REPORT ON THE PUBLIC CONSULTATIONS ON THE QUALITY STRATEGY

APRIL/MAY 2001

Summary

Both the Government and the disability community have committed a great deal of time and energy to developing the quality assurance strategy. It was successfully trialed last year and a number of necessary refinements were identified.

Public consultations were held around the country in April and May to examine the quality strategy and the evaluation findings in detail and to discuss a plan for implementation.

Submissions received from these public consultations show broad support for the new quality assurance system, although a number of issues have been raised which will be fully considered by the Minister with advice from the Department of Family and Community Services (FaCS) in consultation with the Disability Quality and Standards Working Party in fine-tuning the system prior to implementation. The main issue raised is one of resources – this has been largely addressed by the Government's recent Budget announcement. Other key issues raised include support for service providers and the passing of amendments to the *Disability Services Act 1986*.

Further information in relation to a number of specific issues raised at the consultations is available on the quality assurance website: www.facs.gov.au/qa

Methodology

A consultation paper, *Implementing a New Quality Strategy for Disability Employment Services*, provided information on the quality strategy for Commonwealth-funded disability employment services. It was distributed to all disability services, national peak disability organisations, State and Territory Governments and relevant Commonwealth agencies.

The Commonwealth Department of Family and Community Services held 25 public consultations in each state and territory which were open to everyone, including service providers, peak bodies and consumers. They were advertised through the consultation paper, and a plain English version was also distributed. Targeted consumer focus groups were also held.

A total of 612 people attended the public consultations across Australia. The following table details the locations and number of people that attended each session:

STATE	LOCATION	NUMBER OF PEOPLE THAT ATTENDED SESSION
CANBERRA	Canberra City	20
SYDNEY	Sydney City	35
	Parramatta	80
	Wollongong	15
	Wagga Wagga	40
	Armidale	14
	Dubbo	20
	Coffs Harbour	20
	Newcastle	25
QUEENSLAND	New Farm	57
	Maryborough	11
	Rockhampton	4
	Cairns	12
	Toowoomba	29
	Townsville	11
ADELAIDE	Adelaide City	30
	Mt Gambier	5
MELBOURNE	Melbourne City	23
	Dandenong	23
	South Ballarat	13
PERTH	Perth City	73
	Bunbury	12
	Teleconference with rural and remote service providers	6
TASMANIA	Launceston	20
DARWIN	Casuarina	12
	Alice Springs	2
TOTAL:	25	612

Approximately 40 submissions were received, of which 90 percent were from service providers.

Findings

Similar issues were raised in the submissions and the consultation sessions. The following is a summary of the key issues raised:

1. Implementation of the QA system if there is a change of Government

As it is an election year, with the possibility of a change of Government, many service providers were concerned about implementation. Questions included:

- will the implementation timeframe be altered if legislation is not passed?
- could a change of Government substantially affect the proposed quality assurance strategy?

2. Commonwealth funding and support for service providers and consumers

One of the most frequently raised issues concerned the funding and support for service providers for the new quality assurance system. The main concerns were that:

- the additional costs arising from implementing the quality assurance system will be 'burdensome';
- the estimated costs of an audit do not cover a service's time and effort;
- certification costs will be higher than the estimate of \$8,000 identified in the evaluation; and
- consumers will need training in their role on Audit teams.

3. FaCS support during implementation phase

Many service providers requested that support be provided prior to implementation, including:

- information on registration requirements;
- assistance to ensure they are on track;
- clarification of the role of FaCS project staff under the new system;
- advice on how to negotiate and agree on certification timeframes with project officers by November, 2001; and
- support for consumers in understanding the new processes.

4. Standards and KPIs

Various service providers raised concerns and provided suggestions for improving some of the Disability Services Standards and Key Performance Indicators, such as:

- wondering whether service providers needed to meet all the KPIs to be certified;
- noting that not all KPIs are applicable across both open and supported services;
- clarifying "non-employment outcome" in Standard 5;
- rewording KPI 5.2 to reflect services not funded for non-employment outcomes;
- concern over the use of Aged and Infirm Workers permits in QLD (KPI 9.2);
- rewording KPI 10.3 to read "employment aspirations" of the person, not "employment opportunities"; and
- developing further evidence guidelines to accompany KPI 1.1 in order to address the Access and Equity concerns of people from non-English speaking backgrounds (NESB) with a disability.

One State suggested making available a video explaining the standards and how the new process will work.

5. Role of the Consumer Technical Expert

The role of the consumer technical expert raised a number of issues, including the fact that:

- many services believe that the consumer technical expert should be from the same discipline as the service being audited;
- the time provided to consumer technical expert to become acquainted with the service being audited is insufficient;

- concerns about the capacity of people with intellectual disabilities to provide input or be involved as a consumer technical expert; and
- specific training options were identified for Consumer Technical Experts (Disability Services Auditor).

6. Cultural Responsiveness

A number of concerns were raised regarding how people from different cultural backgrounds are accommodated in disability employment. These included:

- under representation in employment services;
- requirement for consumer information strategies that meet the requirements of people from different cultural backgrounds;
- independent individual advocacy for support in complaints mechanisms;
- recognition of families as a key stakeholder; and
- requirement for audit teams to be culturally aware.

7. Continuous Improvement

Many service providers had queries about the continuous improvement system, including:

- the strategies for continuous improvement;
- incentives when a service has "passed";
- intellectual property rights for service providers; and
- continuous improvement not being a separate component but rather as an integral part of the ongoing certification processes.

8. Certification bodies

Services providers sought information about certification bodies, such as the number of certification bodies that have been accredited and whether there is a list of accredited certification bodies.

Other issues raised included:

- whether a service provider can choose their own certification body;
- concern by service providers, particularly in Queensland and Tasmania, over the low number of certification bodies (one in each state) as they may have no control over certifying body availability; and
- that certification bodies have a responsibility to include cross cultural awareness component in their training.

9. The impact of other welfare reforms on QA

As various other welfare reforms impact on the new quality assurance system, many service providers raised the following:

- the "meshing" of Business Services Review and quality assurance;
- the linking of quality outcomes with case based funding outcomes;
- the factoring of the cost of quality assurance and supported wage assessments into case-based funding;
- the removal of the efficiency dividend; and

• the many additional costs to service providers in implementing a new quality assurance system and other government reforms, such as case-based funding.

10. Rural and Remote issues

Certain regional areas were concerned about rural and remote services, including:

- the cost implications for remote and rural services;
- the problems attracting skilled staff to rural areas;
- the large unmet need for service providers in certain areas, eg Southern Shepparton to Seymour;
- the cost factor of productivity wages, with added costs of certification; and
- the unavailability of advocacy services in many rural areas, and whether there will be additional funding for them.

11. Administrative/systems-related matters

Queries included:

- whether the Commonwealth-funded services will be required to sign a new funding agreement incorporating the requirements of the new QA system?
- whether service providers will be able to display achievement of certification on letterhead etc?

12. Complaint Resolution and Referral Service

The implementation of an independent complaint resolution and referral service raised a few questions, such as:

- how will problems with auditing teams, certification bodies or outcome of certification body be handled?
- what about the many country regions that do not have any organisation that currently takes on roles of mediation/facilitation of complaints and disputes.

Conclusions

Overall, feedback suggests that the disability sector is comfortable with the direction of the quality assurance system and the refinements suggested by the evaluation.