

Submission to the Select Committee in relation to the performance of the Health Quality and Complaints Commission.

I would like to thank you for the opportunity to inform the review of the performance of the Health Quality and Complaints Commission (HQCC). The HQCC standards have some relevance to Residential Aged Care Services eg Infection Control and complaints management, but overall the standards are specific to in hospital or closely related services.

State Government Residential services already have an extensive set of standards with 44 outcomes against which we are required under the Aged Care Act 1997 to demonstrate compliance. These standards and compliance are linked to the funding of the service. There is close correlation with some aspects for both standards as noted above eg infection control, complaints management.

One issue of concern is related to duplication of reporting and assessment to two separate legislated bodies. This does not include the requirements of reporting, assessing and accreditation for ACHS.

As responses to the particular items in your invitation to provide a submission, I provide the following comments:

Policies, Procedures and systems to resolve complaints in a timely and responsive manner.

- The standards that have been developed meet all requirements that currently exist for Commonwealth Nursing Homes. The few alterations to our current practice required clearly are improvements and welcomed.

Statewide Access to the Commissions Services for the consumers and providers.

- The Aged Care Act 1997 requires the provider to notify the Department of Health and Aging – Aged Care Complaints Investigation Team of allegations of sexual and physical abuse of residents. This may be identified by the provider or by others.
- If a complaint is escalated to the HQCC by a client or other for either of these issues, we will have dual mandated reporting and investigation requirements through Commonwealth and State regulatory bodies.
- Residents currently are aware of their rights to escalate complaints to the Department of Health and Aging. As a Queensland Health facility residents and carers will also have the right to escalate complaints through the HQCC. There is potential for confusion – see next dot point.
- The facility consulted HQCC in March 2007 regarding a complex complaint and seeking to provide information to the complainant as to options for complaint escalation. The HQCC advised that Commonwealth Residential **did not fall under their jurisdiction**, regardless that we were a State Government facility.
- The issue here is the confusion that clearly exists in relation to information and processes for complaints for State Government Nursing Homes being both State and Commonwealth providers.

Systems to monitor and report on the quality of health services

- Systems will exist in parallel to residential aged care reporting requirements. We currently have robust monitoring and benchmarking systems across the 44 aged care standards that are reviewed and reported throughout the Aged Care Accreditation cycle.
- The monitoring and reporting required to meet the HQCC standards adds another layer of reporting and requires the information to be provided in a different form. This already creates complexity with the ACHS accreditation processes. Residential Aged Care will then be required to alter existing reports three times to provide similar information for three separate processes.

Consumer engagement strategies and consumer rights and quality improvement.

- In the Residential Aged Care Standards and under the Aged Care Act, the resident's rights are clearly defined and the facility is assessed through accreditation against this standard. Quality Improvement is built into every aged care standard and is also assessed at every accreditation visit (1.8 visits per year mandated).
- Again there will be duplication and manipulation of existing information to meet a different self assessment format.
- As a state Government provider, we as a service have not had the opportunity to inform this discussion or the development of the standards and their application to residential services.

Margaret Broomfield
Acting Director of Aged Care Services
Moreton Bay Nursing Care Unit