



30 WAYS TO MAKE CANBERRA FAIRER

ACTCOSS Submission to the ACT Budget 2007-2008

November 2006



ABOUT ACTCOSS

ACTCOSS acknowledges Canberra has been built on the traditional lands of the Ngunnawal people. We pay our respects to their elders and recognise the displacement and disadvantage traditional owners have suffered since European settlement. ACTCOSS celebrates the Ngunnawal's living culture and valuable contribution to the ACT community.

The ACT Council of Social Service Inc. (ACTCOSS) is the peak representative body for not-for-profit community organisations, people living with disadvantage and low-income citizens of the Territory. ACTCOSS is a member of the nationwide COSS network, made up of each of the state and territory Councils and the national body, the Australian Council of Social Service (ACOSS).

ACTCOSS' objectives are representation of people living with disadvantage, the promotion of equitable social policy, and the development of a professional, cohesive and effective community sector.

The membership of the Council includes the majority of community based service providers in the social welfare area, a range of community associations and networks, self-help and consumer groups and interested individuals.

ACTCOSS receives funding from the Community Services Program (CSP) which is funded by the ACT Government.

ACTCOSS advises that this document may be publicly distributed, including by placing a copy on our website.

Contact Details

Phone: 02 6202-7200
Fax: 02 6247-7175
Mail: PO Box 195 Civic Square ACT 2608
E-mail: actcoss@actcoss.org.au
WWW: <http://www.actcoss.org.au>
Location: Jamieson House
43 Constitution Avenue
Reid ACT 2612

Director: Ara Cresswell
Manager Policy and Communications: Llewellyn Reynders
Policy Officer: Jacqueline Phillips

November 2006

© Copyright ACT Council of Social Service Incorporated

This publication is copyright, apart from use by those agencies for which it has been produced. Non-profit associations and groups have permission to reproduce parts of this publication as long as the original meaning is retained and proper credit is given to the ACT Council of Social Service Inc (ACTCOSS). All other individuals and Agencies seeking to reproduce material from this publication should obtain the permission of the Director of ACTCOSS.

30 WAYS TO MAKE CANBERRA FAIRER

<u>ABOUT ACTCOSS</u>	<u>2</u>
<u>30 WAYS TO MAKE CANBERRA FAIRER</u>	<u>3</u>
<u>DETAILED TABLE OF CONTENTS</u>	<u>5</u>
<u>ABBREVIATIONS</u>	<u>10</u>
<u>INTRODUCTION: TIME TO MOVE FORWARD AGAIN</u>	<u>11</u>
<u>PART A: MEETING THE NEED</u>	<u>13</u>
<u>SECTION 1: HOUSING AND HOMELESSNESS</u>	<u>13</u>
<u>Strategy 1: Invest in an accessible and diverse public housing system</u>	<u>14</u>
<u>Strategy 2: Increase the availability and quality of affordable housing</u>	<u>19</u>
<u>Strategy 3: Enhance homelessness services to meet social needs</u>	<u>22</u>
<u>Strategy 4: Support an effective community housing sector</u>	<u>25</u>
<u>SECTION 2: HEALTH AND AGEING</u>	<u>26</u>
<u>Strategy 5: Improve mental health services in the ACT</u>	<u>27</u>
<u>Strategy 6: Improve access to oral health care and nutritious food</u>	<u>31</u>
<u>Strategy 7: Improve the affordability and availability of primary and community health care for people experiencing disadvantage</u>	<u>33</u>
<u>Strategy 8: Commit to innovative harm minimisation alcohol and other drug programs and facilities</u>	<u>36</u>
<u>Strategy 9: Improve aged care services</u>	<u>37</u>
<u>SECTION 3: COMMUNITY AND MUNICIPAL SERVICES</u>	<u>38</u>
<u>Strategy 10: Address disadvantage and improve service access for people with disabilities</u>	<u>38</u>
<u>Strategy 11: Develop a public and community transport system that is accessible, safe, frequent and reliable</u>	<u>43</u>
<u>Strategy 12: Reduce the harm caused by problem gambling on families and communities</u>	<u>46</u>
<u>Strategy 13: Ensure sustainable resource strategies are equitable</u>	<u>47</u>
<u>SECTION 4: JUSTICE AND HUMAN RIGHTS</u>	<u>48</u>
<u>Strategy 14: Foster a corrections and police system that is respectful of human rights</u>	<u>48</u>
<u>Strategy 15: Improve the accessibility of the justice system for disadvantaged members of the community</u>	<u>50</u>
<u>Strategy 16: Foster a human rights culture in the ACT premised on the indivisibility and enforceability of human rights</u>	<u>52</u>

<u>Strategy 17: Reduce violence against women in the ACT and improve support to women who experience violence</u>	<u>53</u>
<u>SECTION 5: EDUCATION, TRAINING AND EMPLOYMENT</u>	<u>54</u>
<u>Strategy 18: Provide a quality public education system that is accessible, inclusive and supportive of disadvantaged students</u>	<u>54</u>
<u>Strategy 19: Improve education and training services for disadvantaged social groups</u>	<u>57</u>
<u>Strategy 20: Examine and address the social and economic impacts of the Federal industrial relations reforms in the ACT</u>	<u>58</u>
<u>Strategy 21: Expand post-secondary training and employment options for people with disabilities.</u>	<u>59</u>
<u>Strategy 22: Expand employment opportunities and support services for mental health consumers.</u>	<u>60</u>
<u>PART B: SUPPORTING THE SYSTEM</u>	<u>62</u>
<u>SECTION 6: COMMUNITY SECTOR VIABILITY</u>	<u>62</u>
<u>Strategy 23: Improve the viability of the community sector workforce</u>	<u>64</u>
<u>Strategy 24: Ensure that community organisations have equitable access to safe and appropriate premises</u>	<u>69</u>
<u>Strategy 25: Improve community sector funding arrangements</u>	<u>73</u>
<u>Strategy 26: Support the development of an innovative, diverse and independent community sector</u>	<u>76</u>
<u>Strategy 27: Respect and support the role of community sector peaks and representative bodies</u>	<u>79</u>
<u>SECTION 7: PUBLIC SECTOR EFFECTIVENESS</u>	<u>82</u>
<u>Strategy 28: Improve access to ACT Government services</u>	<u>83</u>
<u>Strategy 29: Expand the capacity of the Public Sector</u>	<u>86</u>
<u>Strategy 30: Enhance accountability and counterbalance fiscal policy</u>	<u>89</u>

DETAILED TABLE OF CONTENTS

<u>ABOUT ACTCOSS</u>	<u>2</u>
Contact Details	2
<u>30 WAYS TO MAKE CANBERRA FAIRER</u>	<u>3</u>
<u>DETAILED TABLE OF CONTENTS</u>	<u>5</u>
<u>ABBREVIATIONS</u>	<u>10</u>
<u>INTRODUCTION: TIME TO MOVE FORWARD AGAIN</u>	<u>11</u>
<u>PART A: MEETING THE NEED</u>	<u>13</u>
<u>SECTION 1: HOUSING AND HOMELESSNESS</u>	<u>13</u>
<u>Strategy 1: Invest in an accessible and diverse public housing system</u>	<u>14</u>
Expand the public housing stock	14
Ensure public housing is well located, accessible and interspersed with private housing	15
Make certain that joint ventures meet social needs and do not erode overall public housing stock	16
Establish fair and equitable eligibility criteria	16
Retain security of tenure	17
Ensure debt management strategies are appropriate	18
Commit to supportive and non-punitive housing policies for people with high and complex needs	18
<u>Strategy 2: Increase the availability and quality of affordable housing</u>	<u>19</u>
Explore tax incentives that support the expansion of private rental properties	20
Introduce inclusionary zoning to augment the supply of affordable housing	20
Conduct research to maintain up-to-date data on housing affordability	21
Legislate to prevent rental auctions	21
Introduce minimum standards for rental properties	21
<u>Strategy 3: Enhance homelessness services to meet social needs</u>	<u>22</u>
Resource the homelessness sector to cater for people with high and complex needs, and provide homelessness prevention and tenure maintenance services	23
Improve options for people exiting homelessness services	23
Ensure homelessness agencies have access to independent sector development services	24
<u>Strategy 4: Support an effective community housing sector</u>	<u>25</u>
Resource community housing providers appropriately	25
Support a diversity of community housing providers	25
<u>SECTION 2: HEALTH AND AGEING</u>	<u>26</u>
<u>Strategy 5: Improve mental health services in the ACT</u>	<u>27</u>
Increase funding for the new youth prevention and recovery ('step-up/step-down') facility and establish an adult facility	28
Fund Individual Care Packages ('wrap-around' services) for mental health consumers	29
Increase support for community-based psychosocial rehabilitation services	29
Develop practical strategies and allocate funding to implement the Government's PPEI Action Plan	29

<u>Develop a new acute-care mental health facility based on a community care model</u>	<u>30</u>
<u>Improve awareness about mental illness through public information campaigns</u>	<u>30</u>
<u>Ensure that consultation with mental health consumers and carers is inclusive, broad, accessible and meaningful</u>	<u>31</u>
<u>Strategy 6: Improve access to oral health care and nutritious food</u>	<u>31</u>
<u>Improve access to dental health care for disadvantaged members of the community</u>	<u>31</u>
<u>Explore and develop innovative and empowering strategies to improve access to nutritious food for those experiencing disadvantage</u>	<u>32</u>
<u>Examine the implications of existing food regulation and handling provisions for community food providers</u>	<u>33</u>
<u>Strategy 7: Improve the affordability and availability of primary and community health care for people experiencing disadvantage</u>	<u>33</u>
<u>Improve access to primary health care by addressing economic, capacity and physical barriers</u>	<u>33</u>
<u>Improve access to primary health care for mental health consumers as a core aspect of the PPEI Strategy</u>	<u>34</u>
<u>Ensure that disadvantaged members of the community can access affordable after-hours care</u>	<u>34</u>
<u>Address indigenous health inequality by increasing support for indigenous health services</u>	<u>35</u>
<u>Provide free access to medical, psychological and support services for all refugees and asylum seekers</u>	<u>35</u>
<u>Improve cultural awareness within government and community health services</u>	<u>36</u>
<u>Strategy 8: Commit to innovative harm minimisation alcohol and other drug programs and facilities</u>	<u>36</u>
<u>Improve and expand drug and alcohol rehabilitation services in the ACT</u>	<u>36</u>
<u>Devote specific resources to dual diagnosis services, training and sector development</u>	<u>37</u>
<u>Strategy 9: Improve aged care services</u>	<u>37</u>
<u>Fund designated aged care beds in public hospitals</u>	<u>37</u>
<u>Support community-based convalescent facilities</u>	<u>38</u>
<u>SECTION 3: COMMUNITY AND MUNICIPAL SERVICES</u>	<u>38</u>
<u>Strategy 10: Address disadvantage and improve service access for people with disabilities</u>	<u>38</u>
<u>Examine the relationship between disability and poverty, with a view to developing strategies to alleviate disadvantage for people with disabilities</u>	<u>38</u>
<u>Respect and promote the human rights of people with disabilities to access public buildings and services, to be free to relocate and to be involved in the community</u>	<u>40</u>
<u>Allocate targeted funding to service areas of high unmet need</u>	<u>41</u>
<u>Examine and review user-pays and eligibility criteria service-delivery trends</u>	<u>42</u>
<u>Strategy 11: Develop a public and community transport system that is accessible, safe, frequent and reliable</u>	<u>43</u>
<u>Improve transport equity in the ACT by increasing the frequency of and access to public transport services</u>	<u>43</u>
<u>Increase the number of wheelchair accessible buses in the ACT</u>	<u>44</u>
<u>Review funding conditions to community transport services to maintain service flexibility</u>	<u>45</u>
<u>Ensure community paths are accessible to everyone</u>	<u>45</u>
<u>Strategy 12: Reduce the harm caused by problem gambling on families and communities</u>	<u>46</u>
<u>Commit to a reduction in poker machine numbers in the ACT</u>	<u>46</u>
<u>Support problem gambling support services</u>	<u>46</u>

Strategy 13: Ensure sustainable resource strategies are equitable	47
<u>Ensure that sustainable resource strategies do not adversely affect disadvantaged consumers</u>	47
<u>Examine the appropriateness of existing concessions</u>	48
SECTION 4: JUSTICE AND HUMAN RIGHTS	48
Strategy 14: Foster a corrections and police system that is respectful of human rights	48
<u>Foster a human rights culture in the new prison, respectful of prisoner support networks and ensuring access to health services</u>	48
<u>Extend public consultation and establish accountability mechanisms to oversee the prison's development and operation</u>	49
<u>Improve the capacity of the police force to respond appropriately in situations involving members of vulnerable groups</u>	49
Strategy 15: Improve the accessibility of the justice system for disadvantaged members of the community	50
<u>Ensure that the reform of legal and regulatory tribunals and services in the ACT does not compromise accessibility or fairness</u>	50
<u>Improve the fairness of the Mental Health Review Tribunal process by ensuring institutional integrity and improving access to representation</u>	50
<u>Increase support to free legal and advocacy services</u>	51
Strategy 16: Foster a human rights culture in the ACT premised on the indivisibility and enforceability of human rights	52
<u>Invest in the creation of a human rights culture in the ACT</u>	52
<u>Ensure that reforms to the Human Rights Commission do not undermine access and fairness</u>	52
Strategy 17: Reduce violence against women in the ACT and improve support to women who experience violence	53
<u>Increase funding to domestic violence and sexual assault support services</u>	53
<u>Increase public information about violence against women</u>	54
SECTION 5: EDUCATION, TRAINING AND EMPLOYMENT	54
Strategy 18: Provide a quality public education system that is accessible, inclusive and supportive of disadvantaged students	54
<u>Examine and review the impact of the ACT schools reforms on disadvantaged students, family and student health and wellbeing and community cohesion</u>	54
<u>Improve and extend the schools reforms consultation process by making all relevant information publicly available, including socio-demographic analysis</u>	55
<u>Review proposals to reduce the number of counsellors in schools</u>	56
Strategy 19: Improve education and training services for disadvantaged social groups	57
<u>Improve indigenous education and training programs</u>	57
<u>Improve education, employment and training services for refugees and TPV holders in the ACT</u>	57
<u>Resource specific skills-training programs for the aged population</u>	57
<u>Extend access to support staff for students with disabilities</u>	57
Strategy 20: Examine and address the social and economic impacts of the Federal industrial relations reforms in the ACT	58
<u>Distribute accessible information about the IR reforms to the community, targeting vulnerable social groups</u>	58
<u>Monitor and address the social and economic impact of the reforms on disadvantaged groups</u>	58

Strategy 21: Expand post-secondary training and employment options for people with disabilities.	59
Fund additional places in post-secondary training and employment programs	59
Explore innovative employment models for people with a disability	59
Direct resources to ensuring that the ACT Government is a model employer for people with a disability	59
Enhance the capacity of the community sector to provide employment and volunteer opportunities for people with disabilities	60
Strategy 22: Expand employment opportunities and support services for mental health consumers.	60
Develop support programs and employer awareness training to improve workforce participation and supportive work environments for mental health consumers	60
Develop innovative employment programs for mental health consumers	61
PART B: SUPPORTING THE SYSTEM	62
SECTION 6: COMMUNITY SECTOR VIABILITY	62
Strategy 23: Improve the viability of the community sector workforce	64
Ensure that community organisations are able to recruit, train and retain an adequate workforce	64
Provide adequate resources and support for community organisations to reduce the gap in pay and conditions	66
Support the further development of a diverse community sector workforce	67
Assist organisations to meet their health and safety obligations to employees, consumers and volunteers	68
Strategy 24: Ensure that community organisations have equitable access to safe and appropriate premises	69
Increase the availability of space for community organisations to operate, particularly in Civic and the Town Centres	69
Improve the quality and appropriateness of community facilities	70
Ensure the costs of facilities are appropriately recognised in funding arrangements and access to capital	71
Plan for the future development of community facilities	72
Strategy 25: Improve community sector funding arrangements	73
Ensure indexation is applied consistently across the community sector	73
Complete and implement core pricing principles for community sector funding	74
Improve negotiation and the consistency of funding management	74
Ensure transparency in funding decisions	75
Strategy 26: Support the development of an innovative, diverse and independent community sector	76
Promote independence and reduce interventionism in the operations of community sector organisations	76
Support community organisations to build their capacity and ability to innovate	76
Ensure there are appropriate opportunities for collaboration and information-sharing between organisations and with government	77
Support a diverse and flexible community sector	78
Strategy 27: Respect and support the role of community sector peaks and representative bodies	79
Provide appropriate funding for systemic advocacy, policy development and research	80
Ensure that consumers and carers have appropriately resourced representative organisations to assist them in individual and systemic advocacy	80
Continue support for the development of an indigenous representative body	81

SECTION 7: PUBLIC SECTOR EFFECTIVENESS	82
Strategy 28: Improve access to ACT Government services	83
Ensure services are not too narrowly targeted	83
Remove barriers to access	84
Implement effective complaints mechanisms and individual advocacy services	85
Strategy 29: Expand the capacity of the Public Sector	86
Ensure that the ACT Government has sufficient resources to develop effective social policy	86
Ensure effective linkages between government agencies and address 'siloining' between departments	87
Ensure consultation is effective and meaningful	88
Strategy 30: Enhance accountability and counterbalance fiscal policy	89
Ensure revenue is sufficient to meet social needs	89
Improve reporting arrangements, including gender auditing	89

ABBREVIATIONS

ABS	Australian Bureau of Statistics
ACOSS	Australian Council of Social Service
ACT	Australian Capital Territory
ACTCOSS	ACT Council of Social Service Incorporated
ACTPLA	ACT Planning and Land Authority
AIHW	Australian Institute of Health and Welfare
ANZSIC	Australia and New Zealand Standard Industrial Classification
CALD	Culturally and Linguistically Diverse
CALMS	Canberra After Hours Locum Medical Services
CDSMC	Community and Disability Services Ministerial Council
CFNA1	ACT Community Facilities Needs Assessment (Central Canberra, Belconnen and Gungahlin)
CFNA2	Community Facilities Needs Assessment Report for Stage 2 (Tuggeranong, Weston Creek and Woden)
Costello Review	The Strategic and Functional Review of the ACT Public Sector and Services, prepared by Mr Michael Costello
CST Report	Towards a Sustainable Community Sector in the ACT: The Report of the Community Sector Taskforce
CSTDA	Commonwealth State Territory Disability Agreement
DHCS	Department of Disability, Housing and Community Services
GP	General Practitioner
HACC	Home and Community Care
JCGRG	Joint Community-Government Reference Group
ICT	Information and Communications Technologies
ICESCR	International Covenant on Economic Social and Cultural Rights
IR	Industrial Relations
NATSEM	National Centre for Social and Economic Modelling, University of Canberra
NCOSS	NSW Council of Social Service
NCVER	National Centre for Vocational Education Research
NGO	Non-Government Organisation
NSW	New South Wales
OH&S	Occupational Health and Safety
PPEI	Promotion, Prevention and Early Intervention
PPPs	Public-Private Partnerships
ROCKS	Residents of Childers and Kingsley Streets
RSRP	The Right System for Rights Protection
SACS Award	Social And Community Services (ACT) Award 2001
TPV	Temporary Protection Visa

INTRODUCTION: TIME TO MOVE FORWARD AGAIN

The 2006-07 ACT Budget signalled a significant shift in ACT Government fiscal policy. The ramifications of the expenditure cuts and structural changes have had immediate negative impacts on public and community agencies. Some of these will have long-term consequences. ACTCOSS has repeatedly voiced its concerns about the fiscal reforms, believing that they could have been more appropriately staged and diversified. We now seek an ACT Government commitment to re-prioritise the provision of social services to the community.

The new and sudden emphasis on fiscal policy in the last budget reflected a departure from some existing core Government policies and strategies. This has caused considerable concern and frustration in the community sector and the broader public. Commitments that were previously considered unequivocal now appear to have been 'non-core' promises, at least in the short-term. The Chief Minister described this situation in the following terms:

... some of the goals we set ourselves in [The Canberra Plan] may not be reached quite as swiftly as we would have liked. Some ambitions have had to be cooled. But the philosophy is intact. Our determination to build a community that allows every one of its members to reach their potential and engage fully, is undiminished.¹

ACTCOSS calls on the ACT Government to maintain this commitment, and refocus on its social goals in forthcoming budgets. We advise that the need for social services remains undiminished, and will need to be addressed to ensure that the aspirations enunciated in the Canberra Social Plan are achieved.

