Accreditation Decision

**Decision to re-accredit service following a site audit**

**Service and approved provider details**

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| --- | --- |
| **Name of service:** | The Italian Village |
| **RACS ID:** | 6018 |
| **Name of approved provider:** | Italian Benevolent Foundation SA Inc |
| **Address details:** | 6 Mumford Avenue ST AGNES SA 5097 |
| **Date of site audit:** | 09 December 2019 to 11 December 2019 |

**Summary of decision**

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| --- | --- | --- |
| **Decision made on:** | 31 December 2019 | |
| **Decision made by**: | Authorised delegate of the Aged Care Quality and Safety Commissioner (Commissioner) under section 76 of the *Aged Care Quality and Safety Commission Act 2018* to decide under section 41 of the Aged Care Quality and Safety Commission Rules 2018 (Rules) about the accreditation of a service. | |
| **Decision:** | To re-accredit the service under section 41 of the Rules. | |
| **Further period of accreditation:** | 1 March 2020 to 1 March 2023 | |
| **Assessment of performance with the Aged Care Quality Standards** | | |
| Standard 1 Consumer dignity and choice | | Met |
| Requirement 1(3)(a) | | Met |
| Requirement 1(3)(b) | | Met |
| Requirement 1(3)(c) | | Met |
| Requirement 1(3)(d) | | Met |
| Requirement 1(3)(e) | | Met |
| Requirement 1(3)(f) | | Met |
| Standard 2 Ongoing assessment and planning with consumers | | Met |
| Requirement 2(3)(a) | | Met |
| Requirement 2(3)(b) | | Met |
| Requirement 2(3)(c) | | Met |
| Requirement 2(3)(d) | | Met |
| Requirement 2(3)(e) | | Met |
| Standard 3 Personal care and clinical care | | Met |
| Requirement 3(3)(a) | | Met |
| Requirement 3(3)(b) | | Met |
| Requirement 3(3)(c) | | Met |
| Requirement 3(3)(d) | | Met |
| Requirement 3(3)(e) | | Met |
| Requirement 3(3)(f) | | Met |
| Requirement 3(3)(g) | | Met |
| Standard 4 Services and supports for daily living | | Met |
| Requirement 4(3)(a) | | Met |
| Requirement 4(3)(b) | | Met |
| Requirement 4(3)(c) | | Met |
| Requirement 4(3)(d) | | Met |
| Requirement 4(3)(e) | | Met |
| Requirement 4(3)(f) | | Met |
| Requirement 4(3)(g) | | Met |
| Standard 5 Organisation’s service environment | | Met |
| Requirement 5(3)(a) | | Met |
| Requirement 5(3)(b) | | Met |
| Requirement 5(3)(c) | | Met |
| Standard 6 Feedback and complaints | | Met |
| Requirement 6(3)(a) | | Met |
| Requirement 6(3)(b) | | Met |
| Requirement 6(3)(c) | | Met |
| Requirement 6(3)(d) | | Met |
| Standard 7 Human resources | | Not Met |
| Requirement 7(3)(a) | | Not Met |
| Requirement 7(3)(b) | | Met |
| Requirement 7(3)(c) | | Met |
| Requirement 7(3)(d) | | Met |
| Requirement 7(3)(e) | | Met |
| Standard 8 Organisational governance | | Met |
| Requirement 8(3)(a) | | Met |
| Requirement 8(3)(b) | | Met |
| Requirement 8(3)(c) | | Met |
| Requirement 8(3)(d) | | Met |
| Requirement 8(3)(e) | | Met |
| **Timetable for making improvements:** | By 26 April 2020 | |
| **Revised plan for continuous improvement due:** | By 21 January 2020 | |

**This decision is published on the Aged Care Quality and Safety Commission’s (Commission) website under section 48 of the Rules.**

Site audit Performance   
Assessment Report

The Commission makes the decision taking into account this Site audit report, any response by the provider, and any other relevant information.

The met/not met recommendations made by the Assessment Team in this Site audit report may differ from the findings in the decision.

## Introduction

**This is the report of an assessment of The Italian Village (the Service) conducted from 9 December 2019 to 11 December 2019.**

**This assessment was conducted for the purposes of assessing the provider’s performance in relation to the Service against the Aged Care Quality Standards (the Quality Standards) in accordance with the Aged Care Quality and Safety Commission Rules 2018.**

This report contains detailed findings about the performance assessment of the Service against each Quality Standard. The Quality Standards assessed are rated as either Met or Not Met.

