

# Quality Improvement Council (QIC), Quality Management Services (QMS), and Quality Improvement & Community Services Accreditation (QICSA)

## Submission to the House of Representatives Inquiry into Homelessness Legislation

**August 2009**

For further information about this submission please contact:

Steve Einfeld, Executive Director Quality Improvement Council  
5<sup>th</sup> Floor, Health Sciences 2, La Trobe University Victoria 3086  
Email: [qic@qic.org.au](mailto:qic@qic.org.au)  
Ph: (03) 9479 5630  
Fax: (03) 9479 5977

## **Background**

This submission was prepared by the Quality Improvement Council (QIC) together with its licensed providers: Quality Management Services (QMS) and Quality Improvement & Community Services Accreditation (QICSA).

QIC has been a standards developer and accreditation body since 1984. It accredits 500 health and community services providers in Australia and New Zealand including some 63 housing and support services in Australia. It is represented on various national bodies including the Accreditation Reference Group of the Australian Commission on Safety and Quality in Health Care. QIC licenses three bodies in Australia (licensed providers) to recruit and train reviewers, to conduct accreditation assessments with services, and to build capacity of organisations around quality and organisational development.

As a licensed provider of the QIC standards and accreditation program, QMS has broad ranging experience working with State and Australian government departments, peak bodies, large welfare organisations, hospitals, community health services and a variety of other non-government, public and private-for-profit health and community organisations. QMS has worked directly with the SAAP sector in all five of the States/Territories in which it operates. This has included the development of service specific standards in Tasmania and New South Wales that have been endorsed by QIC for use in the program.

QICSA is QIC's licensed provider in Victoria and generally works with a membership group similar to that of QMS. In late 2007, QICSA was contracted by the Victorian state government's Office of Housing as the sole provider of accreditation for the Victorian homelessness and housing support sector. QICSA is now involved in accrediting 141 services, including 15 indigenous organisations, against industry specific standards; these standards are also endorsed for use in the QIC program. Groundwork for this project involved extensive orientation to the sector and the context in which organisations and services operate. Over half of the first cycle of reviews has been completed and the associated interpretation of results and benchmarking has given QICSA a valuable insight into the sector and the implications of introducing standards and accreditation into this setting.

## **Introduction**

This submission argues for a balanced, systematic and flexible approach to development of sustainable quality in homeless services. It is intended to complement that contributed by QMS under the heading 'Quality Management Services, Submission to the Parliamentary Committee Inquiring into Homelessness Legislation'.

## **Comments on Terms of Reference**

We make the following comments on individual terms of reference.

***Term 1. The principles that should underpin the provision of services to Australians who are homeless or at risk of homelessness***

We affirm the continuous quality improvement principles proposed by QMS in its submission, namely:

1. Putting service clients/users first.
2. Inspiring vision and leadership at all levels within an organisation.
3. Developing informed plans and making evidence-based decisions.
4. Encouraging teamwork.
5. Maintaining a system-wide focus.
6. Engaging in continuous improvement.

We would add:

7. Based on approaches to socially just service provision that promote empowerment, recognise and build strengths and offer sustainable solutions
8. Utilising flexible service models that are adaptive to presented needs and well integrated into the broader service system
9. Advocating for the rights of people at risk of or experiencing homelessness
10. Adequate resourcing of services
11. Provided by a well planned, credentialled and skilled, and an adequately remunerated and sustainable workforce.

***Term 2. The scope of any legislation with respect to related government initiatives in the areas of social inclusion and rights***

Evidence shows that people experiencing homelessness include disproportionately large numbers of people with disabilities, alcohol or other drug problems or mental illness, those with health problems, people who have experienced domestic and/or other violence, and people who have had contact with law enforcement agencies. We propose that a legislated statement of rights should be at a broad enough level to recognise the diverse and overlapping factors affecting people who are homeless or are at risk of or being homelessness.

<b>Observation 1.</b>	There should be a legislated statement of rights for marginalised and socially excluded people at a whole-of-government level rather than at a specifically homeless level.
-----------------------	---

***Term 3. The role of legislation in improving the quality of services for people who are homeless or at risk of homelessness***

In the area of quality, we see this term of reference covering the following matters:

- a. Should legislation prescribe standards for services provided to homeless people?
- b. Should there be specific homelessness services standards?
- c. Should accreditation or some other quality regime be mandatory for services?
- d. How else could legislation support service quality?

a. Should legislation prescribe standards for services provided to homeless people? In our experience, standards need to be integrative, achievable, and responsive to changes in service provision. Legislation as a vehicle for mandating standards is problematic because:

- wording is more likely to be rendered in narrow, legalistic language
- legislation is primarily concerned with regulation so standards will tend to be written as inputs or processes rather than desired outcomes
- legislation takes time to pass (and hence may not keep pace with understandings of better practice) and once legislation is passed it is very difficult and not timely to amend.

