



# Fact Sheet B – Comparison Fact Sheet – Related Policies and Procedures between the National Standards for Mental Health Services and the National Disability Insurance Scheme Practice Standards.

## General comments

Whilst there are few requirements for specific policies or procedures in either the National Standards for Mental Health Services (NSMHS) or the National Disability Insurance Scheme Practice Standards (NDIS PS), policies and procedures are used in accreditation/certification processes for both sets of standards, as evidence to demonstrate that organisational practices comply with the intent of the standards. For the NDIS PS, the policies and procedures required as evidence are specified by the certification body undertaking the Certification Audit. For the NSMHS, the policies and procedures required as evidence are specified by a combination of the assessment body undertaking the accreditation assessment and an addendum to the NSMHS, [the Implementation Guidelines for Non-Government Community Services](#).

It is recognised in both sets of standards that there is considerable diversity amongst the organisations providing services and supports. There are differences in size, range of services/supports being provided, geographical location, governance structure and more. Thus, the NDIS PS allow for organisations to have “*systems relevant (proportionate) to the size and scale of the provider and the scope and complexity of supports delivered*”. Similarly, the NSMHS states: “*Given these wide variations, there will be circumstances in which there will be different expectations of compliance to a particular standard for different types of service provision.*”

There will also be circumstances for where organisations believe standards, indicators and criteria are not relevant to their service types and settings. In these circumstances, there are mechanisms in both sets of standards for organisations to seek permission to have standards, indicators or criteria either exempted or accepted as not applicable.

Accordingly, there is a great deal of flexibility for organisations in how they comply with the requirements for policies and procedures, whilst ensuring the intent of each policy and procedure is met.

Finally, as stated in the NSMHS:

*“While policies and procedures are important, they will generally not be sufficient on their own to demonstrate that a service provider is meeting the criteria associated with a particular standard. Evidence will need to be provided to demonstrate how the policies and procedures are actually reflected in the way the organisation operates in its physical environment, its day to day work practices and staff behaviour.”*

## NDIS PS Modules

The NDIS PS consist of a core module and several supplementary modules that apply according to the types of supports and services NDIS providers deliver, and the corporate structure of the organisation.

In general, organisations registered with the NDIS to provide supports to people with psychosocial disability will be audited for certification against the **Core Module**, which covers:

- Rights and responsibilities for participants;
- The providers' governance and operational management;
- Provision of supports; and
- The support provision environment.

Link to NDIS PS: <https://www.ndiscommission.gov.au/providers/ndis-practice-standards>

Some organisations registered with the NDIS to provide supports to people with psychosocial disability will be providers who are individual sole traders or partnerships delivering lower risk or less complex NDIS supports and services. They will be certified against the **Verification Module**.

Link to Verification Module: <https://www.ndiscommission.gov.au/document/1051>

Some organisations registered with the NDIS to provide supports to people with psychosocial disability, in addition to being audited for certification against the **Core Module**, will also be audited against the **Specialist Behaviour Support Module** (for providers who are registered to provide specialist behaviour support to NDIS participants) and/or the **Implementing Behaviour Support Plans Module** (for NDIS providers who are registered to provide specialist behaviour support to NDIS participants. They also apply to providers using restrictive practices in the delivery of any NDIS supports and services). These modules are considered in a forthcoming **Fact Sheet I - Positive Behaviour Support & Restrictive Practices in NDIS**

## Related Policies and Procedures Between the NDIS PS and NSMHS

The intent of this Fact Sheet is to provide guidance to organisations that are accredited against the NSMHS on how evidence used for that accreditation may also be used as evidence for certification against the NDIS PS. For this purpose, policies from both sets of standards have been compared to identify those that were related, with similar intent and content.

Table 1 lists the policies and procedures organisations are required to provide as evidence of compliance for the NDIS PS Core Module, mapped to related NSMHS Criteria. (hyperlink to table 1)

Table 2 lists the policies and procedures organisations are required to provide as evidence of compliance for the NDIS PS Verification Module, mapped to related NSMHS Criteria. (hyperlink to table 2)

Table 3 lists the policies and procedures organisations are required to provide as evidence of compliance for the NSMHS. (hyperlink to table 3)

The results show that for most policies and procedures required for the NDIS PS, there are related policy and procedure requirements for the NSMHS. It is important to note however, that the NSMHS policies and procedures may need to be modified before they fully comply with the requirements of the NDIS PS. Organisations may wish to combine related policies and procedures or to retain them separately, specific to each set of standards.