A Met rating for the Quality Standard means that all requirements of that Quality Standard have been assessed and rated as Met.

A Not Met rating for the Quality Standard means that one or more requirements of that Quality Standard has been assessed and one or more of those requirements have been rated as Not Met.

This Report is to be read in conjunction with the Quality Standards.

## Assessment Details

The assessment was informed by a site assessment, observations at the service, review of documents and interviews with staff, consumers/representatives and others.

The following interviews were undertaken:

| **Type** | **Number** |
| --- | --- |
| Consumers | 27 |
| Consumer representatives | 5 |
| Management | 8 |
| Clinical staff | 7 |
| Care staff | 9 |
| Hospitality and environmental services staff | 6 |
| Lifestyle staff | 4 |

## Detailed findings

This section covers information about the assessment of the provider’s performance, in relation to the service, against the Quality Standards that were assessed.

### Standard 1: Consumer dignity and choice Met

#### Consumer outcome:

1. I am treated with dignity and respect, and can maintain my identity. I can make informed choices about my care and services, and live the life I choose.

#### Organisation statement:

1. The organisation:
2. has a culture of inclusion and respect for consumers; and
3. supports consumers to exercise choice and independence; and
4. respects consumers’ privacy.

#### Summary of Assessment of Standard 1:

##### Consumer outcome

Overall sampled consumers confirmed that they are treated with dignity and respect, can maintain their identity, make informed choices about their care and services and live the life they choose.

For example:

* Consumers said staff treat them with respect, are kind and caring and knock on the door of their room before entering.
* Consumers said they are encouraged to do as much as possible for themselves. Consumers said staff understand their Italian culture and are aware of what is important to them. This may include attending Mass or having Italian meals.
* Consumers said they are able to make individual choices and these choices are respected by staff.

To understand the consumer’s experience and how the organisation understands and applies the requirements within this Standard, the Assessment Team sampled the experience of consumers, asking them about the requirements, reviewing their care planning documentation (for alignment with the feedback from consumers) and testing staff understanding and application of the requirements under this Standard. The team also examined relevant documentation and drew relevant information from other consumer interviews and the assessment of other Standards.

* Care documentation confirmed that consumer’s preferences are included in their care plan and staff have access to this information. Interviews with staff confirmed they are aware of consumer’s individual preferences in relation to the care and services provided.

The Assessment Team found that 6 of 6 specific requirements were met.

#### Requirements:

##### **Requirement 1(3)(a) Met**

The organisation demonstrates that each consumer is treated with dignity and respect, with their identity, culture and diversity valued.

##### **Requirement 1(3)(b) Met**

The organisation demonstrates that care and services are culturally safe.

##### **Requirement 1(3)(c) Met**

The organisation demonstrates that each consumer is supported to exercise choice and independence, including to:

1. make decisions about their own care and the way care and services are delivered; and
2. make decisions about when family, friends, carers or others should be involved in their care; and
3. communicate their decisions; and
4. make connections with others and maintain relationships of choice, including intimate relationships.

##### **Requirement 1(3)(d) Met**

The organisation demonstrates that each consumer is supported to take risks to enable them to live the best life they can.

##### **Requirement 1(3)(e) Met**

The organisation demonstrates that information provided to each consumer is current, accurate and timely, and communicated in a way that is clear, easy to understand and enables them to exercise choice.

##### **Requirement 1(3)(f) Met**

The organisation demonstrates that each consumer’s privacy is respected and personal information is kept confidential.

### Standard 2: Ongoing assessment and planning with consumers Met

#### Consumer outcome:

1. I am a partner in ongoing assessment and planning that helps me get the care and services I need for my health and well-being.

#### Organisation statement:

1. The organisation undertakes initial and ongoing assessment and planning for care and services in partnership with the consumer. Assessment and planning has a focus on optimising health and well-being in accordance with the consumer’s needs, goals and preferences.

#### Summary of Assessment of Standard 2:

##### Consumer outcome

Overall sampled consumers confirmed that they feel like partners in the ongoing assessment and planning of their care and services.

