

Evaluation of the Home and Community Care Cultural Planning Strategy

September 2007

Effective Change Pty Ltd in conjunction with the Department of
Human Services, Aged Care Branch

Acknowledgements

This document was prepared by Clare Keating and Debra Barrow from Effective Change Pty Ltd, PO Box 184, Brunswick East VIC 3057. Telephone: (03) 9388 1661
Email: clarekeating@effectivechange.com.au

The department wishes to acknowledge representatives from the HACC sector who contributed to the evaluation process.

The department also wishes to thank the project reference group who assisted the evaluation.

Reference group members included:

Calvin Graham (Chair)	Department of Human Services HACC and Assessment Unit
Louise McGuire	Department of Human Services HACC and Assessment Unit
Gillian Dickson-Hughes	Department of Human Services HACC and Assessment Unit
Sue Casey	Department of Human Services Social Policy Branch
Naomi Schwarz	Department of Human Services Social Policy Branch
Toni Clarke	Department of Human Services Barwon South Western Region
Anne Hafeel	Department of Human Services North West Metro Region
Joan Cooney	Action on Disability Within Ethnic Communities (ADEC)
Meyer Eidelson	Action on Disability Within Ethnic Communities (ADEC)
Michelle Henshaw	Diversitat
Sigrid van Fondern	Regional Information and Advocacy Council
Wina Kung	Migrant Information Centre Eastern Metro Region
Katherine Wositzky	Municipal Association Victoria
Audrey Dropsy	Department of Human Services Disability Services
Natasha Kukanja	Ethnic Communities Council Victoria

For additional copies please contact:

HACC Service Development
Department of Human Services
Tel: (03) 9096 9959
or visit the website www.health.vic.gov.au/hacc

Published by Rural and Regional Health and Aged Care Services, Victorian Government
Department of Human Services, Melbourne, Victoria
March 2009 © Copyright State of Victoria, Department of Human Services, 2009
This publication is copyright. No part may be reproduced by any process except
in accordance with the provisions of the *Copyright Act 1968*.
Also published on www.health.vic.gov.au/hacc

Authorised by the State Government of Victoria, 50 Lonsdale Street, Melbourne.

Contents

Acronyms	6
Executive summary	7
Introduction	7
Overview of the Cultural Planning Strategy	7
Overview of the policy and program context	8
Overview of the methodology	9
Overarching conclusions of the CPS evaluation	10
Findings and recommendations	12
Introduction	18
1. The Cultural Planning Strategy	20
1.1 History	20
1.2 Financial investment in Cultural Action Planning	21
1.3 Components and operations	21
1.3.1 The Cultural Planning Tool (CPT)	21
1.3.2 The Cultural Planning Tool guidelines	23
1.3.3 Regional processes and frameworks	23
1.3.4 HACC Equity and Access Program	24
1.3.5 HACC Equity and Access forum	25
1.4 Roles and responsibilities	25
1.4.1 HACC Equity and Access Staff	25
1.4.2 Statewide Equity and Access Coordinator	26
1.4.3 Service Providers	26
1.4.4 The Department of Human Services Regions	26
1.4.5 The Department of Human Services Central	27
2. Policy and program context.....	28
2.1 Legislation	28
2.2 Whole-of-Government approach	28
2.3 The Department of Human Services policies and initiatives	30
2.3.1 The Culturally Equitable Gateways Strategy, 2004	30
2.3.2 Language Services Policy, 2005	32
2.3.3 Cultural Diversity Guide – Planning and delivering culturally appropriate human services, 2006	32
2.4 The Home and Community Care (HACC) Program	33
2.4.1 HACC planning environment	33
2.5 Other program areas within the Department of Human Services	34
2.5.1 Disability Services CALD Strategy	34
2.5.2 Health Service Cultural Diversity Plans	35
2.5.3 Mental Health Services	35

3. Methodology.....	37
3.1 Planning	37
3.1.1 Project establishment, scoping and planning	37
3.1.2 Develop evaluation framework	37
3.1.3 Develop data collection instruments	37
3.2 Data collection and analysis	38
3.2.1 Data collection	38
3.2.2 Data analysis	40
3.3 Reporting	41
3.3.1 Draft reporting	41
3.3.2 Final reporting	41
4. Findings	42
4.1 Introduction	42
4.2 Overall strategy	43
4.2.1 The overall impact of the Cultural Planning Strategy	43
4.2.2 The rationale for the strategy	43
4.2.3 Coordination with other strategies and initiatives	45
4.2.4 Coordination with other plans	46
4.2.5 Coordination – general	48
4.2.6 The structure of the strategy	50
4.3 Implementation	51
4.3.1 Cultural Action Planning	51
4.3.2 The planning process	52
4.3.3 Quality framework	54
4.3.4 Assessment	54
4.3.5 Regional variations	55
4.4 Roles and responsibilities	56
4.4.1 Roles and responsibilities for the Cultural Planning Strategy	56
4.4.2 Roles and responsibilities within agencies	59
4.5 Tools and resources	60
4.6 Outcomes	62
4.6.1 Outcomes: General	62
4.6.2 Outcomes: specific	64
5. Potential improvements	66
5.1 General	66
5.2 Integrated planning	66
5.3 Integration with quality frameworks	67
5.4 Triennial timeframe	68
5.5 Flexibility in reporting requirements	68
5.6 Standardised approaches and roles	69
5.7 Communication/promotion	70
5.8 Funding	70

