CONTINUOUS IMPROVEMENT POLICY AND PROCEDURE

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Purpose and Scope

This policy and procedure sets out how Bilingual Care delivers quality services through an effective *Quality Management System (QMS)* that is based on an ongoing cycle of review and evaluation. It ensures that continuous improvement is incorporated into all areas of Bilingual Care's operations. This achieved through systematic reviews and enhancing care and services to meet the needs, preferences and rights of each consumer, in accordance with the *Aged Care Act 2024 (Cth)* and *Strengthened Aged Care Quality Standards*.

It applies to the Leadership Team and all staff and meets relevant legislation, regulations and Standards.

Applicable Strengthened Aged Care Quality Standards

- *Standard 1. The Person*
- *Standard 2. The Organisation*
- *Standard 4. The Environment*
- *Standard 5. Clinical Care*

Definitions

Continuous Improvement - the ongoing effort of a business to improve services, systems, processes, or products to maximise benefits for its consumers. It is a structured process of making incremental enhancements to systems, processes, and outcomes by fostering a culture of curiosity, reflection, and knowledge sharing. It prioritises learning from successes and failures, using feedback and evidence-based data to adapt and innovate, ensuring that individuals and the organisation grow their capabilities over time.

Continuous Improvement Plan (also called a Plan for Continuous Improvement (PCI)) - a written plan for a service that sets out:

- how the provider of the service will:
  - assess the quality of care and services provided through the service against the Quality Standards and
  - monitor and improve the quality of care and services as measured against those Standards and
- if there are any areas in which improvements in relation to the service are needed to ensure that the Quality Standards are complied with, how the provider of the service will make those improvements.

Open Disclosure - open discussions and communication with each consumer/their representative when something goes wrong within the service that has caused harm or may potentially cause harm to a consumer. This harm may be physical, psychological, or social, resulting in loss of quality of life, impairment, suffering, injury, disability, or death. Further information can be found in the *Aged Care Open Disclosure Framework and Guidance*.

Policy

Bilingual Care is committed to quality, innovation and promoting a culture of continuous improvement, self-reflection and learning in its governance, management, and service delivery. Bilingual Care strives to:

- embed a learning culture that values feedback, innovation, and evidence-based practice
- use a structured approach to identify, plan, implement, and evaluate improvements
- involve consumers, their families, supporters and staff in improvement activities
- maintain compliance with regulatory requirements, including having a *Continuous Improvement Plan* available for review by the Aged Care Quality and Safety Commission at any time.

Bilingual Care adopts the following principles in creating a continuous improvement culture:

- **Person-Centred Care:** improvements must reflect the needs, goals, rights and dignity of consumer.
- **Transparency and Accountability:** everyone holds responsibility for their actions and learning, using an open disclosure approach when things go wrong.
- **Collaboration:** engage stakeholders in decision-making and feedback processes.
- **Evidence-Based:** use data, audits, and feedback to inform decisions.
- **Learning and Adapting:** treat improvement as an ongoing cycle, not a one-off activity.

Bilingual Care includes its staff, consumers, and other relevant stakeholders in its continuous improvement activities to ensure services are of a high quality and meet consumers' needs.

Procedures

Responsibilities

The Leadership Team is responsible for:

- providing strategic oversight and ensuring continuous improvement aligns with Bilingual Care's goals and regulatory requirements
- allocate adequate resources (financial, human, technological) to support improvement initiatives
- reviewing quarterly reports on improvement activities and outcomes
- analysing data and trends to inform decision-making and prioritisation of actions and
- fostering a culture of learning, self-reflection, accountability and open disclosure across all levels of the organisation.

The Managing Director is responsible for:

- developing and maintaining the *Continuous Improvement Plan*, ensuring it is current and accessible
- coordinating audits, practice reviews, surveys, and feedback collection to identify improvement opportunities
- reporting progress and outcomes to the Leadership Team as required and
- providing training and guidance to staff on continuous improvement processes.

All staff are responsible for:

- actively participating in improvement activities, including audits, feedback sessions, and training
- identifying and reporting issues, risks, and opportunities for improvement in day-to-day

operations to the responsible manager or the Managing Director and
- implementing changes as required and providing feedback on their effectiveness.

All consumers and their family/supporters are asked to (with their consent):
- engage in consultation and co-design processes to ensure improvements reflect consumer needs and preferences
- provide feedback through surveys, complaints, and informal channels
- participate in focus groups or advisory committees when invited and
- collaborate with staff to trial new initiatives and share experiences.

Policies and Procedures

Bilingual Care's *QMS* is based on policies and procedures that align with the *Strengthened Aged Care Quality Standards* and all relevant Commonwealth and State legislation and regulations.

