



Mr Dilwyn Owen Williams  
Chief Executive  
Gwynedd County Council  
Council Offices  
Shirehall Street,  
Caernarfon  
Gwynedd  
LL55 1SH

Cambrian Buildings  
Mount Stuart Square  
Cardiff CF10 5FL

Adeiladau Cambrian  
Sqwâr Mount Stuart  
Caerdydd CF10 5FL

10 August 2015

Dear Mr Williams

### **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'. It is good to see that the Local Authority is working with the Health Board within some Requirements for Action, and that that you have detailed what review and evaluation procedures you

have 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 have introduced a seven day work plan in Ysbyty Gwynedd with a Social Worker and Care Assessor, to facilitate hospital discharge at weekends (Requirement for Action 2.2).

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.

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**

## **Gwynedd Council**

I welcome that the Local Authority has established an engagement and monitoring structure with Health and the Third Sector (County Forum), which will receive regular progress report on aspects requiring close collaboration. I would expect that as this programme of work develops, regular reporting takes place through these arrangements, or another appropriate channel, within the Authorities corporate governance structure and to the public.

### **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 was previously determined to be acceptable. Therefore, no further analysis has been undertaken.

### **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 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 was previously determined to be acceptable. Therefore, no further analysis has been undertaken.

### **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).

### **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 provides information on the ways that it listens to older people and includes a number of commitments that have the potential to improve how older people's views are captured and acted upon.

For example it has established 'Residents and Friends Committees' in Local Authority care homes. It commits to reviewing the success of these, and sharing any learning with independent care homes. It is also good to see that a 'Residential Homes Quality of Life Monitoring Team' will be established to include people who are residents, and that the Local Authority will disseminate the practice of including residents in the process of appointing staff to Local Authority care homes. If successful, these actions have the potential to reduce the risk of older people feeling ignored, powerless and unable to influence issues that affect their lives.

I welcome that the opinions of residents and family members will now be prioritised in the monitoring visits that are undertaken to both Local Authority run and independent care homes. Furthermore, I am pleased that effectively listening to the views and experiences of older people will now feature as a standing item on meetings of the 'Residential and Nursing External Providers Forum'.

I must note that these appear to be formal methods of listening to older people, and that they might not thoroughly capture the quality of life of older people on a day to day basis, and opportunities to make small changes that can make a significant difference to quality of life and care could be missed. The response does commit to promoting suggestion boxes in all care homes. This could provide a more informal way of listening to the views and experiences of older people, but I must note

that the Local Authority must enable and support people to use these and clearly demonstrate that it is responsive to the issues raised through this method. Notwithstanding this, findings from my literature review and pilots undertaken by Carechecker in Flintshire Local Authority have indicated that ongoing and every day communication with, and listening to older people is the richest possible source of information for improvements in quality of life.

I welcome the particular commitment to ensuring that the Local Authority communicates with all residents of care homes in order to understand their quality of life. For example, to ensure that residents can contribute in their preferred language, to use a variety of communication methods, such as the use of pictures, for those who cannot communicate verbally and those living with dementia.

Overall, the Local Authority demonstrates a commitment to learn from the issues arising from listening to older people by evaluating these proposals and it commits to developing a work programme based on these findings to improve the outcomes of older people. The use of evaluation to learn from these proposals should support the cultural change needed to make the sector more responsive to the needs and experiences of older people.

I welcome the commitment to report on these changes via a newsletter. While the response does not state how regularly this would be produced, I would expect the Local Authority to use this regularly as a tool to demonstrate how on-going feedback from older people has been used to drive continuous improvement. Furthermore, I would expect such a newsletter to reflect progress in both Local Authority and independent care homes and also changes that were brought about as a result of both formal and informal methods of engagement.

## **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's response to this Requirement for Action commits to the publication of an Annual Quality Statement that will include information on the quality of life and care of older people living in commissioned and Local Authority run care homes. This will ensure that older people have access to relevant and meaningful information about the quality of life and care provided by or within individual care homes, and there is greater openness and transparency in respect of the quality of care homes.