- 6. Conclusions 72**
 - 6.1 Introduction 72
 - 6.2 Overarching Conclusions 72
 - 6.2.1 Conclusions in relation to specific components of the strategy 74
 - 6.2.2 Opportunities for the future 74

- 7. Recommendations 75**
 - 7.1.1 Overall strategy 75
 - 7.1.2 Implementation 78
 - 7.1.3 Roles and responsibilities 80
 - 7.1.4 Tools and resources 82
 - 7.1.5 Transition Planning 83

- 8. References 84**

Appendices

- Appendix 1: HACC Cultural Planning Strategy Evaluation Reference Group
- Appendix 2: Evaluation Framework for the Evaluation of the Cultural Planning Strategy
- Appendix 3: Evaluation of the Cultural Planning Strategy Data Collection Tools
- Appendix 4: Service Provider Workshop/Service Provider Survey

Acronyms

ADEC	Action on Disability within Ethnic Communities
ATSI	Aboriginal and Torres Strait Islander
CALD	Culturally and Linguistically Diverse
CAP	Cultural Action Plan
CEGS	Culturally Equitable Gateways Strategy
CPS	Cultural Planning Strategy
CRIS	Client Relationship Information System
DHS	Department of Human Services
ECCV	Ethnic Communities Council of Victoria
EMR	Eastern Metropolitan Region
ESDO	Ethnic Services Development Officer
FASA	Funding and Service Agreement
HACC	Home and Community Care
HSCDP	Health Service Cultural Diversity Plan
IQMA	Integrated Quality Management Approach
MAV	Municipal Association of Victoria
MDS	Minimum Data Set
NAATI	National Accreditation Authority for Translators and Interpreters Inc
NSSI	National Service Standards Instrument
NWMR	North and West Metropolitan Region
PASA	Program and Services Adviser
QDC	Quarterly Data Collection
SEF	Service Excellence Framework
SMR	Southern Metropolitan Region

Executive summary

Introduction

The Victorian Home and Community Care (HACC) Cultural Planning Strategy (CPS) has been in place since 1997. Its overall objective has been to *'increase the responsiveness of HACC services to people from Culturally and Linguistically Diverse (CALD) backgrounds across the range of services'*.¹ Its implementation involved partnership between the Victorian State Government and non-government groups representing and providing services to ethnic communities.

The Cultural Planning Strategy has not been independently evaluated since its introduction. In 2006, the Department of Human Services announced an evaluation of the CPS to *'determine the effectiveness of the HACC Cultural Planning Strategy for HACC service providers and consumers'* and to make recommendations for future development of the CPS, tools, and roles of the Equity and Access staff and the Statewide Coordinator.²

Overview of the Cultural Planning Strategy

The Victorian HACC Cultural Planning Strategy (CPS) was a response to ensure that the HACC service system met the needs of users from CALD backgrounds. People from CALD backgrounds are identified as one of the five *'special needs groups'* within the broader HACC target population under the Commonwealth *Home and Community Care Act 1985*. The Act recognises that this group may experience particular difficulties gaining access to appropriate HACC services and this is confirmed by information from HACC's Minimum Data Set (MDS).

The CPS incorporates the use of the Cultural Planning Tool (CPT), which was designed to be used by HACC service providers to demonstrate and evaluate the provision of culturally appropriate services to people from CALD backgrounds. This is supported by a number of resources, including the Cultural Planning Tool guidelines, and in some of the department's regions, regionally developed tools and resources. Currently, the CPS requires that HACC providers develop and submit a HACC Cultural Action Plan (CAP) each September to their regional Department of Human Services office.

Currently the Department of Human Services invests approximately \$1.6 million in cultural planning across all regions. This funding supports fourteen HACC projects within the Equity and Access Program, with staff based in community service organisations often Migrant Resource Centres (MRCs) or the regional equivalent. The program engages project staff to resource service providers in the tasks of submitting and implementing CAPs. The department also funds thirteen community based Ethnic Services Development Projects and four CALD Liaison Projects.

¹ Request for Quotation Evaluation of the Cultural Planning Strategy, Department of Human Services, August 2006, p. 1

² *ibid*

The role of the Equity and Access staff includes providing practical resources to service providers, providing training, advice and direct support in the preparation of Cultural Action Plans and assisting the department's regions in the appraisal of annual Cultural Action Plans.³ The Equity and Access staff are in turn, supported by a Statewide Equity and Access Coordinator who is located with and auspiced by Action on Disability within Ethnic Communities (ADEC). A forum is held four times per annum in order to reduce isolation for Equity and Access staff, provide opportunity for sharing examples of good practice and building knowledge and skills.

The Department of Human Services regional offices are responsible for the regional planning and contract management role in relation to Equity and Access projects. Through the regional Program and Services Advisers (PASAs), the department's regional offices' cultural planning responsibilities include:

- monitoring Funding and Service Agreements of HACC service providers,
- ensuring that Cultural Action Plans are submitted as a condition of funding, and
- assessing or overseeing the assessment of annual Cultural Action Plans and providing feedback to service providers.

The department's central office primarily has a policy, planning and evaluation role in relation to Equity and Access projects.

Overview of the policy and program context

Commonwealth and state legislation which underpins and supports the intent of the Cultural Planning Strategy includes the *Home and Community Care Act 1985*, anti-discrimination legislation and the *Victorian Charter of Human Rights and Responsibilities Act 2006*.

From the Victorian government perspective, key government policy documents include *Valuing Cultural Diversity*⁴, *Growing Victoria Together* and *A Fairer Victoria*.