There are some gaps where there are no obvious NSMHS policies and procedures that are related to those required by the NDIS PS. One gap is related to policies and procedures required for NDIS participant service agreements, an aspect of NDIS service delivery for which there is no obvious equivalent for NSMHS services provided by Non-Government Mental Health Services. For more information, please see **Fact Sheet H: Tips on Developing a Service Agreement with Easy Read Versions** (insert Hyperlink) that addresses NDIS Service Agreements.

Another gap relates to how NDIS providers are required to manage restrictive practices, how to manage access to participants' money or other property and how to provide financial advice to participants. Whilst there is no related policies and procedures in the NSMHS, it is possible some organisations will have non-NSMHS policies and procedures that relate and can be modified for NDIS PS purposes.

Whilst there are a lot of NSMHS policies and procedures that relate to policies and procedures required by the NDIS PS, there are a large number of NSMHS policies and procedures that do not relate to any requirement in the NDIS PS. In particular, there are those policies and procedures that reflect the strong focus of the NSMHS on the principles of recovery oriented mental health practice; something that at the time of writing the NDIS PS, was not a strong focus of the NDIS. However, the NDIS does have a focus on recovery for participants with psychosocial disability. For example, a new NDIS support item called the *Psychosocial Disability Recovery Coach (Recovery Coach)* became available from 1 July 2020. Therefore, it should be possible for organisations that have a strong recovery-oriented commitment, guiding documents (NSMHS policies and procedures) and practice to reflect this recovery-oriented commitment into NDIS PS policies and procedures.

For more information on NDIS and mental health, go to: <https://www.ndis.gov.au/understanding/how-ndis-works/mental-health-and-ndis#what-is-recovery>

For more information on the Recovery Coach support item, go to:

<https://www.ndis.gov.au/understanding/how-ndis-works/mental-health-and-ndis#factsheets-and-resources>

For more information on the Implementation Guidelines for Non-Government Community services, go to:

<https://www1.health.gov.au/internet/main/publishing.nsf/Content/mental-pubs-i-nongov>

## 1. NDIS Registration process

There are two pathways for registration to become NDIS providers:

- **Certification** (for providers that provide high risk and more complex supports and services); and
- **Verification** (for providers delivering lower risk/lower complexity supports and services).

In addition to accreditation against the National Standards for Mental Health Services (NSMHS), organisations funded by the MHC that register as an NDIS provider will also be required to undertake a certification audit against the NDIS Practice Standards **Core Module**. A small number of these organisations may also be audited against the Specialist Behaviour Support Module and the Implementing Behaviour Support Plans Modules, depending on the NDIS services they register for (Refer to forthcoming **Fact Sheet I – Positive Behaviour Support & Restrictive Practices in NDIS**).

Detailed information on NDIS registered provider requirements can be found at:

<https://www.ndiscommission.gov.au/providers/registered-provider-requirements>

As the NDIS provides a broad range of supports/services to people with a broad range of disabilities, the NDIS PS Core Module does not have a particular focus on psychosocial support/services. Each practice standard has a high-level participant-focused outcome with related indicators that providers should demonstrate.

For organisations accredited against the NSMHS, evidence used for Standards 1,3, 5, 9 and 10 should be able to be utilised to meet the requirements of the NDIS PS. However, it will be important to take into account that the NDIS PS do not have a particular focus on psychosocial supports/services and therefore some modifications to NSMHS-specific evidence may be needed for it to meet the requirements of the NDIS PS.

For example, in the NDIS PS, 'support plan' refers to the high-level plan that outlines participant goals, aspirations and required supports, including any funding they might receive to support achievement of the participant's goals. These plans are reviewed annually and are an important component of the service agreement between NDIS participants and providers. While they are not a care/treatment plan that is

typically used as part of mental health (psychosocial) services/supports, similar individual recovery plans for consumers are expected as part of the NSMHS.

This Factsheet outlines that whilst the NSMHS has a strong focus on recovery-oriented practice; the NDIS PS do not. However, as the NDIS has a focus on recovery for NDIS participants with psychosocial disability, it should be possible for organisations that have a strong recovery-oriented commitment, guiding documents and practice to reflect this recovery-oriented commitment into evidence required for certification against the NDIS PS.

For more information on the NDIS and mental health, visit: <https://www.ndis.gov.au/understanding/how-ndis-works/mental-health-and-ndis>