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Minister Rachel Stephen-Smith
Minister for Health
Minister for Families and Community Services
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ACT Legislative Assembly

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Dear Minister

ACTCOSS Response to Updated Commissioning Roadmap 2021 - 2023 (v2.3)

Thank you for your letter of 14 July 2021 in response to the ACTCOSS [Position Statement on Commissioning and Procurement](#) and the release of the Government's updated *Commissioning Roadmap*.

The aim of the commissioning reform project is to achieve better outcomes for Canberrans who face disadvantage through the improved identification, design, procurement and funding of community services. Using this premise, please find as follows ACTCOSS's response to the most recent *Roadmap* document. Note this response has been informed by ACTCOSS's membership.

Response to Roadmap

1. We welcome the updated *Roadmap* including the:
 - a. description and definition of the five commissioning pathways
 - b. defined outputs to be expected from the commissioning process under each part of the commissioning cycle
 - c. details of the process for engaging with service users and the community sector at each step of the process
 - d. information about contract extensions and flexibility in the provision of contracted services during the reform period; and
 - e. identification of priority sub-sectors for commissioning.

2. The *Roadmap* answers some questions raised by the ACTCOSS *Position Statement*. As would be expected in an evolutionary process, some questions remain unanswered or only partly answered. Appendix A can assist the ACT Government commissioning team to keep track of current outstanding issues.

3. We welcome under the heading 'Strategise' the following statement:

"[The ACT Government] will ... define the system outcomes we are seeking to achieve, taking into consideration the ACT Wellbeing Framework and other key policy objectives, particularly Closing the Gap reforms that support self-determination and equitable outcomes for Aboriginal and Torres Strait Islander people."
(*Roadmap*, p. 6)

Clear links between defined outcomes and the commissioning process must be established. We look forward to receiving details of the defined system outcomes and policy objectives for the priority sub-sectors that will be subject to the first commissioning processes. Further, selecting the frameworks and data to be used for measuring those defined system outcomes should be done in partnership with the community sector and other stakeholders from the ACT to ensure they are fit for purpose.

For example, homelessness services are a priority sub-sector for commissioning. When commissioning services in the homelessness sector, what will be the policy objectives and defined system outcomes? Is it to achieve a particular outcome through the *Wellbeing Indicators*? To reduce the number of rough sleepers? To eliminate factors that lead to homelessness and housing insecurity - 'rental stress' or domestic and family violence? To implement the housing and homelessness commitments in the ACT Housing Strategy and/or Parliamentary and Government Agreement? Something else? Or all/a combination of these?

Dependent on the defined system outcome(s) or policy objectives for which the needs analysis is being undertaken, the services that will need to be commissioned (as identified through the needs analysis) may differ.

The clear and public identification of the system outcome or policy objective will also ensure effective monitoring of progress of Government and the community sector in delivering for vulnerable people through the commissioning process.

4. Related to this we would also appreciate more information on how the commissioning process will operate across directorates. With regards to cross-directorate cooperation, we welcome the comment:

“We are particularly interested in points of integration and coordination between services (e.g. between housing & homelessness and health) and how this is experienced by service users.” (Roadmap, p. 6)

We know that many issues relating to disadvantage are complex and cross bureaucratic boundaries. Detail on the process, mechanisms and agreements between directorates with regards the commissioning process is needed, particularly with regards the budget process.

In addition to cross-directorate cooperation, we are interested to know how the ACT Government will include those organisations whose work has evolved to meet a targeted cohort or community need, but across a range of portfolio / directorate areas. These organisations are not currently represented in the *Roadmap*, for example, LGBTIQIA+ community. Funding for those organisations originated in the response to Sexually Transmitted Infections and Blood Borne Viruses (STIBBV). However, LGBTIQIA+ organisations are now covering a much broader range of health and social issues impacting the LGBTIQIA+ community including advocacy, housing and homelessness, mental health services and other social assistance. The commissioning processes need to ensure that the needs and views of particular vulnerable communities including LGBTIQIA+, culturally and linguistically diverse, Aboriginal and/or Torres Strait Islanders, people with disability and their advocates are included and reflect the cross-directorate nature of their work. We welcome details of how this will occur.

Further, we await more information regarding the participation of and timeframe for directorates outside of ACT Health and CSD in the commissioning project.

5. We acknowledge reference to additional funding through discussion of ‘budget business cases’ in the *Strategise* section:

“This engagement [as detailed in the Strategise section] will inform our final priorities for commissioning, including the appropriate procurement pathway. It will also inform the development of any budget business case for additional funding.” (Roadmap, p. 6)

It is crucial that the Government commits appropriate budget:

- a. for participation in the commissioning process design and implementation;
- b. to fund the services identified in the needs analysis;
- c. to fund services to fulfil the additional obligations of commissioning including participation in needs assessment; monitoring and evaluation; consultation and co-design processes.

We remain concerned that community organisations are already stretched, working to meet increased demand due to COVID-19. Reform through the commissioning process needs to result in all elements of service provision and activity being appropriately funded. For example, many community organisations are active participants in government reference groups, policy discussions, law reform and other advocacy work. However, this work is not reflected in funding. This includes some peak bodies, who are funded only for project work – not for advocacy and advisory activities.

In particular, the issue of how we address workforce issues related to the training, recruitment, pay and retention of staff in the community sector needs to be considered during commissioning to ensure the most effective outcomes are both funded and achieved.

We note that the *True Cost of Service Report* being developed by the ACT Industry Strategy Sub Group (including community sector organisations and CSD) in partnership with UNSW Social Policy Research Centre will highlight funding gaps relevant to this discussion.

Evaluation of the overall commissioning and procurement reform project

Separate to the Roadmap, while we have also welcomed early discussions on the process for monitoring and evaluating the commissioning project's success, some community sector stakeholders continue to hold significant differences on the evaluation's primary focus. ACTCOSS recommends deferring evaluation work until after the early commissioning cycles in statutory child services and homelessness services are closer to completion. This would allow those involved in the commissioning processes to undertake ongoing monitoring and collect evidence to inform discussions of an evaluation model for the overall commissioning project. As it currently stands, we are concerned that the proposed evaluation model for the overall commissioning process places too much emphasis on NGOs and insufficient focus on the Government's role in implementing commissioning and procurement reform for the purposes of better outcomes for community sector organisations and the vulnerable people they serve. The Government has put in real work to build up trust in the commissioning process among NGOs, and there is a risk that an evaluation with a focus on NGOs at this stage will substantially weaken that trust.

We note that there are differences in views among community sector partners about the evaluation process, and at the very least, more consultation is required with community sector organisations before any decision is made about the form and methodology for the evaluation.

Summary

Overall, the *Roadmap* is a positive step in the ACT's commissioning reform process. It provides a valuable framework for continuing our discussions and cooperation on commissioning reform – a process that we all hope will lead to improved outcomes for vulnerable Canberrans and the services that support them.

ACTCOSS would be happy to host a meeting with key representatives from the ACT Government involved in the commissioning and procurement reform project and members of ACTCOSS to discuss this response, the *Roadmap* and next steps.

Yours sincerely



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