 1:

Wrexham County Borough Council, questions raised

Requirement for Action 2.4

Question:

“WCBC to develop an annual quality statement in line with this requirement. Further clarification on whether a national template will be provided would be welcomed.”

This question has been interpreted as relating to the publication of an Annual Quality Statement by the Director of Social Services, and requests clarification on whether a national template will be provided.

The Commissioner has clear expectations about the information published by Directors of Social Services in the public domain about how they discharge their duties. Older people need to have access to relevant and meaningful information about the quality of life and care provided by or within individual care homes. It is the Commissioner’s view that there is a need for greater openness and transparency in respect of the quality of care homes across Wales.

The Commissioner recognises that some quantitative data may not be readily available yet; however, in the meantime this should not inhibit robust and transparent narrative reporting on the quality of life and care of older people living in commissioned and Local Authority run care homes. A lack of transparency undermines older people’s ability to make appropriate decisions, wider public confidence and acts as a barrier to systematic change.

It is the Commissioner’s expectation that Local Authorities will lead on the development and implementation of this Requirement. Therefore, the Commissioner would encourage your Authority to liaise with all Local

Authorities regarding the development of the Annual Quality Statement, including a national template. Your Authority may wish to raise this with the Association of Directors of Social Services to facilitate action.