



CEN/TC 449  
Quality of care for elderly people in ordinary or residential care facilities

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**Collated comments prel PWI**

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# Template for comments and secretariat observations

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MB/ NC <sup>1</sup>	Line number	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Observations of the secretariat
ANEC 001				Ge	<p><b>This document provides an excellent foundation for the work of the TC. The user / consumer perspective is strongly emphasised and any emergent standard will, therefore, influence service provision in the right ways.</b></p> <p><b>We put forward some comments on certain aspects that remain to be considered regarding more detailed content.</b></p>	<p><b>Items missing appear to be (from the headings put forward):</b></p> <ul style="list-style-type: none"> <li><b>education and learning opportunities including basic digital skills;</b></li> <li><b>also telehealth (and the wider use of digital technologies to e.g. foster security and protect against abuse).</b></li> </ul>	
ANEC 002				Ge	<p>ANEC will be pleased to give further input at the meeting on the terminology used.</p> <p>For e.g.</p> <p>A term that caught our attention is 'service <i>delivery</i>'. Delivery (one-way, too top down) should be replaced by 'provision'.</p>	<p>The term 'Delivery' should be replaced by 'provision' (allowing for people to access services in different ways and have their views and choices taken into account).</p>	
AT 003	Entire draft			te	<p>All requirements with general financial effects on the provider have to be identified as such and to be evaluated o the ensuing additional costs. For example see 3.3 g) or 3.3 j) 3.5 h) have extreme consequences on costs which are excessive</p>	<p>Delete all requirements with that collide with existing budgets and finacing arrangements</p>	
AT 004	Entire draft			te	<p>Please consider that all these requirements have also to be fulfilled by "one person companies", eg. individual carers that are entrepreneurs</p>	<p>Rephrase to should from shall requirements that cannot be met by many one person companies, many of them with unsufficient knowledge of the language of the elderly person</p>	
FI 005				ge	<p>We do not see a point to go into details at this stage. Instead, we would like to state some general statements.</p> <p>We think that this document is far too detailed. Quality of care varies according to different practises and legislations in European countries. If we really want this standard to get into use, we need to start "simpler".</p> <p>A few points to consider:</p>		

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					<p>- This standard should be somehow integrated to existing quality/assessment tools. For instance, this could be part of the self-checking plan and criteria. The actual input could then be gathered via e.g. RAI (Resident Assessment Instrument) or other tools.</p> <p>- The structure and classification of standard should be simplified. E.g. basic functions, problems, symptoms, care and special case are now all included in one equal-level clause. Also, the requirements are too long and overlapping.</p> <p>- One point of view seems to be lacking – the quality of care is not linked only to "care" but also to functionality and participation. These should somehow be taken into consideration.</p>		
CZ 006	-	-	-	ge	The document is focused on residential care – it is not in relevance with the “Scope” of the committee. In this context it is <a href="#">necessary to modify</a> all relevant parts which are focused on residential care e.g. general description of the services, offered activities, etc.		
CZ 007	-	-	-	ge	We require that the standard / standards processed by general tasks. It means no detailed adjustment of personnel, material and technical equipment of services which are governed by national legislation. It is necessary to say, that “Criteria” which are already written respect this principle.		
CZ 008	-	00.08	Whole 0.8.	ge	It could be also part of the “Information” (e.g. in case of residential care each resident is given opportunity to visit the residential care services).		
SE 009	Page 5	01.	4	ED	The sentence: “Life expectancy is increasing at the rate of 2-3 months every year” is not really true.	Remove Life expectancy is increasing at the rate of 2-3 months every year. This is a very positive trend. However,	

