

Best Practice Guide: Specialist Disability Accommodation

JULY 2024

Table of Contents

Introduction	2
Specialist Disability Accommodation	2
Design best practice + innovation in design	3
Thin markets	5
Participant engagement: design + build process	5
Conflict of interest + rights and responsibilities	6
Separation of housing and care supports	7
Service agreements with participants	9
Tenancy management	10
Safety and complaints process	12
Choice and control + participant safety	14
Diversity + inclusion	15
Quality providers – staffing, organisational culture	15
Zach + Amal's story	18
SDA Alliance	19

Introduction

Best practice specialist disability accommodation (SDA) is participant-focussed, ethical, and relentless in its pursuit of delivering high-quality, contemporary housing.

This best practice guide has been developed based on deep engagement with SDA Alliance members, including people with disability. Our members are committed to the principles of best practice and achieving good outcomes for people in need of specialist accommodation.

The purpose of the best practice guide is to offer guidance and recommendations on several major areas of SDA including:

- Design best practice + innovation in design
- · Thin markets
- Participant engagement: design + build process
- Conflict of interest + rights and responsibilities
- Separation of housing and care supports
- · Service agreements with participants
- Tenancy management
- Safety and complaints process
- Choice and control + participant safety
- Diversity + inclusion
- Quality providers staffing, organisational culture

This resource has been designed for SDA market players including SDA providers, government, institutional investors, developers, builders, allied health professionals and support coordinators.

SDA is a complex, nuanced and dynamic sector. While this resource does not encapsulate all aspects of SDA, the SDA Alliance is committed to developing additional best practice resources to support the delivery of a thriving and sustainable SDA market.

Specialist Disability Accommodation

SDA supports Australians with extreme functional impairment or very high support needs. Funded by the National Disability Insurance Scheme (NDIS), SDA can be life changing for many people with disability. Prioritising the best interest and safety of people with disability lies at the heart of best practice SDA: this involves adherence to relevant legislation, practices and standards including (but not limited to):

- NDIS SDA Rules
- NDIS Practice Standards and NDIS Code of Conduct
- National Disability Insurance Scheme Act 2013 (NDIS Act)
- The NDIS Rules
- SDA Design Standard
- SDA Pricing Arrangements and Price Limits
- Any applicable state or territory residential tenancy legislation, National Construction Code requirements and any other planning legislation.

Design best practice + innovation in design

Maximising participant safety in the design of SDA	 Promote participant-led design to ensure people with disability have a voice in the design and construction process for SDA dwellings that leads to the development of quality SDA. Understand each participant's unique needs: Conduct a thorough risk assessment for the participant and collaborate with the participant (and their families/guardian) to ensure the design of the property is appropriate for the participant. Commit to ongoing quality improvement in the design of SDA. An example includes managing a Design Change Register – a document which captures all lessons learnt throughout the entire design and development process. Ensure compliance with the SDA Design Standard, SDA Rules and any other relevant legislation, policy and practices. Ensure safety policies are in place which have been designed specifically for each site/dwelling and occupancy. Consider the scale of SDA dwelling congregation to ensure large numbers of SDA dwellings are not constructed in a single location/cluster. A clear and 'fit for purpose' building classification for SDA under the National Construction Code is required to ensure all buildings meet a minimum safety standard and dwellings are more 'home-like' and fit in with neighbourhood character.
NDIA SDA Design Standard: supporting innovation in design + SDA market: offering bespoke designs	 To support innovation, the SDA Design Standard must be flexible, clear and forward thinking. Consistent and clear updates to the SDA Design Standard would be beneficial to ensure it continues to support innovation. A clear and consistent SDA dwelling enrolment process (including categorisation of building type) is required to support a thriving SDA market capable of delivering innovation for people with disability. The process must enable the sector to receive feedback from the NDIA on compliance for a project at any stage of the development process to ensure compliance upon completion. Sustainable design innovation could be triggered by the NDIA incentivising SDA providers who build above minimum standards (namely beyond the requirements of the SDA Design Standard). A mechanism/process for exemptions needs to be established by the NDIA which allows for variations to the SDA Design Standard: this would enable SDA providers to seek advice and deliver proposals/receive approval for person centric changes and innovative design types. A deep understanding of the unique needs of participants (e.g., participants requiring Robust homes) is required to develop bespoke designs. A rigorous site selection and home design process is needed to ensure the location is accessible and able to cater to the needs of participants and care staff. Cost recovery is required to support the development of bespoke designs: a methodology whereby bespoke design features are funded directly by the NDIA is required to ensure quality outcomes for tenants.