We are faced with a dynamic and destabilising social and political environment. In addition to the impact of Budget cuts, the Federal Government's 'Welfare-to-Work' and Industrial Relations reforms have been enacted. The federal reforms will increase demand for community services in the immediate and long-term future. The high cost of housing in the ACT continues to rise, depleting the resources of people living on low-incomes and creating barriers to addressing disadvantage. While the historically low unemployment levels in the ACT are undoubtedly positive, allowing some marginalised groups greater access to employment, the effects of skill shortages in the community sector are hampering effective service delivery. Community organisations are increasingly finding that they are unable to compete with wages and conditions offered in the public and private sectors.

We call upon the ACT Government to commit resources to:

¹ ACT Government (2006) Budget 2006-2007 Paper No.1 Speech, p.4

- Increase access to affordable and secure accommodation in an environment of high housing costs;
- Ensure equitable access to healthcare;
- Provide an appropriate range of community services to reduce disadvantage and fight poverty;
- Uphold human rights across government agencies, including the protection of economic, social and cultural rights;
- Improve access to education, training and employment;
- Support the development of a sustainable community sector; and,
- Promote an effective public sector.

This budget submission outlines 30 detailed strategies to achieve these aims. The over-arching theme, however, is to acknowledge the difficulties that have been caused by the substantial changes to the public sector and fiscal policy in the previous budget. The Government must commit to a return to the social equity principles previously espoused in order to build a community that enables all of its members to attain a decent quality of life.

ACTCOSS understands that community sector viability, public sector effectiveness and social policies and service areas are inter-connected. Changes in one area or sector can have significant external impacts, as evidenced by the ripple effects of recent public sector reforms. Nonetheless, the following submission is divided into Parts A and B, to correspond to a division between cross-portfolio and sector issues and specific portfolio areas.

The structure of the submission is consistent with our role as both a peak representative body for the community sector and as advocates for disadvantaged members of the ACT community. In Part A: Meeting the Need, we address key social policy portfolio areas, with a particular focus on the role of community organisations in service delivery and advocacy in Housing, Health and Ageing, Community and Municipal Services, Justice and Human Rights and Education. In Part B: Supporting the System, we address cross-sectoral and cross-portfolio issues with a view to enhancing community sector viability and public sector effectiveness. In both Parts, we detail general strategies and specific recommendations to inform funding allocations in the 2007-08 Budget.

PART A: MEETING THE NEED

SECTION 1: HOUSING AND HOMELESSNESS

A safe, secure and affordable home is the foundation of a person's life. Without it, people are at greater risk of any number of social problems, including homelessness, violence, problem drug and alcohol use, mental health difficulties, poor health and nutrition, and reduced access to education and employment. Without secure and affordable accommodation, these problems become more difficult to address, and regardless of their area of service, community organisations report that the lack of long-term housing for their consumers remains a major barrier to providing assistance.

After ACTCOSS had consistently nominated housing and homelessness services as among the highest priority issues for the ACT Government to address, we were dismayed to find that these areas were specifically targeted for cuts in the ACT Government's 2006-07 Budget. ACTCOSS believes that this was among the most harmful of the decisions made in that Budget, and urgently calls on the Government to redress some of the social damage caused by it. The ACT Government's attention to long-term planning for improved housing outcomes appears to have been disrupted by a sudden focus on fiscal policy, and it may take many years to redress the outcomes. Improving access to secure and affordable housing is a

long-term project, and needs sustained attention by the ACT Government.

Along with changes to the Federal Government's income support and industrial relations policies, the changes in housing affordability in Canberra may be affecting the distribution of poverty in the ACT. Services report to ACTCOSS that there is an increasing concentration of low-income households in some geographic areas of Canberra. ACTCOSS calls upon the ACT Government to examine demographic trends in the aftermath of recent reforms and to respond to minimise spatial income disparity in the ACT.

Strategy 1: Invest in an accessible and diverse public housing system

Public housing remains the most efficient means of providing secure accommodation for low income households in the ACT. Both the ACT Government's Affordable Housing Taskforce² and the ACT Auditor-General³ cited studies which have come to this conclusion. Public housing is also the most flexible low income housing option, as it can ensure higher levels of occupancy and be most effectively targeted at people in need. While other avenues for providing affordable housing are encouraged, this should not be at the expense of the public housing system.

The public housing system was a target of the 2006-07 Budget cuts. Some \$29.5 million was cut from the operating budget of Housing ACT over four years, with the result that the organisation is projected to generate a cumulative deficit of \$44.7 million over the same period. This level of operation is unsustainable and urgent action is required to reduce these deficits and their significant social cost. The Government has also provided for a \$12 million injection over 3 years into Housing ACT for capital acquisition. This is welcome, but still falls short of the \$30 million injection committed to by the Labor Party at the 2004 ACT

² ACT Government (2002) *Affordable Housing in the ACT: Report of the Ministerial Taskforce on Affordable Housing* (p.34)

³ ACT Auditor-General (2006) *Performance Audit Report: Public Housing* (p.18)

election. The ACT Government has stated that it will find the remaining \$18 million from within Housing ACT, but how this is to be achieved has never been explained. We presume that this may result from the sale of existing assets, such as the 500 properties being investigated for sale. If this is the case, this is simply a re-allocation of stock – not a new investment – and should not be portrayed as such. The 2006-07 Budget also announced a new policy to cease charging Housing ACT land tax, a decision that is very welcome.

While there is no indication that the proportion of people living in poverty is decreasing, the proportion of ACT dwellings in the public housing system continues to decline. One-in-six Canberra households depended on income support as their main source of income in 2003-04⁴, while fewer than one-in-ten dwellings were within the public housing system. There are few options for alternative housing in the current rental environment for this group, and as the population ages, the disparity is likely to worsen.

Expand the public housing stock

While there have been past capital injections into public housing, and rapid growth in the value of Housing ACT's portfolio, this has not translated into increased public housing stock due to losses through sale and redevelopment.

⁴ ABS (2005) *Household Income and Income Distribution, Australia* Data Cube Table 16

At the same time, the private housing market is booming. Rental prices, already very high, have continued to increase since the announcement of large increases in the public service in the most recent Federal Budget. New house development continues apace and the development industry continues to demand that more land is released.

Against this background, the inability of the public housing system to grow to meet the needs of the community is alarming. Investment in public housing, unlike areas requiring recurrent expenditure, expands the ACT Government's asset base, and is a significant factor in the ACT Government's AAA credit rating. Despite being able to attract relatively inexpensive finance, there is continued opposition to using debt financing to expand the public housing stock. ACTCOSS calls upon the Government to invest in public housing, a favourable investment to respond to an urgent social need, with a view to arresting the decline in the proportion of all dwellings within the public housing system.

Ensure public housing is well located, accessible and interspersed with private housing

The proposal to sell well-located public housing in central Canberra and purchase cheaper properties located more distantly from social services is not a useful policy response. Ensuring public housing is 'salt-and-peppered' throughout

the suburbs has always been a hallmark of Canberra's approach to public housing, and avoids the concentration of disadvantaged people and "ghetto" suburbs. While properties in Central Canberra are often "hard-to-let" and there is rising demand for properties in other areas, we would suggest that this is, in part, due to the fact that centrally located properties are disproportionately comprised of units in less desirable public housing estates. An improvement in the quality of centrally located dwellings would mean that residents would not have to trade off quality for access to transport and services. ACTCOSS similarly advocates that when public housing is purchased or constructed outside Central Canberra, it should be strategically located near Town and Group centres, and close to high-frequency bus services to ensure community inclusion and connection.

Existing housing stock does not generally meet the needs of people with physical disabilities. This group is particularly disadvantaged in the private market for several reasons. First, most private housing, especially in the rental market, is not accessible. Second, even where a dwelling could be adapted inexpensively landlords are unlikely to agree to make the necessary changes. Finally, people with disabilities face discrimination from prospective landlords, which reduces their chances of securing appropriate accommodation in the private rental market. For all of these reasons, public housing must have capacity to provide for people

with disabilities, who often have no alternative accommodation options.

Make certain that joint ventures meet social needs and do not erode overall public housing stock

There is increasing use of “public-private partnerships” (PPPs) to redevelop older public housing estates. While in principle, ACTCOSS supports the need for this stock to be renewed, redevelopment through PPPs results in large decreases in the housing stock. This means that although re-development improves the social mix and reduces the difficulties associated with placing large numbers of disadvantaged people in a small area, there is also resultant pressure on the public housing system through loss of stock. Redevelopments therefore need to be carefully managed so that the stock lost can be replaced through alternate mechanisms. At a minimum, ACT Housing must ensure that redevelopments do not result in an overall loss of stock.

ACTCOSS opposes the expansion of PPPs beyond simple construction, including any out-sourcing of public housing management to private providers. Much attention has been focussed on the NSW experiment at the Bonnyrigg estate in Sydney, and ACTCOSS stands by the strong objections raised by the Council of Social Service of NSW (NCOSS) to the proposal.

Establish fair and equitable eligibility criteria

The changes to public housing eligibility criteria in the last Budget have generated significant concern among the community sector and its clients, particularly the requirement that people reside in the ACT for at least six months before they can access public housing. The tightening of eligibility criteria was supposed to be for the purpose of targeting assistance to people in the greatest need. The exclusion of those who are either new to the ACT or have left for a short period has no correlation to the stated purpose of the policy. Rather, the policy may operate to exclude some of the most vulnerable members of the ACT community, including those driven to temporarily leave the Territory to seek affordable housing elsewhere.

People often seek to move to Queanbeyan to seek temporary accommodation until they can be appropriately housed in the ACT, even if this means excessive transport costs, or decreased employment opportunities. This is often an option for people who would otherwise remain in SAAP services or as a short-term solution for people whose best chance of recovery and support would be to be located in the ACT near relatives and support networks. The effect of the residency requirement is to either rule out those who have secured temporary accommodation in Queanbeyan, or to strand people there if they do take that choice. This leaves them to the NSW support system, even if they

previously lived in Canberra all their lives. It also precludes their reintegration in the ACT community and familiar social support structures. For vulnerable individuals, this is likely to compound a sense of social isolation and marginalisation.

The residency requirement seems particularly unfair for new migrants or TPV holders in the ACT. At a time of acute vulnerability, these individuals must find temporary accommodation in Canberra for 6 months before they can be considered eligible. In light of its adverse effects on disadvantaged members of the ACT population and the fact that it bears no relation to 'need', ACTCOSS calls for the removal of the residency requirement.

In addition to the residency requirement, ACTCOSS disagrees with the new income cut-offs for public housing eligibility. ACTCOSS notes that after the first Fair Pay Commission decision on the minimum wage, an individual minimum wage worker would not be eligible for public housing under the current cut-offs. In effect, the ACT Government has now stated that if an individual requires the security of public housing, they must not get a full-time job. This has particular effects on consumers who require access to public housing because of a condition that means they will have periods of working interspersed with time out of the workforce, including some people experiencing mental health difficulties, people with a disability or those with chronic health conditions. ACTCOSS calls for

greater flexibility in public housing eligibility criteria to cater for these groups and support workforce participation.

Finally, the asset limit precludes older people with limited superannuation or savings from accessing public housing, forcing them to deplete these savings. Alternative mechanisms, such as requiring payment of excess assets as rent up-front, are more equitable than completely excluding them from public housing. In the private market, older people must witness the depletion of their savings without secure tenure, imposing a harmful financial and emotional toll. ACTCOSS recommends that new mechanisms to facilitate entry to public housing for older people be implemented.

Retain security of tenure

ACTCOSS advises that there is a growing group of people for whom home-ownership is unlikely to ever be a possibility. This group faces perpetually living with the vagaries and rising costs of the rental market. Public housing is the only secure form of accommodation for this group, and abolishing security of tenure would leave large numbers of people with no permanent form of secure accommodation. The effects of the loss of housing security may be profound and have significant costs to the community and Government⁵. From a public

⁵ See AHURI (2006) *How does security of tenure impact on public housing tenants?* AHURI Research & Policy Bulletin, Issue 78

revenue perspective, the public housing system would also stand to lose significant funds and be pushed further into deficit.

ACTCOSS rejects the argument that security of tenure is inconsistent with the CSHA specification that public housing assistance will be granted to people “for the duration of their need”. We support the ACT Government’s response to the ACT Auditor General that the Commonwealth was aware of the ACT Government’s tenure policy, and that the bilateral CSHA agreements allow jurisdictions to adapt their policies to local needs. These include economic participation and employment where possible and appropriate, which are facilitated by retaining security of tenure.

Ensure debt management strategies are appropriate

Debt management strategies and agreements must be made with a greater understanding of the real costs of living faced by housing consumers. Without this understanding, debt repayment schedules are unsustainable. They can cause considerable financial stress, if not exclusion from the public housing system and resultant homelessness. We understand that debt management agreements, including individual undertakings, are frequently made without appropriate consideration as to whether the repayment regime can be reasonably met by the tenant. ACTCOSS also rejects the proposition that the level of debt carried by Housing ACT is a

useful indicator of its debt management. We note that this remains a very small percentage of the rental stream.

Similarly, there is also a need for a clear and transparent process for debt review. ACTCOSS understands that detailed findings from the pilot Debt Review Committee have not yet been made available for public scrutiny. Further, while Housing ACT has now established an internal review Committee, there is still uncertainty about the future arrangements for external appeals and complaints about Housing ACT decisions. ACTCOSS recommends that Housing ACT re-evaluates its debt management strategies, with a view to ensuring they are informed by tenancy maintenance, sustainable repayments and external oversight.

Commit to supportive and non-punitive housing policies for people with high and complex needs

ACTCOSS is alarmed at suggestions that the ACT may implement ‘good-behaviour agreements’ in some form, following their adoption by other jurisdictions. While appropriate strategies for addressing the challenges posed by those with high and complex needs should be developed, the threat of tenure loss is not a viable or equitable option. This approach is likely to exacerbate the situation for the individual involved, with potential negative repercussions on the wider community through

homelessness, drug and alcohol use and criminal activity.

It is inappropriate to link a neighbourhood conflict resolution and social support issue with tenancy maintenance. Public housing tenants should not have more punitive rules for addressing anti-social behaviour than the rest of the community, neighbourhood conflict not being confined to this group. Strategies to address neighbourhood conflict should be applicable to any Canberra resident regardless of their tenure type, including private renters and homeowners. Any threat to security of tenure is a punitive and short-sighted response to a complex problem. We call on the Government to develop a more long-sighted and intelligent response.

Strategy 2: Increase the availability and quality of affordable housing

Canberra has the highest median rent in the private market of all Australian capital cities, recorded as \$320 per week⁶. Similarly, house prices have continued to rise, with the ABS House Price Index⁷ increasing by 10.5% in the year to August 2006. While these figures give little indication of what is happening at the lower end of the market, evidence suggests that these prices have risen as significantly, if not more so. Other data suggests that low-income housing is unavailable in Canberra, and that we are worse off than other cities in this regard⁸. The private housing market remains heavily distorted and is dominated by small investors. Together with its tendency to over- and undershoot, these factors suggest that inefficiency and market failure is endemic to housing markets. Governments have a particular responsibility to ensure that people living with low-incomes do not suffer the consequences.

ACTCOSS welcomes the Chief Minister's decision to convene an Affordable Housing Steering Group. This group is tasked with examining methods to improve housing affordability in the ACT. In response to its recommendations, we anticipate that the Government

⁶ REIA Market Facts, June Quarter 2006.

⁷ ABS (2006) House Price Index: Eight Capital Cities, September 2006

⁸ Tenant's Union of Victoria (2006) *Rental Housing Affordability Bulletin: A National Perspective* September 2006.

will announce new policy directions and the necessary funding to advance the Government's affordability objectives. In particular, ACTCOSS calls upon the ACT Government to improve access to affordable rental accommodation for low-income earners, whether in the public, community or private housing sectors.

Explore tax incentives that support the expansion of private rental properties

The most obvious policy lever which the ACT has over the private rental market is taxation. While changes to tax scales are unlikely to greatly affect the total amount of rental property investment, if tax policy creates a significant differential between high and low-cost rental investment properties, it has the potential to leverage additional investment towards the low-cost end of the market. The ACT Government has the ability to achieve this, given the significant levels of property taxation in the Territory, which includes land tax, rates, stamp duties and the change-of-use charge. However, any such scheme should aim to deliberately tie any rebate or tax subsidy directly to affordability, for instance to the level of rent specified in a residential tenancy agreement, rather than relying on the rather imprecise mechanism of the average unimproved value (AUV). A further option is to examine tax incentives that might support the growth of the community housing sector to supply additional low-cost rental properties. ACTCOSS recommends

that the ACT Government consider affordable housing rebates to private or community housing providers of low-cost rental to increase the attractiveness of this investment.

Introduce inclusionary zoning to augment the supply of affordable housing

Another significant policy lever for the provision of affordable housing is the planning system. This is particularly appropriate for the ACT, as almost all residential land development is regulated by a single planning authority, unlike the dual nature of state-local governments elsewhere. In addition, the leasehold system in the ACT has encouraging prospects for ensuring ongoing affordability into the future, by including appropriate conditions in leases.

ACTCOSS is concerned that a robust discussion of inclusionary zoning in the ACT has been hampered by a narrow interpretation of the concept. It has been perceived that the only mechanism by which inclusionary zoning can be pursued is by a 'hand-back' of apartments in new multi-unit property developments to the public housing system. In the recent publication, *The Wealth of Home*, produced by ACTCOSS and ACT Shelter, numerous models of affordable zoning are discussed. A similar recommendation was made by the Affordable Housing Taskforce⁹. Indeed, some of the

⁹ ACT Government (2002) *Affordable Housing in the Australian Capital Territory: Strategies for Action* Report of the ACT Ministerial Taskforce on Affordable Housing,

current affordable housing initiatives already underway could be considered versions of inclusionary zoning, such as the 5% requirement for affordable housing in the suburb of Forde, or the proposed development of affordable housing estates recently announced by the Land Development Agency. These projects indicate that general support for the principle behind inclusionary zoning already exists. ACTCOSS recommends that a clear and well-defined system of inclusionary zoning be introduced in the ACT to expand the affordable housing supply.

Conduct research to maintain up-to-date data on housing affordability

There is a current lack of updated and meaningful data on the changes occurring in the housing market. While the Affordable Housing Taskforce commissioned some excellent research on the topic¹⁰, this remains the most recent comprehensive analysis of housing affordability in Canberra. With the 2006 Census recently completed, there is the opportunity in the coming year to repeat these analyses, allowing the Government to observe the changes in affordability in the inter-census period. The cessation of the ABS Australian Housing Survey in 1999 reinforces the need to find alternative sources of data.

Recommendation 33, p.xiii

¹⁰ NATSEM (2002) *Indicators of Housing Affordability in the ACT* and NATSEM (2002) *Unaffordable Housing in the ACT*

In addition, there are a number of housing indicators in those reports that are based upon data maintained by ACT Government agencies, including the ACT Planning and Land Authority and the Registrar-General's Office. It would be useful if this data could be regularly released publicly to help inform understanding of the changes in the housing market.

Legislate to prevent rental auctions

ACTCOSS has been alarmed at reports that the practice of informal rental bidding is occurring in the ACT rental market, and even more so that there have been public announcements that real estate agents wish to begin conducting formal auctions for rental housing. This initiative appears to be aimed solely at inflating rental prices further. ACTCOSS advocates against the practice of rental auctions becoming commonplace, and calls on the ACT Government to legislate against the practice.

Introduce minimum standards for rental properties

Despite statutory rules prescribing mandatory clauses for residential tenancy agreements¹¹, there remains no legislative benchmark for the minimum standards to which private rental housing should conform. While some direction is available by examining case law

¹¹ ACT Legislation Register (viewed Nov 2006) *Residential Tenancies Act 1997*, Schedule 1, p.99

from the Residential Tenancies Tribunal, this is neither comprehensive nor accessible for the vast majority of landlords and tenants. The introduction of standards would lead to improvements in energy efficiency and safety, and have positive impacts on utilities costs and environmental outcomes. ACTCOSS advocates that the ACT Government introduce a set of legislated minimum standards for rental properties to ensure that they are appropriate for lease.