For example:

* Consumers and representatives interviewed said they are consulted in the care and services they receive and are satisfied with their current care.
* Consumers and representatives said they are consulted when care needs changed and are involved in decisions regarding their care.
* One consumer said staff discuss their care with them and their care plan was in the wardrobe.

To understand the consumer’s experience and how the organisation understands and applies the requirements within this Standard, the Assessment Team sampled the experience of consumers – reviewing their care planning documents in detail, asking consumers about how they are involved in care planning, and interviewing staff about how they use care planning documents and review them on an ongoing basis.

* The service provider has a schedule for reviewing consumer care and services. Consumer care reviews are completed in partnership with the consumer and representatives routinely and as care needs change. Consumers are given choices on care and services and consumer care plans are individualised. Consumer care plans reflect the consumer’s current needs.

The Assessment Team found that 5 of 5 specific requirements were met.

#### Requirements:

##### **Requirement 2(3)(a) Met**

The organisation demonstrates that assessment and planning, including consideration of risks to the consumer’s health and well-being, informs the delivery of safe and effective care and services.

##### **Requirement 2(3)(b) Met**

The organisation demonstrates that assessment and planning identifies and addresses the consumer’s current needs, goals and preferences, including advance care planning and end of life planning if the consumer wishes.

##### **Requirement 2(3)(c) Met**

The organisation demonstrates that assessment and planning:

1. is based on ongoing partnership with the consumer and others that the consumer wishes to involve in assessment, planning and review of the consumer’s care and services; and
2. includes other organisations, and individuals and providers of other care and services, that are involved in the care of the consumer.

##### **Requirement 2(3)(d) Met**

The organisation demonstrates that the outcomes of assessment and planning are effectively communicated to the consumer and documented in a care and services plan that is readily available to the consumer, and where care and services are provided.

##### **Requirement 2(3)(e) Met**

The organisation demonstrates that care and services are reviewed regularly for effectiveness, and when circumstances change or when incidents impact on the needs, goals or preferences of the consumer.

### Standard 3: Personal care and clinical care Met

#### Consumer outcome:

1. I get personal care, clinical care, or both personal care and clinical care, that is safe and right for me.

#### Organisation statement:

1. The organisation delivers safe and effective personal care, clinical care, or both personal care and clinical care, in accordance with the consumer’s needs, goals and preferences to optimise health and well-being.

#### Summary of Assessment of Standard 3:

##### Consumer outcome

Overall sampled consumers did consider that they receive personal care and clinical care that is safe and right for them.

For example:

* Consumers interviewed said they are satisfied they get the care they need and they feel safe.
* One consumer said their medical officer visits often and keeps them informed about their health.
* Consumers interviewed said they have access to allied health services both internally and externally and are satisfied with the access to services.

To understand the consumer’s experience and how the organisation understands and applies the requirements within this Standard, the Assessment Team sampled the experience of consumers – their care plans and assessments were reviewed and staff were asked about how they ensure the delivery of safe and effective care for consumers. The team also examined relevant documents.

* The service utilises a multidisciplinary approach in the provision of consumer care and services. Consumers have access to internal and external allied health professionals and specialised services. Consumers are supported by a medical officer of their choice. The service provides a physiotherapist to assist with consumer mobility and pain management needs.
* The workforce receives training in clinical care and is supported by clinical policies and procedures.
* Consumers are referred to specialised services in a timely manner.

The Assessment Team found that 7 of 7 specific requirements were met.

#### Requirements:

##### **Requirement 3(a) Met**

The organisation demonstrates that each consumer gets safe and effective personal care, clinical care, or both personal care and clinical care, that:

1. is best practice; and
2. is tailored to their needs; and
3. optimises their health and well-being.

##### **Requirement 3(3)(b) Met**

The organisation demonstrates effective management of high impact or high prevalence risks associated with the care of each consumer.

##### **Requirement 3(3)(c) Met**

The organisation demonstrates that the needs, goals and preferences of consumers nearing the end of life are recognised and addressed, their comfort maximised and their dignity preserved.

##### **Requirement 3(3)(d) Met**

The organisation demonstrates that deterioration or change of a consumer’s mental health, cognitive or physical function, capacity or condition is recognised and responded to in a timely manner.

##### **Requirement 3(3)(e) Met**

The organisation demonstrates that information about the consumer’s condition, needs and preferences is documented and communicated within the organisation, and with others where responsibility for care is shared.