Good design: how it can reduce the need for support and increase participant independence

- Good design has far-reaching benefits. For example, adopting the following design features can lead to positive outcomes for participants:
 - Assistive technology: this can improve participant independence and safety. Smart home assistive technology can support benefits including extended independent living, safety and security, physical and mental activity and healthcare monitoring (<u>The role of smart home assistive technologies in supporting ageing in place and disability housing</u>, Australian Housing and Urban Research Institute). A key approach to achieving enabling environments is to apply the principles of universal design. Examples of universally designed products include text-to-speech functions built into cell phones or motion-controlled doors (<u>Global Report on Assistive Technology</u>, World Health Organisation and UNICEF).
 - Functional design (e.g., zero thresholds, ensuites, accessible kitchen features): this can contribute to improving participant independence.
 - Environmental design considerations: this can improve natural light, ventilation and temperature control all of which can impact an individual's health and wellbeing. Studies have found links between levels of natural light in homes and physical and mental health of residents.¹ Research also demonstrates that indoor thermal comfort the temperature and quality of air affects our health and wellbeing, as well as the amount of energy used for heating and cooling our homes². Further, good passive solar design can reduce heating and cooling costs (The case for good design: Housing, Office of the Victorian Government Architect).
 - The provision of accessible spaces within housing: this can increase the ability for people to independently complete activities of daily living.
 - Communication systems (e.g. buzzers, mobile phones): these can be used by tenants to contact supports in the event they need information (e.g. support timetables) rather than requiring someone to be in-person to assist.

¹ One study found that inadequate levels of natural light in apartments is associated with increased rates of falls and depression; another study reported that rooms with sunlight were found to reduce stress, lethargy, improve depressive symptoms, visual comfort and cognitive impairment issues (<u>The case for good design: Housing</u>, Office of the Victorian Government Architect).

² One study found that as a result of improved thermal comfort, apartment residents experienced a significant fall in their blood pressure, enjoyed improved overall health, required less medication and hospital visits, and had reduced heating costs compared with those who remained in homes with poor thermal design (<u>The case for good design: Housing</u>, Office of the Victorian Government Architect).

Thin markets

Addressing the obstacles of delivering SDA in a thin market

- The provision of consistent, timely and robust market data (including market demand) from the NDIA is essential for SDA providers to respond to thin markets and make informed decisions. Participants understanding SDA and their housing choices is critical: improved data will allow SDA providers to market to participants which in turn will improve housing options for people with disability in need of specialist housing.
- Market stewardship: SDA Pricing Arrangements for dwellings in thin markets needs to reflect the challenges of thin markets (e.g., increasing prices) this will mitigate vacancy risk as best as possible and assist to cultivate the SDA market in these areas.
- Extending funding for SDA vacancies in thin markets could assist SDA providers to source tenants for available properties.
- The current SDA pricing and payments framework and application of location factors will continue to cause challenges to delivering much needed SDA in thin markets: an ability to share or reduce risk will be required to ensure these markets are served.

Participant engagement: design + build process

SDA participant engagement with stakeholders during the design and build process

- Where possible, promote a custom process which integrates design collaboration with the participant (and guardian/family) from conception to completion. This can include:
 - Engaging with the participant's supported independent living provider prior to purchasing land.
 - Immediately after purchasing land in the participant's requested location: The development team meet with the
 participant to develop a design brief (which captures all the design expectations and requirements for the
 individual) for the site.
 - Design brief developed to 80%: When the brief has been developed into a set of design documentation with specifications that balances the participant's design brief, SDA Design Standard, National Construction Code requirements and any other planning legislation, the development team conducts a workshop with the participant (and guardian/family) to talk them through the design documents and specifications. This is an opportunity for the participant (and guardian/family) to make any final amendments to the plans prior to proceeding with construction.
 - Construction hold point: During the construction phase, the participant (if possible) attends the site to witness
 progress of the build. A sample sign-off can be undertaken during a visit to allow the participant to approve the
 final finishes and fixtures for the build.

