



Response to Housing Ministers' Discussion Paper on a National Quality Framework to Support Quality Services for People Experiencing Homelessness

Our organisation

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 homelessness 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 founding members.

Background and Policy Context

Homelessness Australia is pleased to have been provided with an opportunity to directly participate in the consultation process leading to the development and implementation of a National Quality Framework (NQF). The consultation process follows on from the commitment to implement an accreditation framework (the NQF) that was first proposed in the White Paper in December 2008.

The homelessness sector was given an opportunity to provide feedback on the applicability of accreditation systems from other sector such as aged care and disability services when submissions into the Inquiry into the content of new homelessness legislation were sought.

In our submission we 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.

At the time, Homelessness Australia recommended that the Government draw on the extensive experience of workers from the homelessness services sector when developing national service standards. We are pleased that the two stage consultation process flagged in the Housing Ministers' Discussion Paper provides an opportunity for workers from the homelessness sector to provide direct input into the development of the NQF.

We note that this consultation process endorses Recommendations 12, 13 and 14 from the Housing the Homeless report on the Inquiry into the Content of new Homelessness Legislation, Recommendation 12:

"...That the Minister for Housing, through the Housing Ministers' Conference, supports the introduction of a national standards and accreditation framework which:

- *Provides a broad national service charter to guide mainstream services in their delivery of services to people experiencing homelessness or at risk of homelessness; and*
- *Sets specific minimum quality standards for specialist homelessness services, leading progressively to accreditation."*¹

Recommendation 13:

*"...That the Australian Government consults with state/territory governments and other key stakeholders to develop a national regulatory system based on core service standards to be broadly applied to community services, including homelessness services..."*²

Recommendation 14:

*"...That the Minister for Housing consult with the Housing Ministers' Conference and key sectoral stakeholders about the essential components of a national standards and accreditation framework to determine the broad principles and minimum standards to apply to specialist homelessness services..."*³

Homelessness Australia is broadly supportive of these recommendations because they provide opportunities for direct input into the process of developing and implementing the standards that will underpin the NQF.

¹ House of Representatives Standing Committee on Family, Community, Housing and Youth Housing the Homeless Report on the Inquiry into Homelessness Legislation, 2009, pp.96-97.

² House of Representatives Standing Committee report, 2009, *ibid*, p.97.

³ House of Representatives Standing Committee report, 2009, *ibid*, p.103.

We also note that recommendation 11 in the Housing the Homeless report stated that legislation should provide overarching principles to underpin standards in an accreditation framework and we look forward to the develop of new homelessness legislation.

Homelessness Australia supports a National System that encompasses the spirit of the White Paper in that it should apply to Government, community and private providers of services to people experiencing homelessness. It would be in the best interests of the quality of services to people experiencing homelessness to ensure this system applies to all providers including mainstream providers in the Government, private and community sectors.

Responding to the Discussion Paper

What is needed in a NQF to take into account the scope and diversity of service responses in Australia and to ensure that these are maintained?

One of the most important elements of Australia's homelessness services sector is its diversity and the ability of services to accommodate and respond to the needs of particular client groups. This is partly the result of the evolution of the sector and its emergence out of social movements and partly the result of the ability of services to be adaptable and responsive to the changing needs of different client groups.

One way of ensuring that the requirements of a NQF take into account the scope and diversity of service responses is to ensure that service standards are not too prescriptive. This could be achieved by implementing a generic core set of standards that are broad enough to be applicable to generalist services as well as those who service specific client groups.

Another option would be to ensure that the requirements of a NQF recognise and value the need for providers of services to specific client groups (e.g. people from culturally and linguistically diverse backgrounds, Indigenous people and women escaping domestic violence). In some cases it would be inappropriate to impose service standards that, for example, require services to accommodate all clients seeking assistance. This would be particularly true if standards were put in place that required services for women escaping domestic violence to accommodate men.

It would be appropriate to consider in the development of the standards within the NQF that many services are not generic and cater to specific target client groups. Therefore the standards would need to be developed in consultation with providers of client specific services to ensure that they are achievable, realistic and relevant and will in fact enhance the quality of service delivery to clients. They should reflect the policy and practice environment in which services operate as well as the differing needs of particular client groups. There will also be unique features of service provision that are also dependent on the location of the service as well. It would seem both unrealistic and impractical to expect services to operate like McDonalds and deliver the same products and services in rural and remote locations as services might provide in an inner-city locality.

