

Feedback to the Tasmanian Community Sector following community consultation on the Quality and Safety Standards Framework



Theme	Issue	Resolution
Consultations	All areas of DHHS are participating in a reform process and thus seeking feedback for their particular reform agenda. This has resulted in a series of consultations that have inadvertently been scheduled in the same week, or even on the same day.	The OCS will endeavour to ensure that any future consultations are not scheduled on the same day, and as far as possible, in the same week as consultation activities in other reform areas. We appreciate that participating in consultations can have a significant impact upon service delivery and it may be especially difficult for some smaller organisations. Hence a range of feedback mechanisms have been offered including face to face meetings, email and written feedback, and telephone conversations. If you have further feedback or comments please do not hesitate to contact the Quality and Safety unit on 6336 4132 or email elizabeth.omalley@dhhs.tas.gov.au
Standards	The consultations have confirmed the community sector's agreement with the development and implementation of a quality and safety standards framework. Questions have focussed on details about the selections of standards, the impact upon community sector organisations, and requirements for evidence. There is agreement that the framework must be sustainable and assist both community sector organisations and departmental operational units toward a culture of continuous quality improvement.	Finalising a set of standards applicable to a wide range of organisations is a complex and challenging activity. The Office for the Community Sector with the Agency Sector Forum Reference Group, have been considering a wide range of standards and frameworks, including those used in other states and territories. The set of generic standards will align with existing frameworks, accreditation standards, and legislative requirements predominately. The requirements based in legislation will be compliance standards, and will be mandatory for all organisations. The Office for the Community Sector will select the generic standards. DHHS operational units, in consultation with community

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		sector organisations, will select the service specialist standards from national service specialist standards frameworks which are appropriate for the agreed service or consumer outcomes wherever possible as available. The final set of standards will also consider such factors as the resources/investment, service delivery volume and nature of services provided by the community sector organisation.
Accreditation	Consultations raised some concern that community sector organisations will be forced to seek external accreditation, even if they are not in a position to financially support the process.	While the Office for the Community Sector encourages all community sector organisations to consider seeking accreditation, where this is a viable option, it is not a requirement under the Quality and Safety Standards Framework.
Implementation	Discussions have raised concerns regarding the timeframe for implementation of the Standards Framework, the potential financial and human resources impact of implementation, and the possibility of support or assistance will be made available by the Department.	As with all major projects and reforms, and as a result of the feedback received from the community sector, implementation of standards will be staged on an incremental basis. It is anticipated that the full Quality and Safety Standards Framework will be implemented over the next three years, at which time it will be evaluated. The implementation issues identified in the consultations will be considered in the implementation plan which is currently being prepared. The Office for the Community Sector acknowledges that implementation may have an impact upon some organisations and a range of support options are being considered.

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<p>Finance and Performance Management</p>	<p>Issues have been raised about unit pricing, and the links between the Quality and Safety Standards Framework and the integrated finance and performance framework.</p> <p>A fear that community sector organisation's who do not meet the Quality and Safety Standards Framework requirements will be defunded was also raised.</p>	<p>As previously discussed, the Framework will be incrementally implemented allowing organisations time to address identified gaps in services and standards, and develop a culture of continuous quality improvement.</p>
<p>Monitoring and Reporting Process</p>	<p>The frequency of reporting, requirements of the desk top reviews, concerns about the impact of EIMS (Electronic Information Monitoring System), and service reviews were raised.</p>	<p>The Office for the Community Sector is committed to minimising any additional regulatory burdens on community sector organisations. The Office for the Community Sector is developing guidelines and templates for the 6-monthly self-reports. The Office for the Community Sector has also requested TasCOSS to provide a sample of current reporting requirements of Community Sector Organisations.</p>
	<p>Some community sector organisations queried the frequency of 6 monthly self-reports rather than annual reports, as is frequently required in accreditation processes.</p>	<p>Six monthly reports will be required for the initial three-year period to provide the Office for the Community Sector with early information, thus providing both the Office for the Community Sector the opportunity to assist organisations at the earliest stage should issues emerge. This will be monitored during the three year period and then form part of the evaluation.</p>
	<p>Concern was also expressed about the impact on community sector organisations of quarterly desktop reviews.</p>	<p>Desktop reviews are an internal process to the Office for the Community Sector and associated business unit and will not require, but do not exclude, input from</p>

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		<p>organisations. Desktop Reviews are intended to provide greater structure for the Office for the Community Sector to undertake day-to-day business of monitoring. These reviews give the Office for the Community Sector an opportunity to identify and address issues at an earlier time, increase our knowledge of and familiarity with organisations, and identify potential quality or financial issues as they arise. It also provides an opportunity to identify exemplary or innovative systems or services.</p>
<p>Electronic Incident Monitoring System (EIMS)</p>	<p>As outlined in the consultations, and based on concerns raised by a number of community sector organisations, the Office the Community Sector has decided that the Electronic Incident Monitoring System (EIMS) will not be implemented in community sector organisations at this stage. However, although the `electronic' system will not be implemented, community sector organisations have raised the usefulness of the policies, procedures and definitions of EIMS.</p>	<p>Based on this feedback, the Office for the Community Sector is considering implementation of the policy infrastructure in manual form at this time. For example, SAC 1 and SAC 2 incidents would require an immediate report to the DHHS operational units while SAC 3 and SAC 4 incidents would be managed by the CSO and included in the self reports. Information about complaints, compliments and incidents would, with information from desktop reviews and self reports provide a centralised point for the analysis of information and gaps in the community sector and assist with planning to address identified issues.</p> <p>In terms of the role of the Office for the Community Sector in the investigation of SAC 1 and SAC 2 incidents, the role may be only to monitor and support. The Office for the Community would not lead the investigation of incidents as stated in the original consultation paper</p>

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		<p>regarding the Standards Framework.</p> <p>In terms of the integration between quality and safety and the Finance and Performance Framework, quality and safety is one of the critical domains of performance. Quality and safety standards provide a measure for the achievement of consumer or service outcomes.</p>
<p>Service Agreements and outcome statements</p>	<p>Issues raised in discussion included the expectations of DHHS operational units and the ability of community sector organisations to achieve consumer outcomes within the current level of funding and within the wider range of community issues. Community sector organisations advised that often it is not possible to achieve outcomes due to factors beyond their control, such as the inability to locate long term accommodation options for emergency housing clients within the current climate of housing shortage.</p>	<p>The Office for the Community Sector acknowledges the concern that outcomes are often impacted by extraneous issues. These can be taken into account when outcome statements and expectations are negotiated with DHHS operational units.</p>
<p>DHHS operational units and the Office for the Community Sector</p>	<p>Community sector organisations raised concerns including the training needs of DHHS staff to also meet requirements of a quality and safety framework.</p>	<p>As detailed in the consultative forums, a Quality and Safety Framework will also be implemented in the DHHS Human Services Group operational units and the Office for the Community Sector.</p> <p>Implementation plans are currently being developed that will ensure that information and training sessions are included in implementation.</p>