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SE 010	Page 5	01.	4	ED	I dont understand the senctence: "With the further ageing"	Remove the word "further"	
Cz 011	-	02.		ge	"Care services": We disagree with the definition of "care services"	Social care services assist persons to arrange for their physical and mental self-sufficiency, with the aim to enable them integration in the common social life to the maximum possible extent and, in the case that their health condition excludes such possibility, to arranged for them the dignified environment and treatment.	
CZ 012		02.		ge	"Professional carers" definition. According to our national legislation it is defined that professional carers are social workers, social services workers. It is not connected with payment but it is important what they do.		
CZ 013	--	02.		ge	"Service providers" definition: We recommend that you change the definition + homecare – it is the special term for health assistance at home.	Social Services Providers  Territorial self-governing units and legal entities established by them, other legal entities, physical persons and the Ministry and organizational components of the state established by the Ministry are social services providers subject to satisfying conditions stipulated by this Act.  + there is the condition of registration	
CZ 014	--	02.		ge	"Quality" definition: It would be better to have general definition (not connected with long term care).		
SE 015	Page 12	03.01	1	ED	Person-centred care and support places each older person at the centre of all that the service does.	Change to Person-centred care and support takes its starting point from the older person's needs, resources, interest and foremost history.	

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<b>SE 016</b>	Page 12	03.01	1	ED	A key principle is that older persons in receipt of services are central in all aspects of planning, delivery and review of their care.	A key principle is that the older person's interests are central in all aspects of planning, delivery and review of her/his care.	
<b>017 CZ</b>		03.01.	h)	ge	It is not clear what does the sentence mean.		
<b>CZ 018</b>		03.01.	i) - NOTE	ge	It is not clear what does the sentence "NOTE..." mean.		
<b>SE 019</b>	Page 13	03.02	1	ED	The older person is entitled to feel secure in all respects.	The older person is entitled to feel safe and secure in all respects.	
<b>CZ 020</b>		03.02.	i)	ge	"security alarm" It would be good to specify what does the requirement means. Whether it's as a button in the room, etc. Consequently, we are able to clarify whether the requirements are defined by national legislation or not.		
<b>CZ 021</b>	-	03.03.	e)	ge	The term advocacy services doesn't exist in our system.		
<b>CZ 022</b>	--	03.04.	m)	ge	"Premises of the designated center" – we do not understand it.		
<b>SE 023</b>	Page 17	03.06	2	ED	This is a strange sentence: <i>"People close to the older may be relatives, family and close friends or legal representatives."</i> What is the purpose with the sentence?	Remove	
<b>SE 024</b>	Page 6	04	2	ED	In research, national legislation and in the political arena, one often differentiates between health care services on the one hand and household or social care services on the other.	Research, national legislation and the political arena, often differentiates between health care services on the one hand and household or social care services on the other.	

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SE 025	Page 6	04	3	ED	In general terms it can be said that a health care need is one related to the treatment, control or prevention of a disease, illness, injury or disability, and the care or aftercare of a person with these needs (whether or not the tasks involved have to be carried out by a health professional).	In general terms, health care can be defined by its relations to treatment, control or prevention of disease(s), illness(es), injury(ies) or disability(ies).	
SE 026	Page 6	04	4	ED	In general terms it can be said that a social care need is one that is focused on providing assistance with activities of daily living, maintaining independence, social interaction, enabling the individual to play a fuller part in society, <b>protecting them in vulnerable situations</b> , helping them to manage complex relationships and (in some circumstances) accessing a <b>care home</b> or other supported accommodation.  The red text is doubtful? What do you mean by “protecting” and “care home”?	Change to: In general terms, social care and services can be defined by its focus on assistance with activities of daily living, maintaining independence, social interaction, enabling the individual to play a fuller part in society, <b>supporting them in vulnerable situations and</b> helping them to manage complex relationships.	
SE 027	Page 6	04	4	ED	Social care needs include, but are not limited to: social work services; advice; support; practical assistance in the home; <b>assistance with equipment and home adaptations</b> ; visiting and sitting services; provision of meals; facilities for occupational, social, cultural and recreational activities outside the home; <b>assistance to take advantage of educational facilities</b> ; and assistance in finding accommodation (e.g. a care home), etc.  The first red text does not apply to social care (it lies within rehabilitation). The second red text is difficult to understand.	Remove: <b>assistance with equipment and home adaptations</b> and clarify <b>assistance to take advantage of educational facilities.</b>	

