



Response to Options Paper on a National Quality Framework to support quality services for people experiencing homelessness

May 2011

About Homelessness Australia

Homelessness Australia is the national peak body representing providers of direct services to people who are experiencing homelessness. We work to prevent and respond to homelessness in Australia and advocate on behalf of our members and the homelessness sector to create a framework to end homelessness. Homelessness Australia seeks to improve community awareness and understanding of the issues facing the 1 in every 200 Australians who are homeless.

Homelessness Australia advocates for people who are homeless, aims to represent the interests of more than 1500 homeless assistance services, and contributes to policy development and the evaluation of Australia's homelessness service system.

Homelessness Australia works collaboratively with homeless people's associations, homelessness assistance services, state homelessness peak organisations, national peak organisations from other sectors, governments, business and the broader community to achieve these objectives.

Homelessness Australia represents the single men and women, families, young people and women escaping domestic violence who access the diverse support and advocacy services provided by our members.

Background and Policy Context

The Australian Government's White Paper on Homelessness *The Road Home: A National Approach to Reducing Homelessness* released in December 2008 proposed a number of initiatives aimed at improving service quality.

A National Quality Framework (NQF) was proposed as a platform to deliver an improved and more integrated service response to people experiencing or at risk of homelessness with greater national consistency. Specifically, the White Paper included the need to develop quality standards for specialist homelessness services and:

The Australian Government will enact new legislation to ensure that people who are homeless receive quality services and adequate support¹.

The White Paper said that legislation will underpin the national response to homelessness, setting standards to deliver the best quality services possible, and:

¹ Australian Government *The Road Home: A National Approach to Reducing Homelessness* 2008 page 44

The response to homelessness will be underpinned by legislation that guarantees that people who are homeless are treated with dignity and respect, and receive quality services².

Consultations were undertaken by FaHCSIA with the homelessness sector in the first half of 2010. Submissions were also received by the department. An Options Paper was released in early 2011. Following the release of the Options Paper, FaHCSIA undertook a second round of consultations.

Homelessness Australia commends the department on their consultation process following the release of the Options Paper in early 2011.

We are also pleased that the department has established a Sector Reference Group (SRG) to provide input on the Options Paper and the development and implementation of the NQF.

In our submission following the first round of consultations, Homelessness Australia stated that we broadly support the adoption of national standards for homelessness services noting that in many states and territories some services are already engaged in quality assurance programs and/or are required to meet particular standards that are in place for the community services sector in general.

We noted that while we believe that there is some value in looking at aged care, child care and disability standards and regulatory systems, we would caution that homelessness services serve specific client groups in and of themselves and as such; will require national standards and a regulatory framework that reflects this.

These comments remain as much the case now as they did when they were originally made.

Our response to the 2011 NQF Options Paper

1. Quality systems are important

An important goal of many quality systems in mainstream and allied services is to protect vulnerable client groups.³

Homelessness Australia understands that quality standards provide a means to document and benchmark best practice. They make clear statements about standards to providers and the community. They enable providers to better prepare staff and to monitor and evaluate practice.

The Options Paper itself does not, however, provide any evidence base that implementing quality standards actually results in better quality services and protection of vulnerable clients.

In some jurisdictions, the feedback from services has been that standards support a market of services that is fully committed to continuous quality improvement. If providers chose to enter this market they should be committed to the same standard as service.

² *The Road Home* op cit page xii

³ National Housing Ministers Conference 2010 *A National Quality Framework to support quality services for people experiencing homelessness Options Paper* page 2

2. Dangers of introducing standards

The implementation of quality standards often brings with it the danger of being seen as minimum quality standards.

They can act as an entry deterrent to new players in the market.

In a market where the cost of raising quality outweighs the willingness to pay for the majority of the consumers, regulated organisations/providers may exit the market and consumers may (arguably) end up being worse off.

Moreover, the impact of quality standards may become further complicated if the standards impose restrictions on inputs rather than on quality outputs. If this proves to be the case, providers may comply in a manner that minimizes their costs in adhering to the regulation. For example, a standard which involves a minimum level of contact hours per client per day could result in providers circumventing this by hiring less expensive and less skilled staff. In this scenario, providers could ultimately sacrifice quality for quantity.

While the proposed standards are not as prescriptive as this example demonstrates, it is provided here as a caution.

