



Submission to National Safety and Quality Accreditation Standards Review Response to the Consultation Paper: An Alternative Model for Safety and Quality Accreditation of Health Care

About WANADA

Western Australian Network of Alcohol and Other Drug Agencies (WANADA) is the peak body for the alcohol and other drug (AOD) education, prevention, treatment and support services in Western Australia.

WANADA was established in 1984 as a membership driven organisation, and currently has over 90 member agencies from throughout WA. WANADA provides support to these members and to all other AOD NGO services in WA (including approximately 30 Aboriginal specific AOD services that form a part of WANADA's Aboriginal Network).

The key strategic objectives of WANADA are to:

- Effectively represent the AOD service sector
- Provide a valuable service to WANADA members, including advocacy and public profile
- Improve sector service capacity and effectiveness
- Ensure sustainability of WANADA

WANADA has the mandate to consult, advocate for, and support the workforce development and capacity building of the AOD sector in WA through its strategic plan and governance structure. WANADA manages a range of projects aimed at supporting the capacity and the quality development of AOD services, including the Quality Framework Implementation Support Project.

WANADA receives core and recurrent funding from the Western Australian Drug and Alcohol Office (DAO) and the Commonwealth Office of Aboriginal and Torres Straits Islander Health (OATSIH). It also has current/recently completed project funding from DAO, OATSIH, the Department of Health's Office of Aboriginal Health, the Alcohol Education and Rehabilitation

Foundation, St John of God Hospital Subiaco, Lotterywest, Criminal Confiscations, and Coastal Division of GPs.

WANADA has good working relationships with the AOD peak organisations in other jurisdictions and the peak organisations of other health sectors in WA, including the Women's Health Peak and the WA Association for Mental Health.

The WA AOD Sector Quality Framework

The WA AOD Sector Quality Framework (QF) is a non-accreditation model, sector-wide approach to quality improvement that has been implemented in 84 services (larger agencies are represented here by several services) throughout WA. WANADA has been providing intensive support for the implementation of the QF since the latter part of 2004.

The impetus for the implementation of a continuous quality improvement process came from sector agencies and consumers. The QF was developed in partnership between the Quality Framework Steering Committee comprised of AOD sector representatives, the Drug and Alcohol Office and WANADA. The QF has been specifically designed for AOD services in the WA context through extensive consultation with consumers, service providers and a broad range of other stakeholders. It has been designed to be adaptable and flexible to meet the needs of a diverse range of service types, sizes, locations and structures. It supports agencies to implement their own unique missions and goals whilst meeting the standards of the various funding bodies.

WANADA's QF Implementation Support Project has been supporting all AOD services (government and non-government) funded through DAO, OAH, OATSIH and NIDS Treatment Grant. WANADA employed the equivalent of two full time project officers to support implementation in services in the metropolitan and rural regions. It has recurrent funding from OATSIH to support Aboriginal AOD services with the implementation and sustainability of continuous quality improvement processes.

Now that the implementation phase has been completed in the metropolitan area and is nearing completion in the rural regions, WANADA has also secured funds from DAO and OATSIH to manage a peer review process to ensure ongoing support of AOD services' quality processes. The Institute for Healthy Communities Australia (IHCA) has been appointed to design and coordinate the peer review process. Reviews will commence early 2008.

Response to the Consultation Paper

This submission contains some general responses to the Consultation Paper as a whole and some specific responses to the most relevant proposals of the alternative model in terms of WANADA's concerns and issues.

General Responses:

- The Consultation Paper does not detail how safety and quality standards will be developed and applied. WANADA believes there is a **need for more information and clarity on the impact of proposals** on the WA AOD Sector as well as other sectors within health.
- If this alternative model is adopted, a national accreditation scheme needs to be relevant to the WA AOD Sector as well as other health sectors. WANADA recommends **full and thorough on-going consultations with the different sectors within health and in different jurisdictions to inform the development of safety and quality standards**. WANADA would welcome inclusion in these consultations.

Proposal 1: Separation of safety assurance and quality improvement assessment processes

Proposal 2: Separation between safety standards development and assessment of health services

- WANADA believes there is some merit in this separation of safety and quality and the different approaches to compliance and reporting proposed for each.
- However, it is unclear if there will be one set of safety standards and one set of quality standards that apply to all health settings or if there will be specific standards for different types of health settings, including specific sets of standards for the AOD sector.
- The type of safety and quality issues in AOD services would be very different to those in large hospitals and WANADA would want to ensure that any national standards that apply to the WA AOD sector are relevant to the sector and to the range of different types of services within the sector.

