

Tuesday, November 30, 2010

Your Ref: C2010/998

David Hatfield
Director Adjudication Branch
Australian Competition & Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

Dear Mr. Hatfield

**Attendant Care Industry Association of NSW Inc (ACiA)
exclusive dealing notification N95116 – interested party consultation**

The Disability Trust provides services to over 3000 clients across Southern and South West Sydney, the Southern Highlands, Illawarra and Far South Coast. In 2009/ 2010 we provided attendant care type services (as defined by ACiA) to 887 clients. We are enrolled in the ACiA's endorsed certification to the Attendant Care Industry Management System Standard (ACIMSS) with our audit dates planned for March/ April 2011.

We welcome this consultation and thank you for the opportunity to make this submission.

The Disability Trust currently receives funding from both state and federal sources, and from a number of departments. One of the major challenges facing service providers, including The Disability Trust is the overlap of auditing and compliance requirements.

Whilst we welcome the need for high standards of accountability and quality assurance, there has been a general increase in accountability requirements imposed by government at all levels; this has stretched organisations' resources. Reporting and accountability requirements vary according to whether the funding body is the State or Federal government; this adds to workloads within organisations.

Current Accreditation Activities

The Disability Trust currently participates in monitoring against, The Disability Service Standards (federal and the state integrated monitoring framework IMF); national child care (NCAC); and home and community care. In 2011, The Common Community Care Standards will apply and our federally funded programs will be audited against these. State funded programs at this stage, will continue to be audited from the current standards. New requirements for statutory out of home care, will add further compliance requirements. In addition to the above, we are currently preparing for ISO – 9001 accreditation.

We are currently preparing for the ACIMMS audit and have been speaking with the endorsed certifying body to ensure that we are able to meet all their requirements.

Impact on Resources

The time and resources spent in preparing the self assessment document, collating information and the on-site audit (scheduled for 3 full days) will involve clients, direct care workers, program staff, managers and senior managers. Much of the information is repeated from other audits and whilst easily accessed is often required in a different format and also needs to be specific to the section being audited. Many service providers in the sector experience the same challenges.

Service providers establish strong relationships with contract/ funding managers along with auditors. It would benefit providers and auditors if certification was offered to other auditing bodies to allow for auditing to be more streamlined, undertaken by the same auditor who would be able to assign certification for duplicated standards, receive information in a standard format and complete the on-site components concurrently.

Impact on clients / families

Our clients and their families/ carers would also benefit from streamlining these processes. Currently, on-site audits include interviews with clients, carers and their direct care staff. Whilst many families and clients are happy to participate in interviews and provide feedback on the services they receive, the time taken out of their day often has an impact on service delivery times. Where direct care staff have to be removed from a service to attend or participate in an interview, a replacement staff member is required, again causing disruption to the regular services. Any reduction of impact to clients and families is welcomed.

Cost considerations

The cost of multiple audits and reviews cannot be ignored. Whilst understanding of the need to ensure quality services and high levels of accountability, Not for Profit organisations do not receive funding to cover expenses incurred for accreditation and as such direct services to clients are impacted. Whilst we are willing to accept the costs of accreditation, having one endorsed certifying body does not allow us to compare prices and ensure the most cost – effective use of funding.

Australian Content and Jobs

The current endorsed certifying body for ACIMMS is a New Zealand based organisation. The Disability Trust wherever possible would prefer to engage Australian, (and wherever possible) local providers.

Thank you again for the opportunity to provide this submission. If you require any clarification or would like to discuss the information further, please do not hesitate to contact me on (02) 4255 8000 or via email katharine@disabilitytrust.org.au

Yours sincerely,

Katharine Carney
Senior Manager
The Disability Trust