

14 November 2023

Secretariat
Community Services Advisory Group
GPO Box 9820
Department of Social Services
CANBERRA ACT 2601



Sent via email: CSAGSecretariat@dss.gov.au

Dear Secretariat

Re: A stronger, more diverse, and independent community sector

Thank you for the opportunity to provide a submission to the Department of Social Services (DSS) to explore opportunities to better support Australian communities through the design and administration of grants to the community services sector.

ACON is Australia's largest health organisation specialising in community health, inclusion and HIV responses for people of diverse sexualities and genders. While much of ACON's work is NSW focused, we work closely with the DSS on several national initiatives and programs, including:

- ACON has received DSS funding for our Primary Prevention National Campaign work since 2020. These campaigns have so far reached more than 14 million people and combatted sexual, domestic and family violence by showcasing and celebrating healthy, happy and secure LGBTQ+ relationships. The campaigns aim to foster positive personal identities and relationships and challenge cisgenderism, heteronormativity, shame and stigma in our communities and broader society.
- ACON was funded by the DSS to expand the *Say It Out Loud* website nationally. Say It Out Loud is the only national online sexual and DFV resource for LGBTQ+ people, professionals and allies, creating a safe and inclusive space for people to seek support, information and services. During 2022-23, Say It Out Loud delivered blog posts, added new services and resources, distributed over 1300 printed resources to services across Australia, and recorded over 42,376 unique views.
- The DSS funds ACON's work supporting LGBTQ+ people with disability to access information and capacity building related to the NDIS, through a project which began in 2019. In 2023/24, ACON will deliver virtual workshops to support LGBTQ+ people with disability nationally to build advocacy skills and navigate the NDIS.
- The DSS provides funding for ACON's Community Visitors Scheme, which provides much-needed social support to older LGBTQ+ adults experiencing loneliness or isolation. Trained volunteers make weekly or fortnightly one-on-one visits to older LGBTQ+ people for social interaction and support.
- ACON also have an active role consulting on projects led by the DSS. This includes ACON's work as a member of the National Plan Advisory Group, advising on the development and implementation of the *National Plan to End Violence against Women and Children 2022-2032*.

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ACON has reviewed the issues paper titled 'A stronger, more diverse and independent community sector' and has developed responses to the questions raised in each focus area of the paper:

Focus Area 1: Giving the sector the voice and respect it deserves through a meaningful working partnership.

To ensure that the sector is given a voice and the respect it deserves through a meaningful working partnership, ACON believes that an LGBTQ+ organisation should be invited to join the Community Services Advisory Group (CSAG) to ensure that matters relevant to people of diverse sexualities and genders are properly addressed. This would be an important first step to ensure that organisations are adequately represented in decision making processes undertaken by the DSS.

In order to recognise the value of the knowledge community sector organisations (CSOs) provide, CSOs should be paid for their participation in co-design and contracts should build feedback and advocacy work as deliverables within agreements.

It is also important that there are mechanisms in place to ensure that CSOs with important knowledge aren't excluded from co-design processes because of conflict of interest issues. ACON has seen instances where organisations have been excluded from advisory groups because of perceived conflicts of interest due to the possibility that organisations may wish to apply for grants. For co-design to work, it is important that the most knowledgeable are not excluded from participating.

To effectively streamline the sharing of information between government and CSOs, communication between Federal and State Government departments must also be streamlined. For example, both Federal and State departments have been working in the coercive control space and both have been developing LGBTQ+ fact sheets with similar purpose and content; both have asked ACON to provide feedback. If Federal and State Government departments worked more closely with one another, this would reduce the burden on CSOs working in this space, including organisations such as ACON.

ACON also believes streamlining communication would be beneficial if there was an intergovernmental or departmental register of consultations and co-design processes to reduce consultation fatigue. This register could also be searchable by public servants, so they are aware of who is talking to whom. Mechanisms to avoid double up would go a long way to streamline information sharing effectively.

Focus Area 2: Providing grants that reflect the real cost of delivering quality services

ACON believe that grants must allow for ongoing wage costings. Ideally, all grants should include the capacity to cost for a (portion of) a manager to support staff. ACON managers often work with multiple funding sources and manage staff in distinct project areas. Grant funding should better consider management costs to ensure the sustainability of programs.

Other administrative and overhead costs that are not always being considered in current grant funding include learning and development costs, particularly in complex areas such as domestic and family violence.

Additionally, the process of applying for grants in itself can be a significant resource drain for CSOs. For grants over a certain level of complexity, ACON would support a two-step process, whereby organisations can submit an outline of their idea, and if successful, move to a second round where we supply the detailed

information often requested such as comprehensive operational information and detailed budget breakdowns. This would reduce wasted time for CSOs such as ACON.

To determine where funds are needed most in order to ensure equitable and responsive distribution of funds, ACON recommends taking an intersectional approach and ensuring that place-based and community-based responses are funded. For example, it would be beneficial to analyse and report on the number of LGBTQ+ organisations receiving funding, and where that funding is targeted.

Focus Area 3: Providing longer grant agreement terms

To ensure adequate and flexible funding, ACON believes that grants should ideally be five years in length, or at the very least, three years. Short-term grants make it more challenging to plan ahead and recruit suitably qualified staff when they aren't offered long-term employment.

Five-year grant periods should also allow CSOs to provide details about grant activities and program commitments one or two years in advance. This allows better future planning and means that organisations such as ACON can continue to be responsive to community needs.

ACON believes there should be greater flexibility to allocate funds across financial years as needed. For example, the first year of a two-year grant may involve less costs as implementation has yet to begin. However, there is an assumption contained within many grants that we will spend equal amounts each year. It would be beneficial to have the freedom to spend less during the planning phase and more during implementation without having to go through complex roll over processes.

ACON also believe it would be beneficial for some grants for the DSS to more clearly articulate the goals and purposes of the grants, and ask for demonstrated alignment with the general goals/purposes rather than the specific activities in the original agreement. This would mean there is flexibility to respond to dynamic and evolving community needs.

Focus Area 4: Ensuring grant funding flows to a greater diversity of Community Service Organisations

To ensure the government makes opportunities available for new and emerging organisations to access funding, it is important that the DSS takes a targeted intersectional approach to ensure LGBTQ+ organisations are funded across the country, prioritising community-led organisations, and being accountable for this prioritisation.

Issues/community-based communities of practice are a valuable way for emerging organisations to hear about funding and learn about effective grant administration (for example an LGBTQ+ communities of practice). The DSS has a role to play to ensure these are adequately supported.

The DSS must recognise the importance of smaller CSOs and the barriers they face. Barriers for smaller CSOs include limited funding, and grants are often small so meaningful partnerships between smaller CSOs and larger CSOs can be difficult. It is important to recognise the time it takes to nurture and support smaller organisations to engage in meaningful partnerships and service delivery, and that time isn't always accounted for in grant funding.

Focus Area 5: Partnering with trusted community organisations with strong local links

ACON supports place-based funding and believes it is crucial to address a range of issues. However, it should not be done at the expense of community-based approaches. There must be programs and activities that support LGBTQ+ communities who are spread across Australia.

Thank you again for the opportunity to provide our thoughts on what is needed to support a more robust, more diverse and independent community sector. We welcome any further opportunities to work with the DSS to achieve this. If you require more information about our submission, please do not hesitate to contact Nicolas Parkhill AM, CEO, at nparkhill@acon.org.au or on 02 9206 2122.

Kind regards



Nicolas Parkhill AM
Chief Executive Officer