



Home Modifications Australia

MOD.A's Submission to NDIA on the NDIS Quality and Safeguarding Framework

April 2015

Contact Details:

**Michael Bleasdale
CEO**

**Level 4, 80 Cooper Street
SURRY HILLS NSW 2010**

Phone: 02 9281 2680

Email: ceo@nswhmms.org

Contents

WHAT IS MOD.A?	3
1. OVERVIEW	3
1.1 PROCESS OF SUBMISSION	4
2. EXECUTIVE SUMMARY	6
2.1 LIST OF RECOMMENDATIONS	7
3. NDIA PROVIDER REGISTRATION	8
3.1 SAFEGUARDS IN THE COMMUNITY.....	9
3.2 ACCREDITATION FOR HOME MODIFICATION PROVIDERS.....	9
3.2.1 CONTENT OF THE QA SYSTEM.....	9
3.2.2 ROLE OF MOD.A.....	10
3.3 SUPPORTING CHOICE AND CONTROL	11
3.4 MINIMISING THE ADMINISTRATIVE BURDEN	11
4. SYSTEMS FOR HANDLING COMPLAINTS	13
4.1 INDEPENDENT COMPLAINTS BODY FOR THE NDIS	13
4.2 COMPLAINTS ABOUT HOME MODIFICATIONS	13
5. ENSURING STAFF ARE SAFE TO WORK WITH PARTICIPANTS	15
6. SAFEGUARDS FOR PARTICIPANTS WHO MANAGE THEIR OWN PLANS	16
7. REDUCING AND ELIMINATING RESTRICTIVE PRACTICES IN NDIS-FUNDED SUPPORTS	17

What is MOD.A?

Home Modifications Australia (MOD.A), previously operating as the NSW Home Modifications and Maintenance Services (HMMS) State Council, is the national body representing home modification and home maintenance service providers who are specialists in the area of modifications for people who are frail aged or who have a disability. Our members have been providers of Home and Community Care (HACC) home modifications and maintenance services in NSW since 1985. With the national changes to disability and aged care programs, MOD.A has evolved into a national organisation to meet the challenges of a dynamic community care system, with MOD.A membership widening to cover home modifications and home maintenance service providers across all Australian jurisdictions.

MOD.A's vision is to enable all Australians with disability and those who are frail-aged to continue to live independently and safely in their own homes where the provision of a home modification or home maintenance is what is required to make this possible. Our mission is to provide a resource for service providers, their clients and families across Australia through the coordination and promulgation of high quality evidence and practical support. Our purpose is to support service providers, strengthen clients, grow a sustainable home modification sector, cultivate leadership and foster respect for all.

1. Overview

Home Modifications Australia (MOD.A) is supportive of the new approach to disability services that is being introduced progressively across the country through the rollout of the National Disability Insurance Scheme (NDIS). The focus on outcomes for NDIS participants in turn highlights the need for effective and cost-effective interventions, which to the greatest extent possible enable and empower individuals to control their lives and the supports they receive. Home modifications have been proven to deliver effective solutions to individuals¹ whose homes require adaptation to enable them to function independently and lead regular lives.

Our submission provides feedback to the National Disability Insurance Scheme (NDIS) consultation paper, *Proposal for a National Disability Insurance Scheme Quality and Safeguarding framework*, released in February 2015. The paper identifies five specific elements of the proposed quality and safeguarding framework that are expected to have a regulatory impact:

1. NDIA provider registration
2. systems for handling complaints
3. ensuring staff are safe to work with participants
4. safeguards for participants who manage their own plans
5. reducing and eliminating restrictive practices in NDIS-funded supports.

The first four of these have direct relevance to the delivery of home modifications, as a funded service under the NDIS. The fifth issue, related to reducing and eliminating restrictive practices, is less relevant for home modifications providers, unless alterations to the home environment are proposed which would serve to deliberately restrict access to and from, and around the home. The submission will address this issue, but will refer

¹ Carnemolla, P. And Bridge, C (2015), *Systematic Review: Evidence on Home Modifications*, Home Modification Information Clearinghouse.

back to mechanisms within Sections 1-4 to identify how best to prevent and deal with plans which propose to restrict personal freedom of movement around the home.

