

Response ID ANON-66AU-A3N7-U

Submitted to **Feedback on the proposed regulation of the home and community support**

Submitted on **2020-10-30 10:06:22**

Current home and community support service delivery model

1 In what ways is the current model/process working? Please describe.

In what ways is the current model/process working? Please describe:

The current model is not working because of:

under staffing;

the inefficiencies of the process used for assessing client need and allocating time for each client and the care required;

dependence on unregulated care givers being expected to give complex care without adequate or safe training and supervision;

inadequate time being allocated to travel between clients homes;

no flexibility for the nurse or caregiver to respond to situations that arise while they are in the clients home/onsite.

Care quality and continuity is negatively impacted by lack of professional development opportunity and high staff turnover

2 In what ways can the current model/process be improved? Please describe.

In what ways can the current model/process be improved?:

Caps on lists of clients and aligned with hours contracted to work

Retention of skilled nurses, continuity of and more effective care will be improved by recognising that nurses who work in this sector need pay and conditions that match their colleagues working in acute & tertiary level care.

Professional development is an urgent need in this sector - the client loads etc don't allow time for any 'down time' to keep up with new ideas, products, medicines, techniques nor cultural safety/competence training

Many home and community services recipients need RN care not just caregiver care supervised 'over the phone' by an RN

Benefits of regulating home and community support services

3 Do you agree there are benefits to bringing in HCSS regulation?

Yes (continue to question 2)

Please elaborate on why you don't agree there are benefits in HCSS regulation.:

4 What are the perceived benefits for consumers in the regulation of home and community support services? Tick as many boxes as you'd like.

improve wellbeing through more equitable access to services, improve health outcomes for Māori; Pacific, disabled people and other minority populations, including mātāwhiri Māori (Māori knowledge) models of care, a consistent approach to improving cultural competence and cultural safety in services delivered to consumers, more consistent quality in the services received, greater ability to make an informed choice, more transparency in addressing consumer issues or complaints, increased consumer confidence in the services being delivered to them

Additional comments::

5 What are the perceived benefits for home and community support service providers in the regulation of home and community support services? Tick as many boxes as you'd like.

increased opportunity for services to be delivered by like-workforces (eg, for Māori, by Māori, with Māori; for Pacific, by Pacific, with Pacific), training opportunities and support to improve cultural competency and cultural safety for regulated and non-regulated health workers providing care, reduced audit burden on providers, care workers are supported by national training/sector updates, care delivery expectations clarified, reporting expectations clarified

Additional comments::

6 What are the perceived benefits for public funders in the regulation of home and community support services? Tick as many boxes as you'd like.

audit regime requires all home and community support service providers to identify opportunities for improvements in service delivery, all home and community support services are delivered against the same standards, reduced compliance costs associated with audits

Additional comments::

7 If you are privately funding home and community support services, what do you believe are the perceived benefits of regulating these services? Please describe.

If you are privately funding home and community support services, what do you believe are the perceived benefits of regulating these services? Please describe.:

8 What are the perceived benefits of having a national approach through regulation of home and community support services? Tick as many boxes as you'd like.

national oversight of these services equivalent to aged residential services, independent, rigorous and consistent quality and compliance regime, quality control mechanisms applied regardless of funding provision, an understanding of quality across the sector, an understanding of the variety and complexity of home and community support service needs, a clear role for government in complaints management, a clear role for government in corrective action monitoring

Additional comments::

Regulation can also better align services with respect to their compliance with other legislation/regulation. For example the Health and Safety at Work Act and the WorkSafe 'Guidance for PCBUS: Violence in the health and disability sector.' Regulation with a nationwide approach can facilitate the compliance with such guidance.

ACC is also working on their delivery models - home and community service regulation should align with this significant work

9 What improvements may occur as a result of regulation of home and community support services? Tick as many boxes as you'd like.

reduction in variability of service provision, consistency in performance monitoring, support for enforcement of existing requirements, consistent service data, improved monitoring of equitable access to services and improved health outcomes for Māori; Pacific, disabled people and other minority populations, reduced variation across regions/funders in the collection and storage of information to measure consumer outcomes and service performance, improved quality of care

Additional comments::

Implementation considerations

10 Which of the following policy implications would need consideration if regulating the home and community support services?

the impact of not regulating, how mandatory regulation would interact and work alongside the development of the national framework for home and community support services reporting requirements, cost implications, impact of differences in funding models, flexibility to allow for evolving models of care, including kaupapa Māori and mātāuranga Māori models of care, funding models, standards and service configurations standards, the trends and impacts of travel and pay equity on the quality of services, cross government accreditation work implications, progress monitoring requirements, public sharing of audit reports, information regarding the size and make-up of people receiving services privately

Additional comments::

Some of the costs of delivering the current service aren't being accounted for eg the high staff turnover and lack of professional development for staff which ultimately increases costs and reduces care quality and efficiency

11 What may need to be considered to implement regulation in the home and community support services sector? Tick as many boxes as you'd like.

financial implications of audit for private funders - identification of variable funding arrangements, funder contract audit cycles and variations, training requirements for staff to understand and deliver care to meet the Health and Disability Services Standards (NZS 8134:2008) under the Health and Disability Services (Safety) Act 2001, understanding of consumer rights under the Health and Disability Services Standards

Additional comments::

staff training/professional development will be critical to the realisation of the benefits of regulation

About you (optional)

12 What is your name?

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14 Which group are you making this submission on behalf of?

Other (please specify)

Which group are you making this submission on behalf of?:

professional body and union of workers in this sector