All policies and procedures are formally reviewed at least annually, two yearly, or three yearly, based on the level of risk associated with each. Bilingual Care's *QMS Register* sets out its current policies and procedures and supporting documents, and the review timeframes and history associated with these.

Reviews of policies and procedures must incorporate staff, consumer, and other stakeholder feedback where relevant.

All staff should:
- be familiar with all Bilingual Care policies and procedures and their implementation, relevant to their role and responsibilities
- critically consider whether the policies and procedures are fit for purpose and meet the business' and consumers' needs and
- make constructive suggestions about the policies and procedures.

Further information about updating policies and procedures can be found in the *Records and Information Management Policy and Procedure*.

Internal Reviews and External Audits

The purpose of an internal review (also commonly called an internal audit) is to check that the agreed systems, processes and procedures are being followed, risks are being managed, and the organisation is compliant with relevant standards and legislation, including the strengthened Aged Care Quality Standards. To support continuous improvement, the Managing Director will arrange, monitor, and report on internal reviews and external audits to the Leadership Team, in accordance with *Schedule 2. Internal Review and External Audit Checklist*.

Internal reviews will be undertaken by following Bilingual Care's *Schedule 2. Internal Review and External Audit Checklist*, which sets out the key checks that must be completed periodically across the organisation. When a review is completed, the *Internal Review and External Audit Checklist* must be signed-off to indicate that the check has been done, and any actions that have been identified as a result of the check must be recorded in the *Continuous Improvement Plan*.

Internal reviews need to be objective (non-biased) and completed by an appropriately skilled and experienced person. Bilingual Care will allocate senior staff who have a detailed understanding of the organisational procedures and expectations to undertake internal

reviews. Having an internal audit undertaken by an external service provider can also provide value in identifying potential non-conformities or systemic issues. Where practical, Bilingual Care will consider engaging a qualified and experienced external auditor to undertake a comprehensive internal audit.

Any areas of non-compliance or opportunities for improvement that are identified should be addressed at the time of the check with the relevant staff. Outcomes of internal reviews will be monitored by the Leadership Team to ensure appropriate close-out and tracked in the *Continuous Improvement Plan*.

The effectiveness of internal reviews will be monitored by the Leadership Team. As part of scheduled reviews of the *Continuous Improvement Plan*, they will examine:

- completion of the *Compliance Checklist* as scheduled
- outcomes of internal reviews and
- complaints and feedback about internal reviews and
- the competency of the staff undertaking them.

Where possible, stakeholders (consumers and their representatives) will be included in each formal review or audit procedure undertaken by the organisation.

Communication and Feedback

Bilingual Care is committed to maintaining and enhancing consumers' satisfaction with its service delivery.

All service planning, delivery and evaluation activities will include staff, consumer and other stakeholders and their feedback.

Bilingual Care also has a robust feedback and complaints system in place to support its continuous improvement, as detailed in its *Feedback and Complaints Policy and Procedure*.

Bilingual Care's Continuous Improvement Program

All staff are responsible for identifying and actioning opportunities for continuous improvement. They will be made aware of their responsibilities through formal Induction and training processes as well as ongoing workplace practices.

The *Meeting Agenda* for Leadership Team meetings will include a standing item on continuous improvement (including incidents and feedback and complaints).

All continuous improvement issues or opportunities identified will be reported to and tracked by the Managing Director in Bilingual Care's *Continuous Improvement Plan*. The *Continuous Improvement Plan* is a 'living document', updated as and when improvements are identified.

The Plan includes the:

- improvement identified
- action to be taken including the need for open disclosure
- person responsible for actioning
- staff, consumer or other stakeholder participation required and undertaken
- date of completion and
- review date.

The *Continuous Improvement Plan* also tracks improvements identified from reviews of:

- the *Complaints Register*
- the *Risk Register*
- the *Incident Registers – Staff and Consumer*
- feedback opportunities offered to consumers, their representatives and other stakeholders
- planning, service delivery, plan review, exit, service refusal and referral information contained in Ezihealth
- results from internal reviews and external audits
- Bilingual Care's performance against its Vision, Mission and goals as set out in its strategic and operational planning
- learning and reflection opportunities for staff
- staff supervision and performance reviews
- reporting and data provided to government agencies and
- collaborative relationships with similar organisations and networks.

Practice Reviews

Practice reviews are a reflective process that involves the assessment of Bilingual Care's operations, clinical practices, or service delivery to ensure quality, safety, and effectiveness. Practice Reviews often focus on a particular practice area, cluster of services, or team of staff. A practice review also examines engagement with a group of consumers, and improvements that can be made to their experience of care and services and supports.

