



Catholic Social Services
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Ms Julie Steel
Section Manager, Homelessness Policy Section
Homelessness Branch
Department of Families, Housing, Community Services
and Indigenous Affairs
PO Box 7576
Canberra Business Centre ACT 2610

Dear Ms Steel,

Catholic Social Services Australia (CSSA) is the national body for Catholic social services in Australia. Our 69 member agencies provide a range of support to vulnerable and disadvantaged Australians, including many who are homeless or at risk of homelessness.

CSSA is pleased to provide written comment on the questions raised in the Options Paper: *A National Quality Framework to support quality services for people experiencing homelessness*, circulated earlier this year. Please note that the attached submission reflects the position of particular CSSA member agencies in NSW, Victoria and WA whose homelessness support work is undertaken in a range of contexts, including inner city, regional and rural locations. Although the views of all 69 member agencies are not reflected here, I understand that several Catholic agencies have already provided feedback on the Options Paper via consultation sessions held across the country and in individual submissions.

Thank you for the opportunity to contribute to these important discussions about ensuring the quality of support services to some of Australia's most marginalised people. We see it as important that the resulting national quality framework will directly support the diversity and breadth of the sector and the people it serves.

Yours sincerely

Paul O'Callaghan
Executive Director

A National Quality Framework to Support Quality Services for People Experiencing Homelessness Options Paper

Submission from Catholic Social Services Australia (CSSA)

This submission reflects the position of particular CSSA member agencies in NSW, Victoria and WA in metropolitan, regional, rural and remote areas, which provides direct accommodation, transitional housing and support services to young people, women, children, families and older people. It does not represent the views of all 69 member agencies (which are located across the country), but serves to give a flavour of the experience of CSSA agencies in those three states.

| Question (with Options Paper page reference) | |
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| Core Building Blocks (page 8) <ul style="list-style-type: none"> • <i>Will the core building blocks assist in improving quality service delivery for people experiencing or at risk of homelessness?</i> • <i>Is there anything else that should be included as a core building block of a NQF?</i> | The building blocks appear to be a good platform from which to start. However a Charter, a complaints mechanism and standards will only improve quality if they are enablers of good practice and accountability – they must not themselves become the focus at the expense of spending time with people experiencing or at risk of homelessness. |
| National Homelessness Charter (page 9) <ul style="list-style-type: none"> • <i>What should be in the National Homelessness Charter?</i> • <i>How can mainstream and allied organisations be encouraged to adopt the Charter?</i> | <p>An aspirational National Homelessness Charter explicitly stating the rights and responsibilities of people experiencing homelessness appears, at first glance, to be a worthy ideal for underpinning the National Quality Framework. However, a number of jurisdictions in Australia do not have a Human Rights Act that provides the legal framework for the enforcement of such a Charter. Without legislation to underpin it, a National Charter cannot have the desired impact of upholding the rights and responsibilities of people who are homeless or at risk of homelessness.</p> <p>One option could be for the NQF to refer to the Universal Declaration of Human Rights and couch the rights of people experiencing homelessness within that Declaration, developing principles that stem directly from this. Such a process should also ensure that the needs and rights of children are given equal focus, especially for accompanying children with a homeless adult(s). These children can sometimes get lost in the system, given the focus on the adult(s).</p> <p>It would be unrealistic to expect mainstream services to sign up to a Charter which lacks legislative ‘teeth’, especially when they are accountable in relation to a range of other accreditation processes (e.g. in the areas of education, health, out of home care,</p> |

