

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?

We believe they will be useful for all those engaged in care planning with older people with complex care needs and multiple long-term conditions.

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

We particularly value the attention given to sensory impairments and communication throughout this guideline as these factors are often overlooked.

3. In what ways can the recommendations be made 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?

Being aware that sensory impairments – vision and hearing – and essential functional aids are often forgotten in the event of a health emergency or other crisis.

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

Yes

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?

Yes, the guideline makes this clear

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

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

Stakeholder organisation(s) (or your name if you are commenting as an individual):		<u>Optical Confederation and College of Optometrists</u>		
Name of commentator (leave blank if you are commenting as an individual):		<u>Jenny Gowen</u>		
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	short	general	general	The importance of communication and awareness of sensory impairment is helpfully noted throughout this guidance. Communication is largely dependent on sensory functioning – at a minimum through either vision or hearing, though ideally through both – and as such we particularly welcome this guideline's inclusion of sensory loss and impairment as a key feature of supporting older people with multiple long-term conditions. The consideration given to emotional and psychological support in the document could be strengthened. People with multiple, complex and degenerative health conditions, such as impending sight loss, will inevitably have high emotional support needs.
2	short	7	1.1.3	As sight loss is often overlooked and may not be well understood by front line staff, we recommend clarifying in plain language that sensory loss refers to vision and hearing when this term is first used in the text.
3	short	8	1.1.6-7	In recognition of the mounting evidence that telecare is not a universal panacea – and indeed is often prescribed without full understanding of a person's desire and ability to utilise the technology and therefore not well utilised – we suggest that the guideline make explicit the need to account for the person's level of sensory and other abilities, which may inhibit their befitting from telecare. Undiagnosed hearing or sight loss, common in older people, may act as a barrier to using assistive technologies such as telecare. Older people who have a visual impairment may also have lower than average digital literacy others in their age group, and this should be taken into account when considering suitable telecare equipment. A further issue is that not all parts of the country or all individual homes have access to good broadband and telephone lines.
4	short	8/9	1.2	Training in the use of medical devices and assistive equipment, such as low vision aids, should also be included in this section, as part of information to be included in the care plan.
5	short	9	1.2.2	We note that this guideline does not explicitly remind health and social care practitioners of good practice around

Please return to: Olderpeopleltc@nice.org.uk

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

				providing people with a copy of their care plan for their reference. Because adherence to this good practice can be quite variable on the front line, we would suggest adding a bullet point to this section to that effect and further reminding care coordinators that they may need to provide the copy of the care plan in an accessible format.
6	short	9	1.2.4	We have some concern that ophthalmic prescriptions, which may not be issued by a pharmacist but must nonetheless be taken regularly to avoid serious complications (e.g. glaucoma drops), may be overlooked in standard medicines management. We therefore recommend that this be highlighted in the guideline for the benefit of front line staff who are less familiar with supporting people with sensory loss.
7	short	10	1.2.7	We would suggest adding a bullet point to this section to clarify that personal budgets need not be spent where other entitlements apply, such as eye tests under GOS. A further bullet point might read 'ensuring that people are aware of and have access to any NHS and social services to which they are also entitled.'
8	short	12	1.4.2	Given the significant number of older people who are at risk of visual impairment – 1 in 5 of those aged 75 and older and 1 in 2 of those over 90 – we suggest that community optometrists, dispensing opticians and low vision specialists be included in the list of health and social care practitioners who might be involved in a multidisciplinary support team.
9	short	13	1.5.4 – sub point 1	Consideration of provision for suitable lighting should be strengthened here. This is a very important issue for people who are often bed-bound. A minor point but lighting cannot be accessible, we would suggest rephrasing to 'accessible signage and <u>good</u> lighting.'
10	short	15	1.5.14	There seems to be a word missing in this sentence – we suggest rephrasing to 'paying full attention to people's <u>rights</u> to dignity and respect.'
11	short	15	1.5.19	We are aware of numerous instances in which people's essential functional aids, such as spectacles and hearing aids, are left behind in the event of a health emergency or other crisis. We therefore suggest including a prompt to this effect as the 3 rd sub point in this section. We propose: 'double checking that older people or their carers take essential functional aids, like spectacles and hearing aids, with them in the event of a crisis as the loss of these aids may have an adverse effect on people's ability to communicate'

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	Page Number	Line Number	Comments
	There is no need to indicate this as the implementation	Not applicable	Not applicable	Please say which challenge you are commenting on (use recommendation number if appropriate).

Please return to: Olderpeopleltc@nice.org.uk

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

	section is only featured in the NICE version			
1				We fully agree with this identification of the most important and challenging areas of the draft guideline for implementation.
2				With regard to empowering older people and carers to choose and manage their own support, we suggest consideration be given to the increased risk of social isolation and additional barriers to community participation experienced by people with sensory loss, particularly those who are registered as blind or partially sighted. As a result, people with sensory impairment may be less confident than their peers to try new activities or travel outside the home. For example, sight loss has major adverse impacts on mental health and wellbeing with over one-third of older people with sight loss suffering from depression, which puts them at greater risk of social isolation. People with sight loss are also at a substantially increased risk of falls and hip fractures; between 40 and 50 per cent of older people with sight loss fear falling to the extent that they reduce their own levels of activity.
3				With regard to empowering and valuing practitioners so they can deliver person-centred care, we recognise that many front line health and social care staff will need extra support and training to recognise sensory loss, and that this will need to be carried out in layman's language.

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.
- 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

Please return to: Olderpeopleltc@nice.org.uk

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

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.