



# Site Audits in residential aged care

Date: 21 February 2023

**1800 951 822**  
[agedcarequality.gov.au](http://agedcarequality.gov.au)

# What is a site audit?

A site audit is a comprehensive assessment of performance against the Aged Care Quality Standards carried out at residential aged care services for the purpose of accreditation or re-accreditation.

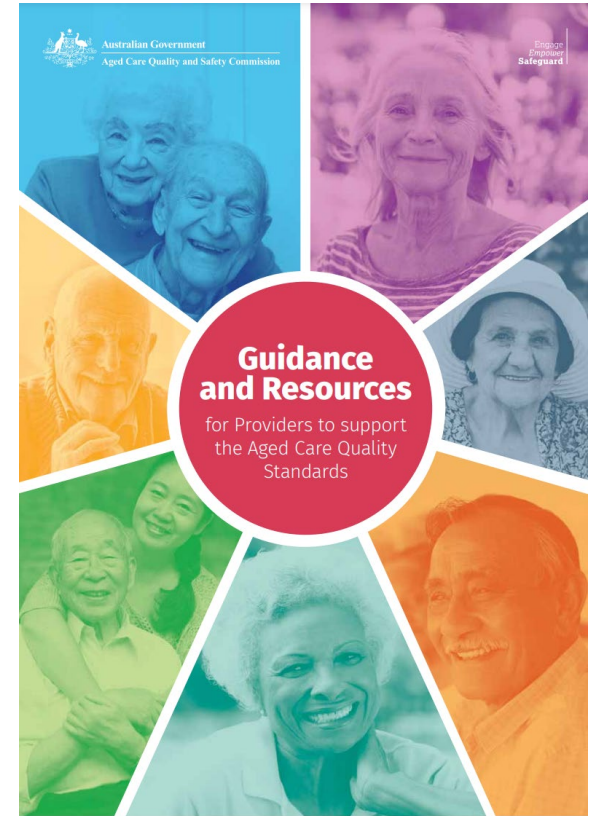
Site audits are unannounced and will result in a decision by the Commission to accredit/re-accredit or not to accredit the service. Where a service is accredited or re-accredited, the Commission will also make a decision regarding the period of accreditation.





# The Assessment Methodology

- Sector guidance on the Commission's approach
- Supports a consistent approach in conclusions
- Application will vary subject to circumstance
- Reflective questions and examples of evidence



# Preparing for a Site Audit

- Self assessment tool provides evidence that a service understands the requirements of the Quality Standards
- Evidences an understanding of risk and continuous improvement
- Submitted with application for reaccreditation



# Conducting an unannounced site audit

- Assessment Team appointed with registered Quality Assessors who must comply with Code of Conduct
- Unannounced to request consent to enter the premises with appropriate screening procedures on entry
- Quality Assessors interview consumers, staff and others and may follow risk based questions drawn from our regulatory intelligence
- Information is drawn from three potential sources of evidence:
  - Interviews
  - Observations
  - Document and records review



# The assessment approach



# What we are looking for onsite

- The organisation understands risk and implements treatments in response to the risk
- The organisation understands the consumer experience
- The organisation demonstrates that it:
  - a) understands the requirement in relation to the consumer outcome
  - b) applies the requirement, and this is clear in the way it provides the consumer's care and services



# Provider Responsibilities

- Submit a valid application for reaccreditation
- Notify consumers (and their representatives) and staff of a site audit and support their participation
- Actively participate in the audit, providing information as requested, as early as possible
- Arrange management participation if preferred
- Address any urgent concerns are raised by the assessment team
- Demonstrate courtesy and respect





# Continuous Improvement

## Approved Providers

- Plan for Continuous Improvement
  - consider the needs of consumers and involve them in improvement activities
  - demonstrated through measurable outputs and outcomes
  - Request for copies and direction to revise

## Commission

- Operational Quality Assurance Framework
- Workforce training and capability enhancements





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# Responding to a site audit report

- Providers are given 14 days after receiving the Site Audit Report to provide a written response to its contents
- The response should present factual information and evidence about how the service meets the Quality Standards
- The Site Audit Report, along with the provider's response and other relevant information will be taken into account by the Commission in developing a Performance Report and making a reaccreditation decision



# Performance Reports and the accreditation decision are published

<https://www.agedcarequality.gov.au/reports>

## Find a Report

Access performance information about individual aged care services including performance reports in relation to performance assessment activities undertaken, decisions relating to accreditation of residential services and other historical performance information.

For information relating to Non-Compliance Notices, Notices to Agree and Sanctions, please visit [My Aged Care's non-compliance checker](#).