• In the event a participant has not been identified ahead of the design and build process, perform customisations (to the extent it is possible to do so) which meet the needs of each new SDA participant. Engage with the participant (and guardian/family), support providers, allied health care professional (e.g., occupational therapists) and any other relevant stakeholders to ensure the customisation is fit-for-purpose for the tenant. Seek feedback from tenants on existing builds to inform future designs.

Conflict of interest + rights and responsibilities

Informing participants of any potential or perceived conflicts of interest with support providers

- A participant's choice and control must be promoted and respected: a participant's housing rights, including security of tenure, are upheld, irrespective of any decision/s the participant makes about the provision of other NDIS supports within the SDA dwelling.
- Organisational policies (including a conflict of interest policy, participant conflict of interest policy, code of conduct) must be in place that detail how perceived or actual conflicts of interests are managed. The policies must be made available to participants in the language, mode of communication and terms which each participant is most likely to understand.
- A Conflict of Interest Register must be established and maintained. Conflicts of interest, perceived or actual, should be managed and documented by organisations.
- Provide clear messaging in all verbal interactions with participants as well as in written materials that they have choice and control regarding their support services.
- All vacancies and housing projects must be promoted transparently. Where applicable, policies and procedures are in place about how a provider will declare, advertise and fill vacancies in shared living. The policies are made available to participants in the language, mode of communication and terms which each participant is most likely to understand.
- Careful and considered tenancy matching: work with participants and their families ensuring a supported journey to identify their housing preferences. Ensure a tenant selection criteria is in place and agreed and understood by participants. In the context of shared living, a participant (and family) should be given a brief profile of other tenants, including prospective tenants, enabling them to make an informed decision; explain the design features of the property that promote independence, as well as opportunities to engage and retreat.
- In instances where an SDA dwelling has a support provider in place delivering supports to residents in a shared setting (e.g., onsite shared support, onsite overnight assistance), ensure that all communication with the participant is honest and transparent from the outset. Provide clear and accessible information that explains the support models available at each dwelling, and where applicable, how tenants may be able to jointly choose the provider providing shared supports. Ensure these terms are clearly set out in formal agreements with the tenant. Supply tenants with house rules/information

	statement which covers the responsibilities of the providers and residents. (Useful resources include: Consumer Affairs Victoria). • Ensure participants have easy access to information (e.g., policies, information resources etc) in a central location, such as an online tenant portal through the SDA provider website.
Supporting participants to understand the distinction between the provision of SDA and other NDIS supports delivered in the dwelling	 Ensure processes are in place which inform participants about the distinction between SDA and other NDIS support providers (e.g., supported independent living providers) throughout the onboarding program from start (lead enquiry) to end (tenancy). Participants must be made aware that SDA and support services are provided by separate entities. Service agreements with participants must clearly articulate the responsibilities of an SDA provider and how they differ from other NDIS supports. Information + resources: Use marketing and educational materials to explain the distinction between an SDA provider and other NDIS support providers (e.g., supported independent living providers, onsite shared support providers). These materials can include Participant Handbooks, Frequently Asked Questions, website content, brochures, and one-pagers outlining the different roles and responsibilities of each party. Consider assisting participants and/or their support networks to understand, articulate and design the particular support model they require to live in an SDA dwelling.

Separation of housing and care supports

Promoting choice and control: ensuring participants choose	 Ensuring the separation of the provision of housing + support services: The separation of housing and support services must be mandated: this means that separate entities must be providing these services to participants.
their own support provider	 Governance: Multi-entity organisations (e.g., large not-for profit organisations, commercial entities) which report into a single Board, whereby the separate entities are delivering housing and care supports, respectively, ought not to be considered as sufficiently 'separated.' There is a risk that a participant in this situation may have their choice and control restricted (e.g., an SDA tenant in this situation may feel pressured to choose the support provision offered by the other entity part of the organisation). An SDA tenant should be able to change their supported independent living provider and remain in the SDA property. There should be nothing in the tenancy or collaboration agreement that prevents or restricts a participant's right to
	 choose their support services (noting possible exceptions such as shared support agreements/arrangements). Processes need to be established, by the Australian government, to consider circumstances where separation can be exempted or explained. For example, remote/very remote locations, and SDA self-providers that choose to self-manage their in-home care supports.

