

**National Institute for Health and Care Excellence**

**PUBLIC HEALTH GUIDELINES – OLDER PEOPLE: INDEPENDENCE AND MENTAL WELLBEING**

**Consultation on the Draft Guideline from 29 May – 10 July 2015  
Comments to be received no later than 5.00 pm on 10 July 2015**

**Stakeholder Comments**

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<b>Name:</b>		<b>Jane Minter</b>
<b>Organisation:</b>		<b>Care and Repair England</b>
<b>Section number</b>  Indicate <b>section number</b> or ' <b>general</b> ' if your comment relates to the whole document	<b>Page Number</b>	<b>Comments</b>  Please insert each new comment in a new row.
General	Page 4 – 7 (Section I – 5)	<p>We suggest that the guideline as drafted feels too narrow in focus in relation to the 'What the guidance is about?'</p> <p>The guideline, with regard to interventions and strategy, focuses specifically on activities and linked services. There is no consideration of environmental factors that impact on independence and mental wellbeing. This would include guidance on the infrastructure that supports independence and mental wellbeing which would include a broader focus on the development of 'age friendly communities' across all factors that impact on older people. (It should be noted that on page 7 there is a mention of public seating and toilets in line 29 whereas one would have expected the guidance to look much more broadly at the issues for creating age friendly communities focusing on this broader range of factors).</p> <p>Examples of this infrastructure would include good, decent housing that is suitable for people in later life, access to health and care at home, getting out and about, including transport, neighbourhood safety, accessibility etc...</p> <p>If this is the focus (and we believe it should be) then the guidance would need to be framed to include measures that support these infrastructure issues. We have not done this in details in our comments since we feel clarity is needed on the purpose of the guidance first which we set out below.</p>

Please add extra rows as needed

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General - What is the guideline about	Page 1 line 8 - 10	If the guidance is purely aimed at the development of activities then this should be stated at the outset so that 'What the Guideline is about' states that it 'makes recommendations on maintaining and improving independence and mental wellbeing <b>by the provision of activities and linked services</b> '.
General	Page 7 - 9 (Rec 6 and 7)	If the focus is only on activities and linked services the guidance on strategy, including needs assessment and working in partnership, misses the opportunity to be much bolder in considering environmental and neighbourhood factors that support independence and mental wellbeing. There needs to be more clarity at the outset of the parameters of the guidance.
Section 1 Draft recommendations	Page 4 line 10 - 14	Throughout the report there should be a distinction between 'should' and 'should consider' which is what should be said here. At the moment line 12 just says 'consider' yet the report uses 'should consider'. This would help clarify expectations for those who need to take action.
Section 1.1 Interventions - principles	Page 4 after line 27	Add after line 27 – <b>ensure older people can access community activities in the locality (that were not developed exclusively for them but for which they might wish to partake in)</b> . Currently this recommendation could imply age exclusive activities whereas older people should be able to access activities that interests them locally regardless of their age and there is benefit to encouraging greater intergenerational links for independence and well being
Section 1. 2 Interventions – group activities	Page 5 after line16	Add <b>access to work activities</b> (as relevant for older people as any other age)

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Section 1.6 Strategy	Page 7 line 17	Add <b>housing authorities</b>
Section 1.6 Strategy	Page 7 line 18	Why only non- statutory housing providers?
Section1. 6 Strategy	Page 7 line 28 - 29	This should be reworded to focus on age friendly neighbourhoods more broadly – not just toilets and seats. There is now very good evidence of councils developing age friendly cities to draw on – see <a href="http://www.who.int/ageing/publications/Age_friendly_cities_checklist.pdf">http://www.who.int/ageing/publications/Age_friendly_cities_checklist.pdf</a> for a checklist
Section 1.6 Strategy	Page 7 line 30	This is not right. Fire services don't advise on whether home adaptations are needed. If talking about environmental factors like home adaptations there should be a reference to social services departments, the availability of Disabled Facilities Grants and other help and a reference to the role of Home Improvement Agencies
Section 1.7 Strategy local needs assessment	Page 8 line 17	Add <b>housing data</b>
Section 1.7 Strategy local needs assessment	Page 8 line 31	Add such as their income, ethnicity <b>and housing circumstances</b>
Section 1.7 Strategy local needs assessment	Page 9 line 7	Add <b>link to local older people's groups and networks to consult and engage with local older people</b>