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CZ 028	-	04.		ge	<p>Especially in this theme we do not agree with the detailed information (as it is written – vision, hearing, service, sleep, pain, skin and wounds, falls, physical function, medication, medical assessments and activities). These topics are specifically governed by our national legislation. It cannot be edited in any other way, and we disagree <u>with their launch and specifications in the standard.</u></p> <p>According to our opinion there should be the basic principles of work in the field of health care in this clause.</p> <p>We prefer more ideas which are written in comments in this part (support mechanism which support clients/users/people, identify their needs, goals and preferences and ensure that their needs are met.</p> <p>In the part of individual care planning (Comments, p. 17. 2<sup>nd</sup> Paragraph) we have some comments. Individual planning is based on personal needs. In the text is given the term "target". These terms are not identical.</p> <p>It is not possible to have complex individual plan for social and health goals (because of the rules of the health care in the Czech Republic).</p> <p>We do not also understand what does the term "recreational goals" mean.</p> <p>On the other hand we think that very important points are: activities (as the part of individual planning – so we would connect it with it).</p> <p>"Maintenance of record" – in the Czech Republic this area is governed by specific legislation to protect personal and sensitive data and rules for shredding and archiving. In the case of modification of standards, we recommended to adjust again the basic principles.</p>		
SE 029	Page 19	04.05		gen	The whole section about social care is questionable. For example the "assistance with equipment and home adaptations" and	Remove irrelevant information. Add social care in terms and definition	Ta bort st 3 Definiera Social care I termen och definitioner

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					"facilities for occupational". Is this really social care? Or rehabilitation? Or else?		
SE 030		04.18		ed	Better to move 4.18 to follow 4.15. Update other number order to be chronologically.		
SE 031	Page 7	05	1	ED	The sentence: " <i>Person-centred care places the older person at the centre of all services.</i> " is not correct.	Person-centred care takes its starting point from the older persons needs, resources, interest and foremost history.	
SE 032	Page 7	05	1	ED	A key principle of this standard is that older persons in receipt of services are central in all aspects of planning, delivery and review of their care.	Change to: A key principle is that the older person's interests are central in all aspects of planning, delivery and review of her/his care.	
SE 033	Page 21	05.01		gnb	In this sentence: "Fragile older person people in great need of care can nowadays live at both ordinary and different kinds of residential care facilities" you use fragile instead of frail (see comment above)". Frail and frailty are well-established and defined terms, that should be used correct. Fragile is not.	Change to frail consequently and use correct definition.	
SE 034	Page 7-8	06	1	ED	Is this sentence necessary: Many older people also need frequent visits to health services, which in turn involves an increased risk of infection, and risk of spreading infection.	Remove sentence	
SE 035	Page 8	06	2	ED	This sentence: " <i>Staff showing respect for and understanding and <b>acceptance</b> of the disabilities of the older helps to reinforce the self-esteem and confidence of the older person.</i> " is not at all personcentred." For example "acceptance" is incorrect.	Staff showing respect for and understanding the <b>disabilities and resources</b> of the older person, helps to reinforce the self-esteem and confidence.	
SE 036	Page 8	07	1	ED	Formal services are rendered by external people having a formal contract of employment. Spouses, children and their spouses or other family members usually provide informal care.	Change to: Formal services are rendered by external people having a formal contract of employment and professional education. Informal services are provided by relatives, for example spouses or children, or friends or neighbors.	

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SE 037	Page 9	08		ED	I miss a section to describe assisted living facilities. There are a lot advantages from them as well.	See separate text Assisted living	
SE 038	Page 8	08	2	ED	Home care is delivered at home.	Home care is delivered at the home of the older person/patient.	
SE 039	Page 8	08	2	ED	This sentence needs to be revised: <i>"Home care promotes healing and allows freedom for the individual, in contrast to institutions, which are more or less regulated environments."</i> Doesn't institutions promote healing? Home care can truly restrict freedom as well, since the older person may be bound to their home waiting for the staff.	Remove sentence	
SE 040	Page 8	08	2	ED	This sentence should come first among the reasons for home care: <i>"Many people prefer home care to any other option. Home is a place of emotional and physical associations, memories and comfort."</i>	Move the sentence.	

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