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| | <p>children’s services, disability, aged care). However, mainstream services should be encouraged to commit to the principles underpinning the NQF as a complementary process to upholding the principles and compliance requirements of their own specialised fields.</p> |
| <p>Handling Complaints (page 10)</p> <ul style="list-style-type: none"> • <i>How do we ensure complaints mechanisms are accessible to clients regardless of their location and circumstances?</i> | <p>All clients or potential clients must be made aware at the outset of their right to make complaints and how to proceed. Sound processes need to be in place at a service provider level and through an external mechanism. This means that service users must have access to relevant and accessible information (including information targeted at children, young adults, and others with specific needs) upon entry to a service, with the same information displayed in prominent locations. A free call number and web/email address is critical for external complaints services, as well as for the homeless services themselves, especially in rural and regional locations.</p> |
| <p>Standards (page 11)</p> <ul style="list-style-type: none"> • <i>Do the proposed categories for standards cover all the areas they need to? If not what else needs to be included?</i> • <i>What area/s of the standards would your service need the most support to achieve?</i> | <p>The proposed standards cover the areas well. They need to align with existing standards such as SAAP and OOHC. Continuous quality improvement is an important component of standards. It works well when there is a standard enjoining agencies to develop a quality plan in relation to their performance against standards. However, when continuous QA is a component of each standard, it becomes impractical and loses its power as a cornerstone of quality.</p> <p>The grouping of the standards under ‘Your clients’, ‘Your relationships’ and ‘Your organisation’ works well, and the areas that they cover are comprehensive.</p> <p>While agencies aspire to high service standards, a risk of accreditation systems is that the increased complexity and ‘bureaucracy’ can take time away from service delivery to the client. Outcome standards (in contrast to standards about systems of quality service delivery) can become complex and confusing to identify and measure. Standards should ensure programs have a system of focusing on client outcomes, but not attempt to <i>be</i> the process for monitoring the outcomes.</p> <p>The areas of the standards which are likely to need most support are:</p> <ul style="list-style-type: none"> • The ‘Your Relationships’ section as it may be difficult to provide evidence for in some areas. • The Systems Advocacy and Community Education area – is it the agencies’ job to build community capacity? • Would need to be clear about possible exclusions, i.e. Aboriginal-Specific SAAP Services in the Access and Equity section; • If agencies have reached certain standards via other systems, there may not need to be much support. However, smaller organisations or agencies with limited capacity may need significant support to meet the agreed standards. |
| <p>Options (page 24)</p> <ul style="list-style-type: none"> • <i>Which of the four options best achieves the vision and</i> | <p>The CSSA agencies consulted indicated a preference of aiming for Option 3, and then in the longer term for Option 4. These two options are the most comprehensive for ensuring homeless services are provided at a consistent quality across all states and</p> |

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| <p><i>objectives of the NQF?</i></p> <ul style="list-style-type: none"> • <i>Are the transition timelines for each option realistic and achievable?</i> • <i>How frequently should services be required to complete a Quality Improvement Plan?</i> | <p>regions, as long as the approach is one of continuous improvement whereby agencies are well supported and timelines are realistic. Specifically:</p> <ul style="list-style-type: none"> • It is critical that <u>mutual recognition</u> is addressed in a manner that allows agencies to simply show where a standard has been met in another system, otherwise programs that already meet state compliance requirements will be unduly burdened with a double compliance regime. • A <u>staged process</u> will be essential. Requirements to meet all standards are complex and could be considered overwhelming (option 4), whereas requirements for continuous improvement towards meeting standards (option 3) can lead to great variations between services in the extent to which they comply with standards. Ultimately option 4 would lead to more consistent quality, but needs systems built in to support agencies to meet the requirements over a sensible period of time. Agencies with specific target groups, such as Indigenous or clients from culturally and linguistically diverse backgrounds may need additional tailored support. • Option 4 is the most robust, but it is important to have auditing and accountability in order for this to be useful. Agencies should then meet accredited standards in order to provide the best service for clients. Self-review may not benefit the clients or encourage agencies who are not meeting the standards to 'up their game'. What would happen to the QIP in Option 2 once it is developed, if it is not then audited? <p>Some CSSA agencies have already expressed a preference for option 4, and believe the timelines are achievable IF agencies have access to the new standards early in 2012. However smaller agencies may need increased support to meet accreditation over a longer timeframe.</p> <p>Frequency of QIP completion would be dependent on auditing or accreditation timelines.</p> |
| <p>Review Cycle (page 28)</p> <ul style="list-style-type: none"> • <i>How long should the review cycle be?</i> • <i>Would a mid-cycle review be useful?</i> | <p>The review cycle should reflect the life-cycle of the NQF, i.e. an initial review might be conducted fairly early in the process to check that the agency is on track in terms of a continuous improvement approach to achieving the desired quality outcomes and subsequent reviews might occur over a longer cycle (3-5 years). It is important not to burden agencies with excessive 'red tape', when much of the core aspects of service delivery will remain constant, especially where programs are also meeting State standards.</p> <p>There should be safeguards against requiring an annual self-assessment as this becomes burdensome and time consuming and mitigates against agencies having time to respond to the actions in the quality improvement plan.</p> |