The department's policies and initiatives with relevance to the CPS include:

- the *Culturally Equitable Gateways Strategy*
- Language Services Policy, 2005
- Cultural Diversity Guide – Planning and delivering culturally appropriate human services, 2006

The CPS is located within the HACC program and therefore all HACC-based initiatives and policies are of relevance. In terms of other departmental program areas, the following are relevant to the CPS:

- The Disability Services CALD Strategy
- Health Service Cultural Diversity Plans
- The Cultural Diversity Plan for Victoria's Specialist Mental Health Services 2006-2010.

³ Eidelson, M (2005) Summary Report: The Implementation of Cultural Action Plans in Victoria 2004-2005, ADEC

⁴ Department of Human Services, 2006 *Cultural Diversity Guide*

Overview of the methodology

The Evaluation was undertaken in three key stages: Planning, Data Collection and Analysis, and Reporting.

During the Planning stage, an Evaluation Framework was developed to guide the research. Data collection instruments were designed based on this framework and the key evaluation questions.

Data was collected through a range of methods:

- Desktop analysis and review of relevant documents and a selection of 80 Cultural Action Plans.
- Structured interviews and group meetings with HACC Equity and Access staff; the department's regional staff; the department's central staff; the Statewide Equity and Access Coordinator and the ADEC Education Unit Coordinator and representatives of the Municipal Association of Victoria (MAV), and the Ethnic Communities' Council of Victoria (ECCV).
- Feedback Surveys sent to service provider networks and to all Program and Service Advisers (PASAs) from the department.
- Service Provider workshops (two metropolitan, two rural) attended by a total of 166 people.
- Service provider survey sent to all Victorian HACC funded agencies through their PASA. A total of **108** surveys were returned representing a return rate of approximately 21 per cent.

A total of **211** agencies funded to provide HACC services (approximately 42 per cent of agencies in the HACC sector) provided input into the *Evaluation of the Cultural Planning Strategy* either through attending a workshop or submitting a completed survey as shown in the table below.

Agency type	Metro	Rural
Aboriginal Community Controlled Organisations	0	3
Acute Health Services	7	29
Community Health Centres	16	13
Ethno-specific Agencies	12	0
Local Government	19	30
Multicultural Organisations	3	2
Non-government Organisations	36	29
Nursing Providers	1	8
Other	1	2
TOTAL	95	116

Data from all sources was collated and analysed against the key evaluation questions.

Effective Change prepared a draft report on the evaluation which was discussed with the Project Managers and presented to the Project Reference Group. Feedback from both sources was incorporated to prepare the final report.

Overarching conclusions of the CPS evaluation

The fundamental question of the evaluation of the Cultural Planning Strategy must be: *'Does the Cultural Planning Strategy increase the responsiveness of HACC services to people from CALD backgrounds across the range of services?'* Despite the extensive amount of information collected through the evaluation, the answer to this question is patchy and inconclusive because the historical data to conclusively support or disprove this proposition is not readily available. The conclusions that can be drawn about the strategy are that:

- there is high compliance amongst service providers with the requirement to submit Cultural Action Plans;
- there is widespread understanding and acceptance amongst service providers of the need for organisations to plan and implement specific actions in order to increase the responsiveness of HACC services to people from CALD backgrounds;
- amongst service providers, there is considerable goodwill and commitment to achieving equitable access and the best outcomes for their HACC clients and potential clients from CALD backgrounds;
- there is evidence that the strategy has contributed to the implementation of culturally responsive programs, services and management practices.

The greatest achievement of the Cultural Planning Strategy has been to embed the concept of cultural action planning and develop this as a regular activity for organisations. Further, training undertaken through the Cultural Planning Strategy has raised the awareness and knowledge of the HACC workforce in relation to issues of cultural sensitivities and service responsiveness. Service providers have been supported to develop and implement culturally sensitive practices.

However, across the HACC service sector there are reservations about the currency and relevance of the Cultural Action Planning processes, tools and resources.

After ten years of operating within the current system, service providers have communicated clear messages that the process of Cultural Action Planning needs to be integrated into:

- the core business planning processes of organisations, and
- the core quality management systems of organisations.

On a more strategic level, it is evident that:

- Very few stakeholders have a clear overview of the strategy as the roles and components of the strategy are fragmented across the department and the non-government sector.
- Across the partners involved in the strategy, no single role has overall responsibility for the strategy.
- The strategy has not kept pace with developments across the HACC service system, such as service coordination or the HACC National Quality Assurance Framework.
- There are no clearly articulated systems, processes or mechanisms for management and coordination of the strategy.

- There are inherent weaknesses in the structure of the strategy, with its focus on collection of prospective data, rather than retrospective reporting (or a combination of prospective and retrospective data collection).
- There is no system for monitoring, evaluation or continual improvement of the strategy.
- Other than referencing the HACC National Service Standards, the CPS is not well aligned to the overall HACC Quality Framework including the three yearly assessment against the NSSI.
- There are limited cross-program links between the Cultural Planning Strategy and comparable requirements emanating from the department's Disability, Mental Health and Acute program areas.
- The potential for cross-program linkages (for example, consolidated 'Diversity Planning and Reporting') inevitably raises issues of coordination and responsibility within the department, monitoring and reporting by program area.
- And the Cultural Planning Strategy is not systematically integrated into the planning processes of individual agencies.