The Consultation Paper restates the fundamental operational principles of the NDIS in terms of the QA systems and safeguards and protections that need to be in place to ensure that participants are served as best they can be to achieve their identified outcomes. In addition to the need for levels of certainty around safeguarding vulnerable clients and ensuring that public dollars are spent on good quality goods and service, there appears to be a need for new national providers to ensure widest availability of choice within each industry. MOD.A. supports the view that our industry would benefit from some form of national quality assurance system for all service providers, as a mechanism to ensure consistency of best practice broadly, and a way for clients to identify which providers best meet their needs and differentiate between services in an increasingly competitive market. Because MOD.A is committed to developing such a system we believe we have much to contribute to this Consultation Paper.

One important aspect of the NDIS is the ability for participants to expend their funding on goods and services other than those which have been traditionally considered to be within the disability services sector. The focus on outcomes of participation in the community may lead to a greater uptake of purchased services which are available widely in the community, with the expectation that consumer and other protections are in place. These protections differ across the following variables:

- extent and coverage (of the goods or services provided)
- quality of work undertaken
- ease or difficulty of process to have required corrections made to the goods or services
- availability of complaints or other oversight body to assist in claims against poor quality goods or services

At the heart of home modifications is a process of building and repairing which is very similar to other domestic building work undertaken by tradespeople and professionals in the community. Currently the National Disability Insurance Agency (NDIA) has a price list for a range of home modifications, and registers of builders and Occupational Therapists, traditionally the professionals and tradespeople involved in home modifications. All those registered will be subject to the checks and balances that their professional associations require, and some protection for building work is afforded (to varying degrees) by the state Fair Trading departments. There is currently, however, no set of specific accreditation or professional standards specifically for the completion of home modifications, although many providers operate within the disability and aged care systems and thus are required to comply with the various standards associated with community service delivery.

The Consultation Paper talks about a focus on national consistency in the way services are delivered and monitored such as a national QA policy. MOD.A. has largely been responsible for the NSW HM QA policy in past years and could certainly provide national consistency to the HM industry in numerous ways that include the below issues.

1.1 Process of Submission

Home Modifications Australia (MOD.A) is currently developing an options paper about quality assurance in the home modifications industry in Australia. This work involves evaluation of a previous quality assurance program (the Quality Assurance Rectification Program) which was operated by the NSW Home Modification and Maintenance Services State Council between 2009 and 2013 in NSW. It aims to investigate what quality assurance mechanisms are in operation around Australia and elsewhere in the world, specific to home modifications, and to develop options for a national system which would have the potential to accredit providers and enable them to meet their regulatory compliance requirements in the range of areas which are relevant to this industry. The work that is ongoing in that project has helped to inform the positions stated in this submission.

MOD.A has only recently acquired its national status, and its current membership is predominantly NSW-based. In the development of this submission, however, as was the case in a previous submission to DSS regarding the new Commonwealth Home Support Programme, we have engaged with members and with a list of national stakeholders across all States and Territories, through a survey and telephone interviews, to elicit information and direct our thinking. The survey was targeted at service managers to ascertain the workings of their own QA systems as well as gauge support for a national system. This followed a national and international literature search for QA systems that work within the home modifications industry. This information is currently being analysed to assist in the design of a nationally consistent QA tool that can be used effectively in Australia by all providers across all funding streams.

The response to this submission is also informed by issues raised at the public meetings held to discuss how quality assurance and safeguarding may operate within the NDIS, attended by the authors of the submission.

2. Executive Summary

Members of MOD.A are home modifications providers of many years' standing, who are passionate about the delivery of their services at the highest possible standard. Safeguarding the rights and wellbeing of clients, and assuring the quality of all aspects of the home modifications process, are high priorities for providers and for MOD.A.