	 SDA Providers refrain from entering into exclusive collaboration agreements with supported independent living providers ensuring all collaboration agreements are subject to tenant choice and control.
Collaboration agreements: using them to promote best practice and deliver good outcomes for participants	 Collaboration agreements between an SDA provider and a support provider (e.g., supported independent living provider) ought to set out the legal and practice roles and responsibilities of each provider relating to the property. The collaboration agreements must comply with all relevant NDIS and other applicable legislation and standards. The collaboration agreement should: Explicitly state that tenant choice and control is the paramount right affecting the parties' rights and obligations under the agreement. Not include 'commercial terms' which can inhibit choice and control. Ensure the method to exercise choice and control of support provider is transparent. Clearly define expectations in quality support provision. Require each party to support the tenant to sustain a successful long-term tenancy and work towards the best outcomes for participants. The collaboration agreements are a critical component of the separation of housing and support services.
SDA providers and disability support providers (e.g., SIL providers): working together to best serve participants	 Effective collaboration among providers leads to improved outcomes for tenants. The following examples can assist to ensure effective collaboration: All parties must understand the legal and professional obligations to uphold participant choice and control and other participant rights. All parties must implement practices and models of business that uphold the NDIS Practice Standards and other applicable standards/legislation. Ensure meetings between SDA providers and support providers take place to discuss matters relating to tenants (e.g., issues relating to the dwelling, support needs etc.). All parties ensure each participant has support for decision-making and is involved in decisions that affect them. Be transparent about issues that may be impacting provider or participant relationships and inform other providers that are involved so a resolution is collectively reached. Never seek to legally restrict another provider's right to speak freely and transparently with participants or the NDIS Quality and Safeguards Commission about provider suitability and quality. Consider ideas and opportunities that seek to pioneer new, innovative and flexible ways of practice that better meet participant needs.
House design: how it can support multiple service	 Housing design and the built environment can play a significant role in enabling service providers to deliver simultaneous services to a tenant. Examples of design features which can support the cost-effective + safe delivery of multiple

providers to deliver their services simultaneously

(simultaneous) services are listed below (noting the examples exceed the current requirements of the SDA Design Standard):

- Where possible, each tenant has their own spacious bedroom with a private ensuite, allowing personal care providers to deliver services directly in the resident's private space. This is imperative for maintaining dignity and comfort, especially for residents requiring intensive personal care.
- Where possible, a centralised automation system which can be controlled through an App on personal devices that allows residents and service providers to manage various aspects of the home (e.g., lighting, climate control and security).
- Spacious open living areas, where possible, which offer space for multiple service providers to work simultaneously without crowding.
- Open living spaces that are multi-functional and can be easily reconfigured to accommodate different activities and services (e.g., a quiet area for relaxation, a private meeting space for consultations).
- Where possible (e.g., a house with three residents) a second living room that offers tenants a private retreat when needed, ensuring personal space even when multiple providers are present in the main living areas.
- Where possible, proximity to appropriate amenities (e.g., healthcare centres, shopping, and recreational facilities) which supports service providers to deliver services.
- Access to parking (e.g., street parking) for service providers.
- Safety systems that allow tenants to alert staff when feeling unsafe or when an incident has occurred in their home.
- Dedicated onsite overnight assistance space where required (with electronic communications systems direct to tenants): this allows for different support providers to deliver different aspects of an individual's supports and enhances privacy for tenants.

Service agreements with participants

Supporting participants to understand their tenancy obligations and tenancy agreements

- Ensure the terms of the tenancy agreement are transparent, fair and reasonable. The service agreement must meet the requirements of the National Disability Insurance Scheme (Specialist Disability Accommodation Conditions) Rules 2018, and any applicable state or territory residential tenancy legislation.
- Offer participants the option of a tenancy agreement prepared in easy read and plain English format (in addition to the original tenancy agreement) so that even the most complex legal aspects of the tenancy relationship can be understood by all participants.

