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10 June 2021

Dear Fiona,

Thank you for your email of 4 May 2021 inviting comments and feedback on the draft *ACT Approach to Commissioning* document. The Youth Coalition of the ACT and Families ACT welcome this opportunity and are providing a joint response.

We would like to commend the ACT Health Directorate (ACTHD) and Community Services Directorate (CSD)'s ongoing commitment to the commissioning reform process in the Territory. Since the beginning of the engagement process for this important reform, we have both, jointly and individually, provided input and advice to yourself, the Minister and staff from both Directorates. We will continue to do so in the future.

We agree in principle with the definitions of commissioning and coproduction proposed on page 2 of the draft document, however we recommend the meaning of terms under collaborative design are clarified and more tightly defined elsewhere. In particular, what is meant by "demonstrably representative" and "shared decision making".

We also agree with the shared vision of the *ACT government's approach to commissioning* and the shared principles of commissioning practice.

However, we think the list of success factors may be too long and ambitious, risking setting commissioning up for failure from the outset, or at least jeopardising its success by having too many exacting factors. Not all these factors are achievable at the same time and some will take longer to achieve than others. We recommend re-ordering and staggering the factors into short, medium and long term to be able to allow effective assessment of the success of commissioning over the coming years.

Some factors seem to be prerequisites of others and mutually reinforce each other such as DIRECTLY LINKED investment, funding reflecting the TRUE AND FULL COST and providing CERTAINTY for community partners. By staggering the success factors and acknowledging that some will take longer to achieve than others, the expectations of what constitutes successful commissioning can be reframed, re-set and ultimately more effectively measured.

We also believe that the listed success factors omit the importance of workforce development and ongoing service improvement which is vital for the overall success of commissioning. A stable, satisfied, high-quality, inclusive, well trained and well supported workforce is integral to commissioning in the Territory.

In addition, we suggest:

- The word “learning” in the fourth bullet point should be changed to upper case to acknowledge the importance of ongoing and continuous learning in addition to innovation. The bullet point should read: “We welcome INNOVATION and support LEARNING to build new capabilities across government and sectors.”
- With the 8th bullet point needs clarification. For example, if investment is only DIRECTLY LINKED to improved outcomes for people and communities, there is a risk of not valuing less tangible, but essential outcome contributors such as networking and engagement. It is dangerous linking funding to outcomes without accounting for target groups and complexity of work.
- The 11th bullet point should be amended to also reflect proportionality in relation to funding and should read: “Reporting requirements are PROPORTIONAL to the amount of funding and the policy outcomes being sought. Requirements need to be valid, relevant and informative”. Higher funding shouldn’t necessitate more reporting. We believe “proportional” needs to be clarified and clearly defined.

Families ACT and the Youth Coalition of the ACT support a staged approach to commissioning ensuring that community and health sector partners are able to go on this journey together in a supportive, understanding and trusting environment.

We are also supportive of the common language and common approach and confirm that, in addition to our comments above, the draft document reflects our overall understanding and aspirations of our organisations of commissioning. We look forward to the joint roadmap and timeline providing more detail on the commissioning and procurement process over the next 12 months. If you need further clarification, please don’t hesitate to contact us.

Kind Regards

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Families ACT

Dr Justin Barker
Executive Director
Youth Coalition of the ACT