Fundamentally, the Cultural Planning Strategy is only nominally a strategy, and rather, is a number of resources, including staff, and a Cultural Planning Tool sitting together under the title of 'strategy'. When it was introduced in 1997, the concept of regular Cultural Action Planning was a forward thinking approach. However, over the last ten years it has largely been overtaken and outpaced by developments within the HACC service system and within many organisations, particularly in local government and larger organisations which typically have sophisticated planning and quality management systems in place.

Conclusions in relation to specific components of the strategy

The Evaluation found that service providers and key stakeholders held concerns about specific components of the strategy including:

- the Cultural Action Planning process (separation of the process; timing)
- the absence of a quality framework, although the process does reference HACC National Service Standards
- the value, and at times, appropriateness of the Cultural Action Plan assessment processes
- the role and responsibilities of the Equity and Access staff, in particular the planning advisory function and the role in relation to the regional assessment of the Cultural Action Plans, and
- the need for the tools and resources to be updated.

It must be clearly stated that the Equity and Access staff are respected in the field and that their dedication and commitment is generally acknowledged. However, the evidence suggests that resourcing of a HACC cultural planning strategy by community-based staff located in the non-government sector (NGO) is not necessarily making the best use of the HACC Equity and Access staff' skills or supplying advice at the level required by service providers. While established as an innovative partnership approach, over time responsibilities for various components of the strategy have become diffuse and lack coordination.

Opportunities for the future

Both the strategic and the specific conclusions highlight the need for changes and improvement to the strategy. Any way forward needs to:

- ensure that the significant gains over the last ten years are protected in future changes;
- ensure that there are appropriate checks and balances in the new system, and
- involve the appropriate stakeholders and map a way forward with a realistic timeline for implementation.

Findings and recommendations

Overall strategy

Key finding 1: The overall impact of the CPS

The long term impact of the Cultural Planning Strategy has been to embed the concept and practice of cultural planning within HACC funded agencies across Victoria. The contractual requirement to complete Cultural Action Plans (CAPs) has obliged service providers to complete this task. By going through this process on a regular basis over the last 10 years, service providers have developed or extended their appreciation of the relevance of cultural planning to service quality.

Key finding 2: The rationale for the strategy

The department's HACC Cultural Planning Strategy (as opposed to the Cultural Planning Tool) is not designed in the conventional structure comprising:

- an overarching goal
- broken down into objectives, articulating more specific and measurable aims
- a range of strategies to achieve the objectives
- anticipated outcomes
- where possible, measurable benchmarks.

This limits capacity for the strategy to be monitored and evaluated, either internally or externally, and continuously improved. It also leaves the strategy open to a range of individual interpretations which can not be either validated or discounted.

Key finding 3: Coordination with other strategies and initiatives

The Cultural Planning Strategy does not have formal links to complementary initiatives, strategies and programs. This isolates the Cultural Planning Strategy from other strategies and limits opportunities to maintain its currency or implement improvements. Similarly, if Equity and Access staff are not exposed to strategic developments and initiatives affecting the HACC program, their capacity for building knowledge is restricted, in turn limiting their capacity to provide strategic advice to HACC service providers.

Key finding 4: Coordination with other plans

There is no formal coordination of the Cultural Planning Strategy with the plethora of other planning requirements on service providers. There is strong support from service providers to reduce duplication and integrate plans where possible. There is in principle support for this from the department at the broad level and it is acknowledged that achieving this goal would require a coordinated approach from the department.

Key Finding 5: Coordination in general

The CPS does not have a system for consolidating information on the activities and achievements of the strategy. Consequently, after 10 ten years there is a very limited record of the work of the strategy. This system gap also highlights that there is no solid process for reflection and analysis in order to inform future work priorities. Exceptions to this are models in place in the Eastern Metro Region (EMR) where Cultural Action Plans are submitted electronically and recorded on a database, and the North West Metro Region (NWMR) where information is consolidated and reported to the region each year. This enables the tracking of change in the region over time.

Key Finding 6: The structure of the strategy

There are structural weaknesses in the CPS. Firstly, the strategy's primary benchmark is the number of Cultural Action Plans submitted. But this only provides prospective information (what the agency intends to do). There is no broad-scale collection of retrospective data (what the agency did) or comparative data (intention versus actual).

Secondly, the strategy is managed through a partnership arrangement. Responsibility for coordination of the strategy is delegated to the non-government sector. Overall management of the strategy sits with the department but there are no resources dedicated to the day to day management. There are communication and reporting lines between the coordinator and the department, but this overall structure inevitably distances the CPS from other strategic initiatives.

Recommendations: Overall Strategy

1. It is recommended that the Cultural Planning Strategy graduates to a new phase, with the focus of the strategy redefined to cover 'diversity' in a broad sense, acknowledging that barriers to accessing services are experienced by many who may be marginalised or disadvantaged for a range of reasons, including cultural diversity. The aims of the new phase should move from completion of plans, compliance and monitoring to local integration and continuous improvement.

As such the strategy should be renamed to a 'Diversity and Access Strategy' to reflect its redefined focus.

2. It is recommended that the overall goal, aims and objectives of the strategy are clearly articulated and that a definition of the terms 'diversity and access' is developed.
3. It is recommended that the department's central office takes on a greater role in coordination of all diversity focused initiatives in the HACC program. This approach should provide greater sharing of information; greater coordination and integration of activities and greater analysis of issues and trends.

Implementation

Key finding 7: Cultural Action Planning

While Cultural action planning is widely complied with, qualitative feedback indicated the process is often perceived as lacking in meaning because the system is not aligned with any other core business processes of the organisation. Strong support was recorded for integrating the process with other planning and reporting requirements.