- Each participant is supported to understand the terms and conditions that apply to their SDA dwelling and the associated service and/or tenancy agreements by using the language, mode of communication and terms which that participant is most likely to understand. Prior to being offered a tenancy agreement, the terms of the tenancy relationship and the participant's rights and obligations are discussed with the participant.
- Once a tenancy agreement is offered, all documents including tenancy agreements, SDA service agreements, and any other tenancy/strata related documents are provided to the participant; the participant is given adequate time to read/discuss with others (e.g., advocates/support persons) if required and ask questions prior to signing the agreement. Staff remain available to answer any questions and discuss tenant's rights during this process with the participant and their advocate where required.
- All participants must receive a copy of the agreement once signed by the participant and the provider.
- Provide tenants with a welcome pack prior to moving into their home which includes key information about the property and a resource which explains the SDA service.
- Ensure tenants who may lack legal capacity to enter into a contract are provided with appropriate support for the duration of the process: ensure their support person receives the tenancy agreement and all other documents/resources (and are given adequate time to read the documents prior to signing) and are informed of the tenant's rights and responsibilities.
- Ensure a suite of policies are in place (e.g., policies regarding working with people who lack legal capacity to enter into a contact.)

Tenancy management

Frequency of engaging with SDA participants	 Ensure a regular point of contact for the tenant (e.g., Tenant Support Specialist/Officer) so they know who to contact about issues which may arise with the property and any other support they may require during their tenancy. Engage with tenants on a regular basis as appropriate (e.g., quarterly visits) regarding tenancy issues and to provide any updates (e.g., strata law updates, energy rebate information, Body Corp Committee minutes etc.). Respect the privacy of tenants outside of scheduled tenancy engagement and routine inspections. Ensure a suite of policies are in place (e.g., tenancy management policies).
Assisting participants to transition to their SDA home	 Allocate a dedicated staff member (e.g., Tenant Support Officer) to the tenant to support their successful transition into their new home. Arrange a transition planning meeting between staff, the tenant and where required key support persons (e.g., their guardian, supported independent living provider, support coordinator, occupational therapist etc.) to discuss matters such as:

	 the participant's move-in plans and expected move-in date requests for home modifications + assistive technology needs pet applications any information required to complete a home risk assessment supported independent living service agreement and operational readiness training required to support the participant or their support services to operate technology or other appliances at the property questions the participant has about their tenancy agreement + any other matters that may impact the participant
	 Move-in or tenancy. A partnership approach is essential across all parties involved during the transition process, particularly between support coordinators, occupational therapists, the support provider/s and the SDA provider: good communication will deliver optimal outcomes. The participant is central to this partnership arrangement, which supports them to maximise their choice and control.
	 Adopt a participant-centred approach to supporting the transition: responding to the needs of the tenant and the amount of support they have to assist with the move (e.g., assisting them to arrange the move, helping to source furniture and equipment, providing a personal housewarming gift, and providing a free handyman service on the move-on day). Subsequent to the tenant moving into their homes, a dedicated staff member (e.g., Tenant Support Officer) allocated to the tenant contacts the participant (e.g., during the first week, and periodically for the first three months) to ensure the experience for the tenant is positive and meeting their expectations.
Measuring tenants' satisfaction with their tenancy services	 Tenant satisfaction surveys: use feedback to continually improve services. Examples include: offering a feedback survey 6 weeks after moving in and quarterly thereafter; surveys must be conducted at least annually. (A useful resource: <u>Disability Housing Outcomes Framework</u>.) Ensure the survey methods are designed in an inclusive manner and support persons are engaged where required (e.g., participants with complex communication needs). (Useful resources include: <u>Disability Gateway</u> - creating accessible materials, SA Government <u>Online Accessibility Toolkit</u>.) Use face-to-face meetings with tenants to illicit feedback and encourage conversations about their tenancy to ensure any issues are addressed promptly. Conduct audits throughout the year (e.g., every 6 months). Provide tenants with feedback forms so they may communicate feedback at any time.
Managing property maintenance	 Comprehensive property maintenance policies and procedures are in place to ensure accountability and responsibility. Clearly explain to tenants what to expect when it comes to maintenance including what property maintenance is on offer, how to report issues, and what to expect when resolving maintenance issues. Ensure this information is made available

