

Submission in response to DSS Issues Paper: A Stronger, More Diverse and Independent Community Sector

Prepared by:

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Thank you for the opportunity to contribute some thoughts about the ways that the Department of Social Services (DSS) supports the community sector, particularly through grants.

I am an independent consultant working with organisations across the community sector. I provide support with evaluation, program design, and grants, especially grant writing. I have worked with non-profit organisations with budgets over \$100m/year, and with community organisations whose total annual budget is <\$10,000 a year. I have also worked in grants management as a Commonwealth public servant, as a contract grant assessment officer at DSS, and as an evaluator engaged by government to evaluate grant programs. This gives me a broad perspective across the community grants sector that may be valuable to DSS.

Also, unlike many others contributing to this process, I am not a recipient of grant funding, and I do not have to consider the viability of any ongoing funding relationship between myself and DSS. This means I can be fairly frank in my submission – and I will be. My submission is personal, and represents only my thoughts and perspectives, based on my experience and observations. It does not represent the views of any of my clients.

I think it's fantastic that DSS is asking these types of questions about the grants process and how grants can be structured to better support CSOs. At the same time, I think DSS needs to realise that it is not the sole funder for most CSOs, and that while any improvements that DSS makes will be welcome, CSOs will continue to feel pressures from their other funders. There's an opportunity for DSS to leverage its position and power in the system to influence better practices from other grant makers, especially other Commonwealth departments but also state and territory governments. An organisation that gets 10% of its grant funding from DSS will be 10% better off from any changes that DSS makes – and that's not nothing, but it's probably not enough.

1. Area of focus: Giving the sector the voice and respect it deserves through a meaningful working partnership

1.1 What would a partnership between CSOs and the government that achieves outcomes for Australians being supported by the community sector look like?

There's a huge amount of good will across the community sector, and a strong desire for partnership with government. There's also a massive power imbalance that government doesn't always recognise. Government has funding, so it has power, and to an extent CSOs will be careful in what they say to manage that relationship risk. A meaningful partnership has to recognise that, and create a relationship where honesty is possible despite this imbalance.

A true partnership has to cede power to some extent. Is government ready or able to do that? Maybe true partnership isn't the goal that government is ready for – maybe more active listening and responding is a good step?

Working more actively with CSOs is great, as is listening and responding to their input. But expecting CSOs to give that input for free is unfair, and it's not respectful.

A question to you, readers of this submission: what do you think is the dollar value of all of the submissions provided in response to this request for input alone? What might be the cost in labour to put together documents like this – gathering ideas from across each team, synthesising and writing them up, passing the draft back around for refinement, adding new ideas and getting the wording just right. Each submission is weeks of work by several people. I suspect that you're looking at, at least, several hundred thousand dollars of work that has been provided to government for free.

Of course, most people writing these submissions are being paid by *someone* to write them. The organisation will have a funder who pays for advocacy work, or they'll have some untied donations, or they'll be squeezing the cost out of the overhead budget. (And that's all money that then isn't being spent on other vital CSO activities.) But some people will be doing this for free – they'll be staying late, or working over the weekend, and they won't have a funding source to cover this work but they'll do it anyway because it's important. There will be a few other people like me, too – I don't have any prospect of being paid for my work in putting together this submission, but I think it's important, and I think there are some things I can say more easily than others, so I'm doing this for free.

But if government wants to “give the sector the voice *and respect* it deserves”, then the enormous value of this free work needs to be recognised.

The leaders of CSOs are *smart*. They're *capable*. And many of them could walk into a highly paid job at a top for-profit firm very easily. But they don't, because they believe in the importance of their work. But just think – if you were paying consulting firm director or partner day-rates for the download of information that CSO leaders have given you in these submissions, what might it actually cost?

It's worth thinking about if there are ways to pay CSOs for their contributions. This would reduce some of the pressure on CSOs, and show them more respect.

