

2 August 2017

Jeanette Radcliff
Secretary
Community Affairs Legislation Committee
Parliament House
Canberra ACT 2600

Dear Ms Radcliffe,

In reference to the current Inquiry into the effectiveness of the aged care quality assessment and accreditation framework for protecting residents from abuse and poor practices, and ensuring proper clinical medical care standards and maintained and practised ACIA is making the following submission. ACIA is advocating for changes to the current Aged Care Quality assessment and accreditation framework to increase the effectiveness of the processes and further safeguard aged care recipients.

As a peak body, ACIA's primary purpose is to advocate for quality in the community care sector. ACIA's members, include private, not-for-profit and charitable organisations. Nationally ACIA represents over 100 provider organisations. ACIA and our member organisations would like to see alignment in the regulation of the aged care and disability sectors.

ACIA administers the Attendant Care Industry Standard (ACIS). Disability and Aged Care service providers can seek Certification to ACIS. We believe ACIS is the most rigorous quality standard currently available in the community sector. ACIS is an example of how a single Quality Standard can be effective across both the Disability and Aged Care Sector.

ACIA is a member of the National Aged Care Alliance (NACA). The ACIA President is currently chairing the NACA Quality Advisory Group which provides the Department of Health feedback and views from the aged care sector. Through this role and other activities, ACIA is working to improve the quality safeguards requirements in the Aged Care Sector.

ACIA proposes improvements to the Aged Care Quality Assessment and accreditation framework to increase the rigour of the framework without overburdening providers with additional regulation. Currently, Aged Care Quality Assessments and Accreditations are conducted by the Australian Aged Care Quality Agency. To increase the assurance of the assessment process, ACIA suggests that assessment should be conducted by a third-party auditor that has received training to the Accreditation Standard. Third-party auditors should be required to undergo certification to a body such as Jas-ANZ. The introduction of a third-party auditor will enhance the integrity of the scheme as the third-party auditor would be accountable for endorsing the certification of the provider.

ACIA would also like to see a review of the Accreditation Standard. The Accreditation Standard should be re-written so that there is greater clarity in the requirements to achieve each of the outcomes within the four Standards. A set of requirements

should be developed under each outcome. Each requirement should be written in language that can be audited. Auditable language will allow each service provider to provide evidence against the requirements, and give a clear means to assess if the requirement has been met. Where a provider meets all the requirements for a given outcome, the outcome should be deemed to be achieved. As the Outcomes are currently written, it is unclear what is required for a provider to meet or achieve the Outcome.

In updating the Standard ACIA would like to see progress toward a Single National Standard for Human Services. A national standard would encompass aged care homes, the provision of aged care services in the community and disability support services. Many providers of Aged Care services also provide services within the Disability sector. Currently these providers are required to attain accreditation to multiple standards. A single national human services standard will help reduce the cost of regulation for providers who deliver services across each of these industries. It would also ensure that vulnerable people regardless of their support needs receive the same protections and safeguards.

A Single National Standard for Human Services would represent a significant reform to both the Aged Care and the Disability sector. In the absence of such reform, mutual recognition of Disability and Aged Care standards where providers are delivering similar services should be considered to limit the cost of regulation for providers operating in both sectors.

ACIA also recommends improvements to regulations in complaints handling processes and the adoption of a single national approach to the handling of complaints within the Aged Care sector. Providers of Aged Care services should be required to have effective complaints handling systems in their organisations. The updated Accreditation Standard should refer to these requirements. A lack of conformity by individual providers would be picked up as part of the Assessment and Accreditation process conducted by third party auditors. Beyond internal provider systems, the Aged Care Complaints Commissioner should be maintained. This is essential for cases where complaints have not been handled appropriately by a service provider, or for circumstances where an individual does not feel comfortable reporting their complaint to the service provider.

In addition to improved complaints handling processes, specific regulatory requirements should be put in place which outline requirements for the reporting of serious incidents and adverse events. These events should also be reported to the Aged Care Complaints Commissioner. The regulatory requirements should outline the nature of incidents that need to be reported and the timeframes in which such events should be reported.

ACIA is pleased to have the opportunity to provide a submission to this inquiry and would be happy to provide further information on request.

Yours sincerely,

Natasha Cebalo
Attendant Care Industry Association