A broad set of minimum requirements could be developed that are achievable for all services and standards would need to be broad enough that those with for instance specific target groups could write Not Applicable and yet mainstream and other services could complete the general ones.

In summary, the homelessness sector has evolved over a number of decades and a feature of this gradual evolution is that different services are funded to support particular client groups. In 2007/08, just over 30% of services were funded to support young people, just under 30% were funded to support women (and their children) escaping domestic violence and a smaller number were funded to support single men, families and single women. It is appropriate that services are funded to support different client groups. It is also appropriate that services operating in areas with higher numbers of people from culturally and linguistically diverse backgrounds are able to tailor their services to provide culturally appropriate support to people.

In addition, services in Indigenous communities and metropolitan areas with significant Indigenous populations such as Redfern in Sydney and Northbridge in Perth must be able to provide culturally appropriate and Indigenous specific services.

Do you agree with the characteristics of quality service provision outlined in the Housing Ministers' Discussion Paper?

Homelessness Australia is broadly supportive of the key characteristics of quality service provision outlined on page four of the discussion paper. They are general enough to be applicable to services across the sector and to services in metropolitan, regional, rural and remote locations.

There are four characteristics of quality service provision listed that it is appropriate that Homelessness Australia will comment on specifically.

- **Quality service provision enables the client to participate in the decision making process and supports them to make their own decisions and achieve goals**

Homelessness Australia is pleased to note that both service providers and service users were invited to participate in the first round of the consultation process. The discussion paper places a heavy emphasis on clients being at the centre of the NQF.

It makes sense that clients should be provided with an opportunity to provide feedback about the quality of service they are receiving at a service level and how seeking assistance from a homelessness service has helped them to begin the process of making positive changes in their lives.

We know that homelessness services do this but there is little in the way of consistent documentation from clients about how the critical time interventions provided by key workers in homelessness services were the catalyst that enabled clients to make lasting changes.

A central component of good case management already employed by key workers focuses on enabling clients to identify their strengths and the support networks available to them and to empower them to utilise these to make decisions that will help them to take steps towards achieving mutually identifiable goals.

The standards need to be broad enough to recognise that the users of Homelessness Services will be from different situations and backgrounds, will have different understandings of what they see as quality, and some may remain disillusioned about their life situation long after they have departed their immediate homelessness. This means there needs to be a variety of ways to demonstrate quality service from both the Service and the Client perspective. We suggest Services be resourced and encouraged to build on existing systems or to develop ways to demonstrate and document quality from both the Service and the Clients' perspective and this may include collection of narratives, simple consultation systems for client input and suggestions, and simple surveys. The importance of client input is that it is gained at the Service level and used in service improvement. This input is not useful at the Program level. The standard therefore must be broad and not prescriptive and may be the Service will demonstrate the systems used to collect the Clients' perspective on services delivered.

- **Quality service provision is delivered by a competent, trained and qualified workforce**

The Productivity Commission report on the contribution of the not for profit sector demonstrated that the third sector, including workers in the homelessness sector is already competent, highly trained and well qualified. It found that:

"... A relatively high proportion (64 per cent) of community services employees hold a post-school qualification compared with the general workforce (52 per cent)..."⁴

This suggests that services are already delivered by a competent, trained and qualified workforce. That said Homelessness Australia would support being given the opportunity to work with our members to develop a comprehensive workforce strategy for the sector as a component of the NQF.

The White Paper directly linked the development of a workforce strategy for the homelessness sector with the implementation of accreditation processes and national service standards. Clients must remain at the centre of quality service delivery. The homelessness sector, like the community sector in general has experienced significant difficulties with recruiting and retaining appropriately qualified staff. Clients achieve their best outcomes when they build trusting relationships with key workers.

⁴ Australian Productivity Commission Report on the Contribution of the Not for Profit Sector to the Australian Economy, 2010, p.262.