There are particular skills and expertise associated with delivering home modifications for specific client groups, such as older people and people with disability, which are distinct from undertaking general building work. The NDIA will need to develop a register of home modifications providers to support participants to make informed choices about providers, ensure that work is carried out to a high standards, and afford a level of protection against work which does not meet standards or expectations.

The best way to ensure providers are operating to these standards is for MOD.A to develop a Quality Management System (QMS) which results in accreditation for providers, and enables participants to easily identify which professionals and tradespeople are able to offer specific expertise in the delivery of home modifications. Once developed it could become a requirement for registration with the NDIA.

A quality management system (QMS) which will attain a recognisable "quality mark", would need to be registered with an independent standards monitoring body such as the Joint Accreditation System of Australia and New Zealand (JAS-ANZ), or Standards Australia. Developing the standard in consultation with the home modifications industry and in line with the expectation of the standards monitoring body would appropriately be a project for MOD.A. A registration system for all the professionals involved in home modifications will not only provide a safety mechanism for the participants but also give them quality information in the selection process for who will be involved in assessing and completing the home modification.

MOD.A is supportive of an independent complaints handling body for the NDIA. To facilitate resolution of complaints about home modifications MOD.A. could take the role of providing information and specialist advice to this independent complaints handling body, and could assist the NDIA and other funding bodies by working with home modification providers to ensure that their internal complaints handling processes are up to the required standard. Aspects of the QMS would focus on ensuring that complaints are minimised and also utilised for continuous improvement purposes.

As home modification providers are funded by various government agencies, there is a requirement for them to comply with standards relevant to their funding stream, and all of these require working with children and/or vulnerable people checks and police checks. To ensure the checks and standards are in place, the systemisation of this process within the operations of the home modification provider will constitute an important component of the QMS.

MOD.A strongly supports the principle of choice and control in the administration of the NDIS to its participants. At the heart of this principle lies the potential for participants to control their own lives and the supports they require, which implies that the possibility of self-management must be present within each plan and package of support. Service providers, including those who deliver home modifications, should be geared toward responding to and supporting NDIS participants who manage their own plans. The success of self management will also depend on the quality of the information they receive in making their decisions. MOD.A. is already involved in developing ways to best inform participants in the home modification industry and is well placed to take on a lead role in this area as part of its QMS development.

2.1 List of Recommendations

Recommendation 1: MOD.A will develop options for accreditation in the home modifications industry and work with the NDIA to ensure that registration is appropriately tied to this accreditation once completed.

Recommendation 2: Once the quality mark (accreditation) is developed MOD.A will provide suitable industry support and training to providers to enable them to successfully integrate the QMS to their regular services.

Recommendation 3: MOD.A can work with the NDIA and other agencies to provide a quality oversight service which scrutinises the quality of audited home modifications services, identifies systemic weaknesses in quality and safeguards, and works directly with the industry and on the strength of the quality mark to improve the quality.

Recommendation 4: To reduce the red tape burden an accreditation system for the home modifications industry must serve as the single QMS which demonstrates clearly the expertise and quality in providing these services, and achieves compliance with all funding body standards.

Recommendation 5: MOD.A will work with the NDIA and other funding bodies to provide expert information about all aspects of home modifications delivery, advise complaints agencies about technical and specialist aspects regarding quality, and also assist by working with the industry to improve the overall quality of home modifications.

Recommendation 6: MOD.A supports making working with children/vulnerable people and police checks mandatory for anybody working on home modifications with participants, and that this should be required within contracts and also as evidence toward compliance with an industry-specific QMS.

Recommendation 7: When appropriately resourced MOD.A and HMinfo will partner to develop a compendium of information resources and modes of distribution to ensure that participants of the NDIS have access to tools which will facilitate their decision-making about home modifications.