Key finding 8: The planning process

A variety of approaches to cultural action planning have been adopted by HACC funded organisations. Some have taken the initiative to integrate cultural action planning with other organisational processes, however the majority report that the process is undertaken in isolation from other organisational processes. Further there is a level of dissatisfaction with the monitoring of the plans from the Department. There is also strong support to move to a triennial planning process.

Key finding 9: Quality framework

There was strong support for integrating the Cultural Action Planning process within the HACC quality management system, and any developments in HACC quality management.

Key finding 10: Assessment

A range of issues were raised in relation to the transparency and value of the assessment process. Further, it was found that despite the mandatory requirement to submit CAPs, there is no meaningful process for dealing with non-compliance.

Key finding 11: Regional variations

The field supported the suggestion that regions should have the flexibility to modify statewide cultural planning tools and guidelines in order to meet local needs and priorities. Feedback also indicated that this approach should be balanced against some minimum, core requirements applicable to all, in the interests of fairness, consistency and transparency.

Recommendations: Implementation

4. It is recommended that cultural planning is integrated into appropriate strategic, business or diversity plans of HACC funded organizations from July 2008 (to coincide with the next, nationally aligned HACC triennium). In consultation with the department's regional offices, HACC funded organisations should have the opportunity to choose the appropriate platform for their Diversity and Access Plans and the appropriate focus for their local area. Guidance should be provided to the department's regional offices and to HACC services providers to assist in this transition, (see recommendations 14 and 15).

5. It is recommended that the Diversity and Access Strategy should be integrated into the HACC Quality Framework. Monitoring and assessment of Diversity and Access Plans should therefore occur through the triennial HACC assessment process. This will require adaptation of the external assessment tools and further briefing of the external contractors. There should be clear specification of the types of reports which should be available from the assessments to the regions and the central office.

This integration of Diversity and Access with the HACC Quality Framework should be clearly communicated to the HACC sector.

6. It is recommended that Diversity and Access Plans should have a three year planning cycle, with annual reviews to be conducted as part of annual service agreement negotiations and visits undertaken by the regional PASAs.

Roles and responsibilities

Key Finding 12: Roles and responsibilities

In terms of roles and responsibilities, it was found that:

- at a regional level, the Equity and Access staff work independently
- the role contains some inherent anomalies in terms of participation in the assessment of CAPs
- Equity and Access staff are skilled and well-positioned in the NGO sector to provide support to service providers which requires community development knowledge and expertise
- the role of the department's regional offices is critical yet the role is perceived as 'overcrowded' and lacking capacity to dedicate appropriate time and energy to the CPS,
- the coordination of the CAP Equity and Access staff is outsourced to the NGO sector,
- there is essentially no assignment of responsibility for overall management of the strategy at a statewide level.

Recommendations: Roles and responsibilities

7. It is recommended that a Diversity and Access Statewide Reference Group is established with appropriate representation from the department, peak bodies, service providers, the Statewide Coordinator and Equity and Access staff. The role of the Reference Group will be to oversee the transition from the CPS to the Diversity and Access Strategy. The Reference Group will ensure that appropriate linkages are established between the strategy and other relevant policies or initiatives.
8. It is recommended that the roles and responsibilities of the key stakeholders in the Diversity and Access Strategy are redefined in line with the strategy aims and objectives.

9. It is envisaged that the role and focus of the HACC Equity and Access worker will change from preparing and monitoring Cultural Action Plans to a facilitating / enabling role, with a focus on resourcing organisations in the implementation of their plans. This will eliminate some of the conflicts which exist in the current system, and is a better match between the needs of organisations and the skills and expertise of the Equity and Access staff.
10. It is recommended that the department's regional office, the Equity and Access staff and their auspice work together to define and negotiate an annual Diversity and Access Plan for the region. The plan should fuse information from all sources – e.g. the regional office data and the content and local knowledge of the Equity and Access staff, to identify trends and issues for the region and its sub-regions.
11. It is recommended that Equity and Access staff are provided with training and development opportunities to ensure that they have the appropriate content knowledge to provide advice to HACC funded organisations. For example, it would be appropriate to provide briefings to the Equity and Access staff on the new Assessment Framework so that they can assist organisations in its implementation, with an appropriate response to diversity and access issues.

Tools and Resources

Key finding 13: Tools and resources

There was wide agreement that the current CPS tools and resources require updating.

Recommendations: Tools and resources

12. The current tools and resources should be re-designed to fit the structure of the new Diversity and Access Strategy. With a new focus on integrating diversity issues into existing organisational plans, the Cultural Planning Tool and the template should be replaced with guidelines and checklists, to be inserted in the HACC Program Manual. While service providers will have the option to choose whether to integrate their actions into an organisational diversity plan, a HACC plan or a business plan, they will need to ensure that a range of minimum requirements are addressed.
13. Additional tools and resources will be required. At a minimum the following will need to be designed:
 - guidelines for the HACC Program Manual
 - a checklist for Diversity and Access planning
 - guidelines for the HACC NSS Assessment process
 - articulation of roles, responsibilities and expectations.

Outcomes

Key Finding 14: Outcomes

Findings in relation to outcomes of the strategy were variable. There is clearly a gap in information on measurable outcomes. At the same time, the data clearly suggests that positive outcomes have been achieved. In some cases, these are clearly achieved as a result of the strategy. In other cases, the link between the strategy and outcomes is less clear, with the suggestion that they would have been achieved, regardless of the strategy.

