



1 May 2015

NDIS Quality and Safeguards
PO Box 7576
Canberra Business Centre ACT 2610

Email: NDISqualitysafeguards@dss.gov.au

Dear Sir

Re.: NDIS Quality and Safeguarding Framework

The Association appreciates the opportunity to comment on the proposed NDIS Quality and Safeguarding Framework.

Stakeholders have been asked to comment on five specific elements of the proposed quality and safeguarding framework. In particular, the Association is concerned with two aspects of the *Proposal for a National Disability Insurance Scheme Quality and Safeguarding framework Consultation Paper*.

The first is the emphasis of the 'market' in disability services. The Association believes that there is a role for minimum mandated standards in such 'markets'. In the same way that professional standards govern the provision of services in health, social services and within the trades, so too should people with disability be provided with such minimum standards.

Those providing care, particularly in the context of intellectual disability (with multiple medical co-morbidities) should have minimum skills sets depending on the needs of the client. The desire to provide care is not enough – the capacity to provide such care safely is also fundamental requirement of such a role.

The Association considers the 'risk based' market approach as problematic. As the Consultation Paper states (at page 8):

There is a risk that people with disability could receive poor quality supports that do not help them achieve their goals. There is also a risk that people with disability could be harmed in some way.

It then discusses managing such risks. Again the Association does not see the provision of care as a mere market to be mediated only to the extent that explicit harm, abuse, exploitation or violence are discouraged. Minimum standards of care should also be part of the system through the regulation of skills, qualifications and experience required.



Part 2 of the Consultation Paper as it relates to *Ensuring staff are safe to work with participants* perpetuates the problems associated with the minimal intervention in the market approach. Put simply, the Paper appears to consider that the only valid issue associated with "ensuring staff are safe to work with participants" is to regulate deliberate abuse of people with disability. Such an approach is absolutely necessary. But, it is only one part of "ensuring safety". The missing component is again requiring personnel working for people with disability having the appropriate minimum qualifications, skills and experience.

The Association would be happy to further discuss this matter in person should that be of assistance. Please contact Maggie Potts on 8595 1234 should you wish to make such arrangements.

Yours sincerely



Brett Holmes
General Secretary