- Maybe there's some kind of panel arrangement that could be created to pre-qualify CSOs to provide advice, and then CSOs on that panel could be paid (even a nominal amount) to provide advice or insight, or participate in focus groups or communities of practice, or provide submissions. There could be places reserved for smaller or newer CSOs, and First Nations CSOs.
- Maybe things like roundtables and consultation sessions can be paid.
- Maybe submissions like this could be paid some kind of nominal amount, if they meet a basic standard.
- Maybe if some kind of co-design group is established with CSO leaders, it could be paid an amount that recognises the work that goes on behind these leaders, too.

On a similar note, First Nations CSOs are always inundated with requests to give advice to mainstream CSOs. Mainstream CSOs need their advice, but are also aware of the pressure that they're under when they ask – there's only so much that the limited staff at First Nations CSOs can do. DSS could increase the funding to key First Nations CSO peak bodies so that they have more

resources to give advice to mainstream CSOs and support their projects. That would improve outcomes for First Nations people being supported by mainstream CSO grant funded projects, and reduce the pressure of First Nations CSOs.

1.2 How can CSOs and government streamline the sharing of information, particularly through utilising technology to effectively engage, distribute, share, influence and inform in a timely and efficient manner?

No comments from me.

1.3 How can government ensure the community sector, including service users, and those not able to access services, have an opportunity to contribute to program design without imposing significant burdens?

It's about payment, and recognising all the work that goes into those contributions. They want to contribute, but most small and medium sized CSOs just don't have the resources. Giving them the resources to contribute would make a difference.

That goes for service users too – they need to be paid for their input. That said, sometimes there needs to be care in how payment is delivered – people won't want to do a one-off or ongoing contribution to a design process if the payment would muck up their Centrelink payments, which is a serious risk for some people.

A different thing that gets in the way of program design is the requirement to always demonstrate how a program is innovative. Innovation is great – but so are proven programs. Too often, proven effective programs can't score well in a grant round because they're not innovative, they're proven. There needs to be a mechanism to fund proven programs as well as new ones. This could draw on community sentiment about what works for them, and outcomes data.

Other thoughts relating to this focus area:

Again, it's great that DSS is offering this chance for feedback. But this focus area is about "giving the sector the voice and respect it deserves", and this submission doesn't demonstrate respect in two key ways.

First, the submission is due on a public holiday in Victoria. That means that Victorian CSOs get less time to do the work if they don't want to work on the public holiday to get it finished. And for non-Victorian CSOs who do Melbourne Cup social functions, staff dealing with an important due date will have trouble joining in. (I know, why don't they do it early? Some will, but some will work to the deadline, because this is a really busy time of year.) This is really easily solved by just not making things due on a public holiday.

The other key thing is that the word limits on the online form version of this submission don't show respect to the sector, or give the sector a proper voice. You've given everyone the option of doing a document upload instead, which is great, and it's obviously what I'm doing. But the word limit you've given still tells the sector how much you'd like to hear from them. The word limit for each question works out to about 300 words – so, what DSS has said is effectively "Tell us how we can meaningfully partner with you – max 2 paragraphs." That's not respectful, that's not enough to

really explain a meaningful partnership, and that's preventing CSOs from being able to give you all the info they think is important. If you want to give the sector the voice and respect it deserves, you need to let them have more than 2 paragraphs to express themselves.

(Ok, "so be briefer", you might say! Sure. But it's hard to be brief about stuff that matters, it's hard to write to a word limit. If I edited this submission down to the word limits for the online form, it'd take me twice as long to write. And as I said, I'm not being paid for this. So that's time I either take away from my clients or from being with my family.)

2. Area of focus: Providing grants that reflect the real cost of delivering quality services

2.1 What would adequate and flexible funding look like?

It's really hard to set costs in stone at the outset. When I work with clients who are new to grant applications, they always say to me "but we don't know how much that will cost yet – it depends." And I have to tell them, grants don't work like that – the grant maker expects you to have your costs completely worked out, and they will not allow you to deviate from that at all, even if things turn out differently than expected.

Even capital projects find this really hard. I recently volunteered to support a small community organisation with a non-DSS capital works project, and the tradesperson found it nearly impossible to give a definitive quote, because some costs just depend on what happens. If the cost goes over what they estimated, this tiny community-based CSO will be on the hook for the balance. The grant is a risk for the community.