Key Finding 15: Specific outcomes

Through the evaluation, data has been collected on a wide range of specific outcomes achieved by individual organisations. This data indicates a wide range of activities being undertaken. At the same time, it underscores the absence of any central collection of this valuable data.

Potential improvements

Key Finding 16: Potential improvements

There was a range of potential improvements to be made to the strategy, with considerable agreement in the way the improvements should be shaped. In summary these included:

- integration with other planning processes
- integration with quality frameworks
- introducing a triennial timeframe to align with the HACCC planning cycle
- standardised approaches and roles
- better communication and promotion, and
- enhanced funding.

Transition planning

Recommendations: Transition planning

14. With the prospect of major change implementation, it is imperative a staged process is developed to implement these changes. In the short term, it is recommended that the status quo remains in place for 2008-2009.
15. The Diversity and Access Strategy should be implemented from 2008-2009 and should align with the new Community Care Quality Standards System due in June 2008 and the next HACCC Triennium commencing in the 2008-09 financial year.

Introduction

This report sets out the findings of the *Evaluation of the Home and Community Care Cultural Planning Strategy*. The project was conducted between September 2006 and June 2007 by Clare Keating and Debra Barrow of Effective Change Pty Ltd.

The Cultural Planning Strategy (CPS) has been in place since 1997 and its overall objective has been to 'increase the responsiveness of HACC services to people from Culturally and Linguistically Diverse (CALD) backgrounds across the range of services'.¹

Since its inception, the strategy has developed at different rates across the regions of the Department of Human Services, and specific regional frameworks, guidelines, tools and protocols have been developed to support its implementation.

This evaluation project has provided the opportunity to review the outcomes of the CPS to date, and develop recommendations for future development and implementation.

In order to do this, the evaluation has taken into account the impact of other complementary strategies and programs on the CPS, for example:

- the Culturally Equitable Gateways Strategy (CEGS)
- the Cultural Diversity Plan for Victoria's Specialist Mental Health Services 2006-2010
- Disability Services CALD Strategy
- the HACC Assessment Framework
- Health Service Cultural Diversity Plans, and
- the National Service Standards Instrument (NSSI).

The objective of the *Evaluation of the Home and Community Care Cultural Planning Strategy* was to determine the effectiveness of the HACC Cultural Planning Strategy for HACC service providers and consumers, and the key deliverables included:

- a workplan
- the collection and analysis of MDS data, consumer survey data and other relevant information
- a review of regional processes and guidelines related to the planning and reviewing of the Cultural Planning Tool (CPT)
- a review of sample action plans
- consideration of the Equity and Access projects and the Statewide Coordinator role in relation to the implementation of the CPS
- a final report evaluating the strategy against its objectives and addressing:
 - identification of the practices and processes developed as part of the CPS

¹ Request for Quotation Evaluation of the Cultural Planning Strategy, DHS, August 2006, p. 1

- the level of implementation of practices and processes
- the level of agency compliance with the CPS
- the level of integration of the CPS into overall management policies
- the effectiveness of the strategy in increasing culturally responsive practices and processes, and
- recommendations for future development of the CPS, tools and Equity and Access worker/Coordinator roles.²

The project was managed by Calvin Graham, Manager HACC Service Development, with day to day management provided by Gillian Dickson-Hughes, Program Adviser, HACC Service Development. The project was conducted by Clare Keating and Debra Barrow of Effective Change with project support provided by Holly Smith. The project reported to a Project Reference Group. The membership of this group is listed in Appendix 1.

This project report is presented in the following sections:

- Introduction
- The Cultural Planning Strategy
- Program and policy context
- Methodology
- Evaluation findings
- Potential improvements
- Conclusions
- Recommendations
- References

² Request for Quotation Evaluation of the Cultural Planning Strategy, DHS, August 2006

1. The Cultural Planning Strategy

1.1 History

The Home and Community Care (HACC) Program has been challenged by the considerable immigration intake into Australia since the Second World War and a rapidly ageing population. As a result, there have been many different approaches by Government to ensure that funded services meet the needs of users with widely diverse languages, expectations, community structures and levels of information about social services.³

The Victorian HACC Cultural Planning Strategy (CPS) was a response to ensuring that the HACC service system met the needs of users from CALD backgrounds. Its implementation involved partnership between the Victorian State Government and non-government groups representing and providing services to ethnic communities.

The overall objective of the Cultural Planning Strategy (CPS) is to increase the responsiveness of HACC services to people from CALD backgrounds across the range of services. The CPS incorporated the use of the Cultural Planning Tool (CPT), which was designed to be used by HACC service providers to demonstrate and evaluate the provision of culturally appropriate services to people from CALD backgrounds.

People from CALD backgrounds are identified as one of the five 'special needs groups' within the broader HACC target population (as defined in the Commonwealth *Home and Community Care Act 1985*). The Act recognises that this group may experience particular difficulties gaining access to appropriate HACC services. The issue of access to HACC services by CALD consumers has been confirmed by HACC Minimum Data Set (MDS) information which indicates that people from CALD backgrounds are relatively under-represented across a range HACC services compared with people whose first language is English.

As a result, in 1997 the Department of Human Services requested that all HACC funded service providers in Victoria develop a strategy or action plan based on the HACC Cultural Planning Tool, to improve access to services for people from CALD backgrounds. By June 2002 almost all HACC providers had achieved this target at least once. In August 2002, stage two of the Cultural Planning Strategy 2002-2006 required that HACC Cultural Action Plans be updated and submitted by September 30th each year until June 2006. This requirement was incorporated into HACC agencies' Funding and Service Agreements and all service providers were encouraged to actively implement these plans within day-to-day practice.