A practice review is not an investigation - it is focused on understanding the factors contributing to peoples' experience of a service, with a view to learning and improving practice. Practice reviews are one step on the continuous improvement continuum and go further than pure compliance activities by actively building internal capability and support systems, including strengthening the capability of staff, consumers and the organisation.

Practice reviews do not replace Bilingual Care's obligations with respect to its incident management system and reportable incidents (SIRS) as required by the *Aged Care Act 2024 (Cth)* and *Aged Care Rules 2025*.

Examples of indicators that may trigger a practice review include, but are not limited to:

- Consumers
  - changed health needs for more than one person
  - changed behavioural needs for more than one person
  - increased number of injuries
  - unexplained injuries
  - increased number of incidents/cluster of incidents
  - increased number of 'near misses', e.g., medication misses picked up by next colleague on shift
  - under or non-reporting of incidents
  - trends in incidents – e.g., the same kind of incident repeatedly reported for a group of consumers and
  - trends in complaints – e.g., an increased number of complaints or issues raised, clusters of complaints, an absence of complaints, the level and complexity of issues raised by other stakeholders, etc.
- Workers
  - changed attendance patterns, e.g. a higher number of staff sick days
  - higher than usual staff turnover
  - higher than usual overtime rates (unrelated to scarcity of staff)
  - reluctance of staff to work at particular service outlets or with particular

consumers
    - staff not attending or completing training
    - team meetings not occurring
    - increased number of work-related incidents and
    - increased number of grievances/issues raised.
- Other
    - high-risk practice areas (e.g. behaviour support/restricted practices, falls, dementia and cognitive decline)
    - isolated people, e.g., consumers who may only have contact with Bilingual Care's staff or only have one provider,
    - difficulty for consumers to engage with family and friends, or have them visit in a relaxed and comfortable environment, and
    - increased property damage.

Responsibilities

The Leadership Team is responsible for:

- building a practice review culture within Bilingual Care
- identifying when a practice review is required, based on recommendations from staff or consumers, as well as regular review of Bilingual Care's continuous improvement activities (including the business' incident management and reporting processes, complaint management processes, and internal and external audits)
- developing a Terms of Reference – ensuring each review's scope reflects whatever has triggered it and is linked to any practice frameworks that may apply (e.g., person-centred practice, active support, positive behaviour support, etc.)
- appointing a designated internal or external Reviewer or Review Panel to undertake specific practice reviews and
- ensuring people across all levels of the business (including frontline staff and consumers) are aware of, and where possible, engaged in practice reviews.

For each specific practice review, the appointed Reviewer or Review Panel should:

1. Engage stakeholders at all levels of the organisation, including the Leadership Team, senior managers, frontline staff, consumers and their representatives, ensuring sufficient resources are allocated to undertake the practice review
2. Invite review consumers and organise any necessary support for them to participate. It may be helpful to coordinate the review as part of Consumer Advisory Body meetings to facilitate this process.
3. Review information about the people involved in the review, such as support plans, progress notes, previous reports, and recommendations
4. Ensure subject matter expertise and research is available, if necessary
5. Undertake the review, by visiting service outlets or sites, if possible, to talk to people and observe what is going on
6. Consider recommendations, making sure suggested actions are practical and achievable. Consider what needs to change to prevent the same issues or situation happening again, considering whether it is an issue across other services or organisations. Formal investigations should only be recommended to establish facts or identify what has occurred in relation to a specific event or incident.
7. Document what has been learned and encourage review consumers to reflect on what they learned. All agreed improvement actions are to be entered into the *Continuous Improvement Plan* by the Managing Director.

8. Submit a report to the Leadership Team which encourages them to think about how the findings of the review reflect Bilingual Care's values or expose gaps or differences. The Leadership Team can then consider and action areas for further improvement.

Supporting Documents

Documents relevant to this policy and procedure include:

- *All policies and procedures*
- *QMS Register*
- *Schedule 2. Internal Review and External Audit Checklist*
- *Continuous Improvement Plan*
- *Compliance Register*
- *Complaints Register*
- *Risk Register*
- *Incident Registers*
- *Meeting Agendas*

Monitoring and Review

This Policy and Procedure will be reviewed at least every three years by the Leadership Team. Reviews will incorporate staff, consumer, and other stakeholder feedback, where relevant.

Annual satisfaction surveys will assess consumer and staff satisfaction with Bilingual Care's continuous improvement practices and the quality of services provided. They will also provide stakeholders with the opportunity to provide further feedback on areas for improvement.

Bilingual Care's *Continuous Improvement Plan* will be used to record improvements identified and monitor the progress of their implementation. Where relevant, this information will be considered as part of Bilingual Care's service planning and delivery processes.

DOCUMENT CONTROL

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