Similarly, my clients who are new to grants always want to apply for "contingency" funds. I know from experience as a grants manager that this won't get into a grant agreement. But it's so hard to know exactly what the spending will be over the life of a 3 year grant, even a 1 year grant.

There has to be more flexibility.

Perhaps government could have contingency funds available that could be accessed upon application by grant recipients. They don't get it if they don't need it, but if they DO need it, there's something they could apply to in order to cover the gap.

As the Issues Paper recognises, there's so many overhead costs that aren't covered. Maybe government could add a margin on top of each grant to do the activities that need to be done to set a CSO up for success? E.g. designing the next initiative, building the relationships, etc. There could be a report to demonstrate what was achieved with this.

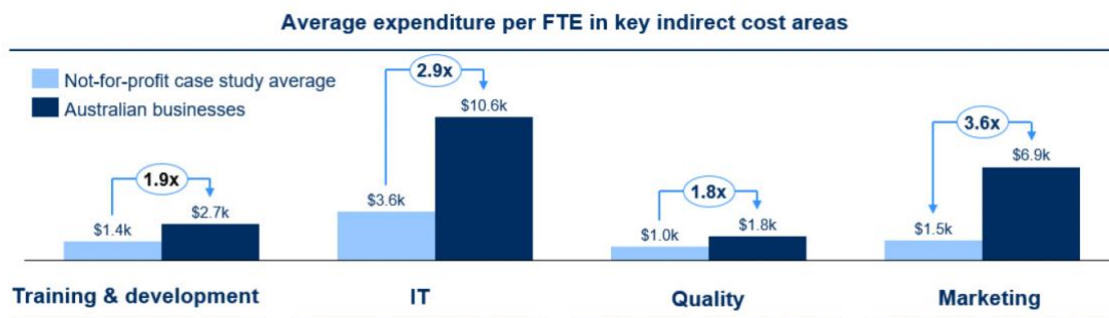
Another key thing is for grant makers to realise just how much can possibly be done with a set amount of funding. If a grant requires a person to manage and implement the program, you're not going to get much change out of \$100k/year (salary, on-costs, recruitment, onboarding, mandatory training) – and that's without any program costs, or even proper overhead. If a grant is offering \$50k, it's going to fund predominantly volunteer-led projects – and so the grant objectives need to be aligned to that, and it needs to recognise that volunteers are a limited resource in many communities.

Most grant opportunities favour proposals with a high number of beneficiaries and a low cost-per-beneficiary. This biases them towards low-impact-high-volume projects. There needs to be opportunities where it's possible to be competitive with a high-impact-low-volume proposal to meet complex needs and address entrenched disadvantage – otherwise, we're all just going in circles.

The Issues Paper states that “Grants can provide CSOs with flexibility, within the parameters outlined in grant agreements, to deliver services in response to changing community needs”. But that’s not really true – grants are one of the least flexible funding sources. Often, they lock CSOs in to a narrow set of KPIs with a predefined budget. Grant agreements actively prevent CSOs from adapting services in response to changing community needs, because any change in activity requires a variation, which takes at best a few weeks and at worst over a year. (I recently heard about a variation that took over 18 months due to understaffing in the grant management team.) The idea of more flexibility is GREAT – and it will need a big change in the culture around grants and grant agreements. Grants are not currently flexible.

2.2 What administrative and overhead costs are not being considered in current grant funding?

The Issues Paper cites SVA’s Paying What It Takes report (2021). This needs to read again and again. Low indirect costs lead to lower capability and lower effectiveness for CSOs. Non-profits spend a fraction of what Australian businesses spend on key things like training, IT, quality and marketing.



Source: *Paying what it takes*, SVA, 2021.

And yet – training and quality might be more important for CSOs than for businesses – many of whom work with very vulnerable cohorts. IT is just as much of a risk – we live in a world of growing data breaches and cyber extortion and CSOs are just as vulnerable as businesses.

Grant opportunities always seek innovation – but it’s really hard to innovate when there’s no breathing room in the funding model. If we want sustained impact and innovation, there has to be funding to support that.

