

NSW DISABILITY NETWORK FORUM

Submission to Draft Service Charter of Ageing, Disability and Home Care March 2013

The NSW Disability Network Forum (the DNF) is pleased to provide this feedback on the Draft Service Charter for Ageing, Disability and Home Care. This submission was developed at the March 2013 meeting of the DNF. If you require any further information or clarification, please contact the NCOSS secretariat.

About the NSW Disability Network Forum

Initiated in June 2011, the **NSW Disability Network Forum** comprises non-government, non-provider peak representative groups whose primary aim is to promote the interests of people with disability. The aim of the NSW Disability Network Forum (the Forum) is to provide a new avenue to build capacity within and across all organisations and groups so that the interests of people with disability are advanced through policy and systemic advocacy. The Council of Social Service of NSW (NCOSS) provides secretariat support to the Forum as part of funding from Department of Family and Community Services, Ageing, Disability and Home Care.

The NSW Disability Network Forum generally meets monthly to co-ordinate issues of significance among people with disability, make representations on disability issues in NSW to Government, advise Government and others on policies affecting people with disability and to promote issues relating to people with disability across the wider society.

More information and current reports from the NSW Disability Network Forum are available at http://www.ncoss.org.au/component/option,com_docman/task,cat_view/gid,367/Itemid,78/

Introduction

The DNF worked from the regular version of the document and not from the Easy English version. The DNF noted, however, that the explanations provided in the easy English version seemed to have more information and be clearer than in the regular version.

Not for non-government services

This Charter applies only to services operated and provided by ADHC. It does not include non-government services funded by ADHC. This is an important distinction that should be clearly explained early in the body of the Charter and not in a footnote on the first page.

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What is the Charter?

The DNF advises that the regular version would benefit from an explanation of what the Charter actually comprises. The paragraph entitled *Our Charter* does not sufficiently cover this.

Other Charter examples

The DNF canvassed other examples of Charters that were

1. Easy to understand and follow
2. Favoured the person using the service
3. Effective in purpose

The particular example that was discussed was the NSW Police Customer Charter¹ that seemed to exemplify these criteria. Note this Charter made strong statements of commitment to the “customer.”

Further, the DNF is aware that the NSW Disability Industry Development Fund developed a draft Customer Charter using an expert subcommittee in 2011. NCOSS advises that this draft Customer Charter, which was completed but never progressed, contained several important features:

- Purpose
- Applicability: who it is meant for
- Guiding principles:
 - Person-centred
 - Open and accessible
 - Non-discriminatory
 - Effective and outcomes focused
 - Collaborative and in partnership
- “Our commitment to you”: containing 8 points and how they would be implemented
- Your responsibility to us: containing 4 points

Our Service

Statements of commitment

The DNF recommends that the language used in this section could be strengthened. For example: *We will provide you with a high quality service ...* rather than *We will strive to provide...*

The DNF does not believe this creates an entitlement to service nor does it mean that all services will always be perfect. It does, however, provide a statement of commitment from ADHC through the Charter that services will be high quality rather than simply a best attempt.

¹ Refer http://www.police.nsw.gov.au/_data/assets/pdf_file/0016/150127/NSWPF_Customer_Service_Charter.pdf

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Collaboration, not partnership

Point 4 indicates that ADHC offers to work in partnership with the person with disability and families and carers. The DNF discussed the fact that a person and their family does not really enter into a true partnership with an entire government department, nor is the resultant relationship one of equity or equality. While this concept was innovative in the 1990s and even the 2000s, perhaps the notion of partnership between a person and a government department should be more accurately replaced with or described as genuine collaboration. The DNF considered this to be more respectful and more person-centred.

ADHC to actively seek advice

The *Our Service* section does put the onus of feedback on the person or the family on an individual basis. This seems to be reinforced in the *Help us to help you* section. The DNF advises that ADHC must actively seek feedback on the quality, scope, timeliness and manner in which its services are provided to people with disability. The onus should be on ADHC, with government officers being receptive to feedback from people when intentionally or incidentally given.

In actively seeking this feedback, however, ADHC should be aware that this is a personal choice and that this should be neither a mandatory requirement or exhaustive in approach.

Improving Our Services

Finding out about service standards

Using the ADHC website to find the Standards in Action and navigating which Standard could apply to specific situations would be very difficult for many people with disability, family members or carers. The Charter is clearly written for people with disability and their families and carers but the references to service standards in this section are openly aimed at service providers. The DNF notes that the National Disability Standards are all in one place and contained in one document.

Breaches of the Charter

ADHC invites feedback on possible breaches of the Charter. The DNF discussed how this would occur. The DNF found that it would be extremely difficult for a person with disability to prove or secure a breach while the Charter contains words like: *strive to provide.., treat you with .., support your right to.., listen to you.., work with you to build, respect your privacy... use your information in the right way..., and provide advice to you.*

Using these words, the ADHC Charter seems to make only potential commitments, not real commitments, so any breach would be highly unlikely. The DNF recommends that this could be addressed by converting the language into statements of commitment.

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Complaints

The DNF advises that not all people with disability have ready access to computers and the internet and therefore recommends that the paragraph on complaints also contains the ADHC contact number with an offer to provide written material in accessible formats.

Further, the NSW Ombudsman phone number should be provided as well as the website address for the above reasons.

People who use ADHC operated services

The DNF has been concerned for some time that people with disability and their families and carers who use ADHC operated services have been the last to be informed and included in person-centred initiatives. The DNF remains concerned that ADHC is slow to provide ADHC service users with the information and advice that other people with disability receive in order to participate in consultations, conference and events and other opportunities under NSW person centred approaches and the National Disability Insurance Scheme.

The NSW Charter should address this by making a strong statement of commitment that people using ADHC services will be kept up to date with opportunities under NSW person centred approaches and the National Disability Insurance Scheme and provided with the necessary supports to access them.

Conclusion

The NSW Disability Network Forum appreciates the opportunity to provide input to the Draft Service Charter for Ageing, Disability and Home Care. If you require any further information or clarification, please contact the NCOSS Senior Policy Officer, Christine Regan at chris@ncoss.org.au ph. 02 92112599 ext. 117

NSW Disability Network Forum Member Organisations:

Aboriginal Disability Network NSW	NSW Consumer Advisory Group - Mental Health
Association of Blind Citizens of NSW	NSW Council for Intellectual Disability
Brain Injury Association NSW	NSW Disability Advocacy Network
Deaf Society of NSW	People with Disability Australia
DeafBlind Association NSW	Physical Disability Council of NSW
Deafness Council (NSW)	Positive Life NSW
Institute For Family Advocacy	Self Advocacy Sydney
Intellectual Disability Rights Service	Side By Side Advocacy Incorporated
Multicultural Disability Advocacy Association of NSW	Council of Social Service of NSW