Similarly, ACTCOSS notes that the *Residential Tenancies Act 1997* retains a 'no-cause' eviction clause, which allows people to be evicted from their homes for no reason whatsoever with 6 months notice. ACTCOSS would note that this provision can be used to require additional rent increases, for instance, by issuing an eviction notice but agreeing to withdraw it if the tenant signs a new lease. It can also lead to potentially discriminatory behaviour, as a landlord can evict people because they belong to a group of which they don't approve. There are already provisions for eviction in the case of renovation, property sale or because the landlord or a relative requires the property to live in. The provision for a 'no-cause' eviction is redundant, and ACTCOSS recommends that it be removed.

Strategy 3: Enhance homelessness services to meet social needs

From ACTCOSS perspective, the most disappointing outcome from the 2006-07 Budget was the decision to cut recurrent funding of \$1 million from the Supported Accommodation Assistance Program (SAAP). Despite reports of increasing need, and that the majority of people who seek assistance through SAAP-funded agencies are turned away, the Government has decided that this program should be cut.

The implementation of *Breaking the Cycle: The ACT Homelessness Strategy* seems to have stalled due in large part to these cuts. We call on the Government to recommit to implementing this Strategy. We also advocate that homelessness consultation processes are re-energised. The failure to meaningfully consult with the ACT Homelessness Committee on a range of core homelessness policies marks a failure of participatory democracy that needs to be remedied.

We are also concerned that this action has reduced the cohesion between homelessness agencies and DHCS, and interrupted progress towards achieving the outcomes of *Breaking the Cycle: The ACT Homelessness Strategy*. There has been consternation at the way funding cuts were determined in the SAAP sector: the pattern of cuts has not been disclosed to the sector nor the rationale detailed and explained. ACTCOSS is concerned that funding cuts have been based on *ad hoc* information with neither meaningful analysis of service

delivery models nor consultation with the sector.

Moreover, the cuts to SAAP reflect a broader concern that the ACT Government is focussing on acute crisis services. In this case, the Government's focus is on homelessness "beds", without ensuring that the necessary satellite services that provide support, early intervention and tenancy support are adequately resourced. These services are essential to prevent homelessness and relapses.

Finally, ACTCOSS does acknowledge the efforts by Housing ACT to introduce a new transitional housing program to provide additional exit points for the SAAP sector. However, we remain concerned at the lack of additional funding to provide support for these arrangements, and at the use of "hard-to-let" housing stock for the program, likely to be unsuitable for a large range of consumers.

Resource the homelessness sector to cater for people with high and complex needs, and provide homelessness prevention and tenure maintenance services

Changes to the structure of the SAAP sector, including the emphasis on retaining beds, mean that the support that accompanies accommodation is likely to be reduced. This means that the capacity of SAAP services to provide support to people with high and complex needs will be

impeded, and that those who need support most will be less likely to receive it. In particular, there are still difficulties in providing support to people experiencing mental health difficulties, people with problem drug and alcohol use, people with dual diagnosis, and accessible and appropriate services for people with a disability, including intellectual disabilities.

While there will need to be continuing provision of crisis services for people who experience homelessness, the direction set by *Breaking the Cycle* in providing homelessness prevention services and tenure maintenance support needs to be progressed. Ultimately, if the Social Plan objective of reducing primary homelessness to as close as possible to zero by 2013 is to be achieved, this preventative approach to reducing homelessness is required. ACTCOSS recommends that the capacity of the SAAP sector to provide an optimal range of services be assessed and appropriate resources be provided to support this capacity.

Improve options for people exiting homelessness services

There continues to be a need for appropriate accommodation for people exiting SAAP services. Part of the reason that the SAAP system is unable to cope with demand is that people who would otherwise be able to sustain tenure elsewhere cannot find affordable and appropriate accommodation to do so.

ACTCOSS understands that some SAAP agencies have been required to only house people for a maximum of 13 weeks, regardless of whether they have found alternate accommodation or have progressed to the point where they can sustain their own tenure. While it would be optimal to reduce the length of times people remain in services, this method of doing so is likely to simply recycle people through the system, rather than providing any long-term options for accommodation.

ACTCOSS recommends that additional resources are directed to providing exit points for SAAP consumers, and that compulsory limits on support periods are abolished.

Ensure homelessness agencies have access to independent sector development services

The cuts to the SAAP sector will have important implications for the way homelessness agencies deliver their services. Many will have to alter their methods of operation to continue to provide services in a more stringent funding environment. However, it seems contradictory that at the precise time that the SAAP sector most requires independent assistance to assist with change management, these services have been de-funded. ACTCOSS notes that some SAAP agencies have been given funding to investigate alternative methods of operation, although it seems incongruous that, despite a fiscal emphasis on efficiency and effectiveness, these resources were

not centralised in a service that could be utilised by the whole SAAP sector.

While sector development services are sometimes provided directly by funding agencies, ACTCOSS observes that these are less effective than community operated sector development services, organisations often being hesitant to approach their funding body if they are experiencing difficulties.

Strategy 4: Support an effective community housing sector

The community housing sector has also been hit hard by Budget cuts in the last financial year. The ACT Government has again pointed to 'over-matched' funding as a reason to cut funding to housing providers. The ACT Government appears to be actively trying to reduce the number of community housing providers, potentially losing the diversity and range of services that have previously been available for people needing secure accommodation.

Resource community housing providers appropriately

The ACT Government has introduced a new requirement that community housing organisations must be accredited through the NSW accreditation process. However, we are not convinced that current benchmark payment being paid to providers is adequate to cover the cost of accreditation, noting that accreditation is more achievable for large housing providers capable of the administrative load. Smaller providers have indicated a willingness to be accredited, but require appropriate resources to do so. As the ACT Government has placed new requirements on community housing providers to meet an additional administrative load, they receive appropriate additional resources if this to be a quality improvement process, and not simply a means to reduce the number of providers.

ACTCOSS is concerned that new funding levels do not appropriately reflect the operating costs of community organisations, despite being under review for some time. Providers are being asked to do more with less, and the new funding agreements threaten the viability of a number of community housing organisations. Funding arrangements should be reconsidered to ensure they recognise the real operating costs of community housing providers.

ACTCOSS also deplores the removal of development services designed to facilitate change in the community housing sector at a time of intense change and when the assistance is needed most.

Support a diversity of community housing providers

Part of the strength of the community housing system in the ACT is its diversity: it can meet the needs of a wide variety of population groups and adopt a diversity of models of operation to facilitate housing access.

ACTCOSS is concerned that the Government appears to be pressuring the community housing sector to reduce the number of providers, without having achieved consensus in the sector that this is the appropriate path. We do not want to see the ability of the sector to reach a diversity of clients compromised in an exercise design to achieve abstract 'efficiency' goals.

Community housing provides an important means of assisting disadvantaged groups to maintain housing tenure. A number of community housing initiatives have catered for mental health consumers. These include the current arrangements between Richmond Fellowship and Havelock House, and the NSW Housing Accommodation Support Initiative (HASI), involving community based housing and support options. ACTCOSS recommends that the ACT Government examine and adopt innovative housing support models utilising the community housing sector.

SECTION 2: HEALTH AND AGEING

ACTCOSS' perspective on health and ageing is informed by a social determinants of health approach. This approach understands health as being influenced by social, economic, psychological and environmental factors.¹² We advocate an holistic approach to health issues which recognises population-level patterns and risk factors and emphasises the importance of promotion, prevention and early intervention (PPEI) strategies. Following this, a number of core principles inform ACTCOSS' approach to health and ageing issues:

- A human rights approach to health, premised on the universal right to access health care¹³;

¹² For an explanation of this approach, see the World Health Organisation Report on the social determinants of health, Sir Michael Marmot *et al*, *The Social Determinants of Health: The Solid Facts*, accessed at: <http://www.euro.who.int/document/e81384.pdf>.

¹³ Article 12 of the International Covenant on Economic, Social and Cultural Rights recognises 'the right of everyone to the enjoyment of the highest attainable standard of physical and mental health.' The United Nations has indicated that this right gives rise to 'the right to a system of health protection which provides equality of opportunity for people to enjoy the highest attainable level of health.' See United Nations Economic and Social Council, 'The Right to the Highest Attainable Standard of Health: 11/8/2000, E/C.12/2000/4. General Comments, accessed at: [http://www.unhcr.ch/tbs/doc.nsf/\(symbol\)/E.C.12.2000.4.En?OpenDocument](http://www.unhcr.ch/tbs/doc.nsf/(symbol)/E.C.12.2000.4.En?OpenDocument).

- A belief in the principle of person-centred, recovery-oriented planning;
- A commitment to an empowerment model of health service support;
- A belief in promotion, prevention and early intervention strategies to physical and mental health; and,
- A belief in the importance of consumer and carer participation in the development of health policy.

In addition to improving the quality of health service interventions, ACTCOSS advocates to narrow the gap between access and health outcomes for the advantaged and disadvantaged in the ACT community. For this reason, ACTCOSS welcomes and supports the *ACT Health Action Plan* in its call for a focus on the social determinants of health. Further, we applaud the ACT Government's stated commitment to a range of population health issues. We also support, in principle, the ACT Government's Consumer and Carer Participation Policy. We are pleased to see recognition of the role and rights of consumers and carers, and emphasise the importance of their contribution and consultation input. However, despite these Government commitments, ACTCOSS is concerned that there has been no real shift in emphasis in health care services and funding from crisis care to promotion, prevention and early intervention. This concern informs many of the comments made below in relation to particular funding priorities and policies.

Strategy 5: Improve mental health services in the ACT

ACTCOSS welcomes the *ACT Mental Health Strategy and Action Plan 2003-8* (the Strategy). We congratulate the Government on its recent focus on mental health policy reform. In particular, we welcome the new focus on PPEI mental health strategies. We are pleased that the Strategy adopts a recovery framework and enshrines the notion of community responsibility for mental health. We understand that the implementation of this strategy will take some time and that, in light of the whole-of-government approach adopted, both government services and the community sector are involved. However, we call upon the Government to deliver on its commitment to increase mental health expenditure to 12% of the total budget by 2012.¹⁴ We urge the Government to provide the necessary resources and commitment to achieve an innovative, whole-of-government approach to mental health services in partnership with a supported community sector. In doing so, we press the Government to consult meaningfully with stakeholder community and consumer groups and develop policies and services that are responsive to this input. Further, we encourage the Government to consider some of the innovative mental health service delivery models developed in other states and overseas, on

¹⁴ Commitment made at ACTCOSS Conference, August 2006, by the Chief Minister and the Minister for Health.

which there is considerable literature available.

ACTCOSS is concerned by the need to address the cross-portfolio impact of mental illness. Mental health consumers experience broader social and economic disadvantage due to the domino effects of poor mental health, job insecurity, unemployment, poverty, homelessness and the co-morbid nature of many mental disorders with alcohol and drug (AOD) problems. For this reason, the creation and maintenance of effective links between core government and community social services is vital. In particular, effective linkages between clinical and non-clinical services must be at the heart of broader linkages with supported accommodation, housing, employment, rehabilitation and AOD services. Therefore, in order for the ACT Government to effect its good intentions in relation to PPEI, it must continue and improve its engagement with the community sector. In addition, it must address the current 'siloeing' of relevant Departments (Disability, Health, Housing and Justice, in particular). We call for better cross-departmental coordination in the area of mental health policy and services in recognition of the complex relationship between mental health and other social problems.

Increase funding for the new youth prevention and recovery ('step-up/step-down') facility and establish an adult facility

ACTCOSS welcomed the 2006-7 Budget proposal for a youth prevention and recovery ('step-up/step-down') facility. However, the proposed allocation for the development of a 15 'bed' ('place' more aptly describing the non-clinical nature of care) facility fails to respond to unmet need. This minimal funding allocation is likely to result in an under-funded and over-stretched community service, struggling to deliver vital, quality services. Further, a lack of clarity persists around who is to provide these services, and the location of the service has not been revealed. For the youth step-up/step-down facility to be an effective and quality service, funding must be increased. To enable further community discussion about the proposed service, the Government must provide further information and invite consultation.

More generally, ACTCOSS is disappointed by the Government's failure to respond to repeated calls for an adult step-up/step-down facility. Such a service is fundamental to a PPEI and recovery framework. Step up/step down facilities provide a place for mental health consumers to go after exiting an acute care facility or when becoming unwell, in order to avoid hospitalisation. The importance of such services cannot be overstated, with the potential to protect the health and safety of mental health consumers, their carers, families and the broader community. We urge the Government to consider, as a health funding priority, the establishment of an adult step-up/step-down facility, based on the

model of PARC in Victoria.¹⁵ This service is situated in the community, with individual units rather than dormitory or clinical accommodation. It involves a coordinated approach between government and community service sectors, and embodies a core commitment to the rights and dignity of mental health consumers.

Fund Individual Care Packages ('wrap-around' services) for mental health consumers

A key priority identified by mental health consumers and carers for the 2007-8 Budget is Individual Care Packages (otherwise referred to as 'wrap-around' services) for mental health consumers. These are packages of care funded by cross-departmental arrangement (with Health, Disability and Housing) and managed by a community based service. A community worker is assigned to a mental health consumer and provides support in accessing housing and psychosocial support. In this way, the relevant community service bears the onus of coordinating support, rather than the consumer, their carer or family. We urge the Government to consider this as a funding priority. It is an essential aspect of an effective PPEI strategy.

Increase support for community-based psychosocial rehabilitation services

¹⁵ See a description of this facility at www.health.vic.gov.au/mentalhealth/atoz2.htm.

The community sector provides fundamental psychosocial rehabilitation, peer support, employment and training services to mental health consumers. These services are under-resourced and have high levels of unmet need and long waiting lists. Despite this, there was little investment in community sector service development in the last budget. We understand that, compared with funding allocated to community providers in NSW and Victoria, the ACT community mental health sector is dramatically under-funded. This is contrary to COAG funding priorities and to key recommendations from recent National and Territory inquiries into mental health PPEI. Pertinently, given that the community sector provides the bulk of these services, their under-funding by Government is inconsistent with its stated commitment to PPEI.

Develop practical strategies and allocate funding to implement the Government's PPEI Action Plan

ACTCOSS welcomes the *ACT Action Plan for Mental Health Promotion, Prevention and Early Intervention 2006-8*. This Action Plan provides a framework for coordination between government, business and community agencies. ACTCOSS supports the emphasis in the Action Plan on shared community responsibility for mental health promotion and understanding. We also applaud the focus on linkages, partnership and collaboration between the mental health sector and other parts of the community

sector. Further, we support the initiative to incorporate better prevention strategies in the activities of various government sectors: health, housing, education, employment, transport and environment. ACTCOSS now calls upon the Government to act to implement these strategies. To do so, it must adequately resource and effectively coordinate Government and community services. Only in this way can these services work together to effect a shift away from crisis-oriented service delivery systems, to a new focus on PPEI. The ACT Government must develop detailed, practical strategies to achieve the integration and coordination of Government and community mental health services.

Develop a new acute-care mental health facility based on a community care model

The ACT Government has committed to closing the Psychiatric Support Unit (PSU) and building a new 50 bed acute-care facility on the Canberra Hospital campus. ACTCOSS supports the proposal to replace the current PSU facility, which is poorly designed, unsafe and traumatising for patients, with alternative acute care services. Nonetheless, we are concerned by the proposed form of these new services. In particular, we seek a guarantee that the planning of the new facility will be responsive to consumer and carer input, particularly in relation to size (small), location, design and service delivery model. The mental health community sector

definitively opposes the construction of a 50 bed facility, advocating for a smaller 30 bed facility instead. A new facility should involve minimal use of seclusion and restraint practices to reduce the trauma of treatment and uphold the dignity of mental health consumers.

Consumers and carers seek a facility based on a community care model, with consideration given to non-hospital settings. This must be well integrated with early intervention and prevention services to provide a continuity of care. In addition, in order to be geographically accessible and provide quality care, consumers wish to see small services available in both North and South Canberra. To create a non-clinical atmosphere, the location of the facilities in green spaces is important. All of these features are necessary to avoid the potentially traumatising impact of acute care facilities. Further, ACTCOSS seeks a Government commitment to ensure that the new acute care services are appropriate and adapted to the needs of women, indigenous persons and those from Culturally and Linguistically Diverse communities, who we believe may be particularly vulnerable in such facilities.

Improve awareness about mental illness through public information campaigns

Despite recent Government and non-government awareness raising initiatives, fear, prejudice and stigma continue to surround

mental illness. Mental health consumers are often the targets of misunderstanding and discrimination. This affects their chances of securing employment and appropriate housing. For these reasons, ACTCOSS emphasises the need for the Government to resource effective public education campaigns around mental illness. Such information should be accessible and widely distributed, for example, in schools and workplaces.

Ensure that consultation with mental health consumers and carers is inclusive, broad, accessible and meaningful

As noted above, ACTCOSS welcomes the ACT Government's 'Consumer and Carer Participation Project' and its recognition of the role and rights of consumers and carers. We look forward to seeing greater consultation with, and involvement of, consumers and carers in the development of innovative mental health strategies. We also urge the Government to give consideration to expanding the role of carers, with consumers consent, in the creation of treatment plans.¹⁶

However, despite the formal policy shift towards consumer and carer participation, we are concerned at the limited, exclusive and formal nature of many consultation processes and highlight the need for consultations to extend beyond the committee level. We are particularly aware of community

¹⁶ ACTCOSS, 'Comment on the Review of the ACT Mental Health (Treatment and Care) Act 1994', October 2006.

dissatisfaction with the new acute care facility consultations. We note the Government's commitment to reconsider these plans after the Mental Health Services Plan project is completed and advocate inclusive consultations on this issue. For consultations to be effective, a broad consumer and carer representative organisational base is important. In addition to funded consumer and community representative organisations, there is a need for a Government funded specific carers' network in the ACT to represent these interests. We urge the Government to direct funds accordingly. Further, to ensure that consumer input into decisions about treatment is adequately considered and that consumer rights are protected, we stress the importance of consumer advocates. Advocates are essential in representing the interests of consumers in PSU facilities. They also play a vital role in assisting consumers to access or communicate with housing and other social services. We therefore call upon the Government to improve consumer advocacy services in the ACT, while ensuring the advocates are supported by a strong organisational base.

Strategy 6: Improve access to oral health care and nutritious food

Improve access to dental health care for disadvantaged members of the community

Oral health is vital to general health and wellbeing. Poor oral

health can result in serious primary and secondary infections. More generally, it can cause daily pain and suffering, limiting diet and disturbing sleep patterns. ACTCOSS is concerned by major disparities between the oral health of advantaged and disadvantaged members of the community.¹⁷ This gap is both a national and Territory phenomenon. We believe that the prosperity of the ACT obliges it to eliminate this gap within the ACT community. The withdrawal of Federal funding for dental care has further raised the imperative for the ACT Government to act.

Although the Primary Health Care Plan includes a commitment to 'continue provision of community based dental services for high need groups'¹⁸, ACTCOSS was disappointed to see that no new spending was allocated to dental health services in the last budget. With long waiting times, at 15-30 months for visits to publicly funded general dental care¹⁹, there is an urgent need for action. Of those nationally not eligible for public dental care, some 23% report that they delay or avoid treatment because of the cost of dental care.²⁰ Given that oral health is essential to overall wellbeing, dental care cannot be seen as a luxury. As a component of the right to health, it is a basic human right.

Population groups with particularly poor oral health include indigenous

¹⁷ Australian Council for Social Service, 'Fair Dental Care for Low Income Earners', ACOSS Info Paper, October 2006 at 2.

¹⁸ At pg. 7.

¹⁹ Ibid. Table 3 at 13.

²⁰ ACOSS, see note 17. At 2.

communities, refugees and asylum seekers, those in residential aged care facilities, low income adults, people with disabilities, young adults on income support payments and single parent households.²¹ A recent ACOSS inquiry into dental health found that these groups were most unlikely to access dental care, largely due to the cost.²² We call upon the Government to support specific strategies to enable and encourage these groups to access dental care. Appropriate strategies will depend on the needs and location of the particular group. For example, ACTCOSS understands that although there is a mobile denture clinic which provides services to residential aged care facilities in the ACT, there is no equivalent dentist service. An appropriate Government strategy in this instance would therefore be the provision of a mobile dentist to visit residential aged care facilities. In light of the immobility of many of those in such facilities, a mobile service is essential. Other targeted programs should be developed with community consultation.

Explore and develop innovative and empowering strategies to improve access to nutritious food for those experiencing disadvantage

Access to nutritious food as part of a balanced diet is essential to general health and wellbeing. Diet plays a key role in determining general health outcomes. We are concerned by the obstacles to

²¹ Ibid. At 2.