Ditto collaboration. Collaboration takes time and work – it needs meetings, MoUs, planning. None of that happens for free – yet CSOs are expected to make it happen for free.

And program design. I’ve created ways to work very cheaply so that I can help clients with program design, but even then, many can’t afford the support they want. Ultimately poor program design means poorer outcomes for the community. And it means fewer collaborations, as these are generally set up in the program design stage of a project, which is unfunded.

This cycle of starvation affects morale, and over-worked people in under-resourced environments burn out. We think of burnout as being a frontline worker problem, but it affects people in the

finance and HR and back-of-house teams too. One of the worst cases I've seen of CSO burnout was in a CEO of a small/medium community-based CSO, who tried and tried and tried to scrape by on inadequate funding, including from DSS – it broke them. A bit more resourcing can give the cushion that prevents that happening so much.

2.3 How are rising operational costs impacting the delivery of community services?

Costs go up, but grant agreements don't change. We all know that prices are increasing. I noticed a hotel that I stayed at 3 years ago has gone up from \$99/night to \$229/night (no, they haven't refurbished). If I had budgeted a grant that included overnight travel expenses 3 years ago, I'd still today be trying to find somewhere to sleep for \$99/night, and I wouldn't be able to – that would no doubt be affecting outcomes. It's the same for all expenses.

2.4 What have been your experiences with and reflections on the supplementation and change to indexation?

I don't have comments about this.

2.5 How can CSOs and the department work together to determine where funds are needed most to ensure equitable and responsive distribution of funds?

I've been in a position to ask some (non-DSS) grant managers about the extent to which their funding has been distributed equitably and in response to identified need. Many grant managers have told me that because their grant round was open with broad eligibility criteria, it has been equitable and has responded to the community need. However, that assumes that competitive applications were submitted addressing all relevant need across each community – and that's a big assumption.

We know that many organisations don't submit strong grant applications, even when there is a clear identified need in their community. They may be too busy to prepare the application, they may not hear about the opportunity, they may experience cultural or linguistic barriers in completing the application. For those that do submit, anyone who has worked in grants assessment will know that sometimes great ideas are expressed badly in an application, and can't be scored well. Some applicants miss parts of questions, or seem to misunderstand a question. Some people just aren't good at writing – but that doesn't mean they're not great at making change in their community. Grant writing is a skill and not everyone is good at it – and if there's no one at an organisation who is good at it, there will be no grant funding.

Open competitive time-limited grant rounds are rarely equitable or verifiably aligned to where funds are most needed.

Open grant rounds are still important, because they do create a mechanism to open funding opportunities to a variety of organisations that can achieve something. But they're not the only tool in equitable and responsive funding.

2.6 How can government streamline reporting requirements, including across multiple grants, to reduce administrative burden on CSOs?

DSS needs to exercise caution in streamlining outcome reporting requirements. Aligning dates, financial measures and requirements across grants would be great, but outcomes need to be reported in a way that retains meaning in the data. Too much streamlining might result in reporting only against simple metrics that don't represent the outcomes a service has achieved.

Outcome reporting needs to include qualitative data, particularly for evaluation. This better tells the story of change, particularly for complex initiatives or for people experiencing multiple intersecting vulnerabilities.

3. Area of focus: Providing longer grant agreement terms

3.1 What length grants are CSOs seeking to provide certainty and stability for ongoing service delivery?

For service delivery grants, grant lengths needs to be at least a few years, with option to extend.

Genuine long-term thinking is needed to solve entrenched problems – far too often, “3 years” is referred to as “long term”. At least a 10yr+ horizon is needed to drive real change.

There are limits to what can be achieved in 1-2 years, including under the SARC grant (which the paper highlights as a positive example of short-term funding). Programs take time to set up. Withdrawing programs too early disrupts communities.

A grantee told me recently that success is a double-edged sword. They successfully delivered a 1-year grant-funded program that the community loved. There's now pressure to repeat it – and no funding to do so. They've scraped together enough for a cut-down version of the program, but that's damaging their reputation in the community, too.

There needs to be mechanisms to extend successful programs based on the outcomes they generate. Similarly, there needs to be mechanisms to end programs that are not delivering the change planned.