##### **Requirement 3(3)(f) Met**

The organisation demonstrates timely and appropriate referrals to individuals, other organisations and providers of other care and services.

##### **Requirement 3(3)(g) Met**

The organisation demonstrates minimisation of infection related risks through implementing:

1. standard and transmission based precautions to prevent and control infection; and
2. practices to promote appropriate antibiotic prescribing and use to support optimal care and reduce the risk of increasing resistance to antibiotics.

### Standard 4: Services and supports for daily living Met

#### Consumer outcome:

1. I get the services and supports for daily living that are important for my health and well-being and that enable me to do the things I want to do.

#### Organisation statement:

1. The organisation provides safe and effective services and supports for daily living that optimise the consumer’s independence, health, well-being and quality of life.

#### Summary of Assessment of Standard 4:

Overall consumers did confirm that they get the services and supports for daily living that are important for my health and well-being and that enable me to do the things I want to do.

For example:

* Consumers interviewed said they are satisfied they get the service they need. Consumers said they feel supported to maintain activities within the community and have choices.
* One consumer said I get to come and go as I please.
* Consumers said they are generally satisfied with the meals provided and can ask for alternative meals if they do not like the meals on the menu. Consumers said the facility provides meals which meet their specific dietary requirements.
* One consumer said they have special dietary requirements and the service ensures their needs are met.

To understand the consumer’s experience and how the organisation understands and applies the requirements within this Standard, the Assessment Team sampled the experience of consumers – observations were made, consumers were asked about the things they like to do and how these things are enabled or supported by the service and staff were asked about their understanding and application of the requirements. The team also examined relevant documents.

* The Assessment Team observed consumers undertaking large and small group activities. The service provides a monthly activity calendar and consumers choose events in which they would like to partake. The service provides multicultural activities for consumers both within the service and in collaboration with local community groups. The service provides group bus outings to various destinations.
* Consumers individual cultural needs are supported and facilitated.

The Assessment Team found that 7 of 7 specific requirements were met.

#### Requirements:

##### **Requirement 4(3)(a) Met**

The organisation demonstrates that each consumer gets safe and effective services and supports for daily living that meet the consumer’s needs, goals and preferences and optimise their independence, health, well-being and quality of life.

##### **Requirement 4(3)(b) Met**

The organisation demonstrates that services and supports for daily living promote each consumer’s emotional, spiritual and psychological well-being.

##### **Requirement 4(3)(c) Met**

The organisation demonstrates that services and supports for daily living assist each consumer to:

1. participate in their community within and outside the organisation’s service environment; and
2. have social and personal relationships; and
3. do the things of interest to them.

##### **Requirement 4(3)(d) Met**

The organisation demonstrates that information about the consumer’s condition, needs and preferences is communicated within the organisation, and with others where responsibility for care is shared.

##### **Requirement 4(3)(e) Met**

The organisation demonstrates timely and appropriate referrals to individuals, other organisations and providers of other care and services.

##### **Requirement 4(3)(f) Met**

The organisation demonstrates that where meals are provided, they are varied and of suitable quality and quantity.

##### **Requirement 4(3)(g) Met**

The organisation demonstrates that where equipment is provided, it is safe, suitable, clean and well maintained.

### Standard 5: Organisation’s service environment Met

#### Consumer outcome:

1. I feel I belong and I am safe and comfortable in the organisation’s service environment.

#### Organisation statement:

1. The organisation provides a safe and comfortable service environment that promotes the consumer’s independence, function and enjoyment.

#### Summary of Assessment of Standard 5:

Most of the sampled consumers indicated that they feel they belong in the service and feel safe and comfortable in the service environment.

For example:

* Consumers interviewed said they feel safe living in the facility.
* Consumers said they feel at home and are satisfied with the size of their rooms. Consumers said they are able to personalise their rooms with photographs and furniture from their home. Consumers said visitors are made to feel welcome and this was observed by the Assessment when staff were greeting and speaking with representatives.
* Consumers said they are very satisfied with the cleanliness of their rooms and that they are regularly cleaned by staff.

To understand the consumer’s experience and how the organisation understands and applies the requirements within this Standard, the Assessment Team observed the service environment, spoke with consumers about their experience of the service environment and interviewed care staff about the suitability and safety of equipment. The team also examined relevant documents.

