



# TasCOSS' Response to the Review of DHHS-funded Peak Bodies

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The Tasmanian Council of Social Service (TasCOSS) welcomes the review of Tasmanian DHHS funded peak bodies and the development of a peak body strategic framework. We believe that role of the peaks is inconsistently understood within government and that the review provides a valuable opportunity to examine the functions performed by peaks and the basis upon which funding should be allocated.

Much of TasCOSS' response to the review is contained in the attached Peaks Common Points of Agreement (Attachment A), but TasCOSS specific comments and some further issues of interest are addressed here.

### **TasCOSS' role as an advocate across government**

We welcome the fact that the review report recognises TasCOSS' role as the industry-wide peak body. It should be noted however that there are two key elements to TasCOSS mission. These roles are:

- i) to provide a voice for Tasmanians affected by poverty and inequality, and
- ii) to act as a peak industry council for the community service organisations that serve, support and work for them

This report has focused on TasCOSS and other DHHS funded peaks roles in terms of serving as industry peaks, but largely ignored their roles as bodies which represent the interests of disadvantaged population groups in Tasmania. TasCOSS firmly believes that the Tasmanian Government provides TasCOSS with CORE funding to be an advocate for low-income Tasmanians across all government portfolio areas.

The implications of this dual role include that;

- o TasCOSS has both individual and organisational membership
- o Any measure of TasCOSS' performance needs to include its performance in terms of influencing policy outcomes for Tasmanians affected by poverty and inequality
- o TasCOSS works across all government departments, and this needs to be recognised in its CORE contract
- o TasCOSS funding should not be primarily based on or derived from its industry membership

A further implication of this dual role is that TasCOSS' contract should not sit with the Office for the Community Sector. The Office for the Community Sector is primarily concerned with community sector industry policy and strategic development and not State Government social policy. While it makes sense for TasCOSS industry development contract to sit with DHHS it does not make sense for our CORE contract.

TasCOSS proposes that the logical contract management point is the Deputy Secretary for Human Services position. TasCOSS engages significantly with the Deputy Secretary position on key social policy issues relating to housing, disability, children and families, youth justice and, importantly, whole of

government areas such as the development of Child and Family Centres and the Kids Come First project. TasCOSS also believes the Deputy Secretary is in a better position to recognise the whole of government purpose of TasCOSS CORE funding.

### **Adequacy of funding**

One of the central flaws of the review was the lack of analysis of funding levels and the relationship between existing funding levels and the roles and responsibilities of peak bodies. TasCOSS has recently made a submission to the State Government about its CORE funding, as we believe that at \$260,000 TasCOSS' CORE funding is inadequate and will soon be less than the core funding of a number of other Tasmanian community service peak bodies. TasCOSS believes that the renewal of its three year service agreement with the DHHS provides an opportunity for this situation to be rectified and we look forward to discussing this with DHHS.

### **Proposed funding mechanism**

TasCOSS does not support a funding model based on compulsory membership by DHHS funded agencies. Under the current voluntary model, organisations choose TasCOSS membership on the basis of the work done by the peak body and representation of their interests. Membership fees provide a source of income separate to DHSS funding and assist in ensuring TasCOSS autonomy in its dealings with government.

Under a compulsory membership structure with membership funded by DHHS, there would be no truly independent funding provided to the organisation.

### **Reframing the Strategic Peak Body Framework to recognise the civil society and systems value of peak bodies**

TasCOSS welcomes the fact that the Department is seeking to establish a framework for peak bodies. However, TasCOSS is concerned that the review is taking a reductionist perspective that tends to prioritise and limit peak bodies in relation to DHHS business unit areas.

TasCOSS believes that there is significant evidence to support the critical role of peak bodies as civil society organisations that work across government areas, engage with the community, and contribute to the vibrancy of public debate and discussion. The democratic role of peak bodies, as civil society actors, should not be lost in the attempt to design a coherent DHHS funding framework.

TasCOSS in collaboration with all other state-based Councils of Social Service is providing a submission to the Productivity Inquiry into the Not For Profit sector in relation to the civil society contribution and value of peak bodies. The inquiry is looking at the value and contribution of the Not For Profit sector, and the outcomes of the inquiry should inform DHHS' and the Tasmanian Government's thinking about how it supports the Not For Profit Sector.