3.2 What timeframes should the government aim for, at a minimum, to provide final outcomes on grant variations/extensions before the current grant ceases?

In answering this question, DSS should consider the kind of job security that anyone would need in deciding whether to stay in their role or seek another position.

3.3 What funding flexibility do CSOs require to enable service delivery and innovation?

There needs to be some mechanism to fund program design. That's all done unfunded, and it causes huge strain on CSOs. Again, how would DSS cope if essential parts of your remit were supposed to be done without funding?

3.4 What flexibility is required by CSOs in acquittal processes to support and encourage sector innovation?

Innovation is a great ambition. But there also needs to be funding available for programs with proven, demonstrable outcomes, including extending programs to new geographies and cohorts. Too many grants have selection criteria that favour innovation, which prevents funding services that we already know work.

3.5 How can government improve the variation process, with consideration that CSOs must demonstrate alignment with the grant agreement and provide evidence of value for money outcomes?

No comments from me.

4. Area of focus: Ensuring grant funding flows to a greater diversity of CSOs

4.1 How can the government ensure opportunities are available for new and emerging organisations to access funding?

There could be specific grant rounds for new and emerging organisations, with structures appropriate to the risk profile of such organisations. Many new CSOs are hamstrung by the requirement to have experience in order to get their first opportunities. Specially designed grant rounds that don't pit new CSOs against mature CSOs could nurture new voices in the sector.

4.2 What programs, supports and information are already available for smaller CSOs to help build capacity of the organisation? Are these working?

There's often a "how to apply for a grant" webinar available ahead of a grant process, but in my experience, these are typically not detailed enough to be really helpful for inexperienced CSOs. More detailed support or 1:1 support could help.

4.3 How could larger CSOs support smaller CSOs? What are the barriers to providing this support?

Expecting large CSOs to support the growing CSOs that may become their competition in a competitive funding landscape is unfair. The sector is naturally collaborative, but the funding landscape is scarce and fierce. Some organisations behave very openly, and are sometimes burnt by more cutthroat CSOs. Ultimately, the community loses when CSOs are pitted against each other.

5. Area of focus: Partnering with trusted community organisations with strong local links

5.1 What is your experience with and reflections on place-based funding approaches?

Place-based approaches are great when they work, and they don't work everywhere. They require a magic combination of people, services, attitudes and commitment to a place. Some places have that – some don't. Place based funding needs to be part of the funding mix, and it can't be the only part. If it is, communities without that magic combination will lose out.

I sometimes see supposed place-based opportunities that have contradictory expectations on providers. For example, a grant might require a place-based pilot with a scale up to multiple locations – but services that work at scale need to be designed differently to place-based services. Place-based funding needs to be truly place-based – and it's not the only thing that works.

Place-based services risk entrenching geographic service disparity, especially when there are strict eligibility requirements based on postcode or address, and especially when services are delivered online. Services should be available to people who need them, and people shouldn't be turned away because their official address isn't sufficiently local.

5.2 What innovative approaches could be implemented to ensure the grant funding reaches trusted community organisations with strong local links?

Only prioritising highly-local organisations risks squeezing out specialised skillsets, especially when services can be delivered remotely. Virtual service delivery is great, and it's a great way to access highly-skilled services. Without telehealth, I couldn't access the mental health support I need from my small rural community as there simply aren't specialists locally. The same goes for other forms of specialised community services.

CSOs can build local links if they have the opportunity. Rather than restricting funding, supporting the development of local partnerships might be a better way to ensure more communities can access specialised effective services.

The discussion paper says "may put greater emphasis on supporting organisations that have a connection to, and understanding of, the community needs." That sounds good, but it may bias funding to large CSOs resourced to do detailed community consultation studies. Many CSOs are more focused on service delivery than on fundraising, and so have fewer resources to do that kind of work.

5.3 Which areas do you consider have duplicative funding or gaps you think need to be addressed, and what is the evidence?

Rural, regional and remote communities are consistently overlooked. Sometimes, a funding opportunity will be available only to organisations headquartered in a MMM2-7 location – this actively prevents metro-based organisations from seeking to expand their services to regional areas, and further entrenches service disparity between metro and regional areas.

