



## Council of Social Service of New South Wales

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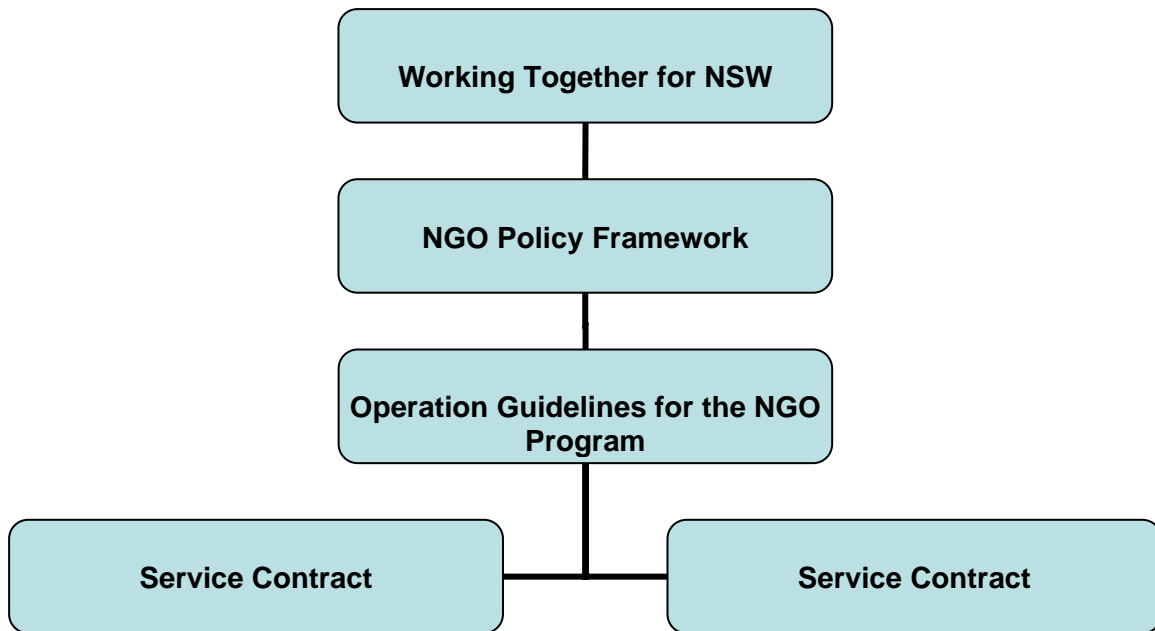
Dear Joanne,

Thank you for providing NCOSS with the opportunity to give feedback on the draft NSW Health NGO Policy Framework. Overall, NCOSS is very pleased with the framework and congratulates NSW Health for taking steps to develop and finalise this document.

### General

- In referring to the *NSW Health Operational Guidelines: Non-Government Organisation Grant Program* throughout the document, the Framework needs to ensure it refers to the fact that the Operational Guidelines have not yet been developed and are a proposed document. For example page 1 line 195, it should state that; 'The Framework *will be* supported by the *Health Operational Guidelines: Non-Government Organisation Grant Program*.
- All references to *Working Together for NSW - An agreement between NSW Government and NSW non-government human services organisations* need to be changed. Currently the reference for *Working Together for NSW* has it in final draft and no year of publication. This agreement was signed in 2004.
- NCOSS requests that that the relationship between the NGO Policy Framework and the proposed Operational Guidelines for the NGO Program is clearly flagged within both documents. Areas of the Draft *NSW Health NGO Policy Framework* where this clarification is required include Section 3.2 ("NSW Health and NGO's – Partnership Principles"); Section 4.4 ("Planning and Consultation"); Section 4.6 ("Capacity Building"); Section 4.7.2 ("Quality Improvement"); and Section 4.9.4 ("Learning and Development").
- A concern raised at the NGO Advisory Committee Meeting July 2006 was ensuring that the Framework clearly established guiding principles for the '*NSW Health Operational Guidelines: Non Government Organisation Grant Program*' (currently under development) and individual contracts with NGO services providers.

**Figure1: Relationship of Working Together NSW with Policy, Operational Guidelines and Service Contracts**



Ideally the agreement between the NGO sector and the NSW Government should clearly inform policy, guidelines and contracts within human sector government agencies (see Figure above): for example the funding principles established in *Working Together for NSW* should in turn relate clearly to funding policy for NGOs, funding guidelines and shape funding issues in contracts with NGO providers ‘on the ground.’ This will ensure that there are no funding principles applied to individual contracts that are inconsistent with policy, guidelines or *Working Together for NSW*.

**Section 1 Introduction**

**1.1 NSW Health NGO Program**

- Line 171: After, “and advocacy for health consumers” include the sentence “The NSW Health NGO Grant Program also provides funding to peak NGO bodies and state-wide NGOs”. This is not explicit in any other section of the document (including the Glossary).