Rather than directly prescribing standards it is proposed that the legislation provide a framework for quality services. The framework should:

- state the broad dimensions of quality
- embody principles such as those set out above
- recognise that sustainable quality practice arises from multiple interventions and supports, with distinctive roles at all levels
- comprehend that service consumers need joined up and continuous services which a quality system should encourage. People experiencing or at risk of homelessness use a wide range of human services in conjunction with specific housing related services
- encourage quality performance and make services transparent and accountable without placing an unreasonable compliance burden on them
- provide that evaluation should occur at individual service, program and sector-wide levels, and evaluation findings should inform further service design and planning.

<b>Observation 2.</b> Legislation should not contain specific standards but should set out a framework for quality services.
--

b. Should there be specific homelessness services standards?

We acknowledge the current use of SAAP program standards, and understand the appeal of having service or sector specific standards. Over the last 10 years however we have seen the proliferation of standards in a range of government programs – Commonwealth and state. The workload burden for services – many of whom are funded not-for-profits with minimal administrative resources, has been huge. Indeed we have been informally advised by service providers that staff sometimes have to be withdrawn from directly providing services and deployed to standards compliance administration.

The Victorian Department of Human Services recently commissioned consultants Deloitte to examine the extent of multiple standards compliance, and suitable solutions. As a result, the Department is considering moving away from program standards and towards generic standards such as QIC's Core standards. QIC itself is in the process of abandoning its Service Specific Standards (of which there are presently 6, representing QIC's main participating service sectors). It is planning to use its generic Core standards only, with Good Practice Guides that will contextualise them to a range of service sectors.

After a recent rigorous stakeholder consultation QIC believes that its revised Core standards will support the full range of human services, and that the Good Practice Guides will substantially reduce the compliance burden. From this experience we suggest that the homelessness sector considers a guidelines approach rather than standards and that it liaises with accreditation bodies to determine how documentation can be used to conceptualise and motivate good quality practices.

<b>Observation 3.</b>	Consideration should be given to removing program level standards from homelessness services, and substituting guidelines for interpretation of generic human services standards, in order to reduce the administrative and compliance load on service providers.
-----------------------	---

c. Should accreditation or some other quality regime be mandatory for services?  
A case can be made both for and against mandatory accreditation. If accreditation is mandatory, there is a legal requirement to comply, with consequences for failure to comply. The argument runs that all services must meet minimum standards otherwise they are not allowed to operate. A mandatory system currently applies to, for example, residential aged care services and child care. On the other hand, it is argued that compliance assessment is only as good as the day the assessment is made, and if sustainable quality performance is sought then quality improvement systems should be in place. The argument against mandatory accreditation is that it encourages minimum compliance rather than quality improvement.

It is also important not to over-promise on the outcomes of accreditation. Participation in an accreditation program can provide a structure and framework for helping organisations develop a quality agenda and promote organisational and service development, and make them accountable for performance and improvements. However it may not in itself prevent bad behaviour or mistakes, remediate a poor performer or substitute for good governance, effective contract management or specific forms of surveillance.

We are comfortable with legislation that requires services to participate in an accreditation program, as opposed to meeting a particular accreditation result. Over time most organisations in accreditation programs develop a motivation to embrace quality systems even if they do not start this way. We are however concerned at accreditation being used as a form of regulation as this leads to mistrust between services and accreditation assessors, and therefore gaming and hiding of evidence. As a result organisations may be less open to possible improvements. Regulation and remediation, if required, should be achieved by a government outcomes-based reporting framework or inspectorial system with short notice assessment to identify unsafe, exploitative and/or illegal practices.

<b>Observation 4.</b>	Consideration should be given to legislation that provides for all homeless services to participate in an approved accreditation program.
-----------------------	---

d. How else could legislation support service quality?  
We support the idea of a quality framework along the above lines, being incorporated into legislation.

***Term 5. The applicability of existing legislative and regulatory models used in other community service systems such as disability services aged care and child care to the homelessness sector.***

As indicated above we would discourage a heavily regulated regime enshrined in legislation. A better approach would see an overarching quality framework in the legislation. A national body that brings together stakeholders should build knowledge of better practice and coordinate program and sector-wide evaluation, ongoing policy development and service planning. Such a body might develop guidelines to aid interpretation of generic standards and advise government on suitable criteria and processes for approving accreditation bodies. If regulation is required, this should be managed through the states and territories and should be limited to an inspectorate undertaking short notice assessment of unsafe, exploitative and/or illegal practices, and meaningful streamlined reporting requirements.

Finally, more so than other individual community services, homelessness services need to integrate with other sectors to ensure a seamless service pattern for individuals or families experiencing or at risk of homelessness. It is therefore important to have a whole-of-government approach to legislation, service planning and monitoring.