²² Ibid. At 2.

accessing nutritious food for the disadvantaged in the ACT. These translate into health inequalities. ACTCOSS urges the Government to implement a number of initiatives to address food inequality and respond to unmet need, including to:

- Establish a centralised food distribution system;
- Establish a community kitchen, adopting an empowerment model of food provision; and
- Establish a community food bank.

Examine the implications of existing food regulation and handling provisions for community food providers

ACTCOSS is concerned by the ambiguity surrounding the application of existing regulatory frameworks to community sector food providers. We call upon the Government to examine legislation around food standards and handling to determine its implications for community sector food provision and conduct training programs in food handling and regulation for the community sector.

Strategy 7: Improve the affordability and availability of primary and community health care for people experiencing disadvantage

Improve access to primary health care by addressing economic, capacity and physical barriers

ACTCOSS welcomed the 2006-7 budget commitment to provide funding to Community Based Health Care:

to enhance community-based health services, provide for timely discharge from hospitals – reduce waiting times and reduce unplanned admissions and readmissions.²³

However, the Government needs to go further to address the serious obstacles to primary health care access in Canberra. These include a shortage of general practitioners (GPs), a limited number of bulk-billing services and a high demand for health services (with many GPs no longer taking new patients). These obstacles render services unaffordable and inaccessible to disadvantaged members of the ACT community. We note the commitment in the last budget, as a response to the doctor shortage, to implement 'targeted workforce initiatives' in order to 'maximise the recruitment and retention of health professionals'.²⁴ However, further urgent action is required to address unmet need.

There are some other specific access concerns arising around

²³ Budget Paper 3, p 9.

²⁴ Budget Paper 3, pg 5.

primary health care. First, we are concerned by reported increases in community health service fees. This must be reviewed. Second, we call upon the Government to remove physical obstacles to accessing health services. ACTCOSS is particularly concerned by the introduction of a system of paid car parking at ACT public hospitals. We understand that cancer patients are being unfairly adversely affected, often needing to be at the hospital for treatment for long periods of uncertain duration. We urge the ACT Government to add cancer patients to the list of those exempt from paid parking. Finally, and more generally, the lack of parking in Civic impedes the access of people with disabilities to medical and other services.

ACTCOSS is concerned by reports that the Government is considering increasing and expanding co-payments for particular services. We urge the Government to reconsider this proposal, which would further compromise the accessibility of the health care system. In ACTCOSS' view, the most disadvantaged sector of the population should not be required to contribute to the cost of essential health care services. We seek a Government undertaking to abolish co-payments in recognition of this principle.

Improve access to primary health care for mental health consumers as a core aspect of the PPEI Strategy

The lack of bulk-billing GPs presents a key impediment to mental health care consumers accessing primary health care. ACTCOSS calls upon the Government to fund additional community-based health services, to provide accessible, affordable services and respond to health needs in a social context. In addition, mental health consumers face financial obstacles in accessing psychologists and psychiatrists. Although the Commonwealth Government recently proposed to fund psychological therapy, this rebate is only available when consumers are in an acute stage of their illness. ACTCOSS urges the ACT Government to cover this eligibility gap by expanding free access to psychological and psychiatric services for those at less-acute stages of mental illness. Apart from the cost of services, lack of information about which psychologists and psychiatrists are funded under the Medicare rebate scheme impedes access. A central list of those mental health practitioners who are covered by the scheme needs to be developed to ensure that consumers are able to easily locate affordable services.

Ensure that disadvantaged members of the community can access affordable after-hours care

ACTCOSS welcomes the establishment of Canberra After

Hours Locum Medical Services (CALMS) at Calvary Hospital, the Canberra Hospital and the Tuggeranong Health Centre. We note that recent figures suggest that CALMS is providing a significant number of additional consultations.²⁵ Further, we welcome the expansion of the service to include all members of the ACT Community, not only those whose GP is a member. However, we are concerned by increases to after-hours care fees. In particular, we fear that increased fees will render these services inaccessible and force disadvantaged patients to go to hospital casualty instead. This is considerably less convenient for patients, often involves long waiting times and imposes an unnecessary burden on the public hospital system.

Address indigenous health inequality by increasing support for indigenous health services

Despite the prosperity and privilege enjoyed by many members of the ACT community, the indigenous population continues to experience significant disadvantage. This manifests in a large gap in access to health care and differential health outcomes. It results in poorer individual health and is interconnected with lower levels of income, nutrition, education and housing across the population. We are pleased that indigenous health

²⁵ ACT Minister of Health, Media Release, 'After hours GP services a success', 17 August, 2006 at <http://www.chiefminister.act.gov.au/media.asp?section=53&title=Katy%20Gallagher,%20OMLA%20>.

has been identified as a priority policy area by the ACT Government in the *ACT Health Action Plan*. In this context, ACTCOSS welcomes *A New Way: The ACT Aboriginal and Torres Strait Islander Health and Family Wellbeing Plan 2006-2011*. We note the commitment in Objective 4 of the Strategy to improve resourcing to increase the capacity and capabilities of service providers. This includes a plan to 'better understand the cost of service delivery' and provide more flexible funding arrangements. However, the success or failure of this Strategy will depend on whether the ACT Government devotes adequate and appropriate funding to render it effective. It will also depend on the Government sustaining constructive and collaborative relationships with community and indigenous organisations involved in the Strategy's implementation.

Provide free access to medical, psychological and support services for all refugees and asylum seekers

We congratulate the ACT Government on its generous funding of a proportion of refugee medical and mental health services. However, ACTCOSS calls upon the Government to provide health care for those refugee applicants ineligible for Medicare. This segment of the population, although accessing some pro bono GP medical services on an ad hoc basis, has difficulty accessing hospitals and specialists. We are also concerned that current resources will not be able to fulfil

the need created by the influx of child refugees from Africa, many of whom have been traumatised by civil war. These children need special programs, including physical and psychological health support services and educational support.

Improve cultural awareness within government and community health services

ACTCOSS stresses the importance of cultural awareness training for those involved in Government service delivery, including the training of ACT Health Staff, GPs and Ambulance Staff.²⁶ We urge the Government to extend this training to those involved in indigenous health service delivery in government and community services. This training must make reference to local indigenous culture and languages.

²⁶ *A New Way: The ACT Aboriginal and Torres Strait Islander Health and Family Wellbeing Plan 2006-2011* at 16.

Strategy 8: Commit to innovative harm minimisation alcohol and other drug programs and facilities

Improve and expand drug and alcohol rehabilitation services in the ACT

Recent ACT drug and alcohol policies and services have retreated from earlier innovations. No new alcohol and drug initiatives were funded in the last budget. [We call upon the Government to closely evaluate its implementation of the 'ACT Alcohol, Tobacco and Other Drug Strategy 2004-8' and develop and support the necessary strategic partnerships.](#) The proposed redevelopment and expansion of the Karralika Drug and Alcohol Rehabilitation Facility at Fadden has been cancelled.²⁷ In light of this decision, ACTCOSS seeks information from the Government as to where the \$9 million in designated funding will be directed and how it will be used.²⁸ Further, we urge the Government to deliver upon its election commitments to seek the Prime Minister's support for establishment of a heroin trial, assess the possibility of developing a safe injecting room in the ACT, implement a harm minimisation drug strategy in the new Alexander

²⁷ Minister for Health, Media Release, 'Redevelopment of Karralika not to proceed', 24 August, 2006.

²⁸ ACT Government 2003-2004 Budget, Media Release, '\$9 million for accommodation improvements at Karralika Drug and Alcohol Service and Other Health Facilities', 6 May, 2003.

Maconochie Centre and increase support for rehabilitation services.²⁹

Devote specific resources to dual diagnosis services, training and sector development

We remind the Government of its election commitment to:

*Develop a formal strategy in consultation with ACT mental health and alcohol and other drug services for responding to the growing incidence of dual diagnosis in the community.*³⁰

ACTCOSS calls upon the Government to follow through with this commitment, and provide adequate funding to dual diagnosis services for those with mental health and alcohol and drug issues. This group includes a high proportion of youth. In particular, funds need to be directed towards dual diagnosis training and sector development in the community sector. Consideration should also be given to the creation of designated dual diagnosis step up/step down services.³¹

Individuals with dual diagnosis may currently be excluded from mental health services by virtue of their diagnosis. This practice needs to be remedied to ensure that treatment

²⁹ See ALP election commitments at: <http://www.act.alp.org.au/policy/pdpdrugs101001.html>.

³⁰ See ALP election commitments at: <http://www.act.alp.org.au/policy/pdpdrugs101001.html>.

³¹ See the discussion of these services above under 'Mental Health Services in the ACT'.

and care can be accessed by those who need it, regardless of additional diagnoses. To respond to this, we repeat our call to the Government to reform policy and legislation to ensure that those with a dual diagnosis are not excluded from mental health services.³²

Strategy 9: Improve aged care services

Fund designated aged care beds in public hospitals

The ACT's ageing population demands an increased funding commitment from the ACT Government. Early intervention programs should be a funding priority in this area, consistent with ACT Health's PPEI Strategy. The current lack of designated aged care beds in public hospitals means that general wards are becoming nursing home 'waiting rooms'. This is an inappropriate medium-term accommodation option, both for aged patients and general patients. In response to these issues, ACTCOSS welcomes the announcement in the last budget of some \$1.5 million each year for four years for a 'Health Service-Wide Aged Care Support' strategy. This is intended to expand acute care for older patients admitted to the Canberra Hospital, such as to minimise hospital inpatient time.³³ We support this initiative, and the Strategy's purpose, but submit that its funding allocation is inadequate

³² This issue was raised in ACTCOSS, 'Comment on the Review of the Mental Health (Treatment and Care) Act 1994, October 2006.

³³ Budget paper 3, pg. 76.

to respond to the current level of demand.

Support community-based convalescent facilities

ACTCOSS urges the Government to increase funding for community-based convalescent facilities. The recent opening of a convalescent ward at Calvary Hospital, though much needed, contains fewer beds than promised and provides care for a maximum two week period. It excludes those suffering any form of 'mental confusion', which rules out dementia patients, and is located within a hospital setting, despite calls for a community location.

SECTION 3: COMMUNITY AND MUNICIPAL SERVICES

Strategy 10: Address disadvantage and improve service access for people with disabilities

Examine the relationship between disability and poverty, with a view to developing strategies to alleviate disadvantage for people with disabilities

ACTCOSS' perspective on disability is informed by a human rights framework and an awareness of the relationship between poverty and disability. We understand that disability can engender poverty by limiting employment opportunities and forcing reliance on income support. This poverty trap is maintained by structural disincentives to workforce participation such that small increases in income, with the potential to raise living standards, become undermined by a drastic loss of eligibility for services. ACTCOSS is also mindful of the high costs of disability, noting that, depending on the form and level of disability, additional expenses might include home modifications, transport (equipment and maintenance), communications mechanisms, hoists, costs of maintaining personal hygiene, home care and attendant care. The higher costs of living for people with disabilities are not reflected in pension payment levels which are roughly equivalent to aged care

pensions.³⁴ Disability support policies, in penalising those earning above a fairly low threshold, do not take into account the costs involved in participating in employment.³⁵

In addition, the Federal Government's recent Welfare to Work changes are likely to have an adverse effect on people with disabilities. New applicants who would previously have been eligible for the Disability Support Pension who are deemed to have 'partial capacity' now receive an allowance payment of lesser value. Payments have been further reduced for people with disabilities who are studying. Additionally, people with disabilities will be subject to new activity requirements. This population group is also now burdened with the threat of penalty payment suspension for 'breaches' of compliance regimes. For those on an allowance, additional income earned is subject to higher marginal tax rates. At the same time, it will become more difficult for people with disabilities to access the highest level of employment assistance from Job Network.

All of these changes will have a significant effect on people with disabilities in the ACT community, and, in turn, on social and community services in the ACT. Poverty among this population group is likely to increase, as is anxiety around activity

³⁴ See Physical Disability Council of Australia, 'Towards a Disability Allowance – Offsetting the Costs of Disability', July 2001.

³⁵ Ibid.

requirements and financial insecurity. In addition, impediments to employment and education will act as obstacles to economic and social participation. We call on the ACT Government to closely monitor the impacts of the reforms on this disadvantaged population group, and respond to ameliorate some of the social harms it effects.

There is a dearth of statistical analysis of the relationship between disability and poverty, employment and service use in the ACT. This information is vital in order to target areas of need and gaps in service provision. We urge the Government to resource the gathering of this data, which must include rates of access of people with disabilities to mainstream services (for example, general health screening services, libraries, public recreational facilities) and be gender disaggregated.

ACTCOSS urges the Government to inquire into aspects of the cost of disability with a view to alleviating the burden of these costs on individuals. One major cost is mobility and transport. This includes purchase of wheelchairs and other devices, in addition to their maintenance and repair. At present, the bulk of these costs are borne by users. Wheelchair repairs are expensive and difficult to procure. The current system for booking wheelchair repairs is inadequate, unresponsive and inconvenient for many people with disabilities. We encourage the Government to consider some innovative schemes to support individuals with disabilities in the

cost of purchasing, maintaining and repairing equipment.

Respect and promote the human rights of people with disabilities to access public buildings and services, to be free to relocate and to be involved in the community

The ACT Government still has a long way to go in improving physical and information access for people with disabilities. Many government buildings remain physically inaccessible to people with disabilities. Information needs to be provided in accessible formats: easy to navigate websites, documents provided in alternative formats and consultations and forums held at accessible venues. ACTCOSS is concerned that the ACT Access to Government Strategy is being implemented in an impartial and ad hoc fashion. While some Government Departments and services seem to be taking their responsibilities under the Strategy seriously, and performing the requisite audits, others are failing to do so. This is inconsistent with the stated 'whole-of-government' commitment to disability access and we call upon the Government to improve compliance and coordination.

Other access issues that continue to affect people with disabilities include inadequate mobility parking spaces in Civic, the inaccessibility of many older public buildings (though we welcome the ACT building code on accessibility), access to park and recreation areas

and footpaths in a state of disrepair.

ACTCOSS urges the ACT Government to advocate for the inclusion of human rights principles in the CSTDA and to drive an unmet need agenda in the CSTDA negotiations. We also urge the Government to use the CSTDA as a means to develop a system for people with disabilities to move interstate while maintaining their care packages. This is critical to allow people with disabilities to exercise the right to determine where they live.

Many people with disabilities experience social isolation and marginalisation. Where unemployed, or in the absence of support networks, there may be little opportunity or motivation to become involved in their community. The reasons for this isolation and exclusion are complex but require a government response to promote welcoming and inclusive communities. Public information campaigns must play an important role in raising awareness about the capacities and contributions of people with disabilities. Social programs should provide opportunities for social engagement and relationship building. Social firms can provide employment opportunities which offer contact with the broader population.³⁶

³⁶ For further information about social firms and the role of Government in facilitating their development, see Jo Barraket. 'Community and Social Enterprise: What Role for Government?', March 2006, accessed at: http://www.dvc.vic.gov.au/Web14/dvc/rwp_gslib.nsf/GraphicFiles/CommunitySocialEnt

Allocate targeted funding to service areas of high unmet need

ACTCOSS was disappointed that there was no significant increase in funding allocated to disability services in the last Budget. This means that no new services have been funded at a time when unmet need is high. Through consultation with our member organisations, several areas have been identified as priority funding areas, including:

- Individual Support Packages (ISPs) – there is currently a high level of unmet need with only a small proportion of applicants receiving assistance;
- family support (respite);
- intermediate accommodation options (between home and nursing home);
- services for the aged and disabled, potentially ineligible for HACC funding if in a Government funded group home; and
- funding for people with increased support needs, and newly disabled people.

ACTCOSS has continuing concerns about the issues raised in the ISP Review regarding the equity of the distribution of funding, the transparency of funding allocations, the accountability of brokerage agencies, staffing problems (e.g. high turnover) and the gap between funding and real living costs.

[erpriseMarch2006.pdf/\\$file/CommunitySocialEnterpriseMarch2006.pdf](#).

Despite an expressed Government commitment to promotion, prevention and early intervention in health policy, disability support services remain oriented around high and complex needs care. This care is vital (and must not be compromised) but should be accompanied by support to those with medium and lower level needs, for whom the provision of limited support can enable broader participation in employment and community. This facilitates both physical and economic independence and improves quality of life. More men than women have high and complex disability needs, due to a higher number of male trauma victims, men with intellectual disabilities and the higher likelihood that men will acquire particular incapacitating diseases. The current focus of disability health services is on high and complex needs. We stress the need for support services across the broader disability community, which provide low and medium range support. These services are essential for both men and women, but will impact more significantly on women. The absence of low-medium level support currently impedes employment and community participation.

Several specific public facilities were raised in our consultations as priority funding areas. The first is a public hydrotherapy pool for those not able to access the hospital pool (as not currently receiving hospital therapy). The second was the need for accessible gymnasiums, where exercise packages can be designed for people with disabilities. We call upon the Government to commit to

the development of these facilities to promote the health, wellbeing and community involvement of people with disabilities.

There are an increasing number of children with disabilities in 0-5 age group due to the number of premature babies and babies with disabilities surviving beyond infancy. This figure is likely to continue to increase. Early childhood development must be a priority funding area. Currently, little support is often provided to children with disabilities until well into primary education. Funding for early childhood development is also consistent with the Government's emphasis on early intervention.

Respite care for people with disabilities has improved but unmet need remains an issue and options are extremely limited. Waiting lists for some respite care organisations are in the range of 150 at any one time. Once again, services in this area focus on high and complex needs individuals, or those in crisis, such that ad hoc users are unable to access services. We understand that there is also a current absence of temporary, transitional accommodation for people with disabilities coming out of hospital, resulting in unnecessarily prolonged stays in hospital or premature discharge.

Examine and review user-pays and eligibility criteria service-delivery trends

ACTCOSS is concerned by some general trends in ACT government service delivery affecting people with disabilities. First, the trend towards user-pays systems of government service delivery (for example, for equipment, HACC, and mainstream services frequently used by people with a disability). Such systems unfairly shift the burden of the cost of service provision onto those least able to bear it, people often struggling with low income levels and the high cost of disability. We call upon the Government to examine and review this trend in light of the inequitable burden it imposes on people with disabilities. We are also concerned by the tightening of eligibility criteria (a feature across the social service spectrum in the last Budget), with most disability programs subject to means tests and eligibility criteria which limit access. This should be reviewed and reversed. Finally, we are alarmed by the proposed changes to eligibility for the hospital equipment scheme, already under-funded with a limited range of items for loan.

Strategy 11: Develop a public and community transport system that is accessible, safe, frequent and reliable

The maintenance and improvement of public transport service has important positive externalities for the community. In particular it supports those people who have few other options for traversing a dispersed city. The erosion of public transport services or real price increases in fares has the potential to reduce social inclusion, housing choice, employment opportunities and access to services.

Public transport also has important economic and environmental benefits. Dependency on private vehicles is a high-cost transport system that leaves the ACT exposed to fuel price risk in a global environment with uncertain supply. The motor vehicle is also one of the major contributions to the ACT's greenhouse gas emissions. Providing real transport choice and encouraging greater sustainable transport utilisation requires a reliable, efficient and comprehensive public transport system and designated bicycle paths and lanes.

Yet as a result of the 2006-07 Budget, there have been drastic cuts to public transport services, compounded by a large increase in bus fares. While ACTCOSS applauds ACTION's decision to minimise the price impacts on concession card holders, overall the

ACT public has been asked to pay more for a lower quality service.

Improve transport equity in the ACT by increasing the frequency of and access to public transport services

We are particularly alarmed by the reduction in bus services outside peak periods. ACTCOSS advises that low-income and disadvantaged consumers are more likely to utilise public transport outside peak periods than the general population, and the cuts to services will disproportionately disadvantage these groups.

ACTCOSS regards the community consultation on the changes as woefully inadequate, and there has been little consideration of the impact of these changes on the older people, young people and people with disabilities who are 'captured' by the public transport system. The result of the service reduction will be further social isolation and marginalisation for those no longer able to conveniently access community facilities, activities and services. It will also mean that access to employment is undermined for those, often low-income workers, who are employed on a casual or shift-work basis and require regular evening and weekend transport services. ACTCOSS calls on the ACT Government to reconsider the cuts to off-peak services, and work towards ensuring equitable access to transport for the whole community.

