

Rebecca Hudson
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Dear Ms Hudson

Investigation into the death of Valerie Margaret Fraser.

Thank you for your letter dated 30 October 2020 accompanying Coroner Bracken's finding without inquest into the death of Valerie Margaret Fraser.

Coroner Bracken recommended that *The Australian Commission on Safety and Quality in Health Care and Safer Care Victoria consider the need for a body external to health organisations to conduct periodic audits within the three-year assessment windows for ongoing compliance with the National Safety and Quality Health Service Standards.*

Following receipt of the Coroner's recommendation, my team has spoken with the Director of the National Standards Program at the Australian Commission on Safety and Quality in Health Care (the Commission), and with the Private Hospitals Unit (PHU) within the Regulation, Health Protection and Emergency Management Division of the Department of Health and Human Services.

Current practice within the Commission includes:

- the standard three-year cycle of accreditation
- services' provision of annual attestation statements, affirming in writing their compliance with the National Standards
- services' voluntary participation in the Short Notice Assessment pathway, whereby they are required to have processes in place to demonstrate compliance with the National Standards at any time.

The PHU works on a two-year renewal cycle, using a risk-based approach to regulation and visiting all registered facilities at least once every four years, with more frequent visits if there are identified or perceived risks requiring increased oversight. Their aim is to time site visits as close to the mid-point of the three-year accreditation cycle, to avoid there having been no 'footfall' in the sector for too long a period. Accreditation reports are also reviewed as part of a desktop review prior to conducting site visits.

The PHU notes that it is a legislative requirement that registered hospitals and day procedure centres be accredited to the National Safety and Quality Health Care Standards. The move to a 'fixed' three year cycle for facilities such as Cabrini Health, where the completed survey has awarded full accreditation, requires that an annual attestation statement is provided from the highest level of governance, confirming that the facility is still meeting the requirements of the Standards.

Safer Care Victoria's role in this space is neither to accredit nor regulate. As stewards of quality and safety, we see our domains as representative of quality planning, quality control and quality improvement as we strive to enable a transparent and responsive quality management system. The [SCV Strategic Plan 2020-23](#) defines how SCV partners with health services, both public and private, to support quality and safety in healthcare.

It is the view of the Commission, the PHU and Safer Care Victoria that the current processes fulfil Coroner Bracken's recommendation that a mechanism be in place for a body external to health organisations to be able to review compliance against the National Standards within the three-year assessment windows.

Should you have any queries, please contact the Patient Safety Response team via email at patientsafetyresponse@safercare.vic.gov.au.

Yours sincerely



Adj. Assoc. Professor Ann Maree Keenan

Acting Chief Executive Officer

Safer Care Victoria

19/01/2021