Recommendation 8: The QMS for home modifications will include specific requirements to abide by strict protocols when designs propose to include features which serve to restrict access of participants, and also ensure that quality throughout the process is scrutinised to ensure that designs and builds do not inadvertently restrict participants' access and independent functioning.

3. NDIA Provider Registration

The Consultation Paper describes the need for flexibility in who provides support services as clients want choice about whom they employ based on their own views of who best fits doing the job for them. The principle of choice is important and one which can fit well with the reforms that are taking place in community services generally, and will also be implemented throughout home modification services. The issues of choice and self-management (addressed below at 6(?)), however, do not preclude consideration of a robust register of providers for specified NDIS goods and services, so that participants are making choices in the knowledge that the decisions they make are likely to result in a skilled and experienced provider being chosen, that the quality of the work will be of a high order, and that a level of protection afforded if the work is not up to standard or does not meet expectations.

The NDIS paper outlines a range of options around registration, which identify the potential level of regulatory burden for providers for each:

Table 1: Summary of options for registration

Options	Basic legal requirements	Code of Conduct	Additional conditions	Quality evaluation	Quality assurance/ industry certification
Option 1	Required	Required	Voluntary	Not required	Voluntary
Option 2	Required	Required	Required	Voluntary	Voluntary
Option 3	Required	Required	Required	Required	Voluntary
Option 4	Required	Required	Required	Required	Required

Currently there is a schedule of costs for home modifications, and registered providers for Occupational Therapy (OT) services, and also of Builders and tradespeople. The requirement to be on the former is to be a qualified OT registered in Australia, and for the latter to be appropriately licensed and insured. These are basic requirements for practicing these professions and trades in Australia. They do not reflect any requirement to meet particular standards or offer specific protections regarding work done on home modifications. These would be representative of the basic legal requirements described above, and would not cover the other four requirements, which progressively speak to the issue of quality rather than just protections.

The NDIS Discussion Paper has described Quality Assurance:

Quality assurance is any systematic process of checking to see whether a product or service being developed is meeting specified requirements. Industries and governments develop quality assurance systems that reflect the standards they believe their customers expect. The process for checking that these standards are being achieved is meant to be very robust. Specially trained and accredited auditors are employed to work closely with their client businesses over a period of time until the business is able to meet the standards. Once the auditor agrees that the business conforms to the standards, a certificate can be issued for a period of time, for example, three years. Quality assurance standards therefore require continuous quality improvement processes. The bar is raised each time the standards have to be 'met' to achieve certification/accreditation (pg. 39).

Home modifications require a robust quality assurance, quality management system, so that aspects of complexity are adequately tracked and monitored, and assurances given at each step that work has been done to the required standard, and to meet the purpose it is required to serve. For this reason MOD.A's preference is for the development of a Quality Management System (QMS) which results in accreditation for providers, and enables participants to easily identify which professionals and tradespeople are able to offer experience and competence in the delivery of home modifications. Once developed it should become a requirement for registration with the NDIA.

3.1 Safeguards in the community

There are many challenges for consideration in delivering a national provider registration for home modification services, as the industry employs a diverse range of professionals and tradespeople. The Occupational Therapists are broadly accountable to Occupational Therapy (OT) Australia, although currently there are no specific standards which oversight the quality of work done by OTs with respect to home modifications, nor national competencies at a level which would be required to undertake complex modifications. Similarly, whilst builders and tradespeople have to be licensed and registered with appropriate bodies in the various jurisdictions across Australia, and are required to complete work to the standards articulated in the National Construction Code (NCC), there are inherent to these standards none specific to the outcomes which are expected to be achieved for individuals once a home modification is carried out to the quality expected. Alongside these licenses the holding of appropriate insurances by builders and tradespeople offers some level of protection to participants who use them to complete all or aspects of home modifications, but again, claims against these insurances are not able to be made if the end product is completed to the specified standard, yet is not fit for the purpose for which it is designed.