3. Is a charter desirable?

It appears that many providers see value in a national homelessness charter to set out client rights and responsibilities, as an educational tool and as a means for leveraging greater mainstream investment in reducing homelessness.

On the other hand, many other providers see a charter as a piece of paper, and many clients (people experiencing homelessness) are not enamoured of a charter, questioning its value. We suggest that a survey of consumers who are experiencing or have experienced homelessness, and consumers who may be at risk of homelessness, be consulted to determine their real viewpoints on the usefulness or otherwise of a charter.

It is often viewed as just another piece of administration. We are unsure how it could be used to lever investment.

There is also a suggestion that the government may simply use the charter as a way of identifying complaints about agencies, which we would find unpalatable. Complaints per se are a useful way of collecting information about service delivery improvement possibilities, and also are a positive in that they demonstrate that clients feel empowered and enfranchised to make a complaint.

In summary, the value of a charter depends what it says and how it is used. It must encompass the commonly accepted cultural definition of homelessness, not simply cover rough sleeping.

Homelessness Australia supports a charter that is accompanied by accountabilities written into the National Partnership Agreements to ensure mainstream services participate with specialist homelessness services in preventing and ending homelessness.

4. Culturally appropriate standards are vital

Our members generally agreed that National Quality Standards will need to be culturally appropriate and sufficiently flexible to work for different types and sizes of services.

5. Underpinning legislation

Our understanding is that the Australian Government is working towards introducing a Homelessness Bill in the 2011 Spring Parliamentary sittings (although drafting may depend on other drafting priorities across Government).

We understand that the Government has had some advice that they are constrained by the Constitution as to what it can put in legislation, and is therefore implementing a Bill that will not confer any new rights or impose any obligations, but will take up the recommendations of the Parliamentary Inquiry into homelessness legislation to the extent that is constitutionally possible and practicable to do so.

The primary vehicle for ensuring service quality will be the National Quality Framework which will sit separately from, but alongside, the legislation.

To help guide the response to homelessness, the legislation will set out, in the context of the Government's Social Inclusion agenda:

- The things that we aspire to deliver for Australians who are facing homelessness.
- The partnerships and the strategies that the Government believes will help to tackle the problem.
- The way we expect people facing homelessness to be treated.
- It will also acknowledge Australia's International Human Rights obligations.
- The legislation will complement the National Quality Framework, whatever shape Housing Ministers ultimately decide that takes.

We understand that there are some alternate legal viewpoints.

Our members believe that legislation with a strong preamble and commitment like the SAAP legislation is required, or that existing legislation should not be repealed

6. A grievance process is required

Another specific items that our members believe need to be addressed within the NQF includes the need for a grievance process so if an assessor says that a particular standard has not been met, how does a service appeal if they believe they *have* met the standard and have provided the evidence (for example, if a service provides photos rather than a written report as proof). This can also be seen as allowing culturally appropriate standards.

7. Resourcing the sector is key

Regardless of which option is pursued, it will be significant that services are fully resourced to enable them to meet the requirements, that the diversity of the sector is protected and the administrative burden created by the NQF is minimised, particularly for smaller services.

In our previous submission, we mentioned that we were informed that services in Victoria found that the employment of (more than one) dedicated worker to assist services with the process of meeting accreditation standards in the state's homelessness peak body was enormously beneficial. Homelessness Australia believes that given this has been shown to benefit services at a state/territory level; consideration should be given to funding the appointment of equivalent position(s) to assist services to meet the requirements of the NQF.

Another comment from one of our members in a state where standards have already been implemented was

“massive amount of resources required to prepare, undertake the required work, provide documentation and implement changes – particularly for the smaller organisations.”

Resources should include:

- **Financial** - funding for services to develop their own resources and internal resource workers so that services can stay abreast of continuous quality improvement.
- **Sector development workers** based in the peak bodies and regions e.g. funded networker positions to assist services to build relationships and share knowledge and good practice.
- **Resources for regional forums** to share innovative ideas and good practice.
- **Education and training** – a highly trained workforce ensures increased professionalism and better outcomes for the client.
- **Reference material and resources** such as websites and e-learning.
- It would be beneficial if state and territory jurisdictions **monitor and evaluate assessment bodies so that they provide effective support to agencies**. (Guidelines should be issued by FAHCSIA to state and territory jurisdictions on the selection of assessment bodies and providing services with a choice of assessment body).

