



Older People's Commissioner for Wales
Comisiynydd Pobl Hŷn Cymru

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12 September 2011

Dear Minister,

**Dignified Care Hospital Review: feedback and Supplementary
Notice requesting further information by 12 October 2011**

I would like to thank you for responding on time to my request for further information in relation to my Review 'Dignified Care? The experiences of older people in hospital in Wales'. I appreciate the time and effort that have been spent in responding to my request.

As you are aware, it was my request that the Welsh Government respond to five of the recommendations, outlining how they will be complied with. If the Government's decision was to take no action in response to the recommendations, I requested an explanation for no action being taken. I received the Government's first response on 15 June 2011. After assessing this response, I issued Written Notice requesting further information in relation to Recommendations 7 (staffing levels), 10 (patient experience) and 11 (good practice) in order to

persuade me that the interests of older people will be safeguarded and promoted by the Welsh Government.

My team and I have assessed the second response thoroughly. We have had help from a panel of advisors whose names are listed on our website. The second response by the Welsh Government to Recommendations 7, 10 and 11 has not persuaded me that my recommendations will be complied with.

Recommendation 7

I requested further information as to whether the recommendations of the Expert Reference Group will be adopted in practice. The Group had recommended that the Welsh Government work with Health Boards to identify an appropriate tool to determine staffing levels and skill mix on wards where older people are cared for. My Review highlights the fact that older people's needs are increasingly complex. Recommendation 7 states that any tool developed by the Welsh Government "should encompass current and forecast levels of need in relation to the care of older people". Paragraph 1 of the Welsh Government's second response to Recommendation 7 is the only paragraph that directly addresses this Recommendation yet it does not provide enough detail for me to be persuaded that any future tool will take account of the increasing complexity of older people's needs nor does it say what work might be done to forecast future levels of need. Recommendation 7 also states that any new tool should "determine both appropriate staffing levels *and* how staff should be deployed".

I would like further information that addresses the substance of Recommendation 7 more fully, for example, the Terms of Reference that have been given to the All Wales Assistant Directors of Nursing Group as they undertake work to identify a measurement tool.

Recommendation 10

I made this Recommendation because we found that the current arrangements for capturing the experiences of patients were not

sufficient to allow their voices to be heard; they do not collect adequate numbers for robust analysis, or allow for comparison between organisations. This has implications for patients in general, but particularly for older people since the majority of patients are older people.

The findings of my Review would suggest that the current Fundamentals of Care Audit Tool is not working as effectively as it should. It has not been effective in significantly reducing abuses of dignity in the past seven years and is heavily reliant on quantitative data. It is also heavily dependent on systems implemented by staff, and makes no reference to routinely giving patients an easy and effective voice of their own. This can, therefore, only be a very partial way of capturing people's experiences. I am particularly concerned that the experiences of older people who are vulnerable or unable to speak for themselves should be captured; I do not believe that the response provided by the Welsh Government demonstrates a real commitment to this.

Recommendation 10 also says that "results should be made publicly available in a form allowing ease of understanding and comparisons over time, on a Wales-wide and on a Health Board and Trust basis". This has not been addressed by the second response.

I would like further information to convince me that Recommendation 10 will be complied with.

Recommendation 11

This Recommendation states that the Welsh Government should drive forward the evaluation and adoption of good practice across Wales, with an emphasis on securing positive, demonstrable changes in practice in the care of older people. The Welsh Government should hold the Health Boards and the Trust to account for their success in adopting good practice which enhances dignified care, or justifying why they have not done so.

The second response provides more information than the first response received from the Welsh Government. I recognise the work that is already taking place through 1000 Lives Plus and Free to Lead, Free to Care. I am pleased to see that a Dignity and Compassion in Care conference is planned for March 2012.

My report highlights that perhaps more needs to be done in addition to these existing initiatives in order to ensure the effective dissemination and uptake of good practice. I believe that the Welsh Government has a key role to play in holding Health Boards and the Trust to account. I would specifically like information about what the Welsh Government will do if Health Boards and the Trust consistently fail in adopting good practice which would enhance dignified care.

Therefore, in accordance with the Commissioner for Older People in Wales Regulations 2007, reg. 15(6), this letter constitutes Supplementary Notice to the Welsh Government requesting further information to persuade me that Recommendations 7, 10 and 11 will be complied with. Please provide this information no later than **Wednesday 12 October 2011 at 12 noon.**

I am required to keep a register, available to the public, containing details of the recommendations and details of further action I have taken, such as issuing Supplementary Notice. This register will be on our website along with all responses sent by the Welsh Government and this letter. The register will also be available in paper form on request.

Once I am satisfied that I have all the information needed, my team and I will be active in working to ensure that the recommendations become a practical reality which benefits older people in Wales.

If you have any questions about this letter that you would like to discuss, please contact Anna Buchanan on 02920 445034 or anna.buchanan@olderpeoplewales.com.

Yours sincerely,

Ruth S. Marks,

Ruth Marks
Older People's Commissioner for Wales