Given the importance of home modifications to a NDIS participant's plan for participation, independence, choice and control, MOD.A is of the view that the protections offered by the current regulations governing both builders/tradespeople and OTs lack the capacity to claim against work which does not achieve the purpose for which it was commissioned. There is also nothing in these regulations which assures the quality of work, so that outcomes identified in participants' plans can be monitored and corrected. For this reason some form of registration is clearly critical to QA service delivery in the home modifications industry.

3.2 Accreditation for home modification providers

In order to provide both quality of service and safety to clientele, a registry of service providers of home modifications, including OTs and builders/tradespeople, is essential. Similar to the Quality Mark provided through Foundations UK (see [weblink]) is currently being looked at as an option by MOD.A for application across the home modifications industry in Australia.

3.2.1 Content of the QA system

The various components of home modifications need to each be subject to quality assurance processes. These will include:

- *Assessment on environment and individual* – Specialised assessments are carried out of the home environment and its impact upon the functional capacity of the individual. Assessments by OTs identify what additions or changes need

to be made to the structure of the dwelling in order to achieve the goals requested by the participant, and these are integrated into a scope of works.

- *Design*- Detailed specifications are drawn up, which translate the individual needs into structural design, often necessitating some level of negotiation and compromise to ensure the preferred option is able to be fitted or modified in accordance with the NCC. Costings are generated and participant approval sought.
- *Building*- With a contractual agreement, the builder/tradesperson completes the work to the specified design and expected standards. The builder/tradesperson is frequently selected not just based on the quote but also by level of experience and qualifications in performing home modifications. Relevant licenses and insurances are required.
- *Follow-up* – Checks are in place to ensure that the building has been done according to the specifications and meeting the required quality against the NCC. In addition there should be a follow-up by the OT with the participant to ensure the completed modifications achieves the intended outcomes for the client. If not fully meeting its intended goals and outcomes, the builder/tradesperson is asked to modify the work as necessary.

Value and cost are increasingly important factors of quality, for paying clients and for contributing government agencies. In addition the systems that services employ to govern their financial viability, human resources, client relations, complaints and other aspects of organisational procedure, will need to be included. These have been critical issues raised during the course of our research with home modifications providers, backed up by information from an international literature review. These organisations all employ their own style of QMS systems to the home modification processes, yet realise there are many similarities across organisations. They generally feel it would benefit themselves and the home modification industry in general if there were more cohesive and consistent QMS processes for all to employ together across the nation. They feel such a unified national approach to QMS could improve the efficiencies, time commitments and costs to providing QMS within their organisations.

Importantly, given the various funding streams which subsidise home modifications to varying degrees across Australia, a QMS will need to enable home modification providers to achieve compliance against the standards to which their funding is tied (addressed more fully in 3.4).

Recommendation 1: MOD.A will develop options for accreditation in the home modifications industry and work with the NDIA to ensure that registration is appropriately tied to this accreditation once completed.

3.2.2 Role of MOD.A

A quality management system (QMS) which results in the attainment of a recognisable “quality mark”, will need to be registered with an independent standards monitoring body such as the Joint Accreditation System of Australia and New Zealand (JAS-ANZ), or Standards Australia. Developing the standard in consultation with the home modifications industry and in line with the expectation of the standards monitoring body would appropriately be a project for MOD.A. Once established MOD.A would become the sole agent for the sale of the system to providers, and would provide a range of support and training services to assist providers understand how to integrate the system into their business operations.

The monitoring and improvement of the QMS, once developed, would also fall to MOD.A, which it could do periodically, or on an ongoing basis by means of an oversight process of all audits carried out on providers across the country. This would have the benefit of identifying areas of work where providers were commonly not meeting standards or where there were concerns about systemic conditions which resulted in problems occurring regularly, and addressing them through training, information provision or lobbying to funding bodies.

Recommendation 2: Once the quality mark (accreditation) is developed MOD.A will provide suitable industry support and training to providers to enable them to successfully integrate the QMS to their regular services.