The introduction of the pensioner "off-peak daily" ticket was a

deliberate strategy to encourage a more even distribution of passengers throughout the day so that service frequencies could be maintained. However, this strategy appears to have been abandoned, and the value of the pensioner daily tickets has been undermined by the large reduction in services available on the ticket, meaning that they are no longer suitable for many pensioners who will find that they will no longer be able to use this option for travelling to many appointments. In effect, the ACT Government has placed significant additional costs on pensioners if they wish to access the same level of service, as many will now be forced use commuter services instead. ACTCOSS recommends that the availability of concession fares be reviewed to ensure they meet the needs of pensioners.

Increase the number of wheelchair accessible buses in the ACT

ACTCOSS is pleased to acknowledge that the number of wheelchair accessible buses on the road has continued to increase. However, we remain concerned that the number remains too low, that targets have been reduced and that the number of routes serviced has remained the same. We urge the Government to set more ambitious targets to increase the number of wheelchair accessible buses, expand the number of service routes on which they are available, and ensure the accessibility of bus stops on relevant routes.

Improve access to wheelchair accessible taxis.

There is a high level of dissatisfaction with the new automated taxi booking system. The Government has acknowledged that this impacts upon the whole population, but has particularly adverse effects on those with a disability.³⁷ It has also recognised that the inability to make a booking is impacting upon “individuals’ ability to access Canberra’s services, businesses and recreational activities”.³⁸ We support the ACT Government’s proposal to legislate to require that all taxi services provide an effective alternative to the automated booking system, and to introduce a system of penalties for non-compliance with service standards.

In addition to this initiative, ACTCOSS calls upon the Government to increase the number of wheelchair accessible taxis (WATs), which are currently failing to meet the need. ACTCOSS understands that, despite the Wheelchair Accessible Taxi Review, services have become even less reliable, with frequent delays, often more than one hour, and no-shows. There are currently far fewer WATs on the road than targeted. We also urge the Government to ensure that eligibility criteria for WATs not be tightened.

³⁷ Minister for Territory and Municipal Services, John Hargreaves, ‘ACT Taxi Services’, Media Release, 17 November 2006.

³⁸ Minister for Territory and Municipal Services, John Hargreaves, ‘ACT Taxi Services’, Media Release, 17 November 2006.

Review funding conditions to community transport services to maintain service flexibility

The relocation of some government facilities and services has resulted in considerable stress on community transport providers. Existing services are subject to geographic service limits as a funding condition. However, these parameters are creating significant inconvenience and impeding access to services for some consumers. In addition, unlike public transport services, the Government has made no provision for rising fuel costs. We urge the Government to consider devising more flexible parameters within community transport funding agreements to meet a greater diversity of needs and respond to real cost pressures.

Ensure community paths are accessible to everyone

We also urge the Government to commit to improving the condition and appropriateness of community paths and bicycle lanes. ACTCOSS is aware that many footpaths in the ACT pose safety risks for people with disabilities and impede access to public and community services. While we welcome the introduction of bicycle lanes on major roads in the ACT, there are continuing safety concerns about their usage, and the lack of lanes on some routes. It is also necessary to supplement bicycle lanes with good quality off-road community paths suitable for cyclists, especially children and older people for whom on-road cycle lanes may be unsuitable. ACTCOSS recommends that the ACT Government evaluate

whether the current configuration and maintenance of community paths and cycle lanes is optimal for encouraging walking and cycling.

Strategy 12: Reduce the harm caused by problem gambling on families and communities

ACTCOSS' position on this issue is informed by a concern about the social and financial destruction wreaked by problem gambling, with an estimated seven other people affected by the problem of any one individual.³⁹ Research suggests that real per capita expenditure on gambling in the ACT in 2003-4 was \$1030.37.⁴⁰ It is estimated that there are approximately 5300 individuals with a significant gambling problem in the ACT.⁴¹

Commit to a reduction in poker machine numbers in the ACT

We are concerned by the high number of poker machines in the ACT, numbering 20.7 per 1000 population, compared to a national average of 13. We are also angered by the reported profits made by poker-machine operators in the last financial year, some venues

³⁹ See Lifeline, Gambling Care website, accessed on 17 November at <http://www.act.lifeline.org.au/problemgambling.htm>.

⁴⁰ ANU Centre for Gambling Research, '2005 Gambling Summary: Australian Capital Territory', 2005, accessed on 17 November at <http://gambling.anu.edu.au/menu/PDFs/factsheets2005/FactsheetACT05-Final.pdf>.

⁴¹ Australian Institute for Gambling Research, Survey of the Nature and Extent of Gambling and Problem Gambling in the ACT, July 2001, Commissioned by the ACT Gambling and Racing Commission, at 10, accessed at http://gambling.anu.edu.au/menu/PDFs/ACT_Gambling-Survey_2001.pdf.

making close to \$15 million in annual revenue. We urge the Government to reconsider its decision to maintain current numbers of poker machines in the ACT as well as the legislative power to increase the number of machines.

Increase efforts to minimise the harm from problem gambling

ACTCOSS appreciates the additional harm minimisation measures that were introduced by the ACT Government in 2004, and acknowledges that the decision to ban smoking in enclosed public places is also likely to have a positive effect on reducing the incidence of problem gambling. However, while the revenues from gaming machines have continued to grow, there has been little assessment of the changing incidence of problem gambling in the ACT, nor any commitment to include additional harm minimisation measures. We appreciate the need for evidence-based policy, but this should not be used as an excuse for inaction. ACTCOSS recommends that additional harm minimisation mechanisms be assessed for their impact, and those demonstrated to be most effective introduced into legislation.

Support problem gambling support services

Counselling and advice services play a critical role in supporting problem gamblers and their families and raising public awareness. These services are

unable to meet demand, given the extent of the problem in the ACT community. We call upon the Government to increase its support for problem gambling services. A major gap in service funding is for prevention, education and awareness-raising. Gambling support services are currently funded to provide only a limited number of hours per week of prevention and education services. This is not adequate to effectively perform this core function, and the potential social costs of inadequate funding are significant. Such services are vital to assist people before they reach crisis point. They are also essential to raise community awareness about the signs of problem gambling and, more generally, the social harms caused by problem gambling.

Strategy 13: Ensure sustainable resource strategies are equitable

Ensure that sustainable resource strategies do not adversely affect disadvantaged consumers

We welcome the ACT Government's policy direction to develop more sustainable water and energy usage policies. However, we urge the Government to consider issues of equity and ensure that the costs of water and energy reductions are not imposed on those least capable of bearing them.

ACTCOSS is concerned that the cost of basic utilities is outstripping wage growth for low income households. Water costs have significantly increased in the last few years. We are concerned that wage rates for consumers on low and fixed incomes have not increased at a comparative rate.⁴² We understand the environmental objective behind increasing water costs, but suggest that the burden of this cost should be borne by those household that are both high-income and high-use. In addition, energy and water usage cannot always be controlled by the consumer but may relate to the nature of the dwelling. Poorly insulated, inadequately heated and water inefficient properties, like those at the cheaper end of the rental market, impose larger energy and water costs. These issues need to be taken into

⁴² Wage increases have been approximately 8%, compared to a 13% increase in water costs over the last few years.

account in the development of water and energy policies.

Finally, ACTCOSS urges the Government to review the ACT Housing retrofitting program to make dwellings more energy and water efficient. If reviewed positively, this program should be expanded and continued. We also call for a renewal of the WEST Energy trial and a review of results. Finally, we recommend that water charges for public housing tenants be limited to, at a maximum, excess water use only.

Examine the appropriateness of existing concessions

We reiterate our comments on water and wastewater pricing made earlier this year, in which we called for the ACT Government's review of Community Service Orders, rebates and concessions to be made public.⁴³ We also expressed concern that current rebates and concessions are inadequate for low income households, while some concessions are no longer appropriate.

⁴³ ACTCOSS, 'Comment on the ICRC's Water and Wastewater Annual Price Reset', March 2006.

SECTION 4: JUSTICE AND HUMAN RIGHTS

Strategy 14: Foster a corrections and police system that is respectful of human rights

Foster a human rights culture in the new prison, respectful of prisoner support networks and ensuring access to health services

ACTCOSS believes that early intervention, diversion and non-custodial sentencing should be the cornerstones of corrections policy. In our view, custodial sentencing should be viewed as a last resort. This perspective is informed by a cognisance of:

- the socio-economic factors that bring people into contact with the criminal justice system;
- the ineffectiveness of prison terms in preventing recidivism; and
- the traumatising effect of detention.

The 2006-7 Budget allocated \$3 million to the set up costs of the Alexander Maconochie Centre. We press the Government to ensure that the prison adopts a human rights framework and recognises and respects the role of prisoner family and support networks. A culture of respect for human rights must be fostered within the prison, with prisoners aware of their basic rights and prison staff respectful of these rights. In particular, the

rights of women and indigenous persons need to be carefully protected, with separate facilities for women. In addition, comprehensive and high quality health services need to be provided to prisoners at the centre, mindful of their generally low health status and the complex nature of the physical and mental health conditions likely to be experienced. Health programs need to include a needle exchange program and the provision of free condoms.

Extend public consultation and establish accountability mechanisms to oversee the prison's development and operation

We are concerned that the consultation process leading to the development of the prison plan has been inadequately inclusive of relevant community organisations. As this process continues, we urge the Government to extend its consultations more broadly.

Strong oversight mechanisms need to be maintained to ensure accountability and compliance with human rights principles throughout the planning process and beyond construction. Effective and transparent mechanisms must be developed for prisoner and family complaints to be lodged and reviewed. Finally, an ongoing dialogue with community organisations must be maintained to monitor the impact of the prison on community services.

Improve the capacity of the police force to respond appropriately in situations involving members of vulnerable groups

The last budget committed \$30 million to be spent on police services in the next four years. This includes funding for 60 additional police staff and is intended to increase police presence and visibility in the ACT. ACTCOSS believes, rather than expanding the police force, Government resources need to be directed at improving the quality and appropriateness of existing police services. In this regard, ACTCOSS suggests that core funding priorities for the police force should be:

- the recruitment of additional indigenous liaison officers (we understand that the current numbers are unable to meet the need);
- cultural awareness and anti-racism training, particularly on indigenous issues;
- mental health training (to equip officers to interact with mental health consumers with care and respect);
- human rights awareness training, to inculcate a human rights culture in the police force.

Strategy 15: Improve the accessibility of the justice system for disadvantaged members of the community

Ensure that the reform of legal and regulatory tribunals and services in the ACT does not compromise accessibility or fairness

The Government has signalled its intention to conduct a review of the structure and operation of tribunals currently administered by the Magistrates Court. It was indicated in June that stakeholder consultation would occur by the end of this year. ACTCOSS is not aware of any substantive progress having been made in this review, nor of any discussion paper being released. Similarly, in June this year, the ACT Government announced the creation of a new Office of Regulatory Services within the Department of Justice and Community Safety, incorporating the Office of Fair Trading, the Registrar-General's Office, Workcover, the Independent Competition and Regulatory Commission and a range of other regulatory functions. This is intended to be a 'one-stop shop', reducing duplication and increasing efficiency. We are concerned to ensure that any reforms for the purpose of 'economy' and 'efficiency' do not compromise, but improve, access to fair, impartial and competent tribunals and regulatory services. Our particular concern goes to the capacity of amalgamated tribunals to cope with their combined case load, and the potential for delays. We would

also wish to ensure that specialised tribunals are maintained in specific areas, including those tribunals involved in the assessment of 'hardship'.

In addition, ACTCOSS is concerned by the existing powers and function of the Housing Review Committee. This body currently has the power to make recommendations to Housing ACT, but no independent decision-making power. There has been a suggestion from Government that this body is to be reviewed. ACTCOSS calls upon the Government to clarify its intentions with regard to the Committee, and to conduct broad and meaningful consultation on any proposed changes, mindful of their impact on disadvantaged Canberrans. We would welcome the expansion of the Committee's review functions to include community housing decisions.

Improve the fairness of the Mental Health Review Tribunal process by ensuring institutional integrity and improving access to representation

ACTCOSS is concerned by the current structural location of the Mental Health Tribunal under the umbrella of the Magistrates Court.⁴⁴ This, we understand, can potentially result in an individual coming before the same judge or tribunal member in both a mental health review proceeding and a

⁴⁴ See our recent comment on the Review of the ACT Mental Health (Treatment and Care) Act 1994 Discussion Paper, which raised this issue at 6.3.1.

criminal matter. Even if this potentiality is avoided, the institutional integrity of the Tribunal is compromised by its structural location. We therefore call upon the ACT Government to establish an independent Mental Health Tribunal, entirely discrete from the criminal justice system.

ACTCOSS is also concerned by limited access to representation in the Tribunal, in light of the particular vulnerability of those likely to be involved in a Mental Health Tribunal review. We therefore encourage the Government to consider expanding funding for consumer advocates. We understand that the presence or absence of a representative is quite critical in determining the outcome of a mental health review. Advocates are essential in ensuring that the interests of mental health consumers are raised and considered. As argued earlier in this submission, advocates are fundamental in legal and administrative review processes but also in situations involving involuntary orders, forensic clients and access to services for other mental health consumers.

Increase support to free legal and advocacy services

For disadvantaged members of our community to have access to justice, free legal advice must be available and accessible. Legal Aid and Community Legal Centres (CLCs) play a fundamental role in the provision of this advice. Several priority funding areas

identified by CLCs for the next budget year include:

- Developing CLC capacity to not only give advice to clients in centres but to take services out to clients where necessary;
- Recurrent funding for indigenous workers to be able to effectively engage with and support indigenous clients; and
- Funding for CLCs to perform critical advocacy and law reform functions.

ACTCOSS also repeats its call for increased resources for consumer and community advocacy services. These services are essential to effective human rights enforcement. The lack of advocacy services has been repeatedly raised as a core concern of the community sector, particularly around human rights issues in relation to people with physical and intellectual disabilities and mental health consumers.

Strategy 16: Foster a human rights culture in the ACT premised on the indivisibility and enforceability of human rights

...as yet, the impact of the HRA upon the lives of Canberrans is slight, and human rights remain a largely nebulous concept that lies beyond the realm of everyday life.⁴⁵

ACTCOSS continues to press the ACT Government to include economic, social and cultural rights in the Human Rights Act. It cannot be assumed that these rights are available to all Canberrans, when a significant number of ACT citizens experience homelessness, housing stress, health inequality and other disadvantages.

Invest in the creation of a human rights culture in the ACT

ACTCOSS has welcomed the reviews of racial vilification legislation and the Human Rights Act in the past year. These reviews play an important role in raising public awareness about relevant provisions and identifying problems with the legislative schemes. We urge the Government to further strengthen the protection offered by these laws, and to improve the accessibility of relevant tribunals and courts to disadvantaged members of the community. We also encourage the Government to extend and intensify public information campaigns about human rights to generate a human rights culture, both within ACT government services, and in the wider community. ACTCOSS repeats the comment made in our submission on the review of the Human Rights Act, that:

The ACT Government must move beyond an institutional 'dialogue model' in order to generate awareness and instil a sense of ownership of human rights in the people of the ACT. This requires education and engagement. Litigation should be an option of last resort – the end, not the beginning, of rights protection.

Ensure that reforms to the Human Rights Commission do not undermine access and fairness

ACTCOSS is concerned by the recent amalgamation of the Human Rights Commission and the Community and Health Services Complaints Commissioner. The new Commission is comprised of 3 Commissioners: Human Rights and Discrimination; Health Services and Disability; and, Community Services, Children and Young people. The new body will process complaints about discrimination, health services, disability services, services for older people, community services, and services for children and young people. It is also charged with a community awareness function. ACTCOSS is concerned to ensure that efforts to reduce expenditure and 'streamline' administration are not

⁴⁵ ACTCOSS Submission to the Review of the Human Rights Act 2004, at 5.

at the expense of accessible, fair and competent tribunals. In particular, we fear that the effect of streamlining and amalgamation may be a lack of specialisation where needed. We urge the Government to conduct consultations with affected stakeholders: consumers, community organisations, and members of disadvantaged social groups, to examine the impact of the changes on access and fairness and remedy any adverse effects.

Strategy 17: Reduce violence against women in the ACT and improve support to women who experience violence

ACTCOSS believes that all women have the right to live in a world without fear of violence. Governments can contribute to the achievement of this objective through public information campaigns and the adequate resourcing of domestic violence services. Freedom from violence was identified as an Area for Action in the ACT Women's Plan and a Government commitment to the principle elaborated in *Justice, Options and Prevention – Working to make the lives of ACT women safe*. This proposal is supported by an annual action plan to outline Government action in regard to the stated objectives. In addition, the Family Violence Intervention Program is designed to provide an integrated response to criminal family violence matters. ACTCOSS welcomes these initiatives, but stresses that a commitment to freedom from violence requires both Government initiatives and support for the community sector to perform crisis care, education and advocacy functions.

Increase funding to domestic violence and sexual assault support services

The ACT Government provides ongoing funding to community domestic violence and rape crisis services. Evidence from women's organisations indicates that this

funding is not adequate to enable them to respond to existing need and to develop their core functions. Both the frontline service and public education function of community organisations is constrained by a lack of resources. We call upon the Government to respond to the recommendations made in the 2004 Women's Services Network Report, 'Women's Refuges, Shelters, Outreach and Support Services in Australia'.⁴⁶ In particular, we emphasise the recommendations that funding be allocated to domestic and family violence outreach workers, to enable community organisations to provide on-going training and professional education to police and court personnel, and to provide medium-term and transitional housing for women and children exiting crisis accommodation.

Increase public information about violence against women

Supporting healthy relationships education has been identified by women's services as a key funding priority. We call upon the Government to direct adequate resources to women's community organisations to develop effective public information strategies which target schools and other strategic forums. These strategies should be complemented by Government public information campaigns and education programs.

⁴⁶ Published by the Commonwealth of Australia 2004, accessed at http://www.wesnet.org.au/publications/reports/0511EA00W_report.pdf.

SECTION 5: EDUCATION, TRAINING AND EMPLOYMENT

Strategy 18: Provide a quality public education system that is accessible, inclusive and supportive of disadvantaged students

Examine and review the impact of the ACT schools reforms on disadvantaged students, family and student health and wellbeing and community cohesion

ACTCOSS has serious concerns about the proposed closure of 39 schools in the ACT. Under this proposal, by 2008, 22 preschools, 15 primary schools, 1 high school and 1 college will have closed, with 22 schools to close by the end of 2006. Although we note that the Government has pledged \$1 million in transitional assistance to students affected by the school closures, we predict this will not adequately alleviate the damage wrought by the reforms. We call upon the Government to review its proposal, addressing the following concerns:

- The likely adverse impact of the reforms on indigenous and disadvantaged students⁴⁷;

⁴⁷ As raised in our recent comment on 'Towards 2020: Renewing our schools', we understand that school closures and relocations are likely to disproportionately affect students from low socio-economic backgrounds and disadvantaged groups. According to Save our Schools, of the ten schools in Canberra with more than 5% indigenous student enrolment, 7 will be fully or partially closed. Further, the

- The likely adverse impact on special services currently provided in schools marked for closure (e.g. autism, ESL, DCAP). Even if services are relocated, the disruption caused to students will be significant;
- The instability and inconvenience that will be caused by the changes to students, families and communities;
- The increased travel time and expense for students and their families;
- The related diminution in students' time for recreation, extra-curricula and exercise activities;
- The threat to community cohesion - irreconcilable with the Government's Social Plan;
- The loss of community facilities (e.g. sports grounds, meeting halls etc);
- The undermining of the college system, despite consistent positive reviews;
- The inconsistent nature of the proposed system, with no clear commitment to any particular educational model;
- An increase in the number of transitions for young people, despite the claim that the Strategy will reduce them;
- The loss of the only secondary school in the inner north, at Dickson; and
- The removal of student choice, limiting educational options in the name of increasing them.

ACTCOSS fears that those with the fewest resources may be least able to adapt to these changes. These families tend to send their children to local schools. The physical and social adjustments required are likely to impose significant economic and emotional costs. Public schools form the heart of a community, inclusive spaces in which students from diverse economic, social, racial and cultural backgrounds interact and learn together. The impact of the closures on student, family and community wellbeing must be further considered and addressed through Government review (including social-demographic analysis) and substantial community consultation.

