

Rated. Reviewed. Reliable.



**Submission to NDIA:
NDIS Quality and Safeguarding Framework
April 2015**

About Clickability

Clickability is an Australian disability service directory that features ratings and reviews from the people who actually use the services.

Clickability was founded and is staffed by workers and consumers from the disability community.

For us, it's simple. Everyone deserves consumer rights. That's why we are working towards a vision of equality in consumer choice and control within disability support services. Our mission is to bring established techniques of promoting consumer choice and control into the disability sector.

We have written this submission because our work directly impacts and is impacted by quality and safeguarding in disability services, and it's important to us to be part of the conversation.

For more information, please visit us at clickability.com.au or contact us at info@clickability.com.au

Jenna & Aviva



Building participants' capacity

We think it's important to have reliable, relevant, unbiased information available. For us, that means information that's been generated through the experiences of people who have first hand knowledge as users of the services. Most importantly that's consumers, but it could also be carers, family members, support workers or care coordinators.

We think it's important to have information available publicly, so that consumers and their support networks are able to inform decisions at all stages of their engagement with NDIS. From our perspective, one of the most central parts of building capacity is reducing dependence on institutions and case management, and that includes separating information sources from support providers.

Information needs to be easy to understand. The disability sector is full of jargon, which makes the system unclear, complicated and confusing, and increases reliance on services such as case management to help people navigate through it. Some examples of helpful resources might be:

- Annotated sample support plans.
- Clear instructions about how to access the system, e.g. when a diagnosis is needed, how to get a diagnosis and what this can mean.

Information presented must include:

- Cost, and be very clear about any fee-for-service aspects or parts of service that are not covered by NDIS funding.
- What services are available and *how* to access these.
- How to purchase services.
- How to get assistance from ICL category of services.
- Information about how funds are allocated, and why.
- Predicted outcomes of service delivery, how these are measured, and what happens if they aren't achieved.
- Story sharing between participants about how they have allocated their funding, and why.
- What should be expected from providers and what to do if this isn't being met.
- The quality of the services available.

We also believe that peer-generated information is an important part of creating accessible information. This has been evidenced in various other community development situations.

We offer Clickability as a constructive means for building participants' capacity to generate and to contribute to the information needed for informed decision-making. However, this is just one piece of the puzzle.

NDIA provider registration

The principles we hold with regard to provider registration is that it should not impede participants' ability to allocate their funding creatively in ways that meet their goals.

We see the phrase "risk of harm" as deeply problematic, and would like to offer "dignity of risk" to support it.

We see it as imperative that consumers have the opportunity to allocate their funding to whomever they choose (within reason of it assisting them to meet their goals), regardless of how they manage their funding packages.

If provider registration does go ahead, we encourage the NDIA to invest in developing meaningful, plain language, low-bureaucracy, low-cost registration processes so as not to limit the market and availability of services.

Systems for handling complaints

We suggest that semantics is important here, especially throughout the trial and first few years of implementation. We suggest that "feedback" might be a more appropriate term while systems are changing and service providers are developing business models that work for them.

We think it's important to have a variety of feedback systems that comprise elements of options 1 to 3b. We encourage the NDIA to consider impact of the blend of citizenship rights and consumer rights which the NDIS presents, and to transparently manage the legal implications underpinning this.

We suggest that having a public forum for feedback is imperative to equity in this industry, which as a matter of human and consumer rights should not be made private, and should not sit solely with individual service providers.

We also think there should be a clear external complaints process involving ombudsman and commissioner. There should be clear, public information available as to

- What does it look like when something goes wrong? What are things that I might consider giving feedback about?
- How do I give feedback? What language do I use? Who can help me if I don't have a family member or natural advocate?
- What happens when I give feedback? Who does that information go to? Will my name be made public? Will I have to appear in court?

We think it's imperative that advocacy services be funded by the commonwealth and state governments, and that these organisations be involved in the handling of complaints as needed by the consumer in question.

Once again, we put forward Clickability as a means for meeting many of these needs. We are a public forum for feedback. We are also engaging in ongoing conversation and connection with advocacy groups and the disability commissioner. We believe all stakeholders should be involved in this process.

Monitoring and oversight

We think there should be external monitoring of NDIS providers. We feel that if this is implemented properly, it would be more effective than registration. Again, we encourage transparency for all stakeholders around the systems that will be conducting the monitoring and handling the complaints.

More importantly, we think there should be plain language transparency around expected outcomes provided by services, and means by which participants can self-monitor these. Community visitors / advocates might assist consumers in reviewing these.

Safeguards for participants who manage their own plans

We think that if this is truly going to be a deregulated market, everyone should be able to choose unregistered providers of support.

This does not mean that the NDIS has no duty of care! We don't see it as either/or. Rather, we suggest that the management of risk should sit elsewhere – i.e. that there are safeguards which sit responsibility with government as much as with individuals.

Again, in order to support people to make informed choices, information is needed to assist people in understanding the choices they make, the risks and the benefits. It's with this knowledge that people can enact their rights to chose and shift the phrasing from a "risk of harm" to a "dignity of risk".

We suggest that Clickability will be extremely helpful for those who manage their own plans as a means of accessing relevant, reliable, unbiased information about their options.



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