From a systems perspective, TasCOSS is concerned that the review tends to consider peak bodies solely in relation to DHHS business units. This creates a silo approach, which doesn't recognise the way in which community organisations work across many areas, but more importantly the degree to which many of the service system issues affecting clients cut across more than one business unit, and require peak bodies to engage across the service system.

An example of the way in which the review silos peak bodies, and doesn't recognise the systems value of peak bodies, is the fact that it suggests that the Tasmanian Association of Community Houses (TACH) be subsumed into a children and families peak. TasCOSS does not support this and our view is clearly articulated in Attachment A.

### **A consumer peak**

TasCOSS welcome the proposal for a consumer peak. We have some concerns that the broad ambit of such a peak would mean that some consumer issues and potentially those relating to the most disadvantaged groups could be marginalised.

### **Public tendering**

We oppose a public tendering process for peak bodies on the basis that this would not achieve the best outcomes for DHHS or the sector to be represented.

### **Research**

As indicated in the attached document, TasCOSS believe that research should be recognised as a core function of DHHS funded peaks and that as such peaks should be funded to pursue their own research priorities. In addition to individual funding being provided, TasCOSS see scope for a collaborative multi-sectoral mechanism to provide a valuable role in determining research priorities for the sector. It is important however that sector research priorities be determined by the sector rather than by DHHS. Research priorities will determine the areas in which policy change is driven and thus if peaks are to provide truly independent contributions to DHHS policy formulation then they should be provided the autonomy to determine research priorities.

TasCOSS has recently released the *Just Scraping By? Conversations with Tasmanians on low incomes* report, based on research into the nature of poverty in this state. With this report TasCOSS seek to ensure that Tasmanian government policy making is responsive to the realities of the very large number of Tasmanians living on low incomes whose interests this peak is funded to represent. There is no guarantee that if research priorities were to be jointly determined by government and the sector such research, which does not respond to any defined DHHS target group, would be approved.

It is agreed that a form of community sector research council could be situated with TasCOSS, however it is suggested that council membership

should be limited to community sector peak bodies. The council could seek agency and academic input as required to inform its research agenda.

### **A Partnership Agreement**

TasCOSS believes that the development of a Partnership Agreement between the Tasmanian Government and the community sector is appropriate. We do not support a Compact between DHHS and the community sector, as the evidence from every other jurisdiction is that an agreement needs to be with Government and not a department. TasCOSS also believes that an agreement between the State Government and sector must have an agreed implementation plan.

TasCOSS notes that the Minister for Human Services has recently committed to discussing the idea of a Partnership Agreement with her colleagues.

### **A criticism of the review**

The Peaks Review did not include any significant consultation with the membership of peak bodies. TasCOSS believes this is a significant omission, and distorts the information the consultants had to base their report on.

# Attachment A

Peaks common points of agreement in relation to the recommendations of the review of DHSS funded peak bodies

## **Organisations :**

- Tasmanian Council of Social Service (TasCOSS)
- Shelter Tasmania
- Tasmanian Association of Community Houses (TACH)
- Alcohol and other Drug Council (ATDC)
- Mental Health Council of Tasmania (MHCT)
- Family Support Services Association (FSSA)
- Youth Network of Tasmania (YNOT)
- Multicultural Council of Tasmania (MCoT)

While each of the peaks identified above will be preparing their own responses to the review, the following elements are common to their response to the recommendations made by the review consultants.

## **Defining characteristics of a peak body**

The peaks agree with the characteristics identified as pre-requisites for DHHS peak body funding.

## **Agreed Core Functions**

The peaks listed agree that the core functions of DHHS funded peak bodies should include the five core functions listed, but believe that the following functions should also be recognised as core functions:

- i) Research
- ii) Capacity building
- iii) Community Education

### *Research*

Research is fundamental to good policy development and effective advocacy which contributes to better decision making by government agencies. The close relationship that peaks enjoy with agencies engaged in direct service provision place them in a unique position to undertake research in relation to client and industry needs, best practice and innovative models of service provision.