Improve and extend the schools reforms consultation process by making all relevant information publicly available, including socio-demographic analysis

ACTCOSS has concerns about the planning and consultation process around 'Towards 2020: Renewing Our Schools'. First, we are concerned by the lack of public information as to the background and justification for the schools reforms. With the Strategic and Functional Review documents confidential, the community

schools proposed for closure have 5% or more of their enrolment comprising students with disabilities. Particularly concerning is the proposed closure of the two high schools and the college with the largest proportion of students with disabilities. See Save our Schools, 'Government has failed to substantiate the case for school closures', 14 November 2006, at www.soscanberra.com.

capacity to engage in an informed debate about the provisions is limited. Second, there appears to have been little consideration given in the development of the plan to differential impacts on disadvantaged communities. No publicly available socio-demographic analysis of the changes appears to have been conducted. However, we understand that a Department information paper on changing demography in the ACT acknowledges that 'schools experiencing relatively low enrolment levels are also those schools that are located in areas with lower socio-economic profiles'.⁴⁸ A comprehensive social demographic analysis must be carried out and publicly released. Third, the large scale of the reforms to be completed in extremely short time frames compromises consultation and democratic processes. Concerns have been expressed by the community about the adequacy of consultation and collaboration. The time frame required for consultation regarding changes of such enormous scale cannot be compared to the 6 months legally required for any individual school closure. There is a general community perception that the reforms represent a cost-cutting initiative first and foremost, with no real educational outcomes objective. The reference to pedagogical support in the document has been treated with

⁴⁸ As quoted by Save Our Schools, extracted from documents obtained under FOI legislation. Save our Schools, 'FOI Documents show that school closures will hit least well-off communities', October 23, at www.soscanberra.com.

understandable scepticism in light of the positively reviewed college system currently existing in the ACT.

Review proposals to reduce the number of counsellors in schools

The proposed cuts to the numbers of counsellors and welfare workers in schools also represent a threat to student health and wellbeing. These services are vital in providing confidential emotional and psychological support to students. They are also likely to be a first point of access for students being sexually or physically abused, experiencing other family or relationship problems, experiencing or at risk of homelessness or experiencing mental illness. We are also concerned that this proposal is at odds with the Government's commitment to sustain funding for youth workers in schools in the ACT Government Commitment to Young People 2004-8.

Strategy 19: Improve education and training services for disadvantaged social groups

Improve indigenous education and training programs

As noted in the *Performance of Indigenous Education Eleventh Report 2005*, 'indigenous people continue to experience disadvantage and do not achieve educational outcomes equal to those of the rest of the student population.'⁴⁹ ACTCOSS is concerned by the adverse impact that the schools reforms will have on indigenous students. More generally, we emphasise the importance of specific indigenous education and training programs, which should be continued and expanded.

Improve education, employment and training services for refugees and TPV holders in the ACT

ACTCOSS emphasises the need for special support services for refugee children in schools, in light of the increased intake of refugee children from Africa, exposed to (or directly involved in) civil war. These children have particular educational, psychological and emotional needs to which the Government must respond.

We applaud the Government for providing refugees and TPV holders

⁴⁹ Report to the Legislative Assembly of the Australian Capital Territory, 'Performance in Indigenous Education', Eleventh Report covering calendar year 2005 at 3.

in the ACT with free access to public education and free English classes. However, we urge the Government to enable TPV holders to access adult employment and training services.

Resource specific skills-training programs for the aged population

The *ACT Annual Vocational and Training Priorities for 2006-7* indicated that a rising proportion of the labour force was aged 65 years and over, with older workers less inclined to leave the labour force than previously. ACTCOSS calls upon the Government to resource specific re-skilling programs for older people. These programs need to cater for those seeking to acquire specific skills rather than to learn a generic range of skills.

Extend access to support staff for students with disabilities

ACTCOSS submits that the ACT Government needs to be directing funds towards the provision of an increased number of disability support teachers in schools. We are alarmed by a report that the Government is considering a proposal to tighten eligibility criteria for support for children with disabilities in schools. We call upon the Government to reconsider this proposal and support additional support staff in schools to fulfil unmet need and improve educational outcomes.

Strategy 20: Examine and address the social and economic impacts of the Federal industrial relations reforms in the ACT

Distribute accessible information about the IR reforms to the community, targeting vulnerable social groups

We press the Government to provide public, accessible and widely distributed information about the nature, content and impact of the Federal Government's industrial relations reforms. ACTCOSS reminds the Government of the ALP commitment to educate youth about the Federal Government's industrial relations reforms, particularly in relation to Australian Workplace Agreements (AWAs). Targeted information should be directed at vulnerable groups under the new regime, in particular, youth and Culturally and Linguistically Diverse (CALD) workers and those with a disability or mental illness.

Monitor and address the social and economic impact of the reforms on disadvantaged groups

We call upon the ACT Government to not only analyse and critique the Federal Government's industrial relations reform agenda, but also to formulate policies which ameliorate the worst effects of these changes.⁵⁰ These effects are likely to include lower minimum wages, increased job insecurity, reduced entitlements, poorer working conditions and weaker bargaining power. These factors will increase pressure on public and community housing, mental health and community legal services. In this climate, the ACT Government must closely monitor the impacts of the reforms and formulate appropriate ameliorating social and economic policies.

⁵⁰ See our submission to this effect earlier this year: ACTCOSS, 'Stacking the Deck: The Impacts of Federal Employment Reforms on the Disadvantaged in Canberra', A Submission to the ACT Legislative Assembly Select Committee on Working Families.

Strategy 21: Expand post-secondary training and employment options for people with disabilities.

Fund additional places in post-secondary training and employment programs

ACTCOSS congratulates the ACT Government on the 3.4% increase in people with disabilities undertaking vocational education and training in 2005.⁵¹ However, in comments and submissions made by a number of disability organisations, the lack of post-secondary services has been repeatedly raised as a priority area of need. In light of these issues, we welcome the ACT Government 2007 Post School Options information package. We note that this package provides two support options: transitional pre-vocational funding (for a maximum of three years), and ongoing support through Community Programs Association's "Frameworks" service (on average, 10 hours a week of support). However we are concerned that funding for this support is strictly limited and fear this will leave a high level of unmet demand. The Commonwealth Government's 'welfare-to-work' changes make it now even more imperative that the ACT Government provide education and training to facilitate the transition to work and other post-school options. We understand that there

⁵¹ Reported in July 2006. See statistics released by the National Centre for Vocational Education Research (NCVER), cited in the *ACT Annual Vocational and Training Priorities for 2006-7* at 5.

are too few places to meet need and insufficient training hours available. This means that students emerging from secondary education are often left with no opportunities to further develop their knowledge and skills-base, let alone access employment opportunities. Our concern is that this maintains the disability poverty trap and limits life choices and community participation.

Explore innovative employment models for people with a disability

We urge the Government to consider a strategy akin to the Tasmanian 'Partnerships to Jobs' project, in which the Tasmanian Government funds community not-for-profit organisations to manage projects that increase employment opportunities for disadvantaged job seekers, including the long-term unemployed.⁵²

Direct resources to ensuring that the ACT Government is a model employer for people with a disability

The ACT Government must act as a model employer of people with disabilities. In this regard, ACTCOSS is concerned by the Government's failure to meet the targets of the Workforce Strategy for the ACT public service. Some basic issues need to be addressed to improve access and make the Government a viable and supportive employer for those with disabilities. These include, making

⁵² For more information, see: <http://www.development.tas.gov.au/workforce/jobs.html>.

all buildings accessible and addressing the lack of available parking. We seek an update on the implementation of the ACT Public Service Employment Framework for People with a Disability, launched in September 2004, designed to ensure that Government planning policies encourage the recruitment of people with disabilities. We also await concrete and practical responses to the physical access audits carried out in 2005.

Enhance the capacity of the community sector to provide employment and volunteer opportunities for people with disabilities

In addition to becoming a model employer, we urge the ACT Government to support the community sector to employ people with disabilities both in a paid and volunteer capacity. In order to do so, community facilities need to be audited and necessary adjustments resourced. The importance of participation by people with disabilities in community organisations cannot be understated. As both paid and volunteer workers, people with disabilities make a vital contribution to the community sector. In addition, volunteering in the sector enables people with disabilities who have been out of the workforce for some time to test workforce readiness.

Strategy 22: Expand employment opportunities and support services for mental health consumers.

Develop support programs and employer awareness training to improve workforce participation and supportive work environments for mental health consumers

Mental health consumers experience high rates of job insecurity, unemployment, poverty and homelessness. Job security and a supportive work environment are essential to mental wellbeing. Further, employment is important for the recovery and rehabilitation of individuals after an acute mental health episode. A supportive workplace is also essential in maintaining the mental health of those with less acute mental health conditions. Workplaces have a promotion and prevention function, as well as a secondary recovery function. People with mental health conditions are subject to discrimination and harassment in the workplace on the grounds of their condition. This acts as a deterrent to disclosure, precluding the establishment of support services and networks in the workplace.

ACTCOSS is concerned that the 'Welfare to Work' changes will adversely impact upon many people with a mental illness by reducing income support payments. In addition, the reporting requirements and threat of payment suspension will impose

a burden on mental health consumers, potentially exacerbating existing conditions. In this new and hostile environment, the ACT Government needs to enhance support to mental health consumers seeking to enter, or remain in, the workplace. For this reason, we call upon the Government to invest in programs to educate employers, reduce stigma and discrimination and develop supportive work environments. This could involve incentives for employers, but must also include support for mental health consumers.

Develop innovative employment programs for mental health consumers

ACTCOSS urges the Government to invest in innovative employment programs, like social firms, for mental health consumers. Mental health consumer employment strategies must avoid creating 'sheltered workshops', where people with mental conditions are engaged in menial work with no opportunity for training or advancement, nor interaction with mainstream organisations. Social firms provide an opportunity for mental health consumers to engage in meaningful employment in a supported, but not sheltered, environment.⁵³

⁵³ For further information about social firms and the role of Government in facilitating their development, see Jo Barraket. 'Community and Social Enterprise: What Role for Government?', March 2006, accessed at: [http://www.dvc.vic.gov.au/Web14/dvc/rwpgslib.nsf/GraphicFiles/CommunitySocialEnterpriseMarch2006.pdf/\\$file/CommunitySocialEnterpriseMarch2006.pdf](http://www.dvc.vic.gov.au/Web14/dvc/rwpgslib.nsf/GraphicFiles/CommunitySocialEnterpriseMarch2006.pdf/$file/CommunitySocialEnterpriseMarch2006.pdf).

PART B: SUPPORTING THE SYSTEM

SECTION 6: COMMUNITY SECTOR VIABILITY

ACT community sector organisations remain at the frontline of assisting some of the most disadvantaged people in Canberra. Community organisations often help those who would otherwise be beyond the reach of government agencies. They are able to build strong and respectful relationships to aid people experiencing disadvantage. They are also left to pick up the pieces when governments, whether federal or local, or the private sector, introduce regressive policies that generate poverty or exclude people from participating in society.

It has been a hard year for the community sector. Not only have organisations been forced to cope with the impacts of the Australian Government's misnamed 'Welfare-to-Work' policies, but they have also found their resource base constrained by the ACT Government's implementation of the Costello Review. This has resulted in cuts to some organisations and a lack of growth for others. This process has severely damaged the relationship between community agencies and the government, and has reduced trust that the ACT Government will fulfil its commitments under the Social Compact, The Canberra Social Plan and other strategic documents. At the same time, the

impacts of Industrial Relations (IR) reform threaten to eat away at community workers' wages and conditions, with the Social and Community Services (SACS) Award likely to disappear in its current form in the coming year, potentially reducing the baseline for standards in remuneration and workplace entitlements.

Even before this year's budget, community organisations responding to the ACOSS Community Sector Survey reported that despite providing an additional 10,000 occasions of service over the previous year, some 15,000 people were turned away due to lack of capacity.⁵⁴ Similarly, two-thirds of organisations responded that their unfunded work had increased during the past year. ACTCOSS reiterates that the community sector contributes not only by improving social equity in the ACT, but by directly contributing to economic development, principally by:

- *Creating a high number of jobs per dollar spent;*
- *Directly contributing industry value added and stimulating value added in the economy as a whole;*
- *Promoting local employment beyond the sector through consumption effects;*
- *Providing avenues for volunteer work; and,*
- *Facilitating the economic participation of*

⁵⁴ ACOSS (2006) *Community Sector Survey (ACT)*, p.5

*disadvantaged people who otherwise have limited access to the labour market.*⁵⁵

ACTCOSS notes that in publishing the Social Compact, the ACT Government undertook to:

- *Recognise the importance of and support the sustainability and long-term capacity of the community sector*⁵⁶;
- *Adopt an approach to consultation that seeks early input in policy development and planning processes, as well as provides opportunities to respond when options have been developed*⁶⁷; and
- *Ensure fairness and transparency in funding the community sector*⁵⁸.

In the development and implementation of the Costello Review and the ACT Budget 2006-07, these principles have been severely compromised.

The ACT community sector will receive in the order of \$80 million in funding from the ACT Government this financial year⁵⁹, in support of the services they provide. Community sector agencies continue to be deeply embedded in human services provision in Canberra. It is clear that some progress needs to be made to re-establishing the trust

and co-operation between the public and community sectors in the ACT, and the ACT Government should recommit to supporting the community sector to become viable and sustainable.

⁵⁵ ACTCOSS (2003) *The Contribution of Community Services to the ACT Economy*

⁵⁶ ACT Government (2004) *The Social Compact*, p. 13

⁵⁷ *Ibid.* (p.14)

⁵⁸ *Ibid.* (p.15)

⁵⁹ *Towards a Sustainable Community Sector in the ACT: The Report of the Community Sector Taskforce* estimated that ACT Government funding of the community totalled 'over \$78 million' (p.17)

Strategy 23: Improve the viability of the community sector workforce

Community sector workers are the greatest strength of the community sector. It is through the dedication, energy and innovation of community organisations' staff that the community sector is able to effectively provide support and assistance to those who need it most in our community. Yet this vital resource is increasingly under threat.

Towards a Sustainable Community Sector in the ACT: The Report of the Community Sector Taskforce (the CST Report) identified the considerable gap in wages and conditions between public and community sector workers doing the same job. It estimated the pay differential as 'up to \$20,000 per year'⁶⁰. In addition, the leave and other entitlements for community sector workers are frequently lower than for those working in the public sector, and a higher proportion of staff are in casual positions.

On top of this already troubling situation, the Federal Government's IR reforms will compound the problems. Until now, the SACS award has at least been able to maintain a minimum standard for pay and conditions for community sector workers, however low. In the future, however, the SACS award is expected to disappear in its current form, and remove many of the numerous protections it provides for workers. Even where organisations have the resources to

⁶⁰ Ibid. (p.29)

introduce alternative mechanisms for protecting workers' entitlements, they are not vastly greater than the award.

These are not the only threats to the viability of the community sector workforce. The current tight employment market has also affected organisations' ability to recruit and retain workers, particularly when they do not have the resources to compete with the salaries of the public and private sectors. Over the longer term, the ageing of the population is also likely to have an effect, with community sector workers being, on average, older than the workforce generally. As workforce participation decreases with population ageing, it will likely be the community sector that finds it most difficult to maintain a skilled and viable workforce.

Ensure that community organisations are able to recruit, train and retain an adequate workforce

The ACT Government has repeatedly responded to concerns raised by the business community that they are unable to find appropriately skilled workers in an environment of relatively low unemployment. The Australian Government has also responded with a substantial package of initiatives to increase skills development. Yet governments have not been nearly so ready to support the recruitment, training and retention of staff in the community sector. ACTCOSS is concerned that ACT community

sector organisations are being forgotten in the push to improve the availability of skilled staff.

ACT community sector organisations are currently experiencing some of the highest rates of staff turnover of any industry⁶¹. In addition, recent Australian Bureau of Statistics (ABS) data indicates that nationally, community services have experienced employment growth of an astonishing 17.8% in the year to August 2006.⁶² Even if only a fraction of this figure eventuates in the ACT, it would help explain the shortage of community sector workers, and reinforce the need for government assistance in skills development.

Concurrently, community sector organisations are increasingly required to maintain minimum levels of qualifications among their staff. Organisations are rarely funded to achieve these additional requirements, which are generally accompanied by increased training-related expenditures and higher employee remuneration in recognition of those qualifications.

The Chief Minister has recently announced the formation of an ACT

⁶¹ The *ACOSS Community Sector Survey (ACT)* found in 2005 and 2006 rates of staff turnover in the ACT community sector of 31% and 24%, respectively

⁶² ABS (2006) *Labour Force, Australia, Detailed, Quarterly - Table 06: Employed persons by Industry Subdivision and Sex* Cat. No. 6291.0.55.003. ACTCOSS notes that these figures are based upon the ANZSIC definition of community services, which, while having substantial overlap with the community sector, is not our preferred measure of the community services workforce.

Skills Commission and indicated that there will be opportunities for consultation with the community sector. However, despite the inclusion of three representatives from the business sector, there is neither a representative from the community sector, nor from the targeted potential student population.

Similarly, the Australian Government has announced a package of measures designed to improve workforce skills. While a number of these initiatives would have application to community sector employers, many focus on traditional trades and business skills. Community sector employers often do not have the same access to information and organisational capacity to take advantage of the incentives offered, and their capacity is frequently underestimated by employment service providers.

There is a need for better community sector workforce data, as the ABS, the AIHW and the ACOSS data all have problems in being able to give complete coverage of community services.⁶³ ACTCOSS understands that the ACT Government is participating to progress this issue through the Community and Disability Services Ministerial Council (CDSMC), but we would encourage this process to

⁶³ For a discussion of the concerns with ANZSIC and AIHW data, see ACTCOSS (2003) *The Contribution of Community Services to the ACT Economy* (p.4) and AIHW (2006) *Information relating to the Community Services workforce*. The ACOSS data is drawn from a limited sample size with limited data on the ACT community sector workforce.

be accelerated. We also note that a similar conclusion formed a recommendation of the CST Report. We call upon the Government to ensure that comprehensive data is collected, to give further insights into workforce trends and problems and inform the development of solutions.

Further, an essential component of ensuring a viable workforce is that organisations have adequate access to appropriate and affordable training for their staff. ACTCOSS supports the CST Report recommendation that a training analysis for community sector organisations be conducted. In addition, additional assistance must be provided to ensure that organisations are aware of training opportunities and incentives, and that training is responsive to the community sector's context and need. A particular concern is that organisations often report that they do not have the resources to backfill staff on training, with resources needed to reduce this barrier.

Finally, human service providers tend to recruit workers based on their personal qualities, and then train them to give them the skills required. For instance, research on aged care training reports that:

Managers explain that it was preferable to recruit the right people and then train them, and cited attributes sought after in new recruits as flexibility, sensitivity, an understanding of care, dignity and respect, empathy, people skills, honesty,

dedication, life experience and rapport...⁶⁴.

This is a widely utilised approach to staff development in the community sector, and ACTCOSS encourages government to buttress existing-worker training programs for the sector.

Provide adequate resources and support for community organisations to reduce the gap in pay and conditions

ACTCOSS congratulates the ACT Government on its commitment to a new indexation model for community sector funding that is based on an 80:20 composition of the Wage Price Index and Consumer Price Index. Indexation that better reflects the costs of providing services have been implemented by most State and Territory Governments, and the final implementation of this policy in the 2006-07 ACT Budget stands as an important commitment by the ACT Government to supporting the community sector.

Yet this initiative, important as it is, will not address the problem alone. While it may assist in preventing the gap from widening further, it does little to reverse the previous divergence. A further complication has been created by the Australian Government's IR reforms; alternative mechanisms need to be pursued to ensure organisations are able to collectively increase their pay levels without competing for workers or undercutting one

⁶⁴ NCVET (2005) Workplace training practices in the residential aged care sector (p.20)

another for contracts. This competitiveness is a threat to the sector's cohesion. Government must play a constructive role in this, rather than trying to extract greater 'efficiencies' from the sector, a pressure which often results in the withholding of pay increases from staff.

ACTCOSS also endorses the CST Report recommendation that the ACT Government establish a mandatory portable long-service leave scheme for the community sector. This has been achieved for the contract cleaning industry and proven workable. We call upon the Government to implement this recommendation, but suggest the need for funding over a longer initial period than is suggested by the CST Report.

Support the further development of a diverse community sector workforce

The community sector's strength in being able to assist marginalised people frequently comes from a shared experience with those it assists. Community organisations create a sense of identity and purpose that attracts workers who are able to empathise with consumer groups. For example, culturally-specific services frequently have a higher proportion of workers who share the same cultural heritage as their consumer group. The rapport that is often built from this common understanding is an essential part of an organisation's ability to deliver services effectively.