8. Use existing standards and systems

Overwhelmingly, our members have advocated that national homelessness standards must be mapped against existing standards and systems prior to their implementation to reduce unnecessary burden and remove the potential for duplication.

A key way to ensure that this occurs is to enable reciprocal recognition of standards already demonstrated to have been achieved through other quality systems. Many services have already participated in accreditation and quality assurance processes at a state/territory level. Depending on the size of your service and the number of programmes it provides to different client groups you may have been subject to multiple accreditation processes. Given that services are already burdened by administrative and reporting requirements for funding bodies, every effort must be made to ensure that meeting the requirements of a NQF does not unnecessarily add to this burden. One way to minimise the additional work that will arise out of the implementation of a NQF would be to allow for reciprocal recognition of service standards already achieved. Appropriate processes and systems should be put in place to ensure that services are able to submit evidence demonstrating how they have already achieved comparable standards through previous accreditation processes.

Service providers must be positively supported to meet the standards through incentives and be given sufficient time to make the necessary improvements rather than doing so in an environment where they may fear that their funding is at risk.

Homelessness Australia's understanding is that FaHCSIA is undertaking a mapping process and we look forward to seeing this documented. We would be extremely reluctant to implement a NQF without seeing and absorbing such mapping and connection to existing standards – this **must** occur before the NQF.

9. Who should be the assessor/accreditation body?

Related to this question is the need to ensure that the agency or body responsible for measuring progress towards meeting the standards is separate to the provider of funding for service delivery and we believe it would be best placed in the not-for-profit/community sector which will enhance commitment and engagement. It should not be provided by a for profit organisation which simply takes funding out of the sector and implies a policing mentality. Locating it within the not-for-profit sector will enable some capacity building in the sector. Services must be provided with clear, objective directions and guidelines about the process of achieving the requirements of a NQF. The agencies contracted to do the accreditation must be independent of the Government bodies that fund the services being accredited.

Our members in some jurisdictions have told us of large amounts of money being spent on consultancies in the for-profit sector, and problems during the implementation including reinventing the wheel because these consultancies are reluctant to accept work of others and also use the additional time of re-inventing the wheel to justify greater costs. This is galling to the community sector which watches every dollar carefully and seeks best value for money at all times.

10. Make the process a “carrot” rather than a “stick”

There must be an open dialogue between the accrediting agencies and the homelessness sector. The Australian Government should work cooperatively with the homelessness sector to develop mutually agreed upon methods of reviewing and evaluating the content, outcomes and processes of the NQF. Services that are unable to fully demonstrate that they have met particular component(s) of the NQF should be provided with clear directions about what steps they can take to enable them to do so. The process of progressively meeting the requirements of a NQF should be enabling, open and supportive.

Conclusion

It is vital to note that a recommendation of adopting any NQF Option is dependent on the implementation of the NQF coming with resources to the sector to support the implementation, to minimise the administrative impact on providers. The result would otherwise be a removal of resources away from service delivery to administrative and assurance tasks, effectively reducing service quality instantly, in direct contrast to the intention of the introduction of quality standards.

It appears to us and to our membership that the different Options outlined in the Options Paper are progressive – in other words, adopting one option now would not preclude moving to other options later. For example, agreeing to Option 3 now, may mean that Option 4 is an achievable longer term goal.

Most (although not all) of all members believe that **Option three** – external assessment against standards or **Option four** – accreditation linked to funding would achieve the best client outcomes.

Homelessness Australia recommends **Option four** as a combination of reciprocal compliance by virtue of other accreditation and a modules based system that means only one module may need to be done. A combination of self assessment and review by a not for profit body responsible for this is desirable. This should be about progressive enhancement and supporting genuine service improvement and not about a pass/fail process attached to funding.

Service providers are broadly supportive of the NQF. It could provide an opportunity for both government and non-government service providers to document the processes through which they deliver service quality. Homelessness Australia supports a positive and enabling approach to supporting services to achieve the outcomes of the NQF. We believe it should focus on quality deliverables across both the government and non-government sector.

Homelessness Australia looks forward to working with the department and the NQF sector reference group to provide on-going advice to guide the development and implementation of a NQF that encourages and supports services to demonstrate how they go about delivering quality services and outcomes for the people who access them.

Further information

Please contact Nicole Lawder, CEO Homelessness Australia

02 6247 7744

ceo@homelessnessaustralia.org.au