

Inquiry into regulation of care for older people

NHS Tayside

Thank you for providing a copy of the Health and Sports Committee's report on the Inquiry into the Regulation of Care for Older People (2010) and the Government's response to it. NHS Tayside endorses the content of both the report and the response and welcomes the opportunity to comment.

The report is comprehensive and covers all aspects of care provision and the regulation of it. A number of issues described had already been identified within Tayside and were brought into sharp focus when the Southern Cross Care Group ceased to operate. Local arrangements around assurance were considered and actions put in place to address these. In discussion with our partners we have begun to consider closer working arrangements with the Care Inspectorate which will underpin the regulation of care and have identified some tests of change which are currently being undertaken. Examples of work are provided below utilising the four key questions as outlined in the report as theme headings.

Can we be confident that the regulatory system is picking up on care services where the quality of care is poor?

- NHS Tayside Board are provided with a monthly report which outlines the results of Care Inspectorate visits and the grading awarded. This information provides an 'early warning' monitoring system to the Board and alerts senior officers to any developing issues that could be addressed through supportive mechanisms with partner organisations.
- NHS Tayside are actively promoting partnership working with care home providers through schemes such as community pharmacists undertaking medication reviews, community psychiatry liaison, GP Local Enhanced Service arrangements, etc. Staffs working in these environments are actively encouraged to raise any issues regarding patient care or safety with the care home management direct and/or with their NHS line manager. Nursing staff within the care home settings remain on the nursing register and are therefore accountable for their conduct and professional behaviour. This offers another route for concerns to be raised.
- NHS Tayside support the introduction of thematic inspections as it allows focused consideration of specific issues. The Care Inspectorate in Tayside have invited NHS input into the identification of relevant quality themes. Quality of care would have to remain an integral part of any inspection theme and not addressed as a separate theme.
- NHS Tayside is currently piloting a pre-inspection questionnaire for care home facilities which have NHS units housed within them. It has been agreed with the Care Inspectorate that the results of this questionnaire will be shared with them with the aim of informing the

selection of themes for Care Inspectorate inspection. If this test of change proves successful this process will be rolled out pan-Tayside.

- Shared care home inspections are carried out in Dundee with healthcare staff invited to the feedback sessions.

Are there any particular weaknesses in the current system?

- The NHS are still in the early stages of refining robust patient focused outcomes however the establishment of these will ensure patient care quality is maintained. The availability of patient focused outcomes within the care home setting would provide a key measure within the inspection process. Support to care home management in the development of these would promote partnership working between the agencies.
- Although there are routes for raising concerns regarding the standards of care, support mechanisms are necessary for staff who work within the care home environment who may feel vulnerable if raising concerns.

Does the system adequately take into account the views of the users?

- Patient involvement in the inspection process would be invaluable in providing direct feedback about individual patient experience. NHS Tayside was recently engaged in discussions regarding the re-provision of facilities for patients accommodated within the medicine for the elderly service. One option included the provision of accommodation from a private care provider. The value of patient/carer involvement at the earliest stage in selecting a model of care was recognised and patient relatives were invited to nominate representatives to participate in the option appraisal and tendering process. These individuals actively participated in accommodation tender scrutiny, provider interviews and visited premises. It would be a positive logical step therefore to promote their participation in the service regulation process.
- NHS Tayside submitted a successful bid for the Strathmore area to become a demonstrator site for the Scottish Government Dementia Strategy. This pilot is testing the principles of a community based dementia service model. Support from the Scottish Government is enabling a robust analysis of the project which includes feedback gathered in a systematic way from patients, relatives and carers.
- Relative groups have been established in a number of private care home provider settings across NHS Tayside. Representative NHS community staff have been attending these structured sessions in order to allow relatives to raise general concerns, ask questions or make observations.

Does the registration and regulatory system provide an appropriate basis for the regulation, inspection and enforcement of integrated social and NHS care in the community?

The Care Inspectorate have recently begun to explore the opportunity to develop a more explicit strategic network for both co-ordinating and evaluating current joint initiatives and developing others. Building on existing structures and multi agency relationships there is potential to develop a formal "Care Home Improvement Network". Mr Andrew Sloan, Inspector Manager, Care Inspectorate has prepared a discussion paper which outlines the objectives of a network which include:

- involvement of users of care home services and their relatives in leading and developing strategies to improve the quality of care in the sector
- ensuring users of care home services and relatives understand the responsibilities of the stakeholders involved in improving the quality of care
- embedding a shared vision and partnership approach between stakeholders
- ensuring the quality and methods of communication between stakeholders assist those stakeholders in meeting both their individual responsibilities and the aims of the network
- co-ordinating and integrating stakeholder improvement strategies
- developing new and innovative methods of joint working between stakeholders with an improvement agenda.

The network as proposed by Mr Sloan, to be tested in Dundee, would bring the key stakeholders of care home providers, service users and relatives, local authorities, GP's, NHS and Care Inspectorate together into a forum which would ensure the quality of care was regulated and that improvement strategies were formulated by all partners in a supportive, unified way.

Care Home providers have in the past felt that inspection has been undertaken simply as a punitive measure rather than it being a part of continuous improvement process. The establishment of this network would mitigate this.

NHS Tayside has welcomed this proposal and see this as a test of change the principles of which could be applied across Tayside if proved, as anticipated, as valuable.

Hazel Scott
Commissioner for Older Peoples Services
NHS Tayside