	to, and is easily accessible by, tenants (e.g., in the welcome packs). Another example includes a fridge magnet which reminds tenants about the different maintenance priority levels (Emergency, Urgent and General) and how they can report issues.
	 Offer communication methods and/or systems that are user-friendly for tenants to lodge maintenance requests. Ensure tenants have access to a 24/7 maintenance hotline for urgent maintenance requests.
	 Efficient systems are in place to manage all maintenance tasks, maintain historical records, and keep track of maintenance requests and work completed.
	 Undertake regular inspections and assessments of the homes to help identify maintenance needs and resolve them promptly. Performing annual proactive maintenance of all automation and air-conditioning.
	 Partner and engage with reputable trades to ensure accountability in the work performed and adherence to service agreements and contracts. Ensure all third-party trades engaged follow organisational compliance requirements. Offer tenants the chance to provide feedback following the completion of a maintenance request.
	oner tenunts the chance to provide recastack following the completion of a maintenance request.
Property inspections	 Undertake routine property inspections as stipulated in the tenancy agreement. Provide tenants (and their support network where required/advised to do so) with appropriate notice (as stipulated in the tenancy agreement) prior to a property inspection.

Safety and complaints process

Ensuring participants are informed about how to	• Ensure details of how to make a complaint, including to the NDIS Quality and Safeguards Commission, are included in tenancy agreements, service agreements, tenancy handbook and via SDA provider websites.
make a complaint via the	• Ensure a complaints policy is in place which details how feedback, compliments and complaints can be submitted and
NDIS Safeguards	the process the organisation follows to respond (identification, acknowledgement, investigation, action, check-ins,
Commission	resolution or appeal and review stages).
	• Ensure the complaints policy is given to each tenant, and they are informed of their right to escalate the complaint to the
	NDIS Quality and Safeguards Commission (as well as the NDIA).
	 Consider providing an information sheet which clearly and simply communicates the different pathways to making a
	complaint including contact details (e.g., the NDIS Quality and Safeguards Commission, NDIA, SDA provider, Onsite Shared
	Support provider etc.).
	• Offer tenants assistance to make a complaint about their other support providers: inform participants that they can
	contact staff with complaints about their other support providers and offer to support them to resolve their complaints
	(as far as appropriate and to the extent it is possible to do so). Offer multiple contact points to raise issues, e.g., phone,

Providing information on how to make a complaint without making the home look institutional	 email, in person, via an App, whereby tenants can submit complaints which are not traceable by their other support providers. Avoid displaying information on how to make a complaint in a home (e.g., posters on a wall) as it would make the home appear 'institutional.' (It is up to tenants to decide what is displayed in their homes.) Consider the use of technology, such as an App, which allows tenants to make a complaint. Consider the use of information products, such as an information magnet which can be placed on a fridge. Ensure regular communication with tenants as this offers an opportunity for individuals to raise concerns. Provide tenants documents such as complaints policies and procedures in hard copy (e.g., via a welcome pack) and digitally (e.g., via email and/or an online tenant portal). Offer tenants the option of receiving these documents through alternative ways, for example, providing them directly to their care provider.
Ensuring tenants (and their families) feel safe enough to raise a complaint with the SDA provider	 Ensure tenants are informed that raising a complaint will not impact their tenancy. Build strong relationships with tenants based on trust, respect and effective communication. Effective communication upholds the rights of people with disabilities to have choice and control and to make decisions about their own lives; with effective communication, staff can support and enable people to express themselves, to be heard and be safe (NDIS Quality and Safeguards Commission - <u>Supporting Effective Communication</u> Training). Foster a culture of communication: regularly engage with tenants (and their families/guardians) and proactively seek feedback through this engagement. Ensure tenants understand they can speak to any staff member to raise a complaint (this means in the event they have an issue with a staff member they can approach others in the organisation). Offer tenants multiple contact persons within the organisation so tenants always have options regarding which staff member to approach. Provide multiple access points: allow complaints from multiple channels so tenants can choose one that meets their specific needs, e.g., phone, email, online form, post and face-to-face. Offer the option of submitting a complaint anonymously. When a complaint is raised, seek to act on and resolve it promptly and fairly. Work out what barriers people may face and what can be done to address these barriers. Examples of barriers include: fear of retribution or language barriers. Staff must be well trained, empowered and supported to manage complaints. Complainant concerns must be listened to, acknowledged and taken seriously (Commonwealth Ombudsman Better Practice Complaint handling Guide). Ensure a suite of policies are in place and the complaints handling system is designed in an accessible way. Pay particular attention to the needs of people who may be vulnerable due to age, language, financial or other reasons. For example, a

complaint handling system should include a process to identify and respond to a need for communication to be in a language other than English (Commonwealth Ombudsman Better Practice Complaint handling Guide).