Although not documented, key stakeholders indicated that the idea of the inclusion of Aboriginal Community Controlled Organisations (ACCOs) in the CPS was mooted, but decided against by the ACCO sector. Some ACCOs do however, use the Cultural Planning Tool.

³ Request for Quotation Evaluation of the Cultural Planning Strategy, DHS, August 2006

1.2 Financial investment in Cultural Action Planning

Currently the Department of Human Services invests approximately \$ 1.6 million⁴ in cultural planning across all regions.

This funding supports:

- HACC Equity and Access Projects (\$745,584.60),
- community based Ethnic Services Development Projects (\$628,050.85), and
- four CALD Liaison Projects (\$254,832.28).

1.3 Components and operations

The implementation of the Cultural Planning Strategy involves a number of components including:

- the Cultural Planning Tool
- the Cultural Planning Tool guidelines for:
 - providers of Home and Community Care services
 - Department of Human Services Regional staff and
 - Equity and Access Coordinators and
- Regional Processes/Frameworks, that is, tools, assessment methods.

Other supporting documents define the roles and responsibilities of the HACC Equity and Access Program projects, Equity and Access staff, and those of the Statewide Equity and Access Coordinator in the implementation of the Cultural Planning Strategy.

1.3.1 The Cultural Planning Tool (CPT)

The *Cultural Planning Tool, Planning for Multicultural HACC Services*, 1996, is designed for use by HACC Service Providers to assist in the development of innovative strategies, and evaluate the provision of culturally appropriate HACC services to people from culturally and linguistically diverse backgrounds.

The **goal** of the tool is to establish benchmarks and performance measures within HACC Service Agreements, which can be used for planning and improving generalist or mainstream services to CALD people.

The specific **objectives** of the tool are to:

- identify what an agency is currently doing;
- review practice applied to CALD consumers against HACC National Standards;
- plan service development by adapting strategies for the target group, and
- measure outcomes of service delivery for CALD consumers.

⁴ \$745,584.60 towards E&A staff in CALD and HACC

The Cultural Planning Tool is **structured** in accordance with the principles of the Victorian HACC Ethnic Policy Statement⁵ which set out seven major objectives for service delivery to CALD clients. These include:

- access
- cultural relevance
- consultation
- information
- special needs programs
- service coordination, and
- accountability.⁶

The **tasks** outlined in the CPT require that service providers:

- establish an information base on the demographic characteristics of people of CALD background in their catchment
- identify how services meet the needs of CALD consumers through the use of qualitative and quantitative measures
- identify gaps in service provision in relation to the needs of CALD people
- develop and implement innovative strategies to meet the needs of CALD clients and identify changes in targets over time, and
- provide performance indicators which measure outcomes and act as benchmarks for future planning.

The Cultural Planning Tool also provides guidance and a suggested template for development of the agency's Cultural Action Plan. The Cultural Action Plan requires that service providers outline their objectives, strategies, performance indicators and links to the HACC National Standards within the seven key areas outlined above.

The Cultural Planning Tool further specifies indicators under each of the seven key areas. As an example, the indicators for the area of *Access* include:

- that the agency's demographic profile reflects that of the target population of CALD services users
- that survey results show a consistency between CALD consumers' needs and services provided
- that an interpreter is provided for people who need one, and
- that staff are trained in culturally appropriate assessment.

The completed template forms the basis of the agency's annual Cultural Action Plan which is to be submitted to the relevant Regional office of the Department of Human Services for assessment by September 30 each year.

⁵ Replaced in 2003 by the Victorian HACC Program Manual

⁶ The Creative Skill Consultants (2000) *Living Together – Cultural Planning for HACC and Aged Residential Services*, The Creative Skill Consultants

1.3.2 The Cultural Planning Tool guidelines

Guidelines for the use of the Cultural Planning Tool have been developed for:

- HACC Equity and Access Project Coordinators (*Please note:* referred to as 'Equity and Access staff' or 'Equity and Access Staff' (not Coordinators) throughout this report, which are the job titles used by these staff and by service providers),
- the department's regional staff, and
- providers of Home and Community Care services.

These guidelines, originally developed in 2002 and updated in 2005-06 provide stepped activities for each of these stakeholders in the development, assessment and implementation of the annual Cultural Action Plan.

1.3.3 Regional processes and frameworks

Since the Cultural Planning Tool (CPT) and the guidelines for its use were first developed, additions and changes have been made across some of the department's regions.

Tools:

The CPT and action plan template has been adapted and/or added to by a number of regions:

EMR

adopted the template for the Cultural Planning Action Plan in 2002. This adapted framework included a software program for analysis of the Cultural Action Plan returns.⁷

Gippsland

developed additional resources for the region for both HACC and Aged Residential Services.⁸

Loddon-Mallee

adapted the assessment form.

WMR

developed a Diversity Resource Kit in 2002.⁹

Assessment Processes:

The responsibilities for assessment of the Cultural Action Plans (CAPs) also vary between Department of Human Services regions. For example, in a number of regions, CAPs are submitted to the department's regional office and reviewed by both the Program and Service Adviser (PASA) and a HACC Equity and Access worker. In other regions, the PASA is responsible for both assessment and providing feedback to the HACC agency. In yet another region, the CAPs are reviewed by the regional Equity and Access staff and the Statewide Equity and Access Coordinator.

