

POL 2.A.04	Managing Separation of Assessment and Service Delivery
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Applies to: All Staff
Specific responsibility: Chief Executive Officer
Policy Approval: Managing Director

Policy context: This policy relates to	
Standards or other external requirements	Managing Conflicts of Interest (Good Practice)
Legislation or other requirements	Pursuant to legislation relevant under Contractual obligations
Contractual obligations	<p>Contractual obligations</p> <p>Deed – For Provision of Regional Assessment Services for the Aged Care Gateway Programme, between Commonwealth of Australia represented by the Department of Social Services (the Department) and The Company Pty Ltd T/A Care Assess (the Contractor), including but not limited:</p> <p>Clause 10.10 (a): the Contractor must not, and must not engage or use (directly or indirectly) any Related Body Corporate to provide Home Support Services without the prior written approval of the Department.</p> <p>The Department may withhold, grant, or revoke approval at its sole and absolute discretion and that in granting approval, the Department may specify conditions with which Care Assess must comply in relation to its use and engagement of Care Assess as a provider of Home Support Services</p> <p>The Statement of Requirement (SoR)</p>

Purpose
Care Assessment Consultants (the Company) is committed to the separation of home support assessment from home support services and other aged care services. The Company understands that maximising the quality of assessment is fundamental to the provision of efficient and effective home support services. ‘Independence’ is difficult to achieve when an agency has a stake in a particular type of service and/or a professional expertise in a particular area; therefore a true separation of assessment from service delivery of home support services and other aged care services is necessary to ensure good practice and quality assessment services are provided.
Policy Statement

The Company has received approval from the Department of Social Services to provide Home Support Services as well as Assessment Services. Careful consideration has been given to ensure the most appropriate systems have been developed to ensure the Company manages the inherent conflict of interest between the provision of Regional Assessment Service (RAS) Assessment Services and Commonwealth Home Support Programme (CHSP) services.

This policy statement together with its associated procedure(s) are together referred to as the Company's "Policy of Separation" between its provision of Assessment Services and aged care related Service Delivery, including CHSP services.

Policy of Separation

The Company ensures structural and functional separation between Service Delivery and Assessment Services in order to prevent any likely, perceived or actual conflicts of interest.

Strategies to provide structural and functional separation include, but are not limited to, separate staff roles and organisational structures, separate locations and offices where possible, strict application of access controls and well-defined procedures to prevent inappropriate communication and referrals between these two separate arms of the company.

In addition to the structural and functional separation, a new model of operations has been implemented to create a brand separation within the Company – between the trading names, "Care Assess", which delivers Assessment Services, and "Care Forward", a separate trading name and brand, which delivers CHSP and Home Care services.

Strategies to provide structural, functional and branding separation are enforced through this policy of separation, which in turn is supported by a range of Standard Operating Procedures.

Procedures

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1. Structural Separation

The formal, organisational separation of Assessment Services from Service Delivery within The Company as both a RAS Contractor and a HACC/CHSP Service Provider is achieved through:

- Separate organisational structure, reporting lines, accountability and supervision: Refer Diagram 2 and Diagram 3 (below)
- Designation of separate staff and roles, including separate/dedicated Assessment Services staff and service delivery staff (separate staff = no staff performing both Assessment Services and CHSP Service Delivery)
- Separate location/offices within our premises (where possible); or separation within offices utilising administrative controls to restrict staff to separate teams.
- Separation of information communication technology and data systems
- Development of Department approved criteria for use by Care Assess RAS Assessors conducting referral to the Company for service delivery (Care Forward).

2. Functional Separation

At a fundamental level, there will be a functional separation between the roles of assessors and those staff providing Home Support Services within the Company as a CHSP Service Provider. This functional separation of roles will include:

- Separation of duties and roles and responsibilities of those responsible for the RAS Assessment Services from those responsible for other aged care service delivery will be clearly documented.
- Strict application of access controls to ensure staff only have access to information systems directly required for their role in providing either Assessment Services or Service Delivery.
- Protocols have been established to ensure assessors have a robust understanding of the autonomy required of that role and the necessary resources required to fulfil that role.
- Care Assess only engage potential assessors who have the commitment and resolve to sustain professional independence.
- Assessors are trained in the use of the assessment tools and accredited/credentialed for carrying out assessments, ensuring minimum competency, quality and understanding of the role and the required separation from CHSP service delivery.
- Specific training of staff by the Company is provided regarding the separation of roles, functions and responsibility of Assessment Services staff and service management staff, including policies, procedures and processes related to conflicts of interest and the requirement for separation from Home Support Services.
- Documented processes, procedures and policies will ensure:
 - Single interpretation of the nature and purpose of assessment by the RAS relating to services;
 - Single criteria being used in the assessment process;
 - Independence of assessment processes themselves;
 - Dealing with ideological tensions regarding assessment vs service delivery; and
 - Declaration of and dealing with / resolving conflicts of interest
- In particular, Care Assess has developed a Standard Operating Procedure regarding fair and reasonable levels of referrals to other Service Providers amongst the CHSP Service Providers who are funded in each region.