Supporting organisations to maintain a diverse workforce that is able to engage and interact with their consumers should be an important focus for the ACT Government. This should not be limited to specific consumer group services, but also to more broadly based community services. The sensitivity of community organisations to individual needs means they can also provide an important entry-point to the workforce for people from disadvantaged circumstances.

Sometimes people from particular backgrounds (including former, present or future consumers) require additional assistance and support in the workplace than workers in general. For instance, a mental health consumer may ultimately make an excellent community worker with the requisite empathy and understanding of the people they work with, but may require additional initial support to gain the skills and confidence required to perform their duties. In the case of people with disabilities, an organisation may also need to access additional resources in order to ensure that the workplace is accessible and appropriate.

ACTCOSS is aware that indigenous people are among the most marginalised in Canberra, and that the ability for Indigenous and mainstream community services to employ indigenous staff greatly improves their ability to service this client group. ACTCOSS continues to assist organisations in recruiting indigenous staff and supporting indigenous workers

through our indigenous Program. We hope that this program will continue to be able to improve the ability of community organisations to engage with the indigenous community, although it remains a starting point with much more to be achieved.

Assist organisations to meet their health and safety obligations to employees, consumers and volunteers

As in all workplaces, community sector organisations have important obligations to ensure that their employees, consumers and volunteers work and receive assistance in a safe and healthy environment. While ACTCOSS generally welcomes greater protection for workers, such as the recent changes to the *Occupational Health and Safety Act 1989*, we are concerned that there is little consideration in funding arrangements or in the allocation of premises to ensure that organisations have the resources and capacity to meet them.

ACTCOSS notes that the risks to health and safety in community organisations are frequently very different to those in a business environment. While OH&S regulation tends to focus upon the physical nature of the workplace, in many cases of human service provision the risks are more likely to come from human interaction. In addition, there is little emphasis in such regulations on providing a safe environment for volunteers, consumers, or residents.

Similarly, ACT Workcover almost exclusively targets its information campaigns at the private sector, including a recent campaign at providing information to small business, followed by a 'safety blitz'. While Workcover considers many community organisations to be 'small businesses', the organisations themselves do not respond to that label, as past experience has shown that information prepared for business is often of little use for the not-for-profit sector.

ACTCOSS is aware that at least one community organisation has received a fine for an OH&S breach during this 'safety blitz'. ACTCOSS notes that while Government agencies providing the same services cannot be fined for breaches of the Act, not-for-profit organisations are liable, including those primarily funded by government. ACTCOSS therefore questions the applicability of this instrument for community organisations.

Finally, ACTCOSS supports the recommendation of the CST Report that the government establish an OH&S project to assist organisations to establish good practice in this area. We suggest that the project is likely to be more effective if managed by a community organisation.

Strategy 24: Ensure that community organisations have equitable access to safe and appropriate premises

Effective community services require quality and appropriate premises. In many cases, community organisations are forced to locate in residual premises – locations and buildings that are excess to the needs of government and not suitable for businesses. This situation means that opportunities to engage with consumers are not maximised, and on occasion, that organisational staff and volunteers are working in primitive or unsafe conditions.

ACTCOSS notes that in 2003, Planning and Land Management (now the ACT Planning and Land Authority (ACTPLA)) published the first stage of the *Community Facilities Needs Assessment* (CFNA1) which covered northern Canberra, followed in 2004 by the report for stage 2 (CFNA2) taking in the southern half of the city.⁶⁵ We understand that there is also to be a final report (stage 3), but that this has not yet been publicly released. These reports have followed a previous study of facilities in the inner north by the previous government.⁶⁶ ACTCOSS also understands that yet another report has been completed for the

City West area, which is also yet to be made available.

This process has now been in progress for well over 5 years, and yet we are still to see any response to any of these investigations from the ACT Government. ACTCOSS calls on the government to formulate a meaningful response to these issues with a strategic action plan to improve access to appropriate premises.

Increase the availability of space for community organisations to operate, particularly in Civic and the Town Centres

The first two stages of the *Community Facilities Needs Assessment* found over 1800 community facilities across Canberra. However, CFNA2 found that participants in their consultations continued to report that ‘there is a shortage of low cost meeting space, halls and community centres, and office space for community groups’. Similarly, CFNA1 found that ‘there is very little useable, unleased land available in Central Canberra and Belconnen for future needs’. Our experience confirms these findings, and we stress the importance of locating community organisations in high-use areas to facilitate access.

ACTCOSS is particularly concerned at the reduction in land and space in Civic. While the new Griffin Centre is somewhat larger than its predecessor, it is also on a much smaller footprint without frontage

⁶⁵ The latter, however, has never been posted on the ACTPLA website.

⁶⁶ Planning and Land Management (2001) *Civic and the Inner North Community Facilities Study Issues Paper*, prepared by Susan Conroy.

onto Bunda St, and has continuing access problems in the evenings and on weekends. ACTCOSS understands that community organisations forming the Residents of Childers and Kingley Streets (ROCKS) have been asked to relocate to demountable accommodation as their site is to be used for car parking. ACTCOSS also notes that the QEII site was previously used to provide community services, but this infrastructure has been demolished and is intended to be sold for development. A similar fate seems likely for Westlund House, according to the City West Master Plan. ACTCOSS also notes that a number of community organisations received a copy of a document that suggested the government was considering the sale of Havelock House in Turner, although we have been informed that this was circulated in error and that there are no such plans.

All of these observations seem to indicate that there will be a reduction in community space in Civic, with limited current plans for additional facilities. ACTCOSS strongly urges the ACT Government to ensure that current community facilities in Civic will be replaced in their entirety, with allowance for future growth.

There is also a lack of affordable meeting places in Civic and elsewhere, and this will be further reduced as the Canberra Museum and Gallery withdraws the hire of its meeting spaces due to budget cuts. ACTCOSS advocates for greater availability of affordable meeting spaces, and supports the

CFNA2 recommendation that 'policies and procedures related to community facility hire needs to reflect differing capacity within the community to pay for venue hire' (p.31). ACTCOSS recommends that the ACT Government makes greater provision of community space, particularly in Civic and the Town Centres.

Improve the quality and appropriateness of community facilities

There continues to be a widespread practice that facilities for community organisations are only provided when they are excess to the needs of government, as reflected in a recent suggestion by the Minister for Education that schools facing closure could be used by community organisations. This frequently means that the premises available for organisations are old and/or inappropriately designed for community use. CFNA1 notes that the 'costs of maintaining old buildings is high' (p.23). Further, these buildings are frequently inaccessible for people with a disability and not adequately adapted for service provision or office space. In some cases, facilities may be unsafe for workers, volunteers and consumers.

Because the stock available for community use is so often residual, it is likely to be poorly located, reducing access for consumers and workers. Suburban facilities often have poor public transport connections, and many of these do not have accessible bus routes.

This means that disadvantaged people often have difficulty travelling to venues, needing to use cars or taxis which increase the cost. In addition, organisations, or their staff, are burdened with additional transport costs to carry out their work, effectively increasing their running costs or reducing their remuneration. ACTCOSS supports the recommendation that:

the provision of community facilities need to be a diverse and adaptable supply of accessible facilities, which are affordable to meet government goals for building social capital in the Canberra community.⁶⁷

Ensure the costs of facilities are appropriately recognised in funding arrangements and access to capital

A number of community organisations have been forced to locate to poorly-situated business premises because no other alternatives have been available. We also note that 'there are differences in how facilities that accommodate community groups are managed and maintained'⁶⁸. Accommodation for community organisations may be owned by the ACT Government, a community organisation or the private sector.

⁶⁷ ACTPLA (2004) *Community Facilities Needs Assessment: Report for Stage 2* (p.32).

⁶⁸ PALM (2003) *ACT Community Facilities Needs Assessment (Central Canberra, Belconnen and Gungahlin)* (p.23).

Even within government facilities, the asset may be managed and/or maintained by government or by a community agency, and there are a diversity of responsibilities about which issues are the responsibilities of the organisation and which are conducted by the ACT Government. There are also a variety of cost structures for the lease of facilities, from rent-free premises, through subsidised rent, to full market rent in the private sector.

While there is room for a diversity of arrangements, given the differing capacities of organisations to undertake building management and maintenance, these are rarely taken into account in funding arrangements. This disparity creates inequities in resources for different services, with some required to pay high rents, and others receiving both premises and maintenance free or at low cost. ACTCOSS supports the CFNA1 recommendation that 'a whole of government Community Facilities management strategy is required to standardise approaches to government owned assets leased to community groups' (p.24). Further, this issue should be considered in the development of Core Pricing Principles⁶⁹.

ACTCOSS understands that the Renew Community Infrastructure and Facilities Grants Program will not continue. We strongly advocate that this program be reinstated, as it provided the ability to upgrade community facilities to improve service delivery. More broadly,

⁶⁹ As committed to in the *Community Sector Funding Policy* (p.6).

however, we draw attention to the fact that community organisations generally face a problem with accessing capital for growing and improving their premises. Due to the lack of funding guarantees, restrictions on the ownership of assets in funding agreements and use of funding to finance debt, community organisations, unlike the business sector, cannot obtain private finance to improve service efficiency. Consideration might also be given to providing community organisations with Government-financed loans and reductions in restrictions on the use of funding to allow community organisations to increase their assets and improve their service efficiency, leading to more viable organisations. The development of an asset base could be used as collateral to allow greater access to private finance in the future.

Plan for the future development of community facilities

The current arrangements for planning, design, management and funding for community facilities remain ad hoc and do not anticipate future growth in demand for services. Without ensuring that there is enough land, buildings and capacity, any future expansion of community services will be impeded and more expensive for both government and organisations.

ACTCOSS reiterates our concern at the loss of community space in Civic. Part of the problem is that large areas of land, though used

for community facilities, were not 'zoned' as such. This means that because the Territory Plan did not designate the land as a Community Facility Land Use Policy (CFLUP), it can be easily sold and redeveloped for another (generally private commercial) use. ACTCOSS strongly recommends that, where appropriate, current community facilities owned by government that are not currently covered by the CFLUP should be re-zoned to this use to protect the land for future need, with additional land set aside in high-use locations.

ACTCOSS also draws attention to the need for greater consultation and consideration of the design and relocation of community facilities, particularly in light of the problems encountered in the relocation of the Griffin Centre. We support the recommendations of CFNA2 that 'new facilities' design needs to take into account the diverse needs of the community, including service delivery and space for community initiated groups and activity' (p.34), and particularly that 'co-location needs to be considered within a strategic facility planning process rather than as a "stop gap" response to demand for community facilities' (p.35).

Strategy 25: Improve community sector funding arrangements

Of those ACT organisations responding to the ACOSS Community Sector Survey, expenditure was reported to have increased, on average, by 5%, with revenue increasing by only 4%⁷⁰. The growing gap between growth in costs and demand and the slower growth in revenue is unsustainable over the longer term.

ACTCOSS repeats concerns regarding the use and management of service funding agreements. While we welcome the development and adoption of the Community Sector Funding Policy and the Standard Funding Agreement, there is continued concern that neither are being consistently adhered to. We acknowledge that this year has been particularly difficult for the public service to manage funding, due to both staff cuts and the difficulties in managing structural change. However, we believe that a more consistent and collaborative approach needs to be taken to ensure community organisations are realistically resourced to provide the services they deliver to the community.

Ensure indexation is applied consistently across the community sector

ACTCOSS welcomes the final implementation of the new indexation model for community sector funding. We have, however, been informed of instances where the indexation has not been applied, and call on the ACT Government to ensure that any omissions are rectified.

The implementation of the indexation model has presented a further problem: the Australian Government does not provide the same level of indexation. This means that in joint Commonwealth-State funding programs, the net indexation applied to organisations is less than that provided by the ACT Government. The result is that different organisations continue to receive different levels of indexation, creating difficulties in consistently increasing wages, particularly where an organisation receives several funding streams from multiple programs at both levels of government.

ACTCOSS recognises that State and Territory Governments have limited ability to influence Commonwealth spending, but would strongly urge the ACT Government to apply additional pressure to co-ordinate funding indexation. ACTCOSS notes, for example, that the NSW Government has negotiated matched indexation for its Home and Community Care (HACC) program through use of Australian

⁷⁰ ACOSS (2006) *Community Sector Survey (ACT)* (p.16)

Government growth funding. We call for similar agreements to be reached in the ACT for all jointly funded programs.

Complete and implement core pricing principles for community sector funding

ACTCOSS understands that the Department of Disability, Housing and Community Services (DHCS) has begun work on developing core pricing principles for service funding through the Joint Community-Government Reference Group (JCGRG). We encourage this process, although caution against using the process to produce an over-simplified unit cost approach to pricing community services. In particular, pricing should broadly recognise the totality of an organisation's costs, including: recognising the costs of providing appropriate wages and conditions training, administration, equipment and accommodation but also considering organisational size, capacity for growth and the provision of appropriate information and communications technology. Focussing too narrowly on the costs of service delivery alone will ultimately undermine organisational viability, and lead to low-quality, competitive, race-to-the-bottom service delivery models.

Improve negotiation and the consistency of funding management

In its 2006-07 Budget, the ACT Government announced a new

centralised funding management strategy, which is predicted to save \$5.6 million in administration over 4 years⁷¹. ACTCOSS offers general support for the reform, and encourages the streamlining of reporting requirements by reducing the number of contracts organisations are required to report against. However, there appears to have been little consultation or community sector input into how this process occurs. We would be concerned if the process were to be presented as a *fait accompli*, with organisations having little say on the structure of their funding agreements. Similarly, the Government has announced that a new grants portal will be created to centralise grants management, yet there has been no information or consultation as to how this might proceed.

ACTCOSS also expresses concern that multi-year funding agreements combined with a new indexation model have not provided the funding certainty that was intended. ACTCOSS notes that many of the organisations that have had their funding reduced were mid-way through a contract period. While funding agreements have a clause that allows the agreement to be terminated by government before completion, it was never intended to be used as a means of clawing-back 'administrative savings'. This reduction in certainty will affect the ability of organisations to invest in longer term planning and improve their service delivery.

⁷¹ ACT Government (2006) *Budget 2006-07 Paper No 3: Budget Overview* (p.105)

A related issue is the lack of negotiation with community organisations over new funding agreements. A number of organisations have reported that they have been contacted by their funding managers and required to sign funding agreements or continuity letters with a few hours notice – not nearly enough time to consult with governing bodies, let alone check details and ensure that legal and financial obligations are appropriate and achievable. Despite the commitments made to community-government collaboration and partnerships, this year's management of the funding process has markedly reduced community confidence that these principles will be upheld. It is acknowledged that the reduction of resources and changes within the public sector have contributed to this phenomenon. However, the ACT Government needs to ensure that community funding managers have adequate time, skills and resources to manage transitions in funding priorities, and particularly the ability to negotiate with organisations in an equal partnership. ACTCOSS notes that the Community Sector Funding Policy is intended to:

facilitate a consistent whole-of-government approach particularly in the areas of funding management practices, such as interaction with funded services, consistent use of funding agreement schedules, output specifications, reporting arrangements and data collection arrangements. (p.5)

We are concerned that this process is not occurring.

Ensure transparency in funding decisions

Recent changes to funding for particular community organisations or programs have occurred without adequate negotiation, consultation or explanation. ACTCOSS calls for transparent funding decisions, in which the decision rationale and process is explained and justified. A lack of transparency creates a sense of competition between community organisations, despite the withdrawal of the purchaser/provider model of funding. This undermines cooperation, collaboration and information sharing in service delivery. Ultimately, this reduces the effectiveness and efficiency of the community sector, creating barriers to coordinated service delivery and undermining efforts to reduce gaps in the system.

The size of funding programs and anticipated growth are rarely specified in Budget documents or elsewhere. The Chief Minister's Department Annual Reports Directions omitted the requirement to disclose funding agreements with community organisations for the 2005-06 financial year. As a result the funding received by some community organisations has not been disclosed in the previous financial year. We call upon the Government to rectify these omissions and increase the transparency of funding decisions.

Strategy 26: Support the development of an innovative, diverse and independent community sector

Promote independence and reduce interventionism in the operations of community sector organisations

ACTCOSS has observed a worrying trend towards increasing public sector encroachment into the management and operational activities of community organisations. ACTCOSS welcomed the abandonment of the previous purchaser-provider model of community sector funding, but is concerned that, instead of being required to behave like commercial businesses, community organisations are now increasingly being asked to act as extensions of the public service. Formal and informal agreements between funding agencies and community organisations often include not only the services to be delivered, but the method of delivery, the administrative and management practices of the organisation, and increasing requirements to provide detailed information on the internal functions of the organisation, including personal data which potentially breaches privacy principles.

One of the most significant strengths of the community sector is its ability to be responsive to change – to alter its methods of engaging with consumers to respond to changing needs and social contexts. Yet the tightening

of control and rigid specification of service delivery models, consumer eligibility criteria and management practices limit the ability of organisations to develop their services to meet the changing social needs to which they are best placed to respond.

Community sector organisations are independent institutions that make active decisions about the services they will provide and the funding commitments and arrangements they will accept. Community organisations provide services to the community, and, in recognition of this, this function is often supported by government funding. Organisations do not provide services on behalf of the government; they are not passive sub-contractors, labour hire companies or satellite agencies of government departments. This distinction needs to be understood and recognised by government in its interaction with the community sector.

Support community organisations to build their capacity and ability to innovate

ACTCOSS stresses that there has been a continuing increase in demand for community services. As previously noted, the ACTCOSS Community Sector Survey found large increases in unmet need despite considerable service increases, and expenditure increasing faster than revenue. The strain placed on the community sector means it is less able to grow to meet the level of need, or adapt to a shifting social environment. It

also means that resources are increasingly focussed on direct service provision, without the requisite resources for service planning and evaluation, change management, research and development or structuring for growth.

ACTCOSS notes that demographic change, the impacts of the Federal Government's so-called 'welfare-to-work' and IR reforms, in conjunction with escalating ACT housing costs, will continue to require both growth and change in the services provided by community organisations. It remains essential that organisations have the capacity to manage and develop their organisations, which requires both adequate funding levels and access to seminars, training, networks and resources that facilitate the distribution of information and knowledge sharing. In addition, agencies need support to enable access and utilisation of increasingly available information and communications technologies (ICT), particularly in a sector that is capital-poor and has low levels of ICT literacy.

There has been a tendency for government agencies to provide resource and development services directly, and we do not believe that this is the best use of resources. Organisations are frequently reluctant to seek assistance from their funding body when they are experiencing difficulties, and are more likely to address problems more frequently and earlier if that assistance is provided by an agency external to government.

Finally, the ability of community sector organisations to operate effectively is constrained not only by the terms of service funding arrangements, but by the regulation of organisations more generally. ACTCOSS notes that a number of areas of government regulation, for example, OH&S, food services and insurance, are primarily directed at the regulation of private businesses and are premised on the organisation being profit-driven. This type of regulation may not be the most effective in producing optimal outcomes for the not-for-profit sector and their consumers, and ACTCOSS advises that when regulating the private market, greater consideration be given to whether this is an appropriate regulatory form for not-for-profit organisations.

Ensure there are appropriate opportunities for collaboration and information-sharing between organisations and with government

One of the key features of community organisations is that, as non-profit organisations, they do not need to compete with one another. They are therefore able to form much more resilient and interactive relationships. This supports co-operative approaches that produce more effective outcomes for consumers. Similarly, because community sector organisations are more able to share their intellectual property, information-sharing between organisations can reduce the

duplication of resource and development costs that occurs in the private sector. This analysis is also applicable for relationships between government agencies and the community sector.

Yet these interactions do not happen by themselves, and if they do not occur then the potential benefits will not be realised. Collaboration needs time and commitment from organisations, as well as support to ensure appropriate space and facilitation to maximise the opportunities for building relationships and capacity. It also adds value to create spaces for relationship building between workers at all levels of an organisation, remembering that extremely useful information-exchange occurs by sharing knowledge and building relationships between frontline workers from different organisations.

ACTCOSS continues to advocate for improved collaboration and partnerships between community organisations and government agencies. Many current relationships described as 'partnerships' are not characterised by dialogue and negotiation, with the community organisation being considered the junior partner and having little ability to influence the direction of the relationship. The ACT Government needs to re-commit to the spirit of the Social Compact, reflecting a desire to build 'trust, openness and transparency of communication'⁷².

