



## Introduction

Thank you for taking the opportunity to read and consider the draft guidance material that has been developed to support providers of aged care services to meet the new aged care quality standards. We welcome your feedback.

Once completed please save and send this completed form by email to [qualityagencypolicy@aacqa.gov.au](mailto:qualityagencypolicy@aacqa.gov.au)

Should you require additional support to complete this form, please contact the Australian Aged Care Quality Agency via email [qualityagencypolicy@aacqa.gov.au](mailto:qualityagencypolicy@aacqa.gov.au) or via phone on 1800 288 025.

1. What is your email address? *(This information will not be published)*

[Redacted]

2. Are you answering on behalf of an organisation? If so, please provide your organisation's name

☒ Yes, on behalf of an organisation ☐ No, not on behalf of an organisation

Organisation name: The Federation of Ethnic Communities' Councils of Australia

3. Do you give consent for your submission to be published in whole or part?

☒ Yes, I give consent ☐ No, I don't give consent

4. Where do you live, or, where does your organisation operate?  
Please select all that apply

☒ NSW ☒ VIC ☒ QLD ☒ WA ☒ SA ☒ TAS ☒ ACT ☒ NT



**5. Do you have any specific suggestions in relation to the draft guidance for Standard 1: Consumer dignity and choice? If so, what are they?**

Requirements 1.2 c (p. 15) Communicate their decisions IN THEIR PREFERRED LANGUAGE

Supporting strategies -

\*(p.16) making interpreters, mobile devices and other communication aids, AS WELL AS TRANSLATED MATERIALS/RESOURCES, readily available (and as needed) so consumers can communicate their choices and decisions.

\*Understand the relationships that are important...(p.16) - accommodating requests for visitors to the service, BY INCLUDING LARGE FAMILY GROUPS AND ALSO VOLUNTEERS FROM CULTURAL COMMUNITIES.

p.17 Policies and practices \* Strategic documents, policies and procedures that describe how the organisation supports consumer choice and independence, and how agreements are reached if expressed wishes are not able to be met.

TAKING INTO ACCOUNT THE NEED TO REFLECT CARE FLUCTUATIONS AS CARE NEEDS CHANGE.

Requirement 1.3 (p.19) Where a consumer's choice involves risk to their health and/or safety, they are informed about the risks IN A FORMAT THEY CAN UNDERSTAND, the potential consequences to themselves and others, and how risk can be managed to assist the consumers to live the life they choose.

p.19 Where functional decline adversely impacts a consumer's capacity to participate or undertake the activities they enjoy, work with the consumer, THEIR CARERS OR REPRESENTATIVES, OR SUITABLE ADVOCATE, INCLUDING BILINGUAL STAFF, to problem solve and to find ways to support them to achieve their goals and undertake activities that they enjoy.

**6. Do you have any specific suggestions in relation to draft guidance for Standard 2: Ongoing assessment and planning with consumers? If so, what are they?**

p.30 Policies and practices \* Provision of information in appropriate formats and LANGUAGE translations AND RESOURCES.



### 7. Do you have any specific suggestions in relation to draft guidance for Standard 3: Personal care and clinical care? If so, what are they?

P.45 Purpose and scope of the standard. The standard applies to all services delivering personal care (such as bathing, ORAL HEALTH, assistance with toileting, and assistance with eating) or clinical care (such as nursing care).

\*Key resources and relevant legislation. Australia's National Oral Health Plan

[http://www.coaghealthcouncil.gov.au/Portals/0/Australia%27s%20National%20Oral%20Health%20Plan%202015-2024\\_uploaded%20170216.pdf](http://www.coaghealthcouncil.gov.au/Portals/0/Australia%27s%20National%20Oral%20Health%20Plan%202015-2024_uploaded%20170216.pdf)

p. 47 \* please add to the list: ORAL HEALTH: Poor oral health is a contributing risk to increased inflammation - exacerbating dementia, diabetes, cardiovascular diseases, respiratory conditions and other chronic conditions. Thus affecting overall health and well-being.

p.52 C. Supporting strategies\* Develop clear communication pathways for people whose first language is not English. Ensure that communication aids and interpreters are readily available to assist in communication with the person.

p.55 Please change from dentists to dental health professionals ( as this will include dental hygienists, oral health therapists)

Reflective questions: Are the services of dietitians, speech pathologists, DENTAL HEALTH PROFESSIONALS (please include as dental issues relate directly to nutrition barriers)

p.56 Please include ASPIRATING alongside choking in all areas.

p.58 The consequences of chronic pain include increased confusion...please include undiagnosed pain caused by dental and oral disease.

p.62 Minimising restrictive practice/Supporting strategies \* understanding the triggers which can cause changes in behaviour

### 8. Do you have any specific suggestions in relation to draft guidance for Standard 4: Services and supports for daily living? If so, what are they?

p.79 Requirements 4.5 Where meals are provided, they are varied, including CULTURALLY APPROPRIATE and of GOOD STANDARD quality and quantity.