5.4 Where there is a community-led change initiative, could shared accountability to community and funders (government) strengthen service delivery?

Sounds great – but I have no idea what this could actually look like. Which part of the community would you be accountable to? How would you demonstrate that accountability? What opportunity could the community have to interrogate any reporting? What if different parts of the community have different views about what's needed, or the adequacy of what is delivered? What if community expectations are unreasonable or unrealistic or based on a misunderstanding of what's possible or allowed?

6. General questions for each focus area

6.1 If any, what are the problems or challenges you think have been overlooked?

A range of structural problems in grant applications have been overlooked.

Longer lead times for grant applications would support stronger service design, better organisational partnerships, and facilitate workforce planning at CSOs. At the moment, most grants are open for about 6 weeks – that's a short amount of time to complete the required work in design and partnership. Also, it means organisations may miss out on funding opportunities if, for whatever reason, they missed the announcement of the grant round – this risk is more significant in smaller CSOs. Due to the nature of the financial year cycle, there tends to be a lot due in October/November and April/May – longer lead times would help prevent staff overwork at these key times, and result in better-planned services with better partnerships that better meet community need. Even if longer lead times can't be offered, more use of the grant forecasting system on grants.gov.au would be immensely helpful in planning.

One of the worst things I see in grant opportunities is applications due in early January. As grant makers, you HAVE to understand that an application due in early January needs to be worked on over the Christmas and New Year period. This prevents some staff members from getting a break with their family, and contributes to burnout, overwork, and stress. It also results in poorer design, where staff who do take leave cannot be contacted to contribute or review submissions. Grants should never be due between 20 December and 20 January – it's just unfair on everyone, and ultimately gets a poorer result for the community.

Grant application requirements need to be proportional to the amount of money available and the complexity of the program or issue being addressed. Small, simple grants often require excessive applications with a dozen long questions. But likewise, there is an increasing trend for grant applications for complex initiatives being too short to fully explain the proposed idea.

The current DSS ILC application due 30 November 2023 is a great example. The first selection criterion gives respondents 450 words to: outline the problem/need being addressed; explain which activities will be undertaken to address the problem/need; detail why this activity/project is needed by the target group and include supporting evidence; explain how the proposal addresses the grant opportunity objectives; identify where the activities are located, why they are needed in that location and how they will be delivered in each location; list milestones and timeframes of the project; explain how the milestones will be achieved; and outline the risks associated with implementing the project including mitigation and management strategies. That ALL has to be done in 450 words. If you allocated an equal number of words to each item on that list, there's 56 words available to cover each item – 56 words to list risks and associated mitigation strategies, 56 words to detail the need for the work and provide evidence, 56 words to explain how the project will be achieved.

It's not enough.

It means that the grant opportunity will be biased towards simple proposals that can be explained in such a short word limit, not proposals that seek to address an underlying system through multiple strategies.

I know that the department receives a large number of grant applications, and keeping the word limit low is an important way to manage the workload in the assessment process. At the same time,

DSS has to recognise that these short word limits are *limiting* to applicants, and ultimately to the community those applicants are seeking to serve. Writing a compelling case in a very short word limit is extremely hard. A bit more breathing space on the word limits would make a huge difference.

(On the plus side, that ILC grant has had nearly a 3-month window between opening and applications due. This timeframe has supported a much more sophisticated planning and design approach for one of my clients, which has been excellent.)

One idea that could help with word limits is asking applicants to select whether their proposal is simple, moderate or complex. The online form could adjust the word limits based on the response. This would prevent applicants with simple proposals from over-explaining their idea, while giving other applicants space to properly explain more complex ideas.

Similarly, it is important that the selection criteria are well-aligned to the questions asked in the application form. DSS is usually pretty good at this, but it is still common to see grant applications where applicants have a limited opportunity to explain themselves against the selection criteria based on the questions asked. A recent DFAT grant was a great example of this problem, where multiple selection criteria did not appear in the questions.