High staff turnover can interrupt this process and therefore a central consideration of the development of a NQF framework must be the development of a comprehensive workforce development strategy that addresses longstanding issues such as; high staff turnover, workplace stress/burnout, difficulties with recruitment and retention and ultimately poor remuneration. The evidence shows that the barrier to an improved or strengthened work force is the pay and conditions provided to the Community Workforce.

High quality service delivery requires a high quality, well supported workforce. We must improve our ability to attract the most highly qualified people to our sector and having done so have the ability to retain them. Homelessness Australia recommends that addressing longstanding workforce issues is essential. Therefore the NQF for the homelessness sector should include standards that encourage and aid the building and maintenance of a strong, trained, skilled, appropriate workforce.

- **Quality service provision is supported and enhanced through collaborative partnerships and networks with similar and allied service providers**

Homelessness Australia supports this characteristic. If required to do so, we believe that homelessness services could readily document and demonstrate the many ways in which they collaborate with other service providers. We know from research that we conducted in 2008 that one of the major problems that key workers in homelessness services face is being unable to secure timely referrals to external services that their clients need to assist them to address their presenting issues.

One of the main barriers identified in our research was lengthy waiting lists and the two areas that providers found it most difficult to secure successful referrals to were housing and mental health.

Homelessness Australia believes collaborative partnerships can be critically important to achieving optimum outcomes for clients but the effectiveness of collaboration is severely curtailed if clients are unable to be successfully referred to the external services they need, when they need them.

There are other dimensions to collaborative partnerships. These include the time in which must be provided to develop and maintain partnerships, the value of long term partnerships that are naturally sustainable, the recent overly onerous and unnecessary bureaucratic practice of insisting on written agreements, the high turnover of personnel in Government agencies, the limits to which Government agencies can deliver on what is required and many others. This is another reason why we believe the NQF and standards should apply to Government, private and community agencies to ensure quality is across the sectors.

- **Quality service provision is provided by organisations that have strong governance, organisation and financial management processes and systems in place**

Homelessness Australia also supports this characteristic in principle. We believe that homelessness services would be readily able to demonstrate these capabilities and in all likelihood have already been required to do so in order to meet the conditions of their service agreements with state/territory funding bodies. It stands to reason that service providers should demonstrate strong processes in these areas.

The only cautionary note that could be offered here is that the definition of “strong governance and organisation processes’ could be perceived differently depending on the nature of the service provider, its location and the client group served. Past experience tells us that the imposition of mainstream definitions of what ‘good governance’ means has been used to publicly critique the organisational culture of Indigenous specific services in areas such as housing and health care.

It is essential that the system developed again is not prescriptive but provides a way in which Services can demonstrate good governance in a range of ways.

How can mainstream and allied services be encouraged and supported to identify and respond to people who are homeless or at risk of homelessness?

What quality approaches support stronger cross sector service integration and improved service delivery?

Homelessness Australia acknowledges that the proposal to introduce *service charters* for mainstream services that would specify the services that clients/consumers can expect to receive and their rights and responsibilities is designed to ensure that people experiencing homelessness are taken into account in the design and delivery of services.

There is a perception that these charters do not carry the same weight or impose the same degree of administrative and organisational requirements as service standards that are assessed both through self assessment and external assessment.

Homelessness Australia recognises that access to both mainstream and external specialist services is critical to enabling clients to address presenting issues that are beyond the capacity of key workers in homelessness services. Homelessness Australia supports increased collaboration between homelessness services and mainstream service providers.

There are many examples of instances in which both homelessness services and mainstream services are already working collaboratively and cooperatively.

The Australian Government should make every effort to support services to identify and document these examples and the factors present that encourage collaboration and enhanced integrated service delivery. It may be the case that for some services, formal arrangements such as entering into a memorandum of understanding will work best, while in other cases, different mutual agreements might be more appropriate.

It is our experience that some of the most effective arrangements are those that are not based on a formal MOU but are long term, naturally sustainable and over time

work without much effort and maintenance. These collaborative arrangements must be encouraged and respected. Again the standards must be broad and enable Service to demonstrate the compliance in a range of ways.

Both homelessness services and mainstream services should be actively encouraged to work cooperatively and seek out the most appropriate ways to facilitate cross-sector integration, particularly when key workers from different providers are engaged with common clients.