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| <p>Recognition process (page 29)</p> <ul style="list-style-type: none"> • <i>Does your service participate in other quality systems that you think should be recognised by a NQF?</i> • <i>If so, what are they?</i> | <p>Agencies already participate in a range of quality systems that address many of the components of the NQF, including:</p> <ul style="list-style-type: none"> • Victoria and NSW: <ul style="list-style-type: none"> - Victorian Child, Youth and Family Registration Standards - Disability Standards (Victoria) - FRSP Standards - HACC standards - NSW OOHHC Standards and accreditation - NSW Community Housing Regulations • WA: <ul style="list-style-type: none"> - Quality Assurance Framework ISO 9001:2008 - Department of Housing in WA – registration as a preferred community housing provider and this is based on the National Community Housing Standards - SAAP Protocols 2004 • Other: <ul style="list-style-type: none"> - Good Practice Guidelines - The Performance Management Framework - Client Management Systems - other quality standards such as ISO - other National Standards as developed/implemented <p>Some of these are more onerous than others; all take time and significant resources. One suggestion for streamlining efforts is to introduce a ‘passport’ system, whereby all core standards, common across a range of accreditation systems, could be assessed once and deemed applicable to all agreed program areas. Other specialised standards, in this case relating to homelessness support, would be subject to ‘add on’ accreditation mechanisms. As well as streamlining processes, this approach would reduce red tape, costs and staff time.</p> |
| <p>Sector support (page 30)</p> <ul style="list-style-type: none"> • <i>What kinds of training would assist your organisation achieve the aim and vision of the NQF?</i> • <i>What kinds of sector support currently operate effectively in your jurisdiction?</i> | <p>Initial and ongoing training sessions would be important, with scope for cross organisational dialogue and support as well. It is important that the impost of accreditation does not come at the expense of direct service delivery:</p> <ul style="list-style-type: none"> • Funding agreements with programs must reflect the additional <u>costs</u> associated with program development in order to achieve compliance with standards, as well as ongoing compliance maintenance. Additional funding is needed to implement any changes so that it does not impact on existing service delivery or take time away from the very people to whom we are endeavouring to provide a quality service, and to cover development and implementation of policies and procedures as well as ongoing review and development of quality systems. Lack of attention to the costs of compliance |

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| <ul style="list-style-type: none"> • <i>How could existing sector support initiatives be used to support the implementation of the NQF?</i> • <i>What resources would support you in meeting the requirements of each option?</i> | <p>results in agencies being required to shift funds from direct service delivery to cover compliance requirements, resulting in reduced level of service delivery, and ironically, reduced quality of service, e.g. in NSW, DHS Community Services currently acknowledges the cost of accreditation for OOHC services and builds this into funding.</p> <ul style="list-style-type: none"> • Additional funding is required for peak organisations to support its members in quality and accreditation processes and assist with processes, e.g. how to prepare a QIP. • A clear evidence guide is a must • ‘Support’ is more than training – it also means providing agencies with opportunities to share information and experience, participate in online forums, mentor and be mentored, and identify mutual recognition possibilities. • Timeframes for training and support need to be realistic, and reflect a continuous improvement approach to implementation of the NQF. |
| <p>Any other comments/concerns about the Options Paper; issues raised at the Consultation Workshop; or the Online Survey</p> | <p><u>General Comment:</u> There is a need for a <u>phased approach</u> to implementation of a National Quality Framework which recognises the capacity, resources and infrastructure of each service, jurisdiction and region and provides realistic supports where access to support, including relevant mainstream services, is limited.</p> <p>The agreed NQF system needs to acknowledge and uphold the diversity of the sector if it is to meet the needs of homeless and potentially homeless people in different locations and different circumstances.</p> |