⁷² ACT Government (2004) *The Social Compact*, p. 10

Support a diverse and flexible community sector

Community sector organisations come in a variety of forms and sizes, catering to different consumer groups, and utilising a variety of service models. This diversity needs to be supported and reflected in government funding decisions. ACTCOSS expresses the concern that a desire for 'efficiency' has reduced support from the public sector for funding small organisations. However, 'efficiency' should not override other important considerations in funding decisions, such as effectiveness, the ability to reach disadvantaged consumer groups and support for consumer, carer and community involvement in governance and service development. ACTCOSS advises that 'efficiency' – particularly as measured by unit costs or administrative overheads, is a poor yardstick for effective social interventions.

Nonetheless, ACTCOSS is aware that there is potential for greater resource-sharing between organisations which could potentially reduce organisational overheads without sacrificing effectiveness. However, this requires careful negotiation and collaboration between organisations, and is most likely to succeed where organisations initiate and support the concept. Increased resource sharing is also likely to work best where organisations have similar structures or functions and are co-located. ACTCOSS notes that a similar conclusion was reached by

both Stage 1 and 2 of the *Community Facilities Needs Assessment*⁷³. ACTCOSS recommends that organisations are resourced to pursue collaborations where appropriate, subject to the requirement that these are self-initiated and not coerced.

Strategy 27: Respect and support the role of community sector peaks and representative bodies

Australia-wide, the political environment for community sector peaks and representative bodies has been less supportive than in the past, particularly through the de-funding of numerous national peaks by the Australian Government, and attacks from conservative think-tanks seeking to reduce the standing of those expressing progressive policy positions. The ongoing support of State and Territory Governments has been essential in maintaining balance in public debate and policy formation. The ACT Government has undertaken to 'understand and recognise the role that peak bodies and representative groups play in advocating issues on behalf of their constituencies'⁷⁴, and needs to ensure that the spirit of this commitment is fulfilled.

Community sector peaks and consumer and other representative bodies form important institutions in civil society that contribute to public policy debate and development. There has been a long-standing acknowledgement that it is appropriate for government to fund advocacy groups in order to ensure broad representation for the development of public policy, particularly for those sections of the community that would have difficulty articulating their concerns unassisted. This ensures that there

⁷³ PALM (2003) *ACT Community Facilities Needs Assessment (Central Canberra, Belconnen and Gungahlin)* (p.24) and ACTPLA (2004) *Community Facilities Needs Assessment: Report for Stage 2* (p.35)

⁷⁴ ACT Government (2004) *The Social Compact*, p. 12

are many voices in policy debates, which would otherwise be reduced to a dialogue between Government and those with the greatest amount of resources, such as business groups or wealthy individuals. Advocacy organisations are also important players in being able to mediate and find common ground between the interests of consumers, service delivery organisations, advocacy groups and government agencies.

ACTCOSS advises that, by the same rationale, it is imperative that a diversity of community sector voices is able to participate in the development of policy. Community sector peaks, particularly those that focus on a specific sector or issue, provide expertise, detail and the proximity to consumers and service providers that is essential to informing good policy. In addition, a multiplicity of voices in policy debate stimulates up-to-date, innovative thinking and responsiveness.

Provide appropriate funding for systemic advocacy, policy development and research

The ACT Government appears to be placing additional reliance on private consultants for policy advice rather than funding community organisations to assist in the development of policy directions. While ACTCOSS acknowledges the role that private consultants can play in facilitating community input, we remain concerned at the disproportionate emphasis on this avenue of policy input over use of community sector

peaks and representative bodies. These peaks and representative bodies frequently have greater experience in relevant policy issues, and more direct links to the stakeholders concerned.

While it is appropriate that there is a certain capacity for community advocacy organisations to be able to participate based upon their existing core funding, this remains limited by the low funding levels of many organisations. This is an obstacle to effective participation and policy development in areas where their input would be productive and enlightening. ACTCOSS notes that more than one ACT peak body has sustained cuts to either their core funding or their project funding as a result of the last ACT Budget, particularly in the housing sector. The funding of some peak bodies has now been reduced below sustainable levels, and the ACT Government needs to reinstate funding to ensure the viability of these organisations and their essential contribution to public debate.

Ensure that consumers and carers have appropriately resourced representative organisations to assist them in individual and systemic advocacy

While community sector peak bodies continue their vital role in policy development and representation, ACTCOSS also welcomes an increasing role for consumer and carer advocacy organisations to more directly represent consumer experience to

government and community service providers. Government support for consumer bodies remains disparate, with some consumer and carer organisations receiving resources sufficient to ensure organisational responsiveness, while others continue to struggle with little or no support.

While ACTCOSS acknowledges that funding for consumer organisations has increased over the past few years, its allocation remains *ad hoc* and inconsistent. The ACT Government needs to re-examine its policies and provide appropriate funding levels for consumer organisations.

Continue support for the development of an indigenous representative body

When the Australian Government announced the abolition of the Aboriginal and Torres Strait Islander Commission (ATSIC), many indigenous people reacted with dismay and concern, particularly as the new direction for assisting indigenous Australians appeared to be a return to paternalism and exclusion of indigenous people from key decisions that substantially affected their lives and well-being. In response, the ACT Government announced plans to support the formation of an ACT indigenous representative organisation that would be able to give a voice to indigenous people in the ACT.

ACTCOSS continues to support the proposal, and congratulates the

ACT Government on this important initiative. Yet there remains concern that progress remains slow, and that the resources allocated are inadequate. Nonetheless, we are aware that it is important to take the time to ensure that the processes and structure of the new body are appropriate and both serve the interests, and have the support of, the local indigenous people. ACTCOSS encourages the Government to progress the proposal and monitor any requirements for additional resources.

SECTION 7: PUBLIC SECTOR EFFECTIVENESS

The ACT Government, as part of its 2006-07 Budget, announced the implementation of perhaps the most far-reaching structural reform of the ACT public sector since self-government.

The genesis of these proposals appears to be, once again, the Costello Review. ACTCOSS reiterates its concern that such far-reaching alterations to the structure and funding arrangements of the ACT Government seem to have been determined by a single, and relatively short, review of government services conducted by a small group of people. The fact that the review remains confidential, and that its methodology, assumptions and recommendations cannot be responded to by the community raises questions about the Government's commitment to transparent and consultative government.

The proposals are intended to achieve greater 'administrative efficiency' for the public sector, reducing overheads and administrative costs so that a greater proportion of public expenditure is directed to frontline services. Whether this will be achieved remains to be seen.

Perhaps more importantly, ACTCOSS is concerned that, even without considering the human effects on productivity, job satisfaction and morale, the

direction of the reforms seems to imply that 'lower costs are more efficient'. In economic terms, 'efficiency' means no such thing, and the under-allocation of administrative resources can be just as inefficient as an over-allocation. Of course, any evidence that administration was over-resourced is not available, nor is any research of what the 'efficient' level might be. It is our observation that, even before the Budget, the public service appeared to be dealing with workloads that were stretching their capacity to deliver.⁷⁵

The ACT Government's proposed Shared Services Centre is designed to centralise departmental administrative functions in the Department of Treasury, purportedly to improve economies of scale. However, anecdotal evidence suggests that large numbers of public service positions are being lost, despite having little connection to Shared Services Centre functions. We are concerned that rather than generating genuine improvements in effectiveness by improving structural efficiency, much of the savings forecast in the budget are to be achieved by simply reallocating the existing workload amongst fewer staff. In particular, we are concerned that there will be a reduction in the capacity of the public sector to analyse and develop public policy. This will reduce the long term ability of the

⁷⁵ ACTCOSS (2005) *Uncharted Territory: Steering Canberra Through the Reform Storm* – ACTCOSS Submission to the 2006-07 ACT Government Budget (p.30)

government to adopt and fund innovative and effective services.

Finally, ACTCOSS would note that there has been an observable shift in government priorities from the previous focus on meeting the social, economic and spatial needs of the ACT population and environment, to an over-arching emphasis on fiscal policy. ACTCOSS hopes that this is reversed in the future, as the needs of the community are no less – and in some areas are considerably more – than in the past.

Strategy 28: Improve access to ACT Government services

An overarching theme of our consultations has been continued concern from consumer groups and community organisations about the ability of people, particularly those living with low-incomes or experiencing disadvantage, to access ACT Government services. Particular attention needs to be paid to whether eligibility criteria are too narrow, whether services are accessible or create barriers to access, and to ensuring that there are effective advocacy and complaints services to resolve difficulties in achieving access.

Ensure services are not too narrowly targeted

As a result of the Costello Review, there have been moves to tighten eligibility criteria, introduce additional fees and payments, and cut service levels right across government, particularly in health and human services. Services are increasingly being targeted to the most extreme end of need, waiting until people reach a crisis point before providing assistance. While ACTCOSS agrees that these groups are in dire need of effective services, too narrowly targeted services can have perverse effects.

For instance, where a person is eligible for a service, but is placed on a waiting list before they will receive assistance, they are required to remain eligible for the service until access is achieved. This places a substantial disincentive for people to improve

their situation in the meantime, as often the costs of purchasing the service outside of government or community provision would effectively make a person worse off, even if their health condition or disability improved or they found employment. Similarly, in some situations people who require a service, but could not otherwise afford it, may be excluded by eligibility criteria, effectively requiring them to make themselves more disadvantaged before they can receive assistance. ACTCOSS strongly advocates against a system that requires people to get worse in order to get better.

Many health and human service interventions have important preventative effects, meaning that an early, low-level intervention can often prevent a crisis, and also reduce the demand for high-cost crisis services. By narrowly targeting assistance to the acute end, the Government is increasing the demand for more expensive acute service, resulting in both more people in crisis situations, and a more expensive service system.

ACTCOSS sees moves to more narrowly target assistance as a retrograde step, potentially in breach of the ACT Government's human rights obligations under the ICESCR, and recommends that agencies review their levels of service provision with a view to reducing unmet need for both low- and high-level assistance.

Remove barriers to access

Eligibility criteria are not the only barrier to accessing services in the ACT. ACTCOSS observes that many people in need that would otherwise be eligible for a service do not receive the service for a variety of reasons.

Firstly, people are often not aware that a service exists. There are many services that the ACT Government provides that are not widely advertised, and ACTCOSS is concerned that this is used as method of demand management. However, it is unlikely that providing services only to those who are most informed or most persistent in seeking assistance is an equitable means of targeting service delivery. Greater effort needs to be expended to ensure that potential consumers are aware of the services they can receive and assisted in locating the correct service provider.

Services are often accompanied by a fee or co-payment. While remaining subsidised, the costs of services continue to be a major barrier to access, particularly for people who are living on statutory incomes who are often unable to provide for a frugal standard of living, let alone pay for additional essential health and human services. It appears inconsistent to be targeting services at those most in need, but then managing demand by charging people fees that effectively exclude those with the least ability to pay. ACTCOSS opposes any increase in co-payments or fees, and advocates

they be phased out, or at least made more responsive to a person's ability to pay.

In the case of people from diverse cultural backgrounds, including refugees and TPV-holders, language remains a barrier to accessing a number of government services. While there are some interpreter services in place, they remain under-resourced and difficult to access. ACTCOSS also notes that general information on services in languages other than English remains scarce. We recommend that greater emphasis be placed on ensuring that government services are available to people who are not fluent in English.

The ACT Government announced in the Budget an agency-funded initiative allocating \$556,000 over 4 years towards improving the connectedness of indigenous service delivery. This initiative is welcome, though must be adequately funded and progressed as a priority.

Finally, the ACT Government has closed a number of shopfront services, including ACT Housing Shopfronts and the ACT Government Shopfront in Civic. Shopfronts are often the most easily accessible means of obtaining information and services for many people, particularly those with literacy difficulties, some people with disabilities, or those who are unfamiliar with ICT. The ACT Government claims that:

The introduction of new electronic assessment and

collection systems will give taxpayers access to more efficient and convenient services, and allow the ACT Revenue Office shopfront to be closed later in the year.⁷⁶

We are concerned that this will be highly inconvenient for those members of the ACT community on the wrong side of the digital divide. Consumers are often required to demonstrate eligibility in person, and little consideration of this necessity appears to have been canvassed. ACTCOSS recommends that all services provided through shopfronts should be retained and equitably available in each town centre.

Implement effective complaints mechanisms and individual advocacy services

In August 2004, DHCS released *The Right System for Rights Protection (RSRP)*, a document outlining the Government's proposals for oversight agencies and advocacy services in the ACT. The document outlined a number of proposals, including a new Human Rights Commission. This proposal has only now come into effect, albeit with a greatly reduced number of Commissioners, and low levels of funding. ACTCOSS reiterates that the Commission should receive additional resources to effectively fulfil its mandate, and additional Commissioners should be appointed to ensure the areas of Disability, Children and Young

⁷⁶ ACT Department of Treasury (2006) Annual Report 2005-06 (p.5)

People, and Community Services have specialist attention.

ACTCOSS also remains concerned that the role for the Community Services Commissioner has never been implemented. ACTCOSS participated in consultations about the role of the Commissioner⁷⁷, but no consultation report has ever been released. RSRP stated that this role would include responsibility for housing, emergency relief and counselling services, among others, but these have never been assigned in legislation.

Finally, ACTCOSS notes that RSRP foreshadows a review of community advocacy agencies to determine whether gaps exist in coverage. This has not yet occurred, and we urge the ACT Government to ensure that the unmet need for consumer advocacy services, which is becoming increasingly evident, is resourced appropriately.

Strategy 29: Expand the capacity of the Public Sector

Budget cuts to the public sector, particularly through the loss of departmental staff, remain a questionable method of achieving efficiency. While the Government's emphasis on its frontline service delivery is noted, other workers provide essential support and direction for those services.

ACTCOSS is concerned that these changes have resulted in low morale in government departments, with public servants feeling undervalued. Not only does this environment reduce the productivity of remaining staff, it also allows less time to build relationships with external stakeholders, including community sector organisations. The reductions in benefits for employees make the ACT Government less competitive with the Australian Public Service, and being located in the same city exposes the ACT Government to the risk that it will not be able to recruit appropriately qualified staff – indeed, anecdotal evidence suggests this is already the case.

Ensure that the ACT Government has sufficient resources to develop effective social policy

It is essential to any government that, in addition to receiving information from external bodies, it has the capacity to monitor, analyse, research and develop policy responses from within the

⁷⁷ see ACTCOSS (2005) *A Disability and Community Services Commissioner for the ACT*

public sector workforce. Many of the policy units across Government have had their capacity reduced as a result of implementing Budget cuts. We also note that there is an apparent increase in the use of external private contractors to carry out policy analysis, a trend that ACTCOSS cautions the Government against continuing. Ultimately, a vibrant and perennial policy development process within government, along with community involvement, is an essential means of ensuring that the government adopts effective social policy responses that make best use of limited resources.

ACTCOSS reiterates its previous call for the ACT Government to create a dedicated social policy research unit. While we note the generally excellent work of both the Social Policy Unit within the Chief Minister's Department and the Community Inclusion Board, these agencies have limited research capacity and can generally only focus upon issues of immediate concern. The ability to examine longer-term issues and enable greater original research would enhance the ability of government to respond more effectively to longer-term needs.

There is a lack of statistical data available on the ACT compared to larger jurisdictions in Australia. Such data, where available in the ACT, is often of lower quality and less conducive to meaningful analysis due to small sample sizes. We also note the lack of ACT Government reporting on its previous Plans. For instance, we note that while a useful document,

there appear to be no current plans to repeat the analysis provided by *Measuring our Progress*, and the biennial report on the Social Plan, originally due in July this year, is still yet to be released. ACTCOSS encourages the ACT Government to provide more current and regular statistics on both its operations and about the ACT more generally.

Ensure effective linkages between government agencies and address 'silos' between departments

ACTCOSS expresses its continuing concern that despite the plethora of 'whole-of-government' policies, guidelines and agreements, departments continue to place a greater emphasis on agency-specific policies and information flow is restricted between different departments or within departmental sections. Agencies that are tasked with a whole-of-government focus continue to be placed in line agencies, which anecdotally at least, reduces their ability to co-ordinate an effective response and is against human rights treaty obligations. While the advent of the Shared Services Centre may improve some aspects of this problem with regard to administrative arrangements and purchasing, it remains doubtful whether this will extend to policy areas. ACTCOSS particularly advocates against placing the Office for Women and the Office of Indigenous Affairs into DHCS, believing that these areas would be more effective if they remained in the Chief Minister's Department.

A related concern is the different perspectives that agencies take on social equity outcomes. ACTCOSS advocates that a 'unit-cost' approach, such as that adopted by the Productivity Commission in its Report on Government Services, is rarely a useful tool for analysis in social policy. Differences in unit-costs in the provision of health and human services are more usually reflective of differences in quality and effectiveness than in 'efficiency', and without the qualitative data to compare the outputs, the comparison becomes virtually meaningless. ACTCOSS is concerned that the Costello Review placed undue emphasis on unit-costs without the necessary qualitative analysis.

as well as give useful direction for the Government to pursue. Ultimately, however, consultation will be most effective where there is a cultural commitment to involving the community in decision-making, rather than viewing consultation as a 'tick-a-box' requirement that needs to be overcome before proceeding to a decision.

Ensure consultation is effective and meaningful

In the 2006-7 ACT Budget it is proposed to save \$7 million over 4 years through rationalising boards and committees. While ACTCOSS agrees that, at times, community sector organisations suffer from 'consultation fatigue', particularly where the same issue is consulted upon repeatedly, this is not to say that consultation is unnecessary, or that representative committees or Boards are not useful mechanisms for involving the community in decision-making.

A more useful response would be to improve the quality of consultation. More enhanced methods of appropriate selection, representation and facilitation of Boards and Committees would likely improve their effectiveness,

Strategy 30: Enhance accountability and counterbalance fiscal policy

Ensure revenue is sufficient to meet social needs

The ACT has faced a unique revenue problem since self-government: it has high income levels and economic activity, but only a narrow means of accessing that income through its revenue streams. This has long placed the ACT in an invidious position – it must either have higher tax rates than its counterparts to generate the same levels of revenue, or match other jurisdictions tax rates and make do with less. Obviously, ACTCOSS would prefer the former position, although it appears our current policy is more similar to the latter.

In 2004-05, our total GFS revenue as a proportion of Gross State Product (GSP) was 13.4%⁷⁸, the lowest of any jurisdiction, and far below the average of 17.5%. In terms of tax revenue the ACT takes only 4.0% of GSP, second only to the Northern Territory, and again is well below the national average of 5.8%. It is clear that the ACT is a low-taxing, low-spending jurisdiction.

⁷⁸ Figures are calculated using combined GFS Revenue for State and Local Governments, GSP data uses chain volume measures. Source: ABS (2006) *Government Finance Statistics, Australia 2004-05* and ABS (2005) *Australian National Accounts: State Accounts 2004-05*

While others will continue to lobby for tax reductions, it would be irresponsible to reduce taxes further, particularly when the ACT has already agreed to additional tax revenue loss through COAG agreements. ACTCOSS notes the revenue measures in the 2006-07 Budget, and generally applauds this effort. Given the continued unmet need present in the ACT community, and particularly the impact of rising housing costs, the ACT Government should seek to generate additional revenues where practicable to ensure its ongoing responsibilities to the community can be met.

Improve reporting arrangements, including gender auditing

Much discussion has been made of the appropriateness of budget output measures, strategic indicators and accountability indicators. ACTCOSS welcomes continued discussion of these issues, particularly attempts to strike the appropriate balance between measuring the actual changes in social equity at a population level and the outputs for which departments are accountable. We note that our NSW counterpart, the NSW Council of Social Service (NCOSS) has developed a framework for social reporting for that state, much of which is transferable to the ACT⁷⁹.

ACTCOSS also requests that the ACT Government improve its

⁷⁹ NCOSS (2005) *Measuring Up: A Framework for Government Social Performance Reporting in NSW*.

abilities in gender auditing, particularly in health and human services. While the Women's Budget Statement has been a welcome inclusion in the Budget documents, there is plenty of room for improvement in the information it contains. A gender budget should outline how the funds are progressing equality targets. Rather than trying to analyse the Budget in its entirety, it would be more useful to begin to look at those areas of government expenditure where gender

disaggregation is feasible, and expand the capacity of the Government to collect gender disaggregated data in other areas.

Finally, the 2006-07 Budget papers lacked a community consultation report. ACTCOSS queries the omission of this section of the budget, and hopes that the input provided by a large number of community organisations and individuals will be reflected in the next Budget.