

Social care of older people with complex care needs and multiple long-term conditions

Consultation on draft guideline – deadline for comments 17:00 on 13/07/15 email: Olderpeopleltc@nice.org.uk

Please read the checklist for submitting comments at the end of this form. We cannot accept forms that are not filled in correctly.

1. How will you use the recommendations in the guideline?

2. Which recommendations do you think are the most important? And why?

3. In what ways can the recommendations be made more specific to the care of older people with long-term conditions?

We would like to see housing given much more consideration in the document which we believe would make the recommendations more specific to the care of older people with long term conditions

4. What should practitioners be doing, or doing better, to care for this population that is not already covered in this guideline?

Joining up to see the whole person, listening to what people say and want, ensuring people have advocates and assessing people's housing needs and circumstance

5. Does the guideline cover all the challenges in caring for this group'?

It does not touch on the importance of housing

6. The intention of the guideline is that all recommendations should be considered in conjunction with the person and taking into account their views. Does the guideline make this clear? Are there ways in which this could be made clearer in the guideline?

See section 3.9 of [Developing NICE guidance: how to get involved](#) for suggestions of general points to think about when commenting.

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Stakeholder organisation(s) (or your name if you are commenting as an individual):		Care and Repair England		
Name of commentator (leave blank if you are commenting as an individual):		Jane Minter		
Comment number	Document (full version, short version or the appendices)	Page number Or 'general' for comments on the whole document	Line number Or 'general' for comments on the whole document	Comments
Insert each comment in a new row. Do not paste other tables into this table, because your comments could get lost – type directly into this table.				
Example 1	Full	16	45	We are concerned that this recommendation may imply that
1	Full	General	General	<p>We are concerned there is very little mention of the role of housing in providing person centred planning for social care for people with long term conditions despite the recognition in the Care Act of the role good housing plays in wellbeing and in view of the comments we made on scoping document.</p> <p>For information we have produced a briefing on making the connections to housing in the Care Act which identifies where housing issues need to be addressed http://careandrepair-england.org.uk/wp-content/uploads/2014/12/Briefing-on-main-housing-references-in-Care-Act-Guidance-Oct-14.pdf</p> <p>Without repeating the issues and evidence we raised in our previous submission we would like to make the following general points about why a consideration of housing is important to providing good social care for people with long term conditions</p> <ul style="list-style-type: none"> • Many of the chronic health conditions people face are exacerbated by poor and inappropriate housing and can be alleviated by improving and adapting people's homes. • There is an expanding evidence base that considers the value of housing interventions to care and health planning and provision. We recognise that there is more to do in this area but suggest later in our submission that this would be an area for further research. We also identify work we are already doing in this field to improve the evidence base • Whilst we would not expect social care practitioners to deal with housing issues per se we would argue that

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				<p>housing needs to be considered in any social care assessment and that social care staff need to know about the common housing issues and who to contact locally to ensure that people's housing circumstances are addressed in so far as they impact on a persons' wellbeing.</p> <ul style="list-style-type: none"> • Unless there is collaboration strategically between health, care and housing the document misses a trick in terms of the planning and commissioning of truly integrated services at an individual level. Housing needs to be integrated with social care and health issues at both the strategic and individual assessment level • It seems a real shame that the guidance has missed an opportunity to highlight what good practice might look like when housing solutions and factors have been considered. This would help to solidify the role of housing and ensure that housing factors are considered to meet people's needs. • There is an expectation in the Care Act that housing factors are a part of an integrated assessment. This is not followed through at all in the Guidance which is disappointing
2	Full	Page 7	183 - 188	<p>There is recognition that good social care can reduce inappropriate hospital admissions. But there is no similar recognition of the importance of good housing in reducing costs on the health sector. How much more valuable would it be to assess people's housing circumstances alongside their social care needs in this context? As an example the Building Research Establishment has identified, in its recent Briefing The Cost of Poor Housing, that poor housing costs the NHS £1.4 billion. http://www.bre.co.uk/page.jsp?id=3611</p> <p>A number of reports have also identified how housing interventions can prevent hospital admissions and help people to leave hospital. The guidance should recognise this</p>
3	Full	Page 11	259 onwards	<p>This section does not consider the assessment of housing circumstances yet the Care Act refers to an integrated assessment including housing – see Chapter 6 of the Care Act Guidance</p>
4	Full	Page 12	291 – 296	<p>This draws out telecare as a specific area to address yet there is no reference to housing factors such as adaptations (Disabled Facilities Grants), community equipment and integrated information and advice on housing, care and related finance. These areas are all identified in Care Act Guidance and should be covered in this guidance too</p>
5	Full	Page 16	399 onwards	<p>This section on integrating health and social care planning makes no reference to housing practitioners alongside those in health and care and in other disciplines. We believe housing practitioners should be added</p>
6	Full	17	420 onwards	<p>Whilst there is a section focused on improving social care in care homes - given that most people live in their own homes and in mainstream housing - it would have been helpful to include a section on improving social care for people in their own homes too which includes housing issues such as repairs, adaptations, telecare, equipment, housing advice etc.. and would, again, have drawn close attention to the importance of housing for good social care</p>
7	Full	21	533 onwards	<p>Add after 546 that health and social care practitioners should be able to identify common factors in housing which might exacerbate long term conditions such as damp and cold homes, factors that might prevent falls in the home, accessibility issues in the home etc... and know where people can obtain help and advice locally on dealing with these issues such as First Stop http://www.firststopcareadvice.org.uk/ housing and care advice services, Home Improvement</p>