Recommendation 3: MOD.A can work with the NDIA and other agencies to provide a quality oversight service which scrutinises the quality of audited home modifications services, identifies systemic weaknesses in quality and safeguards, and works directly with the industry and on the strength of the quality mark to improve the quality.

3.3 Supporting choice and control

The application of modifications to an individual's or family's home necessarily involves consultation and decision making, to ensure not only that they are fit for purpose but also work and blend in with the remainder of the dwelling. MOD.A's research indicates that participants are already beginning to take greater control of their decision making regarding the home modifications that take place within their homes. For example, this includes the participants making decisions about which builder/tradesperson is to be employed and they are also being the main signatory to the contractual agreements with builders/tradespeople in regard to what is expected to be built as well as the costs to be incurred.

When enabling more choice and control for participants it is even more critical to provide a list of qualified and/or registered builders/tradespeople for them to select from. A registration system for all the professionals involved in the provision of home modifications will not only provide a safety mechanism for the participants but also provide them with quality information in the selection process for who will be involved in assessing and completing the home modification.

As discussed at 3.2.1 a national quality management system for the home modifications industry will need to monitor quality at many stages and levels of the process. An important focus is upon the quality of the interaction between the various service providers and professionals with the clients or customers in whose homes the modifications are being done. Most funding body standards have a specific domain which looks at how providers interact with client, and how services uphold and promote individuals' rights. It is possible that this will be reflected in a specific quality assurance focus on clients and their rights and involvement in the proposed quality management system. But, importantly, the principles of choice and control will be embedded within the various quality assurance domains of the QMS.

3.4 Minimising the administrative burden

The Discussion Paper is written in a similar manner to a regulatory impact statement. At the consultation it was stated that the presentation of options, from least restrictive to most restrictive, allowed consideration of the risks associated with the various goods and services to be supplied to participants, and the level of regulation required for

safeguards and to assure quality. The development of a QMS which is a requirement of home modification providers to undertake in order to be registered with the NDIA represents an option at the highest level of regulation, which in turn necessitates consideration of how this can be applied with the minimum of burden to the home modification providers.

Compliance with a variety of funding body standards (disability standards, Community Care Common standards, Aged Care standards) often necessitates multiple compliance checking mechanisms. Quality around home modifications needs to be done to a single standard, not subject to funding body variables. Whilst there is a responsibility on MOD.A to develop the QMS to address as far as possible the variables in each of the compliance standards, it would be helpful if the NDIA, should it develop its own standards, ensure that these are broadly in line with existing standards, so that the QMS can easily address this without additional auditing processes and cost to providers. Our research with providers across the country has indicated there is support for the development of a national, streamlined QMS system, as long as bureaucratic red tape does not increase their own workloads. Most home modification organisations desire consistency within the profession through the development of national standards. With this comes the need for comprehensive national training programs amongst both professionals in the industry and its participants to ensure the delivery of quality information and consistent service delivery.

Recommendation 4: To reduce the red tape burden an accreditation system for the home modifications industry must serve as the single QMS which demonstrates clearly the expertise and quality in providing these services, and achieves compliance with all funding body standards.

4. Systems for handling complaints

4.1 Independent complaints body for the NDIS

Access to complaints handling systems which facilitate ease of use for clients, are focused on resolution, but which also have the power to investigate individual complaints and make recommendations where there is evidence of systemic failure, is critical to the success of the NDIS. To achieve this there needs to be an independent, statutory body established which is able to:

- work with providers to build or improve their own internal complaints management processes and increase their accessibility to the NDIS participants who use their services;
- work professionally within set timeframes and using trusted methods to facilitate resolutions to individual complaints, ideally to the satisfaction of all parties;
- investigate cases where complaints are serious and involve misconduct which is not illegal;
- identify systemic problems and report on these to the NDIA, and also commission own motion investigations to better report on serious problems occurring within the system itself.

