



Health Care Consumers' Association ACT INC
100 Maitland Street, HACKETT ACT 2602
Phone: 02 6230 7800 Fax: 02 6230 7833
Email: adminofficer@hcca.org.au
ABN: 59 698 548 902
hcca.org.au | hcca-act.blogspot.com |
[@HealthCanberra](https://facebook.com/HCCA.ACT)

Ms Anna Grealy
HealthCARE Improvement Division
ACT Health

Email: anna.grealy@act.gov.au

Dear Anna,

RE: CHHS Providing Clinical Health Services in an Off-Campus Environment Policy

The Health Care Consumers' Association (HCCA) welcomes the opportunity to provide input into the *CHHS Providing Clinical Health Services in an Off-Campus Environment Policy*, recognising that these are important and valuable services provided to consumers in the community across the ACT.

In preparation for this feedback we circulated the *CHHS Providing Clinical Health Services in an Off-Campus Environment Policy* to members of HCCA. Our feedback is the collated responses to the document provided. As requested, we have tracked our changes in the document and below there are a few issues that we consider worthy of and added our feedback onto the consultation feedback sheet.

The term "off campus environment" is very bureaucratic language and we think there is value in considering changing the title of the policy to more clearly reflect that the focus is on delivering care in homes, including communal living arrangements and residential aged care facilities. For example, *Working Safely in People's Homes*.

Where care is delivered in the homes of consumers there is a balance to be struck between the needs of staff to be safe and recognition that the care setting is the person's home and this needs to be respected. We appreciate that this policy focusses on how to manage workplace health and safety for community based health workers working in people's homes. This is clearly stated in the purpose where it states that this policy is compliant with the *Work Health and Safety Act 2011* and *Work Health and Safety Regulation 2011*. No doubt this is important but the principles that underpin patient centred care that are reflected in the Charter of Healthcare Rights are equally important. We think that it is important for all relevant parties, including consumers and carers, to work together to identify workplace health and safety risks and the best ways to manage them.

We would like to see a section that provides an overview of the risks in plain language. These include electrical hazards, slips, trips and falls, biological hazards including infection, aggressive behaviours and also manual tasks. And this could then be used to communicate to consumers and carers.

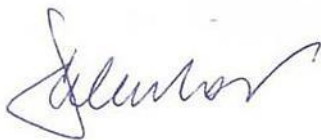
Consumers and carers can take responsibilities to workers when working in the home environments and there is an opportunity to communicate this in plain language. This could include their responsibility to maintain a safe physical environment and repair broken steps, restrain animals and provide adequate lighting. Also this could include moving furniture to allow adequate work space and let service providers know if there are any hazards they are aware of.

We note that there does not appear to be reference to biological hazards or reference to infection control. Is this an intentional omission? Are there references to other policies and procedures that need to be included? This is important for consumers and health care workers.

Documentation and maintenance of accurate clinical notes is an important element of care delivered in the home. It is a key risk to consumers and relates to continuity of care and handover. It is also a risk to ACT Health if clinical information is not recorded or is not accurate. If this is out of scope for this policy we are interested to know how this risk is addressed.

We are happy to discuss our feedback further and look forward to seeing how our comments are incorporated in the final CHHS Providing Clinical Health Services in an Off-Campus Environment Policy. If you would like to clarify any aspect of this response, please contact Kathryn Briant via email kathrynbriant@hcca.org.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Darlene Cox', with a stylized flourish at the end.

Darlene Cox
Executive Director
9 July 2016