There are a diverse range of agencies and services in the WA AOD sector. Agencies range in size from large national and state organisations that provide a variety of programs at different locations to very small one-off localised facilities. Services are provided for both adults and youth. The type of services provided include sobering up centres, residential and home detoxification services, residential rehabilitation centres, community drug service teams, non-residential counselling and education services, Aboriginal medical services,

needle and syringe exchanges, consumer advocacy, crisis accommodation and drop-in centres.

Proposal 3: Accreditation of all settings of care where services are provided by registered health professionals

- WANADA is committed to supporting the development of quality service provision in the WA AOD sector and has taken the position that accreditation is not the only way to achieve this. Some agencies have sought and obtained accreditation and WANADA supports that choice, but is of the view that this should be voluntary.
- WANADA has consulted with the WA AOD sector and the feedback from agencies was, and continues to be, a preference for a non-accreditation approach to the adoption of continuous quality improvement processes, one that is supportive and ensures cooperation and transparency. Consequently, the sector has adopted the WA AOD Sector Quality Framework, which is a non-accreditation model, and WANADA proposes that this be accepted by the Commission as a satisfactory alternative to the accreditation proposed in the Consultation Paper or recognised as an accredited program under the national scheme.
- The WA AOD Sector Quality Framework is a sector-wide approach to quality improvement and has been implemented by all services with AOD funding, including services that do not have registered health professionals. The model proposed by The Commission would only apply to services with registered professionals and would not provide a sector-wide approach to quality improvement.
- WANADA is concerned that a national accreditation process, without sufficient support, would be onerous for small services with just 1-3 staff and for many Aboriginal services.
- The Consultation Paper does not indicate what resources would be made available to support health care providers to implement a national safety and quality accreditation process. WANADA's experience in the implementation of the WA AOD Sector Quality Framework is that support is crucial for the successful adoption and maintenance of continuous quality improvement processes in all services, but especially in Aboriginal, rural and remote services (28 of the 29 Aboriginal services in WA are located in rural and remote regions of WA).

Proposal 4: National minimum safety standards that apply across all settings of care

- WANADA recommends that the Australian Commission consults with the different sectors within health and in different jurisdictions to inform the establishment of minimum safety standards.
- WANADA recommends that a range of quality processes be reviewed to determine what safety standards and expectations are already considered.

- Provided the minimum safety standards that are developed are relevant and applicable to the AOD sector and that the process of accrediting services in relation to safety is not onerous (in terms of operational and financial costs), particularly for small services, then WANADA would be prepared to support this proposal.
- WANADA recommends that existing review processes, so long as they are external to the developers of the standards and nationally recognised, are accepted as reviewers/accreditation auditors for these standards.

Proposal 6: Development of a national framework for quality improvement

- WANADA has a number of concerns about the development of a national quality improvement framework for all health care settings:
 - That it would not be sufficiently relevant to the specific needs of AOD services. Many of the services are non-medical and have different requirements from more traditional health services.
 - That it would not be sufficiently relevant to the WA context, particularly the circumstances of Aboriginal, rural and remote services.
 - That it would not be flexible enough to accommodate the wide range of service types, sizes, locations and structures to be found in the WA AOD sector.
- WANADA recommends that national quality standards specific to AOD services be developed in consultation with WANADA and AOD peaks in other jurisdictions to ensure relevance to the AOD sector and to the state and territory contexts. AOD peaks in other jurisdictions are already looking at the WA AOD Sector Quality Framework as a potential model for a continuous quality improvement process for their AOD services.
- WANADA proposes that the WA AOD Sector Quality Framework be recognised as an accredited/registered program under the national accreditation scheme appropriate for the WA AOD sector, with the potential for it to be developed into a national program for AOD sectors through-out Australia.

Proposal 7: Establishment of a National Entity to lead and coordinate changes

- WANADA supports the establishment of a national coordinating body, but recommends that national monitoring of continuous quality improvement be restricted to determining that the continuous quality improvement process/program is an accredited/registered one and that the health service is engaged with the review process that accompanies it.