This system would encourage greater emphasis on complaints handling within services and the sector as a whole, requiring providers themselves to actively inform participants of their rights to complain and give them easy access to the complaints process. The system would be identified as serving participants of the NDIS, and would apply to any agency or service which provided goods or services to participants utilising NDIS funds.

4.2 Complaints about home modifications

In the system described above home modifications providers who contracted to do work for NDIS participants would need to comply with the same complaints system as other services who received funding for whatever they provided. To a large extent providers already comply with similar requirements, given that complaints handling is a significant component of the various community and specialise standards to which services conform. Having this as a necessary component of contracted work will give further avenues of appeal to participants beyond the broad protections afforded by the professional and trades associations of the various professionals involved in this work (see Section 3.1 for a discussion on this issue).

Currently in the NDIS trial sites, there is a variety of ways that home modifications are being contracted and completed, and the industry is expecting a discussion paper shortly on how home modifications will be delivered in a consistent fashion nationally. A number of models could be adopted, including ones where the various components of the home modifications process (OT assessment, design, building, OT follow-up and training with the client etc) are all contracted out separately to individuals or agencies who operate independent of each other. This should not pose too many issues for participants having cause to complain about the conduct or performance of one or another, but makes the task of assisting providers to develop and enhance their internal complaints systems more complex.

Because home modifications are complex in nature, rely on a sophisticated interaction between OTs and builders/tradespeople, and are required to conform to a range of

standards prescribed in the National Construction Code, in addition to requiring licenses and insurances to be in order, the nature of a complaint, to whom it is directed, and by whom it is most appropriately dealt with may be complex for a single body charged with dealing with NDIS complaints. It may, for instance, be more appropriate to direct complaints to Fair Trading offices in states, or to professional associations. Alternatively the NDIS complaints system could take on the role of referring parts of the complaint to the appropriate bodies and coordinate these on behalf of the participant, to the extent to which the participant chooses. If this was the case then specialist knowledge about the sector would need to be provided.

The role of providing information and specialist advice to an independent complaints handling body for the NDIS could be delivered by MOD.A, through the provision and updating of information available to the officers who are attempting to resolve complaints. MOD.A could also assist the NDIA and other funding bodies by working with home modification providers to ensure that their internal complaints handling processes are up to the required standard, and include reference to external complaints handling bodies. Aspects of the QMS would focus on ensuring that complaints are minimised and also utilised for continuous improvement purposes.

Recommendation 5: MOD.A will work with the NDIA and other funding bodies to provide expert information about all aspects of home modifications delivery, advise complaints agencies about technical and specialist aspects regarding quality, and also assist by working with the industry to improve the overall quality of home modifications.

5. Ensuring staff are safe to work with participants

Currently the home modifications industry is funded by various government agencies to do subsidised work for older people and people with disability across Australia. As they are in receipt of government funds there is a requirement for them to comply with standards relevant to their funding stream, and all of these require working with children and/or vulnerable people checks and police checks.

The NDIS needs to have the highest standard of these checks in place, and this is more a matter of safeguarding and protection than it is about quality assurance in the delivery of services. This means that even goods and support services purchased from outside the usual suite of specialist disability and allied health services must demonstrate that people working directly with or in proximity to the participants have the requisite checks successfully completed.

For home modification providers this can be achieved as an important part of the QMS that we propose to develop and implement across the industry. The contracts between the client or NDIA and the home modification provider should stipulate the requirement for the provider to ensure that the requisite checks are carried out on all people who are involved in the job. The systemisation of this process within the operations of the home modification provider will constitute an important component of the QMS.

Recommendation 6: MOD.A supports making working with children/vulnerable people and police checks mandatory for anybody working on home modifications with participants, and that this should be required within contracts and also as evidence toward compliance with an industry-specific QMS.