Service name

Provider name

RACS/Commission ID (4 or 6 digits)

Service type

Suburb

Previous service name

State

Postcode



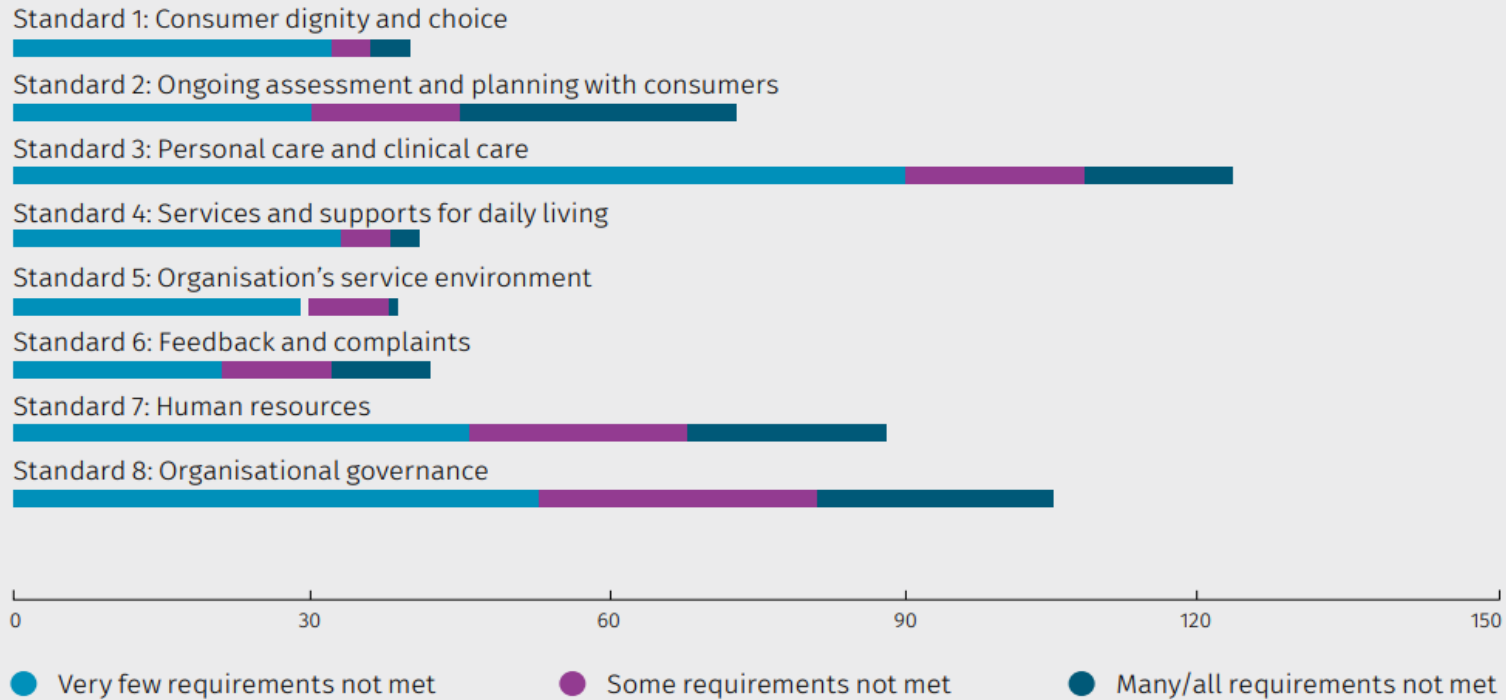
Australian Government

Aged Care Quality and Safety Commission



# Non-Compliance

## Number of services where non-compliance was found with each Aged Care Quality Standard



# Non-Compliance with requirements

## Most frequently cited requirements where non-compliance was found

3(3)(a) Safe and effective personal and clinical care	91
8(3)(c) Effective governance systems	71
3(3)(b) High impact or high prevalence risks managed effectively	65
8(3)(d) Risk management systems and practices	54
7(3)(a) Number and mix of workforce	53
2(3)(e) Regular reviews of care and services	51
2(3)(a) Assessment and planning informs safe and effective services	47
8(3)(e) Clinical governance framework	47
7(3)(d) Recruitment training and support for workforce	42
2(3)(b) Assessment and planning identifies current needs	33



# Feedback following our visit

- Complete the online feedback survey following the visit  
(*a link is provided by the Assessment Team when they depart*)
- Raise a complaint with the Commission  
(*The complaint form can be found at [agedcarequality.gov.au](https://agedcarequality.gov.au)*)



# More information

## Regulatory Bulletin 5 – Aged Care Quality Standards Performance Assessment Methodology

<https://www.agedcarequality.gov.au/regulatory-bulletin>

Bulletin number	Bulletin title
RB 2023-18	<a href="#">Publication of provider performance information</a>
RB 2023-17	<a href="#">Banning orders</a>
RB 2022-16:	<a href="#">Changes to Administration and Management Charges in the Home Care Packages Program</a>
RB 2021-15	<a href="#">Plan for continuous improvement requirements</a>
RB 2021-14	<a href="#">Change in service ownership</a>
RB 2021-13	<a href="#">Regulation of restrictive practices and the role of the Senior Practitioner, Restrictive Practices</a>
RB 2021-12	<a href="#">Reconsideration of reviewable decisions</a>
RB 2020-10	<a href="#">Quality assessor registration</a>
RB 2020-09	<a href="#">Assessment contacts in residential and home services</a>
RB 2019-06	<a href="#">Regulatory decision making</a>
RB 2019-05	<a href="#">Aged Care Quality Standards performance assessment methodology</a>
RB 2019-04	<a href="#">Responding to non-compliance with the Aged Care Quality Standards</a>
RB 2019-03	<a href="#">Exclusion of specific dates for unannounced visits</a>