* The facility has preventative and reactive maintenance processes. Maintenance is undertaken according to the schedule by either maintenance staff, external contractors or gardeners.
* Cleaning staff said they clean consumer’s rooms and public areas according to a schedule to maintain the cleanliness of the facility.
* Laundry services are provided on site and include the laundering of linen and consumer clothing.
* The Assessment Team observed the environment to be clean, tidy and well maintained. Consumers are generally accommodated in single rooms with ensuites. The nursing home area has single or double rooms with shared ensuites. Each area within the facility has its own lounge and dining area. Consumers have access to outdoor areas and gardens which are well maintained by gardening staff.

The Assessment Team found that 3 of 3 specific requirements were met.

#### Requirements:

##### **Requirement 5(3)(a) Met**

The organisation demonstrates that the service environment is welcoming and easy to understand, and optimises each consumer’s sense of belonging, independence, interaction and function.

##### **Requirement 5(3)(b) Met**

The organisation demonstrates that the service environment:

1. is safe, clean, well maintained and comfortable; and
2. enables consumers to move freely, both indoors and outdoors.

##### **Requirement 5(3)(c) Met**

The organisation demonstrates that furniture, fittings and equipment are safe, clean, well maintained and suitable for the consumer.

### Standard 6: Feedback and complaints Met

#### Consumer outcome:

1. I feel safe and am encouraged and supported to give feedback and make complaints. I am engaged in processes to address my feedback and complaints, and appropriate action is taken.

#### Organisation statement:

1. The organisation regularly seeks input and feedback from consumers, carers, the workforce and others and uses the input and feedback to inform continuous improvements for individual consumers and the whole organisation.

#### Summary of Assessment of Standard 6:

##### Consumer outcome

Most sampled consumers did consider that they are encouraged and supported to give feedback and make complaints, and that appropriate action is taken.

For example:

* Consumers interviewed said they are comfortable in raising complaints with management or staff and that complaints are generally responded to in a timely manner.
* Consumers interviewed said that when they have made suggestions or provided feedback, management have considered their feedback and reviewed the services which are being provided.

To understand the consumer’s experience and how the organisation understands and applies the requirements within this Standard, the Assessment Team sampled the experience of consumers – asking them about how they raise complaints and the organisation’s response. The team also examined the complaints register, complaints trend analysis and tested staff understanding and application of the requirements under this Standard.

* The facility has a feedback register on which complaints and compliments are recorded. Complaints are recorded and monitored by the facility’s management team and reports provided to the Director of Residential Aged Care. Feedback is reviewed, analysed and trended monthly by the corporate Quality Officer. Complaints are used to inform the facility’s Plan for Continuous Improvement. Information on issue of complaints is provided monthly to the Board

The Assessment Team found that 4 of 4 specific requirements were met.

#### Requirements:

##### **Requirement 6(3)(a) Met**

The organisation demonstrates that consumers, their family, friends, carers and others are encouraged and supported to provide feedback and make complaints.

##### **Requirement 6(3)(b) Met**

The organisation demonstrates that consumers are made aware of and have access to advocates, language services and other methods for raising and resolving complaints.

##### **Requirement 6(3)(c) Met**

The organisation demonstrates that appropriate action is taken in response to complaints and an open disclosure process is used when things go wrong.

##### **Requirement 6(3)(d) Met**

The organisation demonstrates that feedback and complaints are reviewed and used to improve the quality of care and services.

### Standard 7: Human resources Not Met

#### Consumer outcome:

1. I get quality care and services when I need them from people who are knowledgeable, capable and caring.

#### Organisation statement:

1. The organisation has a workforce that is sufficient, and is skilled and qualified, to provide safe, respectful and quality care and services.

#### Summary of Assessment of Standard 7:

In general, sampled consumers indicated that they get quality care and services when they need them and from people who are knowledgeable, capable and caring.

For example:

* All consumers and representatives were complimentary of the care and services provided by the staff of the organisation. Some consumers provided specific examples of how staff support them.
* Consumers and representatives said the organisation’s staff know what they are doing. Some consumers and representatives said they are not satisfied with the knowledge and promptness of agency staff.
* Consumers said they appreciate that some of the staff can speak Italian, so they can speak their own language.