Consumer choices about who they want to meet their care needs are respected, followed and documented.



**9. Do you have any specific suggestions in relation to draft guidance for Standard 5: Organisation's service environment? If so, what are they?**

p.98 A service environment that is welcoming and easy to understand, INCLUDING CONSUMERS WITH DIVERSE NEEDS

p.100 Requirement 5.1 Support movement and engagement. Please add - Use signs in language to assist consumers to navigate the service environment.

p.106 Reflective questions: Please add \*Does the physical environment ensure that people who may be at risk of wandering outside of the environment are not able to do so unaccompanied?

**10. Do you have any specific suggestions in relation to draft guidance for Standard 6: Feedback and complaints? If so, what are they?**





**11. Do you have any specific suggestions in relation to draft guidance for Standard 7: Human resources? If so, what are they?**

p. 126. 7.5 Regular assessment, monitoring and review of the performance of each member of the workforce, WHICH SHOULD INCLUDE ACCOUNTABILITY MEASURES FOR ALL TASKS.

Training p.134 - Training to include end of life care, death and dying particularly for new recruits to aged care.

Training to be regular and ongoing to accommodate transient work flows.

**12. Do you have any specific suggestions in relation to draft guidance for Standard 8: Organisational governance? If so, what are they?**

P.155 Please add - \* That the organisation's governing body is suitably experienced for the role of governing an organisation which provides care and supports to vulnerable people. The governing body should demonstrate that it understands the operation of the Australian aged care quality system.



13. On a scale of 1 to 10 (1 being not clear at all and 10 being very clear) how clear is the guidance material overall?

<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input checked="" type="checkbox"/> 6	<input checked="" type="checkbox"/> 7	<input type="checkbox"/> 8	<input type="checkbox"/> 9	<input type="checkbox"/> 10
----------------------------	----------------------------	----------------------------	----------------------------	----------------------------	---------------------------------------	---------------------------------------	----------------------------	----------------------------	-----------------------------

What would make it clearer?

Clearer formatting. Colour coded for each area so that each element is easily recognisable.  
It could also be structured to feature an icon next to each area, for example training and workforce. Also each standard to be represented by a different colour, or tabs for easy reference.  
A diagrammatic introduction with a clear, concise explanation of each standard, again with an icon or picture to represent each standard.

14. Are there any gaps in the guidance material? If yes, what else should be included in the guidance material, to help aged care service providers to meet the draft new Aged Care Quality Standards?



### 15. Do you have any other feedback on the guidance material?

additional feedback Standard 1

p.20 Training: Documenting decision making; include an understanding that decisions may alter throughout a person's period of care. If a decision has been made, there needs to be an acknowledgement that people are able to alter decisions and not be locked in. People need to be supported to change their minds. If required, an interpreter should be engaged for people with low English language proficiency.

p.21 \*Policies and procedures...

- include ways to address barriers to consumers taking risks and living the life they choose, for example, family or representative intervention.

p.23 Examples of evidence Consumer experience. \* Confirm that they get the information they need to help them make decisions, INCLUDING TRANSLATED INFORMATION AS REQUIRED AND/OR ASSISTANCE FROM INTERPRETERS.

P. 23 Workforce and others experience

\*Management can describe how often the information provided to consumers is reviewed, to satisfy...This may be in conjunction with the results of formal feedback from consumers and their representatives, THIS INFORMATION SHOULD REFLECT THE DIVERSITY OF THE CONSUMER PROFILE.

P.24 REQUIREMENT 1.5 Intent, please add after residential aged care setting) OR ENTER THEIR HOME

P. 24 Supporting strategies please include \* Demonstrate how the organisation protects its records system from cyber attack in line with current legislation. (this is linked to the privacy and confidentiality aspects preceding.)

p.25 Training please add \* Ensure that boundaries training is up to date.

p. 25 Policies and practices, please include: Share your privacy statement/privacy policy with the consumers, in language

Once completed please save and send this completed form by email to [qualityagencypolicy@aacqa.gov.au](mailto:qualityagencypolicy@aacqa.gov.au).

If you wish to contribute more information than the feedback boxes will allow, please attach a Word document or write to us in the body of your email.

Should you require additional support to complete this form, please contact the Australian Aged Care Quality Agency via email [qualityagencypolicy@aacqa.gov.au](mailto:qualityagencypolicy@aacqa.gov.au) or via phone on 1800 288 025.

Thank you for participating in the survey.

