



Aged Care
Standards and Accreditation Agency Ltd

Mr J Whitton
Coroners Registrar
Coroners Court of Victoria
Level 11 222 Exhibition St.,
MELBOURNE VIC 3000

Court Ref: COR 2009 000711
Investigation into the death of Joan E Ambrose

Dear Mr Whitton

I refer to your letter of 1 August 2012 in which you requested a response to a recommendation of the Coroner's regarding the above investigation. The relevant recommendation is:-

Pursuant to section 72(2) of the Coroners Act 2008, I make the following recommendation(s) connected with the death:

2. That the Aged Care Standards and Accreditation Agency specifically require the emergency management plans of residential aged care facilities to strictly control their entry/exit points to prevent the unsupervised departure of residents during extreme heat events.

Our response is as follows.

The recommendation is unable to be implemented.

The Accreditation Agency assesses a home's performance against the Accreditation Standards.

The Accreditation Standards are not prescriptive in regards to specific practices. Under the Quality of Care Principles 1997, Part 3, section 18.9(1) it states "The Accreditation Standards are intended to provide a structured approach to the management of quality and represent clear statements of expected performance. They do not provide an instruction or recipe for satisfying expectations but, rather, opportunities to pursue quality in ways that best suit the characteristics of each individual residential care service and the needs of its residents. It is not expected that all residential care services should respond to a standard in the same way. The Accreditation Standards are broadly written and do not include information that meets the specific details of the Coroner's recommendation. The Department of Health and Ageing has initiated a review of the Accreditation Standards but there is no firm timetable for their release.

The range of possible solutions or alternative intervention(s) to resolve the issues identified.

Under comments in the inquest report, it is noted on page 10, section b:-

"The Australian Government has advised all residential aged care providers that they are required to develop emergency management plans, including those for extreme heat events, as a condition of the Accreditation Standard 4.6 (Fire, security and other emergencies)..."

The above information was provided to residential aged care homes by the Department of Health and Ageing.

The Aged Care Branch of the Department of Health in Victoria has also developed the Residential Aged Care Services Heat Wave Ready Resource. The website includes a checklist and information sheet.

Our industry publication, The Standard includes topical-interest articles, advice to aged care managers and examples of better practice. The special edition on emergency planning has been regularly re-issued as an update and an emergency planning checklist is available as a free download from our website.

When assessing a home's performance against the Accreditation Standards, we consider the principle for each Standard and the expected outcomes. This includes considering the systems and processes used by the home in providing a safe environment in a way that recognises individual resident needs and preferences.

The principle for Standard four of the Accreditation Standards, Physical environment and safe systems, states, "residents live in a safe and comfortable environment that ensures the quality of life and welfare of residents, staff and visitors."

Expected outcome 4.6 Fire, security and other emergencies requires that "Management and staff are actively working to provide an environment and safe systems of work that minimise fire, security and emergency risks."

A residential aged care home provides a living environment for a resident that is both safe and comfortable; an environment that is as close as possible to a home-like environment. In order to achieve a home-like environment, residential aged care homes need to consider the broader aspect of the Accreditation Standards. For example, when considering a safe living environment, expected outcome 4.4 Living environment is considered in context with Expected outcome 3.9 Choice and decision making and 3.6 Privacy and dignity among other expected outcomes. This ensures that residents can exercise choice and control over their lifestyle, that such decisions can involve risks and that such decisions are recognised and respected.

The Coroner's recommendation represents a level of prescription that is inconsistent with the generally-broad approach envisaged by the Accreditation Standards.

If further information is required please contact me on 02 9633 1711 or 0417 218 167. My email address is ross.bushrod@accreditation.org.au.

Yours sincerely



Ross Bushrod
General Manager Accreditation.

24 October 2012