Choice and control + participant safety

Safeguarding SDA providers must provide housing services only (and not provide any support services). SDA residents from coercive SDA providers undertake regular check-ins with SDA tenants and their service providers to ensure there is no closed system that could enable coercive control to develop. Regular property inspections by SDA provider staff can offer control informal opportunities for general safeguarding. Provide participants with a dedicated tenant support specialist (or equivalent) that understands their individual needs and goals and is available to answer any of their enquiries or complaints. Ensure all staff are trained to identify the signs and indicators of coercive control. Ensure staff promptly and appropriately act on suspicions of coercive control. Ensure tenants have the opportunity to provide feedback to the SDA provider. Provide tenants with information about their rights and how to make a complaint to the NDIS Quality and Safeguards Commission. Seek participant consent to contact guardians and nominated support persons in relation to their tenancy, services and other matters affecting their wellbeing. Consider using tools such as an App which enables participants to confidentially report issues and make complaints about control they are experiencing (either from their support providers, housemates or others). Protecting participants Ensuring the separation of the provision of housing + support services: the provision of these services must be from two from being incentivised separate providers. to agree to a service that Independent support coordination: the separation of support coordination from any other type of support. SDA providers and supported independent living providers must understand the boundaries within which they each is not suitable for them provide services. Support participants to ensure they are aware of their rights (e.g., choice and control over their support provision). Examples include: Designing onboarding processes that support choice and control (e.g., making it clear that participants are not required to disclose their full NDIS plan funding amounts to providers when they are not certain they wish to receive their services) Outlining participant rights in transitioning and onboarding information + leasing documentation

- Specialist staff/teams who can receive enquiries from participants
- Offering Apps which allow tenants to confidentially report concerns
- Ensuring participants are informed about how to make a complaint to the NDIS Quality & Safeguards Commission

Diversity + inclusion

Practices to ensure participants have access to services that respect their culture, diversity, values and beliefs.

- Connect, partner and work with diverse service providers.
- Provide staff with cultural competency and sensitivity training (e.g., LGBTIQ+ awareness training).
- Hire a diverse team of staff including culturally diverse staff.
- Enable and promote the individualisation of participant records in organisational systems (so each participant's background, preferences and values are recorded).
- Provide correspondence in both English and tenants' native language and provide interpreter services where required.
- Ensure a suite of organisational policies are in place (e.g., anti-discrimination policy, diversity policy, diversity focused recruitment policy).
- Tenant satisfaction surveys: use feedback to continually improve + tailor services to cater to diverse populations.
- Consider engaging tenant advisory consultants to the organisation's board.
- Deliver personalised interactions with participants based on their individualised needs (beyond disability specific requirements, e.g., culture, spirituality, values etc.).
- Careful and considered tenancy matching: respect the privacy and dignity of participants by ensuring their personal background, practices and preferences are upheld during the tenant matching process.

Quality providers – staffing, organisational culture

Staff recruitment: finding the right staff

- Adopt a value-based recruitment process: attract and select employees whose attitudes, values and behaviours align with
 those of the organisation and the requirements of the role. Prioritising organisational culture, staff and capacity to deliver
 high quality service delivery begins with the recruitment process.
- Identifying talent: advertise vacancies widely (e.g., use platforms such as Seek, Ethical Jobs, Linked In; approach potential candidates through professional networks; engage value-aligned recruitment agencies). Adopt accessible and inclusive

