



SCOA Submission - Code of Best Practice for Engagement with the Not-for-Profit Sector

Introduction

The Settlement Council of Australia (SCOA) is pleased to provide this submission on the draft Code of Best Practice for Engagement with the Not-for-Profit Sector (Code). SCOA represents the broad network of nearly 80 settlement agencies around Australia. The sector comprises in the main Not-for-Profit agencies and service providers, and as such retains a strong engagement with the Government at all levels and is well placed to provide information on the practical realities of implementing the Code.

The settlement sector is pleased with the draft code and the majority of points covered within it. It is likely that the draft 'Settlement Framework' which is under discussion and development within government, and which SCOA has provided feedback on, will also connect to this code. It is expected that the settlement sector will use the Settlement Framework to guide engagement with various levels of government when the framework is complete.

SCOA's submission is informed by discussions and consultation with its members, which raised a number of issues concerning 'consultation fatigue', conducting consultations using suitable language and with cultural understanding, the type of feedback sought and provided and the underlying basis of reciprocity expected in the implementation of the Code by Not-for-Profit organisations. Monitoring and evaluation are key components for engagement within the settlement sector and the Not-For-Profit sector, built in review and evaluation mechanisms would ensure this takes place.

Consultation Fatigue

Ensuring that agencies involved in the consultation process do not suffer from 'consultation fatigue', overlap or competing priorities is essential. Avoiding this problem requires awareness of existing initiatives and engagements in the settlement sector, ongoing dialogue and a willingness to share information. It is clear that providing these solutions is contingent upon the abilities of organisations to be able to fund and resource such engagement. For smaller organisations, or those geared specifically towards service provision, this may not be possible to implement in a meaningful manner as available resources are already utilised to full capacity. Providing early notification of consultation initiatives would allow settlement sector organisations to plan ahead and budget funds, personnel and other resources, ensuring a full engagement with policy development. Furthermore, it would permit organisations to notify the Government of the most acceptable time for consultations to occur and avoid an oversaturation of such engagement.



Language and cultural sensitivities

SCOA has raised the issue of language and cultural awareness in previous submissions, particularly in regard to the Access and Equity Inquiry Panel, and regards this as an essential part of ensuring an effective consultation process. As noted by the Government in the Code, some NFP organisations may include staff and members for whom English is not their first language or who may themselves represent multiethnic and multilingual stakeholders. It is important, therefore, that any consultation process is mindful of the capacity of organisations to fully access and understand the content, process and aims of the engagement. Every consultation should seek to understand the groups involved and the particular needs of that group. Regarding the Code, documents produced for consultation purposes should be in plain, simple English and clearly articulate the aims of the policy being developed. Consultations undertaken by all Government Agencies within the settlement sector should also be informed by the broad principles and recommendations of the Access and Equity Inquiry.

Feedback

Providing meaningful feedback on the consultation process is important for both the NFP sector and the Government, as it allows for both sides to review how they conduct such engagements. Constructing open and accessible feedback mechanisms, utilising a range of mediums, is important in guaranteeing a fair and democratic process. Furthermore, indicating how such feedback will be used in the future is paramount to creating and maintaining trust between the NFP sector and the Government, which is often seen as ignoring concerns raised by such organisations. Again, any feedback mechanisms provided for the consultation process must be accessible linguistically to the groups involved and accurately reflect the content of the consultation. SCOA would also like more clarification on how the Government is to guarantee that feedback provided will be acknowledged and used to inform future consultation processes.

Reciprocity

SCOA acknowledges that any consultation process must be a two-way street in order for it to be successful. Again, in order for NFP organisations to be able to fully implement the Code, it becomes a question of resources and capacity. The Government's ability to draw upon a large pool of resources and funds means that any consultations with smaller organisations involve questions of power and whether such organisations views can be adequately represented when faced with this. As such, the NFP sector is happy to engage in the reciprocal process outline by the Code, but requires clarity around the expectations of the Government, one it has been put into practice. Proper resourcing, such as training and information sessions, is required to ensure that NFP organisations can participate in a meaningful manner in consultation processes.