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Section 1.8 publicise services and activities	Page 9 line 10	Should not local authorities and Health and Wellbeing Boards also have the responsibility, too, to publicise not just service providers?
Section 1. 8 publicise services and activities	Page 9 line 12-13	This seems very simplistic? What about use of social media, local libraries, GP surgeries, use of supermarkets/pubs/clubs etc...
Section 1.9 raise awareness	Page10 line 1	Add <b>housing practitioners</b>
Section 1. 9 raise awareness	Page 10 after line 15	Add <b>diagnosed with dementia and other long term health condition</b>
Section 1.10 overcoming barriers	Page 11 line 3	Add <b>or mental health</b>
Section 1.10 overcoming barriers	Page 11 line 7	It is not just about toilets but links to the earlier point about developing age friendly neighbourhoods so would include security and safety issues as well as general access issues
Section 1.13 Support community orgs	Page 12 line 14	Add <b>and housing practitioners</b>
Section 1.15 evaluate	Page 13 line 14	'...come along' seems very patronising. Could say ' <b>engage</b> '
Section 1.15 evaluate	Page 13 line 20	Isn't this process outputs not outcomes? It is suggested that evaluations should assess <b>outcomes and outputs</b>

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Section 1.15 evaluate	Page 13 after line 30	Add <b>benefits for older people and their carers</b>
Section 1.16 design training	Page 14 line 1	Add <b>and housing practitioners</b>
Section 2 Recommendations 6,7,10 and 11	Page 16 line 1	Add commissioners of health, <b>housing</b> and care services
Section 3 - Implementation - Biggest impact on practice and challenging to implement (Question 1 in the consultation)	Page 16 line 22	It will be important to develop a local strategy which engages the key providers so that all those working with older people at any level think about the impact of their work and services on people's independence and wellbeing. This will be a challenge for all especially in tough economic times. It is suggested NICE might consider supporting the development of practice in this area by supporting a learning and sharing network. SCIE has recently developed a library of practice on prevention which might be drawn upon as an example. See <a href="http://www.scie.org.uk/prevention-library">http://www.scie.org.uk/prevention-library</a> this is an example of identifying evidence in this context and might work well for this guidance once the parameters are established. This might also help with raising awareness (Question 4 in the consultation)

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Section 3 Implementation - Help to overcome challenges for users and others (Question 2 in the consultation)	Page 16 line 24	<p>A network would help too with implementation - for users a key challenge will be gaining the knowledge about and accessing bespoke or general services and facilities that enhance wellbeing. Age UK London is developing a project where older people are assessing information provision by local councils. Again this might be drawn upon for this guidance – see <a href="http://www.ageuk.org.uk/london/news--campaigns/tell-me/">http://www.ageuk.org.uk/london/news--campaigns/tell-me/</a></p> <p>We also suggest that the guidance should add a section on the importance of advice and information for older people and would draw your attention to the First Stop. First Stop Advice is an independent, impartial and free service for older people, their families and carers to help them get the help or care they need to live as independently and comfortably as possible. It operates a national advice line and works in partnership with local services and as well as offering advice and information provides a directory of services for older people across housing, care and support. <a href="http://www.firststopcareadvice.org.uk/">http://www.firststopcareadvice.org.uk/</a></p>
Section 4 Context	Page 18 line 16	Add health, <b>housing</b> and economic situation. There should be a section here on where people live including tenure and house condition and whether in ordinary housing, specialist housing or residential care. This can have an impact on independence and mental wellbeing as well as on access to activities and services

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Section 5 Considerations (5.9)	Page 20 line 29	This should also include older people with dementia
Section 5 Considerations (5.14)	Page 22 line 8	This should include a consideration of <b>housing practitioners</b> as well as those in health and care

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