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				Agencies http://wwwFOUNDATIONS.uk.com/home/ etc...
8	Full	547 onwards		<p><i>Research Recommendations</i> We would add the impact of housing interventions on health and social care. This is important for the reasons set out in our general comments on the guidelines. Care and Repair England has been looking at how to stimulate fresh research in this field bringing together researchers and key stakeholders to work on projects that have practical application. (In a project called Catch 22 http://careandrepair-england.org.uk/?page_id=205)</p> <p>Work developing in this field includes the cost benefits of adaptations, impact and evidence on falls prevention and work on housing decision making. We would be happy to share progress</p>

Insert extra rows as needed

Comments on implementation (please see chapter 2 in NICE version)

Do you agree with the areas that have been identified as having a big impact on practice and challenging to implement? Let us know if you would give priority to other areas and why.

What would help users overcome these challenges? (For example, you could signpost us to examples of good practice or provide details of educational materials or other relevant resources that you have found useful).

Comment Number	Document There is no need to indicate this as the implementation section is only featured in the NICE version	Page Number Not applicable	Line Number Not applicable	Comments Please say which challenge you are commenting on (use recommendation number if appropriate).
1				<p>Whilst we agree the areas identified as those that would have the biggest impact we would want the section on 'integration of different care and support options' to include housing and housing organisations as well as those in health and social care.</p> <p>We would also suggest that the section on 'empowering older people and their carers' should focus much more on advice and information and should also reflect the Guidance set out in the Care Act on local council's duties to establish and maintain information and advice – which again includes housing. Older people and their carers will not be empowered until they have access to this. This should include details on how to access both local and national services offering this advice and information – First Stop and Foundations for example which are both mentioned in the Care Act guidance and earlier in comment no 7.</p>

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				<p>It is no good empowering older people and their carers without having the services available that they need and want. There is an argument therefore to ensure that the services are developed and integrated so making commissioning of services and support a really important area for implementation. It is suggested that the area on integration the different options (including housing) will be a critical first step.</p>
2				<p>To support users to overcome challenges we would reiterate the work of First Stop in providing tools and resources to help people to make choices in relation to their housing and care options and related finance. First Stop includes a range of practical resources on its website that would support implementation See http://www.firststopcareadvice.org.uk/resources-partners.aspx</p> <p>There are also a number of learning resources available to deal with specific aspects of implementation Care and Repair England for example has produced a briefing on the Care Act and how housing is connected mentioned earlier in this submission – see http://careandrepair-england.org.uk/wp-content/uploads/2014/12/Briefing-on-main-housing-references-in-Care-Act-Guidance-Oct-14.pdf</p> <p>We have also just developed a set of cameos and a briefing on good practice in the use of adaptations. See https://homeadaptationsconsortium.wordpress.com/good-practice/</p> <p>Other resources on linking housing and health/care include</p> <ul style="list-style-type: none"> • The Housing Lin has developed its health Intel resources that aim to help people understand the health and housing landscape • The Kings Fund with the National Housing Federation has developed a Learning network on integrating housing care and health • The NHS Alliance has produced its housing for health resource for GPs

Checklist for submitting comments

- Use this comment form and submit it as a Word document (not a PDF).
- Combine all comments from your organisation into 1 response. We cannot accept more than 1 response from each organisation.
- Do not paste other tables into this table – type directly into the table.
- Underline and highlight any confidential information or other material that you do not wish to be made public.
- Do not include medical information about yourself or another person from which you or the person could be identified.

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- Spell out any abbreviations you use
- For copyright reasons, comment forms do not include attachments such as research articles, letters or leaflets (for copyright reasons). We return comments forms that have attachments without reading them. The stakeholder may resubmit the form without attachments, but it must be received by the deadline.

You can see any guidance that we have produced on topics related to this guideline by checking [NICE Pathways](#).

Note: We reserve the right to summarise and edit comments received during consultations, or not to publish them at all, if we consider the comments are too long, or publication would be unlawful or otherwise inappropriate.

Comments received during our consultations are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the comments we received, and are not endorsed by NICE, its officers or advisory Committees.