6. Safeguards for participants who manage their own plans

MOD.A strongly supports the principle of choice and control in the administration of the NDIS to its participants. At the heart of this principle lies the potential for participants to control their own lives and the supports they require, which implies that the possibility of self-management must be present within each plan and package of support. Service providers, including those who deliver home modifications, should be geared toward responding to NDIS participants who manage their own plans.

Along with self management comes greater autonomy of decision making and choice, and home modifications providers will need to offer their services in such a way as to facilitate these. This begins with enabling participants and their families to assess the environment in which they live, so that they can begin to identify areas of the home which pose problems to access and to their independent functioning. A number of products have already been developed which assist people to do this. The [Way To Stay](#) resource combines self-assessment of the home with a proforma for a detailed OT assessment, and the development of a plan about home modifications which may be required. The [Decision Easy](#) company provides information to people to thoroughly assess their home environment to identify possible barriers which may need to be overcome if they are to age in place. And for many years Archicentre in Victoria has provided a [free home safety inspection](#) service to eligible pensioners, which identifies home modifications which may be needed. There are more examples than these, and providers are becoming increasingly astute at marketing directly to potential clients. But because of the complex and technical nature of home modifications there is a need for this type of information to be provided much more generally and systematically to participants who may benefit from a home modification.

Information about the processes involved in home modification, and the types of products which will need to be sourced to ensure that the modification serves the purpose it is intended for, needs also to be provided to clients in a way which helps them engage with the process and make key decisions along the way. The Home Modification Information Clearinghouse (HMinfo) at the University of NSW has developed a number of Consumer Factsheets on a range of topics relevant to home modifications. These peer reviewed publications are regularly updated and can be used to assist participants to be much more engaged with the process.

MOD.A itself is engaged in a project regarding client information, which should be completed by the end of 2015. This will look at the focus and format of information, where it is best sourced and how it can be distributed. At this early stage it is the view of MOD.A that it is preferable for it and HMinfo to be the primary source of best practice and other useful information for clients, which is in turn distributed to the most relevant information access points which are used by participants and providers, and staff of the NDIA such as Planners and Local Area Coordinators (LACs). In partnership with HMinfo MOD.A can assist decision-making around home modifications through the development of additional essential and accessible tools for participants to use. The NDIA may wish to consider funding the development of tools which help to consolidate and disseminate information used to assist decisions of participants.

Recommendation 7: When appropriately resourced MOD.A and HMinfo will partner to develop a compendium of information resources and modes of distribution to ensure that participants of the NDIS have access to tools which will facilitate their decision-making about home modifications.

7. Reducing and eliminating restrictive practices in NIDS-funded supports

The subject of restrictive practices relates in the main to practices of control exercised upon people whose behaviours place themselves and others at risk, and because they result in the restriction or loss of liberty to an individual need to be tightly controlled and legally sanctioned. These practices relate in the main to personal support services and are not regularly a concern of those providing home modifications.

Restrictive practices are applied in many ways, and have in the past included exclusion of individuals in rooms and other parts of houses or building. It is possible that home modifications funded by the NDIA may include design features which take into account a participant's individual behaviour, with specific intention to create spaces where a person may be excluded and unable to leave without assistance. If this was the case then the same rules and regulations would need to apply to the home modifications provider as to any other service provider, and the proper legal guidelines followed (most frequently through guardianship provision) so as to safeguard the rights of the participant.

Whilst this is not currently a significant issue within the home modifications industry the QMS will take into account how providers address design requests which include features which may deliberately serve to deny access to participants certain areas or features of their home. This will likely be dealt with by a separate provision in the QMS, related to client outcomes.

In addition, but in the general provisions around design and building, there will need to be a focus on the potential to inadvertently build home modifications which actually serve to deny access rather than increase the independent functioning of the participant.

Recommendation 8: The QMS for home modifications will include specific requirements to abide by strict protocols when designs propose to include features which serve to restrict access of participants, and also ensure that quality throughout the process is scrutinised to ensure that designs and builds do not inadvertently restrict participants' access and independent functioning.