

Lesbian, Gay, Bisexual, Transgender, Intersex Community Ageing Network Sunshine Coast
Submission to the Draft Guidance Aged Care Quality Standards

1. What is your email address?

[REDACTED]

2. Are you answering on behalf of an organisation? If so, please provide your organisation's name
Yes; LGBTI (Lesbian, Gay, Bisexual, Transgender, Intersex) Community Ageing Network Sunshine Coast

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

Yes, we give consent

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

QLD

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 Do you have any specific suggestions in relation to the draft guidance for Standard 1: Consumer dignity and choice?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?

Requirement 1.1, Supporting strategies, first dot point should read, '**Listen** to each consumer to understand ...'

Requirement 1.1, Supporting strategies, fifth dot point should read, 'Provide diversity and cultural safety training to the workforce **delivered by persons who have been identified as appropriately trained by the peak bodies representing that diversity eg. LGBTI National Health Alliance for the LGBTI community**.'

Requirement 1.1, Supporting strategies, seventh dot point should read, 'Identify and **promptly** address any discriminatory practices ...'

Requirement 1.1, Examples of evidence, Training (Workforce orientation, training and other records) should include third dash '**– engage appropriately trained and accredited training providers to educate for specific consumer groups**'

Requirement 1.3, Supporting strategies, first dot point, (Empower consumers to take risk on a day-to-day basis such that it is part of normal life, for example' should include third dash, '**– empower consumers to switch service providers**'

Requirement 1.4, Supporting strategies, fourth dot point, should read, 'In addition to providing essential information required by law (such as service agreements) provide other information that can help consumers make choices, including about: the services they receive; how they can change these services; the organisation's performance; **and how to make complaints**'

Requirement 1.5, Supporting strategies, fifth dot point, second dash, should read, '**–Integrity - safeguarding and protecting information and systems, including identifying and tracking access to consumers' information**'

Requirement 1.5, Policies and practices, first dot point, should read, 'Evidence of an information management system that makes relevant information available **only to people who need to know** in a timely manner, and protects the confidentiality, and integrity of the information'

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?

Requirement 2.1, Supporting strategies, first dot point, should read, 'Form partnerships with consumers and their representatives, so that consumers can be actively involved in the assessment, planning and review of a **comprehensive plan for** their care and services'

Requirement 2.3, Supporting strategies, after sixth dot point add extra dot point, '**Make available to consumers information about end of life care and choices**'

Requirement 2.3, Supporting strategies, add extra dot point, '**Make available for persons from diverse communities (for example, LGBTI, CALD, ATSI) resources that have been designed specifically to address their circumstances**'

Requirement 2.4, Intent of this requirement, should be expressed in the following positive terms, 'Cultural safety refers to an environment that is spiritually, socially, physically and emotionally safe for a person – essentially where there is **understanding and affirmation of who they are and what they need**'

Requirement 2.4, *Examples of evidence, Consumer experience*, second dot point should say 'Consumers can describe how the organisation has responded to them as individuals and how their ethnicity, faith, culture, sexuality, **gender**, relationship status or otherwise has been respected, including through assessment and planning'

Requirement 2.6, Supporting Strategies, third dot point, should include extra dash '**– respect privacy and confidentiality so that access is given only to those participating in care or that the consumer provides permission to access**'

Requirement 2.7, Intent of this requirement, second paragraph, should be expressed in the following terms, 'The regularity with which reviews will be **undertaken** will depend on the **needs of the** individual consumer and also on the nature and type of services being provided by the organisation'

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?

Requirements 3.1, 3.2 and 3.3, section D. Minimising risk of falls and harm from falls, Supporting strategies, after fourth dot point add extra dot point, '**Encourage consumers to engage in strength training to prevent falls**'; section E. Optimising nutrition and hydration, Supporting strategies, seventh dot point should read, 'evaluating and reviewing the management of nutrition and hydration to determine effectiveness in meeting the needs of consumers, **in particular that food is appetising and palatable**'; section J. Minimising restrictive practice, fifth dot point needs to be part of the introductory sentence, 'Develop and implement a system **that provides assessment and treatment in the least restrictive way and in the least restrictive environment which is consistent with the consumer's care and safety**';

Requirement 3.7 should remove the words 'when necessary' so the requirement for timeliness is unequivocal, '**Timely referrals to other providers, organisations and individuals**';

Requirement 3.8, Intent of this requirement, Infection control, third paragraph should read, 'As part of an effective influenza infection control program organisations providing residential aged care services are required **to ensure their workforce have influenza vaccinations**'

Requirement 3.8, Examples of evidence, Consumer experience, first dot point should read, 'Consumers and representatives are confident in the organisation's ability to **prevent** an infectious outbreak'

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?

Requirement 4.2, Supporting strategies, sixth dot point, should read, 'Participate in external events such as Sorry Day, Chinese New Year, **IDAHOT** etc., celebrate these within the organisation and enable consumers to access external events'

Requirement 4.4 should remove the words 'when necessary' so the requirement for timeliness is unequivocal, '**Timely referrals to other providers, organisations and individuals**'

Requirement 4.5, introductory paragraph should read, 'Where meals are provided, they are varied and of adequate quality and quantity, **and appetising**'

Requirement 4.5, Supporting strategies, add extra dot point, '**Provide opportunities for consumers to vary their diet by enabling them to order and have delivered take-away meals**';

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

Organisation statement should read, 'The organisation provides a safe and comfortable service environment that promotes the consumer's independence, function, enjoyment **and health**'

Supporting strategies, fourth dot point should read, 'Support movement and engagement **that promotes access to the natural environment, both indoors and outdoors, to encourage the physical and psychosocial benefits of engaging with nature**'

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

Purpose and scope of the standard, first dot point should be changed to read, 'encourage consumers to provide feedback to their organisation about their experience within the service, whether positive or negative, **without compromising their ability to continue to receive services** and'

Requirement 6.3 should read, 'Consumers have access to advocates, language services and other mechanisms for raising and resolving complaints, **including independent avenues for making and reviewing complaints** ';

Requirement 6.4, Intent of this requirement, second dot point, should be changed to read, 'consumers can use a transparent and accessible complaint process that focuses on openness and resolving issues **without compromising their living and service arrangements**

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

Requirement 7.1, Supporting Strategies, first point, add first dash '**– demonstrate the organisation actively seeks diversity in the workforce when recruiting**'

Requirement 7.4, Supporting Strategies, add extra dot point, '**Evidence of frequency of education and training to maintain/upskill/ensure current practice for all levels of the workforce - for example, an education and training strategy that is evidenced by a program, timetable or calendar**'

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

Nil

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?

8

What would make it clearer?

The term 'open disclosure' referred to in Standards 6 and 8, should be included in the Definitions

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?

Nil

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

The draft quality standards are an improvement on the present ones and we're quite proud that our government has decided to continue to review — it holds true to the quality improvement commitment that the government expects of the providers that they also practice this.