3. Brand / Trading Name Separation

At a brand-identity level, there would be a separate trading name and brand which would distinguish the structural and functional separation between the RAS Contracted Assessment Services and other home support and aged care services.

- The organisation has reserved a new trading name, "Care Forward", to communicate a separation of roles between RAS work branded My Aged Care ("Care Assess") and aged care, CHSP/HCP work ("Care Forward").
- The brand/style of the new trading name communicates continuity with existing brand, including existing look and icon, but a distinctive use of the 'pink' in place of the green, the replacement of the word "assess" for the new word "forward" and a different strapline:



- The intention is to communicate to all stakeholders, internally and externally, the structural and functional separation of the Assessment Services from Service Delivery in our CHSP and other aged care services including HCP packages.

4. Maintaining separation of Care Assess and Care Forward operations

- In order to create a true separation within the Company, a third discrete business unit has been established to manage the central and corporate functions of the company.
- The trading name "Care Consultancy" is utilised to create clarity around the separate and central work of the Company which will apply both to the operation of Care Assess and Care Forward.
- The functions of Care Consultancy include:
 - Management through a team of state-wide managers;
 - Centralised administration, support services and resources.
- Therefore, Care Consultancy will do the central work separating Care Assess and Care Forward, and keeping them independent from one another, to ensure all potential, likely, perceived or actual conflicts of interest are removed.
- Structurally, this model can be understood as 'one company with two arms, separated by a central body.' I.e. See Diagram 1 below.

5. Quality Assurance

The following processes have been implemented to ensure transparency and accountability with regards to the structural and functional separation of Care Assess and Care Forward:

- Care Assess will ensure ongoing periodic (and ad hoc) monitoring of all assessment processes, including analysing assessment data, in particular reporting on RAS referrals as part of our quality assurance system.
- Other systems for monitoring the effectiveness of the assessment process and the appropriateness of assessment decisions (accountability) would include:
 - Peer review; and
 - Regional Team Leader roles in monitoring, supervising and reporting quality assurance issues to management
- Quality Assurance would be supported by an internal processing of auditing of referrals, and evidence would be documented to ensure that Care Assess could demonstrate in an external audit/investigation that potential conflicts of interest were being managed appropriately in accordance with Departmental approvals and Care Assess policies and procedures.

6. Exclusive provision of Assessment Services by Personnel

Exclusive dedication of Assessment Personnel providing Assessment Services on behalf of Care Assess will enable Care Assess to:

- Completely/fully ensure that our assessors make autonomous, unbiased judgements in relation to consumer needs and to completely/fully prevent employer, professional and resource availability influences, by:
 - empowering assessors to work together with clients to decide what assistance is needed, looking beyond those services which are most visible or readily

available, to find the best service response to those needs having considered all their needs

- ensure assessors are not conflicted, compromised or distracted in their role of assisting individual clients and their family to choose and obtain the best combination of available services to meet their needs; including recommending appropriate alternatives when community-based services are not/no longer suitable;

Therefore, Care Assess will restrict employment/subcontracting of the Assessment Services from staff undertaking Service Delivery:

- Employed RAS Assessors
 - Care Assess' Employment Contract with its RAS assessment workforce prevents candidates working part time or casually for a Service Provider of home support and home care services, including the CHSP program.
- Approved RAS Subcontractors
 - Care Assess will not subcontract Assessment Services to any organisation that provides Home Support Services or uses/engages a related entity providing Home Support Services. Care Assess believe that this is the most effective and robust mechanism to prevent and minimise the potential for conflicts of interest in the provision of the Assessment Services
 - Care Assess' Approved Subcontractors are private companies that do not provide any grant/funded Home Support Services or other aged care services

7. Resolving conflicts of interests and separating Assessment Services from the delivery of other aged care services

All of the Company's Home Care Packages are delivered through Care Forward on a Consumer Directed Care basis (CDC). Consumers independently direct their care to the service providers of their choice. Care Forward's only role is in the provision of care coordination and for this reason there is no potential for conflict of interest in this model.

