



Mr Mark James
Chief Executive
Carmarthenshire County Council
County Hall
Carmarthen
Carmarthenshire
SA31 1JP

Cambrian Buildings
Mount Stuart Square
Cardiff CF10 5FL

Adeiladau Cambrian
Sqwâr Mount Stuart
Caerdydd CF10 5FL

10 August 2015

Dear Mr James

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 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 outcomes will be delivered for older people.

Your response demonstrates a commitment to delivering the change required that I outlined in my Care Home Review, and details action you have in place or will take to deliver a number of the intended outcomes.

I am pleased that your organisation has used the constructive feedback that I provided earlier in the year to improve your response. It is good to see that the Local Authority is working with the Health Board within some Requirements for Action, and that you have detailed what review and evaluation procedures are in place to provide assurance at a senior level in your organisation that the required outcomes will be delivered.

Your organisation has proposed the proactive development of new services or processes which have the potential to progress as best practice. For example, you will monitor the impact of dementia training on care staff through supervisions and reflective practice sessions which will be held quarterly (Requirement for Action 3.2).

I am therefore satisfied that your organisation is already complying with the majority of my Requirements of Action or is committed to taking the action necessary to deliver the required change. However, I must note that there are still two areas which require further work to assure me that the required change and improvement will be delivered for older people.

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 my intention to undertake a follow up review in 18 months' time at which stage I will be looking for tangible evidence that the outcomes I expect to see have been consistently delivered across the care homes in your area. 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, flowing style.

Sarah Rochira
Older People's Commissioner for Wales

Carmarthenshire County Council

The Local Authority outlines the reporting arrangements for the Named Responsible Officers who are responsible for carrying out the actions within each Requirement for Action. I welcome this as it should enable the Local Authority to closely monitor the progress in each area, and also identify and respond to any complications or concerns that arise.

Furthermore, I welcome that the Mid and West Wales Health and Social Care Collaborative, states that it will: “continue to play a key role in disseminating learning and bringing agencies together to address challenges and continue our shared journey of improvement”.

Requirement for Action 1.6

Final 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.

I raised a concern in relation to the Local Authority’s initial response to this Requirement for Action that while there was a summary provided on the current provision of independent advocacy, there was no analysis or evaluation of advocacy services in relation to the outcomes of older people.

Therefore, I welcome that the Local Authority has responded directly to my concern by stating that it will undertake an evaluation of current advocacy services to identify shortfalls in provision to inform the improvement agenda. If action is taken following the identification of gaps

in service, there is the potential that older people will be able to secure their rights, have their voices heard and concerns addressed, particularly in situations where they may be vulnerable.

The response includes clear timelines for the completion of the evaluation of provision and identification of shortfalls, and also identifies an accountable individual who will be responsible for completing the actions. The clarity of this approach should enable this work to be closely monitored by the Local Authority.

However I must note that the ability for the Local Authority to improve the provision of independent advocacy in the situations referred to in the Requirement for Action rests on the quality of the evaluation activity and any actions for improvement that arise as a result. While the initial response does provide information on some of the existing provision, the response and intention to evaluate current provision does not provide me with complete assurance (based on a firm commitment) that independent advocacy will be provided in all of the situations outlined in the Requirement for Action.

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.

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
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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.

I welcomed the awareness and understanding of the importance of dementia training demonstrated by the Local Authority in its initial response to this Requirement for Action, and also the information that was provided on the current provision of training. However, I raised a concern that it was unclear how supervision and performance assessment would take dementia training into account.

Therefore, I welcome that the Local Authority has directly responded to this concern. The response clarifies that the skills and competencies of care staff are evaluated through routine supervision, and that the impact of dementia training will be monitored through reflective practice sessions which will be held quarterly.

The use of supervision and reflective practice sessions in this way has the potential to enable the Local Authority to identify the impact of this training, and whether all staff working in care homes understand the physical and emotional needs of older people living with dementia.

The response includes clear timelines for the implementation of the supervision and reflective practice sessions, and also identifies an accountable individual who will be responsible for completing the actions. The clarity of this approach should enable this work 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 initial response to this Requirement for Action from the Local Authority appears to demonstrate an understanding of the importance of befriending and provided details of befriending schemes across the area. However, I raised a concern in relation to the initial response that there was no demonstrable evidence of specific befriending schemes for older people living in care homes.

Therefore, I welcome that the Local Authority has now committed to undertaking an audit of the befriending opportunities that are available in Local Authority care homes and will include this Requirement for Action as part of its quality monitoring programme for independent homes. The response states that this exercise will identify shortfalls in provision and inform the improvement agenda. These actions have the potential to identify improvements and augment the provision of befriending, so that older people are supported to have meaningful social contact and their risk of becoming lonely and isolated is reduced.

However, I must note that the ability for the Local Authority to improve befriending opportunities and deliver the desired outcomes for older people outlined in the Requirement for Action rests on the quality of the audit process and quality monitoring and any actions for improvement that arise as a result. Furthermore, I expect that the audit and quality monitoring actions that are outlined in the response would include specific reference to the access to intergenerational projects, faith based support and specific cultural communities.

The response includes clear timelines for the completion of the audit and quality monitoring, and also identifies accountable individuals who will be responsible for completing the actions. The clarity of this approach should enable this work to be closely monitored by the Local Authority.

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 clearly demonstrates a commitment to the development of a National Improvement Service, and also outlines its commitment to improving the health and wellbeing of care home residents. This should ensure that care homes that want and need to improve the quality of life and care of older people have access to specialist advice, resources and support that leads to improved care and reduced risk.

Requirement for Action 6.2

Final 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).

I stated in relation to the Local Authority's initial response, that although there was some demonstrated understanding of the importance of listening to the voices of older people, there was insufficient evidence on how older people's voices were being used as a driver for change in their quality of life and care.

The response commits to embarking on a comprehensive programme of interviewing service users about the quality of service provided, and including this as a key performance management measure. However, while I welcome this commitment as one formal method to hear the views of older people, no further information is provided on the type and regularity of these 'interviews'. I do not believe that a programme of interviews by itself, would enable providers and commissioners to listen to the views and experiences of all older people in an informal and systematic way.

Instead, there is a risk that this approach could be too formal and infrequent to enable providers and commissioners to truly understand quality of life and act on any issues raised. It is also difficult to understand how the Local Authority would ensure that the voices and experiences of older people, who may be unable, or find it difficult to participate in interviews will be heard and responded to. Therefore, this does not provide me with the full assurance I need that older people's views about their quality of life will be captured and shared on a regular basis.

Furthermore, while I welcome the inclusion of a named accountable individual and a date for the commencement of the programme of interviews, the response does not refer to the annual reporting of how on-going feedback from older people has been used to drive continuous improvement.

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.

I welcome that the Local Authority clearly commits to the publication of an Annual Quality Statement by the Director of Social Services that will include information in respect of quality of life and care for older people. This should ensure that older people have access to relevant and meaningful information about the quality of life and care provided by care homes, and that there is greater openness and transparency in respect of the quality of care homes and the care that they provide.