

## Consultation Feedback: HSE National Guideline for the assessment, promotion and management of continence to adults 2018

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Family Carers Ireland welcome the opportunity to provide feedback on the HSEs National Guidelines for the Assessment, Promotion and Management of Continence in Adults. Rather than respond to the specific questions set out in the feedback form, we have opted to provide general feedback.

### General Comments

- Family Carers Ireland welcome the creation of the guidelines and feel they are an important resource to healthcare professionals enabling them to better promote continence care and improve outcomes for adults experiencing/living with incontinence. Such a resource is of particular importance given the hidden nature of incontinence meaning many people suffer in silence not knowing of the practical supports available.
- While the guidelines are clearly intended for use within the health service, there is considerable use of abbreviations and acronyms throughout the document. While these will be easily understood by the majority of health professionals, they may cause confusion amongst some workers (e.g. home care workers) and should be avoided. We note for example that the term PPPG is not explained, even in the Glossary of Terms/Abbreviations.
- Family Carers Ireland suggest moving the Glossary of Term/Abbreviations to the beginning of the document.
- In the Glossary of Terms in the explanation of a carer it refers to the Department of Health’s National Carers Strategy. Please note that the National Carers Strategy, while lead by the DoH is not owned by it but rather is a Government strategy.
- While acknowledging the document is in draft form, there are a number of typos and grammatical errors throughout.
- Page 4 in the flowchart –in step 4 there is no mention of referring the patient to a physiotherapist which should be carried out if conservative treatment is the approach taken
- Page 11 the title of the policy and date is incorrect. It should read “Safeguarding Vulnerable Persons at risk of Abuse” (2014)
- Page 24 the assessment form only refers to CHO8 – this may cause confusion.
- Page 26 in part 6 the management / care plan doesn’t refer to treatment by a physiotherapist.
- On page 24 there is a question asking whether the person receives Domiciliary Care Allowance (DCA). Please note that DCA is a monthly payment made to children under the age of 16 years with a disability and is therefore not relevant in these guidelines which is intended for incontinent adults.
- Page 15 point 2.8 references a link to full contact listing of the HSE safeguarding teams at [www.hse.ie/safeguarding](http://www.hse.ie/safeguarding). Please note this link is to the general safeguarding page and should be replaced by <https://www.hse.ie/eng/services/list/4/olderpeople/elderabuse/protect-yourself/safeguardprotectteams.html> which sets out the Safeguarding and Protection Teams by CHO.

### Important Points for Consideration

- The Department of Communications, Climate Action and Environment has confirmed that households where incontinence care is provided will be given an annual rebate of €75 on their waste

collection charges to compensate for any additional charges they may incur due to increased bin weights. It would be useful if the document included reference to this rebate so health care staff can pass on this important information to their clients.

- The guidelines should be amended to reflect the significant change in practices that will be required under the Assisted Decision-making (Capacity) Act 2015. Under the Act persons lacking capacity or with limited capacity will have a right to have legally recognised decision-makers support their decision-making, or where capacity is lacking to substitute their decision-making. The Act will have significant implications for health care staff in the provision of safe person-centred care, based on respecting the individual rights of each person and as such should be reflected in the guidelines.
- There is often considerable confusion regarding eligibility for incontinence products through the HSE, with Family Carers Ireland understanding that in some CHO areas incontinence products are available only to persons with a Medical Card, while in other areas products are available to all those who need them regardless of whether they hold a Medical Card. To this end it would be useful to include a section setting out the specifics of who is eligible for HSE provided incontinence products.