Mainstream services could be encouraged and supported to identify and respond to people who are experiencing homelessness or at risk of becoming homeless. One example may be providing specific homelessness awareness training to frontline staff to enable them to more easily identify which of their clients were currently homeless or at risk of becoming homeless.

Mainstream services should be encouraged to improve data collection and record keeping for clients who they identify as experiencing homelessness or at risk of becoming homeless. They could be required to document how they were responded to their situation and what procedures were put in place to alleviate their situation and address their housing need. This would enable us to identify improvements to the way in which mainstream services are responding to homelessness.

Improving the response of mainstream services must involve more than the imposition of additional compliance mechanisms. Mainstream services, particularly those accessed by a large number of people experiencing homelessness and those who are at risk of becoming homeless should be encouraged to view the need to identify and respond to homelessness as central to their organisational culture.

Which of the components listed in the Housing Ministers' Discussion Paper should be considered in a national framework?

- ***Quality should not be viewed as static, services should be encouraged and supported to commit to continuous quality improvement (CQI)***

Service quality should not be viewed as a static phenomenon. Quality should be continually reviewed to ensure that service provision remains responsive to the needs of the clients. A commitment to CQI may involve a significant degree of cultural change within organisations both specialist and mainstream to engender a commitment to ongoing service quality and improvement.

One of the most important aspects of a NQF is that it not be onerous to administer, is not about large accreditation assessment processes that take months to get through. It will be much more efficient and more broadly supported if there are a set of standards that the agencies commit to and continually deliver services against.

Simple demonstrations of meeting the standards will aid this. Using a combination of self assessment and provision of demonstration or evidence against the standards will have more chance of being accepted and developed in the sector.

Homelessness Australia supports a continuous quality improvement approach where services are supported to commit to building on their service delivery, identifying what works, and also considering and implementing other innovative and responsive service delivery.

Services should be encouraged to demonstrate components of innovative and successful programmes and initiatives that they have developed to respond to the needs of their client group. When seeking to develop and implement the NQF, there needs to be an acknowledgement that services may need differential amounts of time to meet the requirements.

In addition, depending on the nature of the service, its client group and its location, the features that may be used to define service quality may be very different. Homelessness Australia supports the implementation of the NQF being rolled out as a staged process that allows services sufficient time to demonstrate quality service provision.

We believe that a framework that focuses on CQI is more likely to enable the process of meeting the requirements of a NQF progressively than rigid accreditation systems or quality assurance processes that focus on the imposition of minimum standards rather than encourage services to commit to continuing to improve service quality over time. Homelessness Australia recommends the adoption of a NQF that commits service providers to CQI rather than prescriptive accreditation standards or quality assurance processes.

- ***Consumer charters and service charters are important mechanisms that provide transparency and clarification***

Homelessness Australia believes that both consumer charters (that set out the rights and responsibilities of people while being assisted by the service) and service charters (statements that clarify what service users should and should not expect services to be able to provide) are important because they encourage transparency and can clarify what services can realistically be expected to provide.

Given the vulnerability of the clients serviced by the homelessness sector and the fact that clients often present to services in crisis, it will often be necessary for the key workers to explain these charters to clients upon intake to the service. In many cases, workers will already be explaining the types of services that can be provided to the client as part of the assessment and referral process when a client enters the service.

- ***Service standards***

Homelessness Australia understands that the development of national service standards will be a key feature of any NQF. As long as these standards are achievable, realistic and broad enough to reflect the unique realities of service delivery in different localities and with different client groups we would expect the sector to be broadly supportive. Homelessness Australia supports the flexible, positive and enabling approach to the development and implementation of a NQF flagged in the Housing Ministers' Discussion Paper.

Service providers should be encouraged to demonstrate how they meet NQF requirements and if for various reasons this is not possible at the time of assessment they should be afforded the opportunity to work in partnership with the assessors to make the changes necessary to do so and be resourced appropriately to do so.