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# Compliance Readiness

How to be well-prepared for a visit  
from the Commission

21.02.2023



# The Compliance Environment

1. Unknown Timing	2. Legislative Changes
3. Increased Expectations	4. Risk Data

# Unknown Timing

- We don't know when a visit will happen
- Gone are the days of timed preparation



# Unknown Timing

What do we do?

- Always compliant and prepared mentality
- Systems over people
  - But people deliver the care
- Internal audits to identify gaps
  - Consider external if small
- Gap rectification and systems to maintain

# The Compliance Environment

1. <del>Unknown Timing</del>	2. Legislative Changes
3. Increased Expectations	4. Risk Data

# Legislative Changes

- Increasing and changing legislative requirements
- Royal Commission
  - 119 Recommendations Accepted (or in-principle)
  - 50 of these are for providers to implement
  - Only just started

# Medium to high impact changes

#	Recommendation	Response	Implementation Date	Operational Impact
17	Regulation of restraints	Accepted	2021	Medium
100	Serious incident reporting	Accepted	2021	Medium
130	Responsibility for prudential regulation	Accepted-in-principle	2021	Medium
22	Quality indicators	Accepted-in-principle	2022	Medium
23	Using quality indicators for continuous improvement	Accepted	2022	High
89	Leadership responsibilities and accountabilities (Commissioner Briggs)	Accepted	2022	High
90	New governance standard	Accepted	2022	High
116	Requirement to participate in Pricing Authority activities	Accepted	2022	Medium
120	Casemix-adjusted activity based funding in residential aged care	Accepted	2022	High
122	Reporting of staffing hours	Accepted	2022	Medium
131	Establishment of prudential standards	Accepted	2022	Medium
1	A new Act	Accepted	2023	High
2	Rights of older people receiving aged care	Accepted	2023	High
3	Key principles	Accepted	2023	High
13	Embedding high quality aged care	Accepted	2023	High
14	A general duty to provide high quality and safe care	Accepted	2023	High
19	Urgent review of the Aged Care Quality Standards	Accepted	2023	High
20	Periodic review of the Aged Care Quality Standards	Accepted	2023	High
21	Priority issues for periodic review of the Aged Care Quality Standards	Accepted	2023	High
37	Residential care category	Accepted	2023	High
86	Minimum staff time standard for residential care	Accepted	2023	High
88	Legislative amendments to improve provider governance	Accepted	2023	High
96	Responding to Coroner's reports	Accepted	2023	Medium
97	Strengthened monitoring powers for the Quality Regulator	Accepted	2023	High
101	Civil penalty for certain contraventions of the general duty	Considering	2023	High
102	Compensation for breach of certain civil penalty provisions	Considering	2023	High
103	A wider range of enforcement powers	Accepted	2023	High
108	Data governance and a National Aged Care Data Asset	Accepted	2023	Medium
132	Liquidity and capital adequacy requirements	Accepted	2023	Medium
133	More stringent financial reporting requirements	Accepted	2023	Medium
25	A new aged care program	Accepted-in-principle	2024	High



# Legislative Changes

What do we do?

- Expect to be audited on new legislation (and old)
  - Governance for example
- Continuously monitor and implement systems to comply with new legislation
  - We resource this
- Update internal audits
- Take care of yourself

# The Compliance Environment

1. <del>Unknown Timing</del>	2. <del>Legislative Changes</del>
3. Increased Expectations	4. Risk Data

# Increased Expectations

- More black and white approach
- “Gaps” are not met
- Escalations happen quickly

# Increased Expectations

What do we do?

- Accept the increased expectations
- Take it seriously but not personally
- Don't fight with the Commission
  - Respond don't react



# The Compliance Environment

1. Unknown Timing	2. Legislative Changes
3. Increased Expectations	4. Risk Data

# Risk Data

- The Commission has data for a reason
  - Complaints
  - SIRS
  - Infection management (COVID)
  - Quality indicators
    - Including new indicators (July 2023)

# Risk Data

- All quality indicators from July 2023
  - Pressure injuries
  - Physical restraint
  - Unplanned weight loss
  - Falls and major injury
  - Medication management
  - Activities of daily living
  - Incontinence care
  - Hospitalisation
  - Workforce
  - Consumer experience
  - Quality of life

# Risk Data

What do we do?

- Analyse at the same data (and more)
- Dashboard / reporting
- Root cause analysis
- Systemise



# The Compliance Environment

1. Unknown Timing	2. Legislative Changes
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Thank you.

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# Q&A





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