In a rapidly changing environment for community service organisations it is essential that peaks have the skills, capacity and flexibility to conduct research which provides the knowledge base upon which to develop effective local solutions.

### *Capacity building*

It is very surprising that the review authors do not identify the work of supporting member agencies to become stronger, more responsive and effective service delivery organisations as a core function of a peak body. Effective capacity building requires an enduring relationship of trust, effective communication and some sense of common purpose. Peak bodies are ideally situated to facilitate capacity building in member organisations.

### *Community Education*

Part of the advocacy and policy development role of peaks is an educative role, with government agencies, with member organisations, but also with the Tasmanian community. Part of achieving better outcomes for people with disabilities and people living on low incomes, for example, is to counter disinformation about these groups and to assist communities to understand their needs. Community support enables governments to act more progressively.

### **Strategic framework for peak bodies**

The peaks structure recommended appears to be based on DHHS agency structure and associated reporting mechanisms. A preferred structure would be one based on community and community sector need.

### **Establishment of a children's and families peak**

A properly resourced peak in this area is vital. It is however an area that covers an incredible scope and raises some concerns.

It would seem that one possibility that can be interpreted from the report is that the role of TACH, the peak body for Neighbourhood & Community Houses in Tasmania, may be incorporated within a children's and families peak body. This would appear to be an absurd construction based on administrative efficiency and ignoring the unique role and value of the community house network.

Such a proposal negates the very effective role TACH plays for its member Neighbourhood Houses and the communities they support. The current DHHS and whole of government agenda has a strong focus on building stronger and more inclusive communities. TACH has a fundamental role in enabling community building in many of Tasmania's most disadvantaged communities.

The needs of young children and young people aged 12-21, for example, are very different. This is reflected in the specialisation of services in relation to these different age groups. Youth needs, and the youth justice policy area are not named in the report. It would be of concern if it were proposed that the role of the current youth peak YNOT were to be subsumed within the children and families peak.

Developing effective policy and service responses to young people (as opposed to children) is one of our most serious challenges as a community.

There is a real danger that youth advocacy would be diminished within a children and families peak and that an effective voice for young people would be lost.

### **Industry-based funding model**

The recommended industry membership funding model is not supported by the peaks.

Many of our members are not DHHS funded organisations and therefore such a contribution method does not account for their membership.

This funding model does not reflect the dual role of many peaks. The constitutions of many DHHS funded peaks provide that they have the role of representing the interests of their member organisations and to advocate on behalf of a particular group of Tasmanians (eg people on low incomes, people with a mental illness). Sometimes there will be tension between these roles. A funding model that is based on meeting the needs of member organisations only has the potential of minimising peaks work in advocating on behalf of disadvantaged population groups.

Such a model would undermine the independence of peak bodies and the accountability of peak membership structures. Under a voluntary membership scheme funded by members, peaks need to demonstrate that they are responsive to the needs of their members and performing a role that is expected by them. In some cases this may mean being a strong advocate for members interests to DHHS and government.

If all DHHS funded agencies were required to be members of peaks and membership fees were allocated by DHHS as part of members funding arrangements, ultimate accountability is to DHHS, not to members.

Peak bodies are expected to be independent advocates for their members and identified population groups. The implications of the report are that peaks are being tied to DHHS structures and outcomes, not the outcomes sought by peaks members or the groups they represent.

The funding model assumes that peaks will be able to seek outside donations and resources and that is not realistic, any philanthropic corporates are going to focus on service delivery not donating to peaks

### **Level of Funding**

There is no analysis in the review report of the level of funding required to fulfil the core functions of peaks. This needs to be the first step in determining the amount of funding required.

The amount of \$1.5m is inadequate for DHHS funded peaks to fulfil their core functions. The report notes the current difficulties that peaks face in fulfilling their roles on limited budgets. If the recommendations of this report are adopted and peaks are subject to much more stringent performance criteria, they must be funded to a level that realistically enables them to perform the roles expected of them. This includes sufficient funding to be able to attract and retain appropriately skilled staff.