**Section 2 Policy Purpose**

- The first box references the goals and priority areas of action for NSW Health. The priority areas of action are not consistent wording with those in *Future Directions for Health in NSW –Towards 2025 Fit for the Future 2007*
- Number 2 should read *Create better experiences for people using health services*
- Number 6 should read *Redesign and reinvigorate the health workforce*
- The reference for this box needs to be updated from NSW Health Fit for the Future consultation document 2006 to ; *Future Directions for Health in NSW –Towards 2025 Fit for the Future (2007)*

**Section 3 Policy Principles**

**3.1 Context**

- Line 280: The website reference takes the reader directly to the NSW Premiers Department website.

- Line 283: *The NSW Premiers Department Review of Grants Administration Principles Paper (Final Draft 12/7/02)* has been superseded. This was a working document that was never published. The current reference as advised by the Premiers Department is now the *NSW Premiers Department Good Practice Guidelines to Grants Administration in NSW*. Included in the good practice guidelines are both the policy document and principles.

### 3.2 NSW Health and NGO's - Partnerships

- In Principles for the Relationship the last point on inclusiveness needs to be changed to "the Government is obliged"
- There should be some reference to the NSW Health Integrated Primary and Community Health Policy as it will serve to guide developments that impact on NGOs and if cited, reinforces the pivotal role NGOs play, and the unique nature of the services they provide.

## Section 4 Policy Elements

### 4.2.1 Non Government Organisations (NGO's)

- Line 432 outlines the role of NGO's and references *Working Together NSW*. However the wording in this paragraph differs from the relevant wording in *Working Together NSW*.

### 4.4.1 Area Health Services and NGO's

- Substitute "should" for "must" in: "AHSs should consult with NGOs within its geographical boundary on the establishment of a mechanism for NGO participation, for example an *AHS-NGO Advisory Committee* for local planning and decision-making".

### 4.6 Capacity Building

- The reference *Human Services Chief Executive, NGO Development Support Program discussion paper NGO Support to Improve sustainability and Performance* does not have a year of publication. NCOSS understands it was produced in 2006.
- The Better Service Delivery Program (BSDP) as mentioned in the document no longer exists. It has been superseded by HSNNet.

### 4.7.1 Performance and Accountability

- The principles for a NSW Government grants monitoring framework have been superseded by the *Principles for the funding and working relationship between government and grants recipients* included in the *NSW Premiers Good Practice Guidelines to Grants Administration in NSW*.

### 4.7.2 Quality Improvement

There was discussion at the July NGOAC Meeting 2006 on adding clarity to the Quality Improvement section (4.7.2). The NGO Policy Framework should be clearly related to the terms set out in *Working Together for NSW*, and should clearly articulate its relationship to operational guidelines and individual contracts.

NCOSS is concerned that there is a lack of clarity in the draft NGO Policy Framework on the definition of quality, and what process will be used in the future in relation to quality improvement. In particular the following section of the document implies that standards for quality improvement will only be determined at the service contract stage:

*NSW Health and the NGO grant recipient will negotiate specific requirements for quality improvement strategies and activities that are appropriate to the purpose/s of the grant. The agreed strategy and activities will form part of the Funding and Performance Agreement*

NCOSS is concerned that if implemented this could lead to inconsistencies between NGO services in the application of quality improvement goals, and ultimately inconsistencies between AHS NGO Programs.

NCOSS recommends that the Quality Improvement section be reworded to clearly articulate:

- the definition of quality improvement within the context of the principles outlined in *Working Together for NSW*;
- the proposed quality review process to apply to NGOs
- the goals standards that will apply to assessment of quality improvements or a clear indication within the Policy Framework that these will be defined in the 'NSW Health Operational Guidelines: Non Government Organisation Grant Program'.

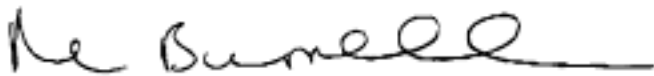
### **Section 5 Policy Review**

This section outlines NSW Health responsibility for monitoring the implementation of the policy framework and conducting a review every five years. It would be important for this section to also detail how NGOs would be involved in the policy review.

Finally, one NGO recommended all Government policy documents should acknowledge and recognise the principle of self determination of Indigenous people.

If you require further information on any of the above, do not hesitate to contact Michelle Bonner Senior Policy Officer 9211 2599 ext 108 email; [m.bonner@ncoss.org.au](mailto:m.bonner@ncoss.org.au) or myself at email: [michelle@ncoss.org.au](mailto:michelle@ncoss.org.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read "Michelle Burrell", followed by a vertical red line.

Michelle Burrell  
Acting Director