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Ein cyf / Our ref:

Eich cyf / Your ref:

Dyddiad / Date: 27 November 2015

Dear Sarah

### **Update on CSSIW's response to "A Place to Call Home"**

Further to our meeting on Wednesday, 25 November, I am writing to provide you with an update on the actions being taken by CSSIW following our first response dated 2 February. It also responds to your letter dated 9 November 2015 where you requested an update on our work of embedding Human Rights within the new inspection framework. You advised us that the information will assist you with providing evidence to the National Assembly for Wales Health and Social Care Committee.

As we discussed on the 17 September, we are keen to work positively with you and to support the action you are taking to drive improvement in the care home sector. However, as a regulator, we also have to operate in the context of a legal framework. As we explained, in addition to responding to your review, we must also take account of the expectations of the Regulation & Inspection of Social Care Bill (Wales) and the recommendations of the "In Search of Accountability", the report published following the review conducted by Margaret Flynn.

Having said this, when we met on 17 September we updated you on the positive developments outlined in our response to your review, in particular:

- **Progress with the Quality Judgement Framework**

The initial pilot study of 14 inspections has been completed and evaluated, and your representative was present at the stakeholder group discussion for this project. A number of the themes in your review have been replicated within the inspection framework. The outcome of our pilot study was extremely positive. The framework clearly helps providers to understand how their services need to improve and,

importantly, fosters aspiration and motivation to improve. We will be introducing the new inspection framework in 2016.

- **Embedding Human rights and setting a bench mark for unacceptable care**

We have developed a Human Rights based framework to sit alongside our inspection framework. This has been co-produced and shared with a number of stakeholders including our National Advisory Board. It is still subject to revision on the basis of recent feedback. The framework promotes good care but also highlights unacceptable care akin to the “never events” you describe in your required actions. A positive aspect of this approach is that where unacceptable care is identified enforcement action will be triggered. Therefore, Human Rights will be mainstreamed within the new framework. We will publish the framework in the provider and inspector’s handbooks which we will implement in 2016.

CSSIW has also become a member of the recently established advisory group for the Equality and Human Rights Commissioner which is developing practical guidance for private social care providers. Our framework has been shared with them.

- **Use of Lay assessors**

We explained when we met on 17 September that whilst we are keen to engage people in our work, we do not believe lay assessors are the best approach to strengthening regulatory practice and engaging citizens in our work. We have had experience of using lay assessors in the past and found them to be problematic. We note your recommendation and would welcome any evidence based evaluation you can provide to justify the requirement you have made. We are in discussion with the Community Health Council to explore what contribution their volunteers may be able to make to the inspection and evaluation of care homes.

In relation to broader citizen engagement, our National Advisory Board, 50% of whom are citizens, has remained active with members being directly involved in a number of the project groups within CSSIW, and contributing directly to the development of the Bill, and giving evidence to the Health and Social Service Committee. Recruitment to our three Regional Advisory Panels has been completed and we held an induction event in November. The regional panels go live in January 2016 and will bring the voice of the citizens even more centrally into the work of CSSIW. We have recruited 14 citizens, six registered care managers and four commissioners of services to the three panels. Members of the panels will work with regional inspection teams to check the quality of CSSIW’s work and will support the greater involvement of citizens in CSSIW’s work across Wales. The panels will discuss challenges facing care, social services being delivered across their region and how those challenges can be met.

- **Quality Forum**

The Quality Forum has been developed by CSSIW and is a collaboration of leaders in the social care community, including health and social care commissioners, domiciliary care and care home providers. Together with CSSIW, HIW and CCW as regulators of care, we have developed a unified framework of practical support to drive improvement for quality integrated care around the person.

The forum aims to bring a common understanding of what constitutes quality and the expectation of each partner through an active deal to ensure consistent interpretation of “quality” in their respective roles and as a forum. The central aim of the forum is to identify, analyse the evidence base and endorse best practice which can be tested to see what impact and influence it has made on the quality of delivery in health and social care services. This collaborative work can both endorse and promote key products, thereby improving quality of care and well-being.

Domiciliary care and care homes are priority areas. The forum has identified a list of “wicked issues” for action starting with falls prevention in care homes and in the community. Using best practice endorsement, collaborative promotion, wide dissemination and publication of key products, the forum aims to see a standardised approach for falls prevention and responses to falls; likewise for hydration, nutrition, ulcers/pressure sores and safe medication. The collective action and application of a standard for each of these matters will mean that commissioners contract to these standards, providers deliver these standards and regulators include these standards in their inspections and reports.

- **Chief Inspector’s Report**

The development of a revised on-line version of self-assessment has progressed and we hope to introduce this in 2016. This will, for the first time, give CSSIW a sound evidence base to use in the Chief Inspector’s report which will enable us to report on a number of the aspects of care you reference in your required actions. Importantly, it will, in time, reduce duplication in data collection with other agencies (health and social care commissioners and the Care Council for Wales). We have now successfully completed a small trial of a shortened “on-line” version of the new self-assessment with providers. The significance of moving to on-line completion is that it will enable us to collate information to create a database for a proper evidence based analysis.

I hope this response assures you that CSSIW is continuing to make positive progress in driving improvement in the care home sector.

I look forward to ongoing dialogue and to working together to achieve progress in driving improvement in the care home sector.

Yours sincerely



Imelda Richardson  
**Chief Inspector**  
CSSIW – Care and Social Services Inspectorate Wales