To understand the consumer’s experience and how the organisation understands and applies the individual requirements within this Standard, the Assessment Team spoke with consumers about their experience of the staff, interviewed staff, and reviewed a range of records including staff rosters, training records and performance reviews.

* The service provider ensures staff and volunteers are engaged with at least a minimum knowledge and skillset. Staff are provided regular education, with topics which are relevant to the consumers in the facility at the time. Performance management processes are in place to support staff in completing their tasks. There are clinical and care staff on site at all times, and support and allied health staff available during the day.

The Assessment Team found that 4 of 5 specific requirements were met.

* Not all consumers and representatives are satisfied with the skills and performance of agency staff in the facility; they are also dissatisfied with the length of time taken to respond to call bells. Care staff confirmed the challenges in providing prompt and quality care when more than one agency staff is rostered to an area on the same shift. Allocation sheets and call bell response reports support the information provided by consumers, representatives and staff, relating to agency staff and call bell response times. Management confirmed they are aware of high agency staff usage, however, have not been able to address this issue.

#### Requirements:

##### **Requirement 7(3)(a) Not Met**

The organisation demonstrates that the workforce is planned to enable, and the number and mix of members of the workforce deployed enables, the delivery and management of safe and quality care and services.

##### **Requirement 7(3)(b) Met**

The organisation demonstrates that workforce interactions with consumers are kind, caring and respectful of each consumer’s identity, culture and diversity.

##### **Requirement 7(3)(c) Met**

The organisation demonstrates that the workforce is competent and the members of the workforce have the qualifications and knowledge to effectively perform their roles.

##### **Requirement 7(3)(d) Met**

The organisation demonstrates that the workforce is recruited, trained, equipped and supported to deliver the outcomes required by these standards.

##### **Requirement 7(3)(e) Met**

The organisation demonstrates that regular assessment, monitoring and review of the performance of each member of the workforce is undertaken.

### Standard 8: Organisational governance Met

#### Consumer outcome:

1. I am confident the organisation is well run. I can partner in improving the delivery of care and services.

#### Organisation statement:

1. The organisation’s governing body is accountable for the delivery of safe and quality care and services.

#### Summary of Assessment of Standard 8:

Overall most sampled consumers indicated that the organisation is well run and that they can partner in improving the delivery of care and services.

For example:

* Consumers and representatives interviewed said they are satisfied with the management of the facility.
* Consumers provided examples of how they have input to the organisation through improvement suggestions and feedback.

To understand how the organisation understands and applies the requirements within this Standard, the Assessment Team spoke with management and staff and reviewed relevant systems and processes relating to the organisational governance underpinning the delivery of care and services (as assessed through other Standards).

* The organisation involves consumers in the development of services and recruitment of staff through inviting consumers to recruitment processes, using feedback and suggestions to inform services, Board engagement at special events and Italian Benevolent Foundation members who are consumers or representatives can attend the annual general meeting. The governing body promotes a culture of safe and inclusive care through identifying consumers as the centre of their business. Governance systems across the organisation are generally effective in ensuring the service provider meets the Quality Standards and other relevant responsibilities, including clinical governance and requirements.

The Assessment Team found that 5 of 5 specific requirements were met.

#### Requirements:

##### **Requirement 8(3)(a) Met**

The organisation demonstrates that consumers are engaged in the development, delivery and evaluation of care and services and are supported in that engagement.

##### **Requirement 8(3)(b) Met**

The organisation demonstrates that the organisation’s governing body promotes a culture of safe, inclusive and quality care and services and is accountable for their delivery.

##### **Requirement 8(3)(c) Met**

The organisation demonstrates effective organisation wide governance systems relating to the following:

1. information management;
2. continuous improvement;
3. financial governance;
4. workforce governance, including the assignment of clear responsibilities and accountabilities;
5. regulatory compliance;
6. feedback and complaints.

##### **Requirement 8(3)(d) Met**

The organisation demonstrates effective risk management systems and practices, including but not limited to the following:

1. managing high impact or high prevalence risks associated with the care of consumers;
2. identifying and responding to abuse and neglect of consumers;
3. supporting consumers to live the best life they can.

##### **Requirement 8(3)(e) Met**

The organisation demonstrates that where clinical care is provided—a clinical governance framework, including but not limited to the following:

1. antimicrobial stewardship;
2. minimising the use of restraint;
3. open disclosure.