

28 July 2017

Jeanette Radcliff  
Secretary  
Community Affairs Legislation Committee  
Parliament House  
Canberra ACT 2600

Dear Ms Radcliffe,

Thank you for your email dated 26 June 2017 inviting ACIA to provide a written submission to the Community Affairs Legislation Committee inquiry into the NDIS Amendment (Quality and Safeguards Commission and Other Measures) Bill 2017. ACIA is pleased to provide the following response.

As a peak body, ACIA's primary purpose is to advocate for quality in the community care sector. ACIA's members, include private, not-for-profit and charitable organisations. Nationally ACIA represents over 100 provider organisations.

ACIA administers the Attendant Care Industry Standard (ACIS). Disability and Aged Care service provider organisation can seek Certification to ACIS. We believe ACIS is the most rigorous quality standard currently available in the community sector.

ACIA endorses the proposed NDIS Quality and Safeguards Commission. As the NDIS moves to full rollout and the number of participants in the Scheme continues to increase, the role of the Commission will be vital in safeguarding participants and ensuring providers of disability supports adhere to best practice in quality service delivery.

The role of the Commission in safeguarding service delivery will rely heavily on the regulatory framework delivered by the Commission. A robust regulatory framework will be required to ensure the safety of all participants. However, this needs to be balanced against the impact of regulation on providers. ACIA believes that the risk based tiered approach to registration outlined within the legislation will help to achieve this balance. The requirement for registered providers of high risk supports to complete a rigorous certification process is a necessary and appropriate measure. While the simpler verification method will be appropriate for providers of lower risk supports or for those who already complete registration through other industry bodies.

The introduction of the NDIS Practice Standards and its national rollout will provide a common certification standard for all service providers. Over the last 24 months, ACIA has worked with the Department of Social Services on the Development of the NDIS Practice Standards. ACIA advocates for a single National Human Services Standard which would encompass both the Disability and Aged Care Sector, we believe the NDIS Practice Standard is a significant step towards this goal.

The NDIS Practice Standard will be a significant improvement on the current State based systems which differ significantly in level of rigour. The national approach will ease the burden on providers who operate across multiple States and Territories.

As the NDIS moves to full rollout and providers transition into the new registration system, it will be important that appropriate arrangements are put in place for the recognition of existing Certifications. This recognition should consider the risk of service delivery as well as the impact and cost of the new requirements on service providers who are already Registered under the current State based systems. ACIA would recommend the involvement of industry in designing transition processes for providers who are already providing NDIS supports.

Beyond provider registration, other key functions of the Commission including a national approach to worker screening approach and the NDIS Code of Conduct will provide further safeguards to the industry. So too will the requirements for registered providers to maintain internal complaints handling systems and to report reportable incidents to the Commission. To date, requirements under the existing state based systems have not been as clear or as rigorous and in many cases, they have relied on individual providers to establish best practice processes without regulatory requirements.

ACIA is pleased to have had the opportunity to provide input on the design of the NDIS Quality and Safeguards Framework and the NDIS Practice Standard. We are hopeful that transition to the full rollout of the NDIS will be a relatively smooth process for service providers. We look forward to the establishment of the NDIS Quality and Safeguards Commission and the benefits that it will bring to both service providers and NDIS participants.

Yours sincerely,

Natasha Cebalo

**Attendant Care Industry Association**