I can tell that DSS puts a lot of work into writing good grant guidelines, but I think it would be beneficial to get a non-subject matter expert and a non-public servant to read and comment on them ahead of release. They are often very difficult to interpret for anyone who doesn't read such documents regularly – and even sometimes for people who do. Again, the recent ILC grants are a good example. There were two ILC grants open at the same time, one due in October and one in November. It seems like DSS was clear on exactly how these two opportunities were different, but it was very difficult to interpret this from the documentation. I personally consulted with multiple people, including disability sector experts, to try to figure it out – and we ALL struggled, not one had a clear idea of the difference in what DSS was seeking between the two opportunities. If DSS sought a read-through by a non-expert before release, it could have been made clearer. (Related: having two very similar opportunities available at the same time always creates confusion.)

Similarly, DSS is resistant to questions during the grant application period, and that makes things hard for applicants. It's common to see Q&A responses that read something like "Q: The grant guidelines are unclear about ABC – can you confirm? A: Refer to the grant guidelines – no additional information can be provided." Such responses are unhelpful, and ultimately mean fewer strong applications from CSOs, and so poorer outcomes for the community.

In receiving grant applications, it's important that all applicants are treated equally. That said, occasionally it's also important to give grant applicants the benefit of the doubt in order to ensure the right outcomes for communities. Sometimes a little flexibility goes a long way.

Years ago, I helped a client with an application to a targeted competitive grant. The application required engaging a specialised consultant – the consultant we used said ours was the best application he'd seen out of a dozen or so. When funding was announced 6 months later, my client wasn't successful. She sought feedback – and was told she had uploaded a blank document, rather than the application she had worked so hard on. She was devastated – she asked why they hadn't told her, and given her a chance to give them the correct document. Ultimately, the lack of funding put her organisation and the people she served a year behind (they did succeed in gaining funding a year later in a subsequent round). That was targeted funding, and desperately needed by that organisation. The grant manager *should* have given her the benefit of the doubt and contacted her about the document. Worst case scenario, if my client had been dishonest and deliberately

uploaded the wrong document, she might have gotten an extra few hours or a day to work on her application – but when it was a comparatively small amount of targeted funding (<\$100k), is that really a bad outcome for the community?

Similarly, a different client submitted two applications to one of two different SARC opportunities closing on the same day – and accidentally submitted one application to the incorrect opportunity. We noticed and contacted DSS within half an hour, and requested that the application be moved to the opportunity to which it was intended. DSS was totally inflexible, and the application was deemed ineligible due to that minor administrative error – again, the people who lose out most are the community that the CSO was seeking to serve. There has to be some flexibility.

Some grant funders do show flexibility. A client had their IT system go down the day that a major Dept. Health grant application was due. We called the Dept, and they offered to extend the deadline from 2pm to EOD in light of the problem – this was extremely helpful. Very recently, I was helping a client apply to a non-government grant opportunity. We required a letter from Council with a specific phrase in it – the letter Council provided us did not have that phrase, and my contact at Council was unable to be reached. I called the grant maker, and they said we could submit the application with the letter I had, and get them the correct letter asap but after the grant deadline. This showed the flexibility that the CSO I was working with needed. DSS should consider showing similar flexibility.

6.2 What other solutions or changes could also be considered?

DSS could consider a survey of grant applicants to generate additional insight for this process. Grant recipients are likely to say that a grant application process was positive, because it yielded the result they were seeking – unsuccessful grant applicants, and non-applicants, will have different experiences.

6.3 What does success look like?

- All grants forecasted.
- At least a 3 month window from applications opening to closing for most grants, with no applications due in January.
- Targeted opportunities for new and mature CSOs, large and small CSOs, specialised and community-based CSOs, innovative and proven programs.
- Grant amounts that reflect the cost of program implementation, including indirect costs and design.
- Better support for newer CSOs in writing a strong application.
- Well-designed guidelines and application forms that are easy to read, with well-structured questions and word-limits suited to the complexity of the proposals.
- A small amount of risk-based flexibility on grant application submission to support applicants through minor administrative errors.
- Easy variations to support minor amendments to costs.
- Clear pathways to extensions for programs delivering good outcomes.
- More consistency and better practices across all grant funders.