

A revised approach for the NGOTGP and ISI programs

Section 1: Underpinning parameters

1. In implementing a quality management framework do you agree that the most appropriate approach is to align with existing quality management systems within the drug and alcohol sector?

Yes, provided there is flexibility for organisations to select the approach which best suits their needs (ie, ISO 9001:2008, QIC, EQuIP, etc).

2. If not, why not?

N/A

3. By aligning with existing frameworks will this approach ensure that all service types and settings, including Indigenous specific services are sufficiently captured?

For the most part. We would also suggest consideration be given to recognising the Culturally Secure Accreditation Framework, developed by WANADA once it has been established as a third party certification scheme through JAS-ANZ.

4. If not, why not?

N/A

5. Do you support the purpose, objectives and underpinning parameters proposed for the quality management framework?

For the most part, with the following exceptions:

- We would support the identification of acceptable quality management frameworks, rather than quality management systems – the only true systems standard used by the sector currently is ISO 9001:2008. QIC and EQuIP are both criteria based frameworks and it would be a misnomer to refer to them as ‘systems standards’. Likewise, there must be a process for recognising additional quality management or accreditation frameworks as they are developed to recognise the diversity within the sector and their varying needs.
- Where organisations have achieved accreditation to an acceptable standard, we would not support the additional assessment process (dot point list commencing at the bottom of page 27). The elements identified under this dot point would be assessed as part of the organisations third party accreditation and evidence of this

accreditation should be all that is required to meet their reporting responsibilities to funders.

- Following on from the above, we would also argue that engagement in an accreditation program, as distinct from achieving accreditation, is the key activity here – rather than focussing on getting a certificate to put on the wall, organisations should be recognised and supported to engage in a quality program, even if it takes them a number of years to reach a point where they have a reasonable expectation of achieving accreditation.
- WANADA also strongly supports the right of organisations to keep the content of accreditation reports confidential from funding bodies to preserve the integrity of the accreditation process and to encourage organisations to be open with their accrediting body without fear of funding repercussions. Evidence of engagement with an accreditation program could be provided through other means (eg contact with accrediting body or certificate of accreditation).

6. If not, why not?

See above.

7. Are there additional factors that need to be considered?

See above re mechanism to add quality management or accreditation frameworks to the list of 'acceptable' Standards for use by funded organisations.

Section 2: An outcomes based approach

1. Do you support the development of an outcomes based approach?

Broadly yes, provided the outcomes are achievable and come with a commitment to properly resource organisations to achieve them.

2. If not why not?

N/A

3. What outcomes should your organisation measure?

We support outcome measures linked to and based on the strategies contained in the National Drug Strategy 2010 – 2015, particularly those around demand and harm reduction pillars.

4. Do you agree that the outcome measures should be as a starting point high level and focus on service system outcomes?

Yes.

5. If not, why not and at what level should the outcomes be measured, i.e. individual, government, community?

N/A

Section 3: Key elements of the proposed quality management framework

1. Are there other elements that need to be considered in the quality management framework?

Provided the identified elements remain unchanged, they appear to cover the essentials.

2. If so, what are they?

N/A

3. Are there other methods for assessing sector performance against the outcomes outside of an annual assessment process?

Yes.

4. If so, what are they and why are they preferable?

Outcomes data could be collected and assessed by jurisdictional peak bodies and reported to government on an aggregate basis.

This would be preferable in that organisations would be able to report outcomes data (whether good or bad) without fear of repercussions with regard to funding in at least the short term and may assist in the development of accurate baseline data.

5. What mechanisms do you currently use to inform service quality and effectiveness?

- WA AOD Sector Quality Framework Peer Review process;
- Organisations undertake self assessment against the WA AOD Sector Quality Framework annually;

Section 4: Implementation considerations

1. Are there other key action areas not identified that need to be considered as part of implementation?

No, the key actions seem to cover the essential activities. However we would again emphasise the importance of a long lead time for implementation (ie at least 18 months) and encourage consideration of a staged implementation process.

Additional feedback not covered in the questions above:

- Page 7, section 2.2 includes a listing of the key components of quality management systems which refers to 'self-assessment which is generally annual in nature and requires an organisation to complete self-diagnoses to identify the systems strengths as well as areas for improvement'. Self assessments are of limited use (especially where an independent assessment is undertaken) and don't generally add anything to the process that cannot be achieved through the process identified in dot point 5 – 'performance measurement which includes monitoring, measurement, analysis and improvement process....';
- Page 11, Final paragraph. We do not agree that 'the focus on continuous quality improvement on slow, incremental change to existing individual processes (through analysis, standardisation and improvement) tends to discourage substantial learning and innovation.' It was by focusing on building a culture of cqi in the AOD sector in WA through the WA AOD Sector Quality Framework, that capacity was built to now enable the sector to fully and competently engage with an third party Accreditation process. We acknowledge, however, that cqi is but part of a quality framework and should not be the sole consideration;
- Page 13, Table row which starts with OATSIH funded services. States that the WA AOD Sector Quality Framework is being further developed for use by Indigenous services across Australia. This is not completely true, as the Culturally Secure Accreditation Framework is intended for use by 'mainstream', as well as Indigenous services across Australia. The intent of this is to encourage culturally secure practice across service settings;
- Page 15, section 3.1. The 'common approaches' column for WA states 'Option of 26 approaches' – we believe this is a misprint?
- Page 33 Table of common elements and approaches – we do not understand why the WA AOD Sector QF is not identified as being underpinned by principles (ie, we believe that it is underpinned by principles and would welcome an opportunity to discuss the test applied to determine this).