Staff training, development + support	recruitment practices to attract people with disability. Consider placing an emphasis on attributes such as emotional intelligence, teamwork, and compassion in addition to technical ability, experience and qualifications. Interviews: Where possible and appropriate, involve participants in the interview process to ensure sensitivity to the needs of people with disability is prioritised. Screening checks + referee reports: Conduct screening checks (e.g., Police Check, Working with Children Check) and undertake reference checks. Onboarding + induction training program: Provide a comprehensive and supportive onboarding and induction program relevant to the role. Ensure a comprehensive suite of policies are in place (e.g., recruitment and selection [diversity, hiring practices etc]; supervision; code of ethics; work health & safety etc). Provide a comprehensive induction program for new staff (this can include training such as mandatory NDIS learning modules, SDA specific training, organisational policies & procedures). Ensure role specific expectations are clearly communicated during the induction period. Provide ongoing training, development and mentoring for staff (e.g., access to industry specific training and conferences; access to role-specific training). Ensure each role in the organisation has a well-defined key performance indicator (KPI) set which is used as performance benchmarking in regular one-on-one meetings with supervisors. When developing KPIs, treat personal growth measures, quality of service delivery and commitment to organisational values on par with commercial KPIs. Provide regular professional staff supervision: effective supervision supports good working relationships, helps to address any issues and celebrates achievements. Create a positive workplace culture where staff feel supported and where collaboration and open communication is encouraged. This can include regular staff meetings and senior leadership constantly engaging with their teams to support growth. Ensure a comprehen
Fostering an organizational culture where staff feel safe enough to raise issues/speak out when things are not right	 Foster an organisational culture whereby: Board leaders set the tone by actively promoting and demonstrating psychological safety. Senior leadership prioritise client safety and the delivery of quality services, and lead by example in their commitment to receiving feedback and instigating ongoing quality improvement. Open communication and the opinions of all staff are valued. This includes creating a psychologically safe work environment and celebrating accountability.

- Staff are encouraged to speak up: encouraging and rewarding honest feedback from staff. An example includes offering confidential disclosure options for staff, so they feel empowered to speak out about sensitive issues.
- Ensure a comprehensive suite of policies are in place (e.g., whistleblower policy).
- Ensure all staff are informed about the processes in place to raise issues. This can include providing resources in easy read and plain English and resources translated into languages other than English.

Zach + Amal's story

Zach (name changed) is in his early twenties and lives with two friends in an SDA home developed and managed by Illowra. All three young men live with cerebral palsy.

Zach and his mum, Amal (name changed), were intricately involved in the design and build process (as were Zach's housemates and their families). Illowra consulted with the families prior to purchasing a block of land to ensure it met their needs: namely that it was close by to family (and therefore the community in which the three young men all have established long-term connections) and near amenities.

Once the land was secured, the families met with Illowra staff, the architect and builder: they discussed home designs including custom features required to cater to the needs of the three young men. Support providers also offered advice on design features.

"I am so grateful that we could be involved in the design process right from the beginning – it is so important to get it right," Amal says. "For example, Zach is a wheelchair user and really enjoys looking out the window, so the positioning and height of the windows needs to be right."

Zach and his two friends were given a copy of the building plan (Zach put his on his bedroom wall). Every Wednesday, the three friends visited the building site to watch their home come to life during the construction process. Once completed, Zach and his friends were given the keys to their new home during a moving in ceremony.

The three families chose their support providers — Illowra made it clear this was their decision to make. Amal is adamant that the separation of housing and care supports offers safety for people with disability as it ensures housing security (irrespective if there is a change in care support providers). Amal meets regularly with the care support providers to discuss relevant issues relating to Zach's support (and the home). Quality providers is very important, and for Amal, something that is critical is employee attitudes: "Staff do not think the house is their workplace: their attitude is, this is Zach's [and his housemates'] home, and they work in their home. They respect this."

Zach and his housemates have now settled into their new home and are embracing their new chapter in life.

SDA Alliance

The SDA Alliance represents more than 70 SDA market players across the country (including SDA providers, institutional investors, developers, builders and allied health professionals). As the peak body representing the good practice New Build SDA sector, we provide a unified voice to better support the development of a diverse and sustainable SDA market.

The SDA Alliance is driven by three principles: active collaboration, maximising choice and control, and innovation and excellence. By engaging with governments and other key stakeholders, we seek to improve standards and regulations and promote the provision of excellence in SDA. Ensuring people with disabilities can exercise choice and control in relation to their housing and supports lies at the heart of our work.

CONTACT:

E: info@sdaalliance.org.au P: 1300 409 932 W: www.sdaalliance.org.au