Any perceived conflicts of interest in the delivery of Home Care Packages is also addressed by the service model Care Forward utilises to deliver all services in Home Care Packages through an operational model of brokering (subcontracting) direct-care to independent service providers across Tasmania.

8. Communication regarding separation and transitioning existing Operations to Care Forward

In order to enable a smooth and widely understood transition to a separate operation with a new brand and trading name, a communication strategy to raise awareness amongst Service Providers and existing Clients was be conducted. This includes:

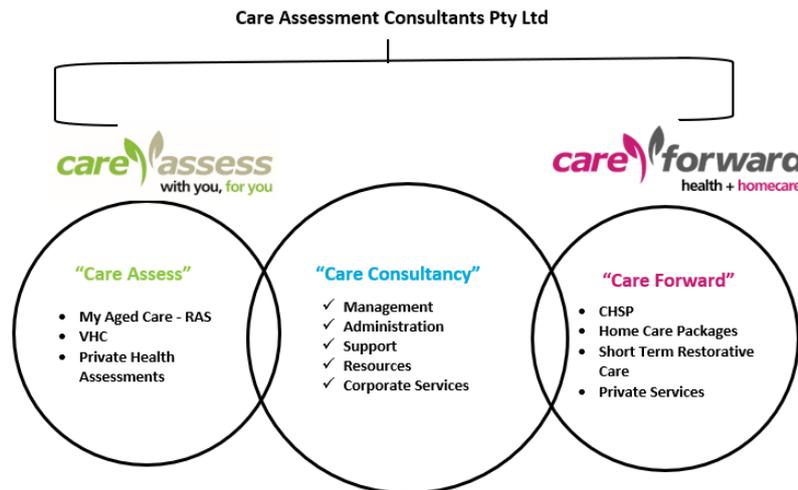
- a letter to all existing Clients introducing Care Forward and explaining the transition involved after 29 June 2015;
- rebranding of promotional material to clearly articulate which services will continue to be provided by Care Assess and which services will be provided by Care Forward; and

- a letter/email to a range of Service Providers to raise awareness that some of Care Assess' services transitioned to Care Forward.

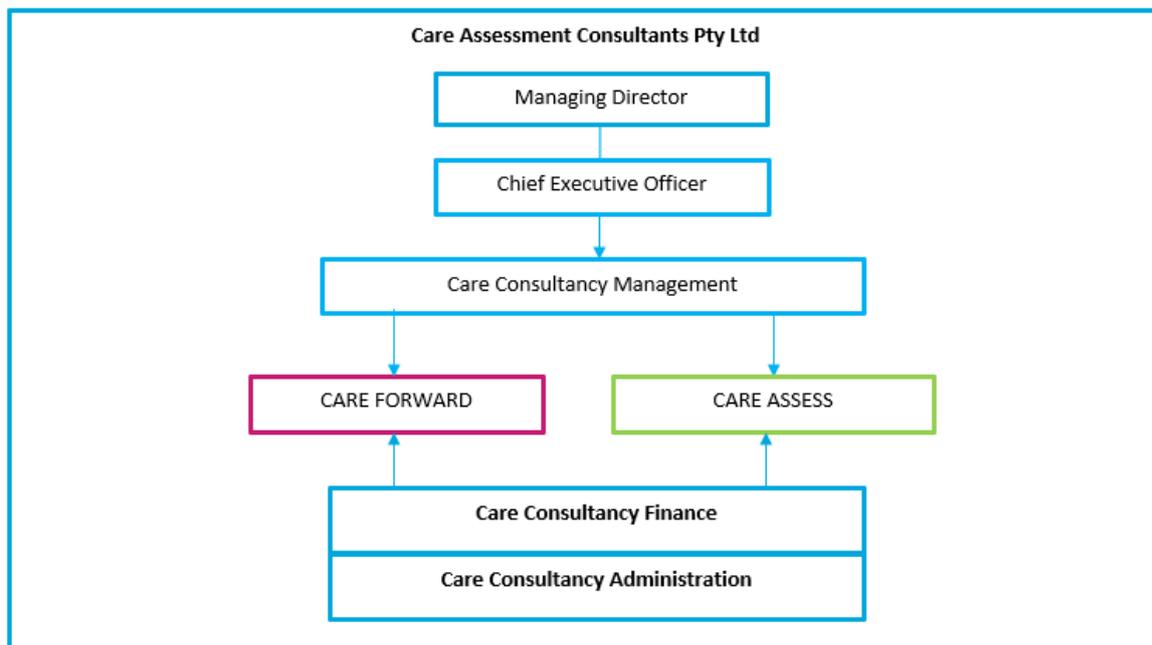
All communications will emphasise the reasons for separation and provide a public link for access to the organisations' policy of separation between Care Assess and Care Forward.