- **Complaints management systems**

Homeless Australia supports a system that encourages services to seek proactive feedback from clients and to proactively respond to concerns to achieve a harmonious and positive environment. Clients should be afforded opportunities to provide feedback about the quality of services that they are receiving. At times this feedback will be positive while at other times it will be negative. When clients do take issue with the level of service they are receiving it would be reasonable to expect that services have put in place appropriate processes to listen and respond to complaints objectively. Where appropriate and possible, responses to concerns should be followed up with changes to the service model or steps should be taken to improve those aspects of service provision. Clients should feel empowered to provide frank and timely feedback about the services they are receiving.

- **Alliance models**

As noted earlier, Homelessness Australia supports increased collaboration between homelessness services and providers of external services. Alliance models are one way of entering into agreements with various services that clients need to access in order to address their presenting issues. Alliance models could incorporate features of client work that have been shown to improve outcomes such as coordinated case management and information sharing. However Homeless Australia as stated earlier believes the most effective collaboration and partnerships are formed at a local level, where it is not forced but where it will happen naturally and with commitment based on the improved services and supports for clients and for Services. There will be a range of different ways, approaches, models, partnerships, agreements, projects and interagency work. The NQF should not be prescriptive about this but encourage diversity and varied approaches.

Are there other key components that should be included in a NQF?

Services should be provided with opportunities to document examples of innovative service delivery models

Services across Australia have demonstrated that they have the capacity to deliver innovative service models for their clients. Services are responsive to the changing needs of their client group and for a variety of reasons are required to think outside the square when it comes to making service provision work for their clients. In a NQF services need to feel valued, supported and encouraged. Many existing Models are innovative and effective. This is often overlooked and we seek in a NQF to ensure that positive encouragement and support is provided to Services.

In 2009, Homelessness Australia asked our members to provide us with examples of innovative service models. We were provided with a number of examples of innovative responses to client need and cooperative relationships that homelessness services have developed with mainstream providers in the localities in which their service is based. These serve to highlight the many ways in which homelessness services are already engaged in quality service provision.

As part of the process of documenting how their service will meet the requirements of a NQF, services should be encouraged to provide examples of the strengths of their service models and the innovative ways in which they adapt them to meet the changing needs of their clients. It needs to be recognised however, that this takes time, is resource intensive and there needs to be capacity within the Peak group to collect and record this information.

What lessons can we learn from existing quality frameworks?

What would you change in existing quality systems to improve outcomes for people experiencing homelessness?

- 1.) Services could benefit from the allocation of funding for the creation of a dedicated worker in homelessness peak bodies to provide advice and assist services to meet the requirements of the NQF**

After consultation with our Councils, we were informed that services in Victoria found that the employment of a 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. Homelessness Australia was reminded that Nationally through SAAP Case Management Resource Workers were funded to community agencies to work with groups of services to improve, enhance and develop case management across the SAAP Services.

The Services responded positively because it was done in collaboration with and based in the community sector, this was highly successful. Homelessness Australia seeks to consult with the department on the practical operations of such a resource and offers to assist in any process that will provide support to services to encourage this.

2.) The process of achieving the requirements of a NQF must be open and transparent

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. Homelessness Australia is concerned about examples of bodies in the private sector that mean the cost of accreditation is high to the Service and private companies profit from it. It is essential that problems in other systems are avoided and again our suggestion is that utilising the peaks, through Homelessness Australia in developing the appropriate system may alleviate some concerns.

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.

3.) A NQF must build on existing quality assurance frameworks and systems and provide reciprocal recognition of service standards already achieved

It must be recognised from the outset that many homelessness services are not stand alone services and a large percentage of services are embedded inside larger organisations, or with other services and programs. 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.

For example we have a number of services who are already accredited through various systems such as the Child protection Out of Home Care system NSW, the Quality Management System (QMS), Housing Registration processes (eg NSW) and many others.

This is now onerous, costly, unsustainable and not supported. It is also essential to ensure the System is appropriate for smaller services as many will not have the capacity to meet a huge administration load. 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 of their accreditation status with other bodies and this should be acceptable for the majority of standards eg governance, human resources, and other such standards. The process for proving how Services have already achieved comparable standards through previous accreditation processes must be simple and not require additional administration.

4.) The NQF should focus on a quality deliverables across both government and non-government sectors.

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.