Diagrams

1. Diagram 1: Separation of Care Assessment Consultants into assessment arm ("Care Assess") and service delivery arm ("Care Forward")

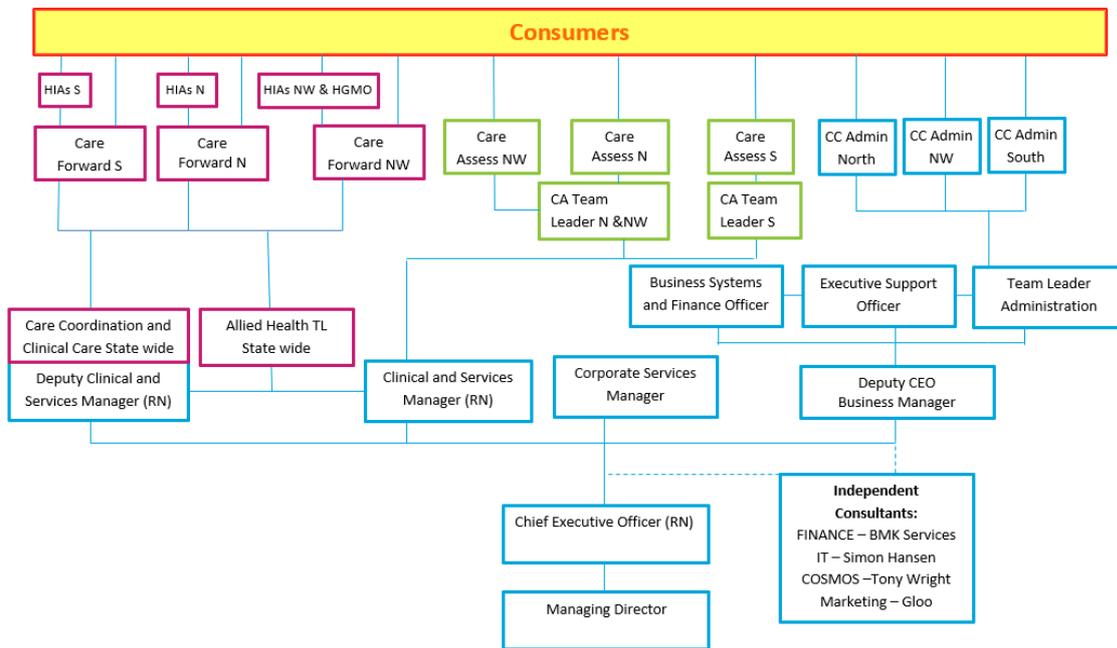


2. Diagram 2: Governance Model with Company Re-Structure



3. Diagram 3: Separation of reporting

Separation of reporting lines between Care Assess (in green), Care Forward (in pink) to



Care Consultancy (in blue):

Documentation

Documents related to this policy

Related policies

Conflict of Interest Policy and Procedure

The Company has in place a number of policies to ensure best practice corporate governance and management of our responsibilities under legislation, contracts and agreements, including a *Conflict of Interest Policy and Procedure*.

The Company places great importance on clarity and transparency regarding any existing, potential or perceived conflicts of interest. The Conflict of Interest policy has been developed to provide a framework for all directors, management and staff in declaring and resolving any conflicts of interest or any areas of potentially perceived conflict of interest.

The purpose of the policy is to protect the Company from any real or implied suggestion of misconduct. It establishes standards of behaviour for directors in the performance of their duties and is intended to support the Company's integrity, to promote its goals and to enhance public,

	stakeholder and donor confidence in the company.
Forms, record keeping or other organisational documents	RAS SOP 3.1.06 Assessment, Independence from service delivery RAS SOP 3.1.07 Assessment, Appropriate Referrals to Service Providers Terms of Access - Declaration of Interest Form Conflict of Interest Disclosure Form

Policy review and version tracking			
Review	Date Approved	Signed	Next Review Due
1	15 June 2015		15/6/2018
2	30 th September 2018		30/6/2020
3	19 th June 2019		30/6/2020