⁷ Migrant Information Centre Eastern Melbourne (2004) *EMR Cultural Action Plan Analysis Report*

⁸ The Creative Skill Consultants (2000) *Living Together – Cultural Planning for HACC and Aged Residential Services*

⁹ DHS and Inner Western Region Migrant Resource Centre (2002) *Diversity and Resource Kit for HACC and Disability Service Providers in the WMR*

The following is a summary of the current range of assessment processes and allocated responsibilities:

Department of Human Services Region	Department of Human Services assess	Department of Human Services feeds back to Service Provider	Joint assessment with Equity and Access staff using statewide format	Joint assessment with Equity and Access staff using adaptation of statewide format	Equity and Access staff assesses using statewide format	Electronic database and analysis, maintained by the department and Equity and Access staff
Barwon South West		✓			✓	
EMR*		✓				✓
Gippsland		✓	✓			
Grampians		✓	✓			
Hume		✓	✓			
Loddon Mallee		✓		✓		
NWMR		✓		✓		
SMR	✓	✓				

* In the EMR, CAPs are monitored and analysed but not rated. The database is maintained jointly by the department and the MIC (Eastern Melbourne). Both the Department of Human Services and MIC respond to organisations to acknowledge receipt of the plan.

1.3.4 HACC Equity and Access Program

The HACC Equity and Access Program has been a strong driver of reform throughout Victoria. Twenty-five Equity and Access projects operate across the state with a focus on those groups of clients identified by the Department of Human Services as being of high priority. These include:

- people of Aboriginal and/or Torres Strait Islander background
- people with dementia
- people who are, or are at risk of homelessness and
- people from culturally and linguistically diverse backgrounds.¹⁰

Fourteen (including ten Equity and Access and four CALD Liaison Projects or 56%) of the HACC Equity and Access Projects are nominated specifically to resource service providers in the tasks of submitting and implementing Cultural Action Plans. These projects aim to:

- improve service delivery to people from diverse cultural backgrounds
- raise community and service provider awareness of unmet need
- provide training, resources and information to support service providers, and
- develop projects that address the issue of unmet need in the CALD HACC client group.¹¹

A further thirteen projects support community based Ethnic Service Development Officer positions (ESDOs).

¹⁰ Action on Disability within Ethnic Communities (2001) *The Best Practice Guide to Home and Community Care Equity and Access Projects*

¹¹ *ibid.*

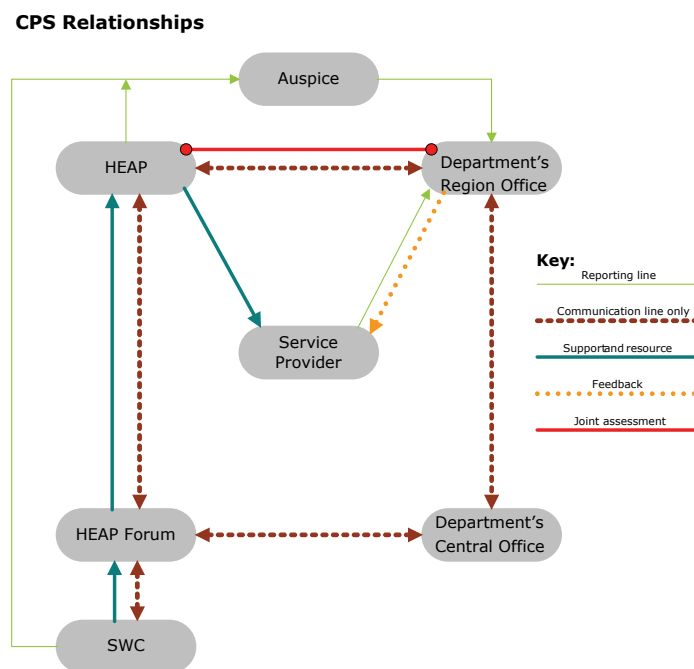
1.3.5 HACC Equity and Access forum

The forum is held four times per annum. Its objective is to reduce isolation for Equity and Access staff, provide opportunity for sharing examples of good practice and building knowledge and skills.

The forums are attended by Equity and Access staff, relevant departmental representatives and the Statewide Equity and Access Coordinator.

1.4 Roles and responsibilities

Diagram 1 below demonstrates the relationships between the stakeholders of the cultural planning strategy and how the responsibilities for cultural action planning are shared. The roles and responsibilities of each of these stakeholders is outlined below.



1.4.1 HACC Equity and Access Staff

The HACC Equity and Access staff who support Cultural Actions Plans receive support from the Statewide Equity and Access Coordinator and are auspiced by community service organisations, often Migrant Resource Centres (MRCs) or their regional equivalent. The following table sets out the various auspices.

Region	Auspice
Barwon South West	▪ Diversitat
EMR	▪ Migrant Information Centre Eastern Melbourne
Gippsland	▪ Gippsland Multicultural Services Inc
Grampians	▪ Ballarat Multicultural Council
Hume	• Regional Information and Advocacy Council • Disability Advocacy and Information Service Inc
Loddon Mallee	• Bendigo Healthcare

Region	Auspice
NWMR	<ul style="list-style-type: none"> Action on Disability within Ethnic Communities NW Migrant Resource Centre
SMR	<ul style="list-style-type: none"> South Central Migrant Resource Centre South Eastern Migrant Resource Centre

The roles of the Equity and Access staff include:

- providing practical resources to service providers, such as manuals, access to language services, credit line applications, promotional material and referral to ethnic communities
- providing training, advice and direct support in the preparation of Cultural Action Plans
- supporting agencies in the implementation of responsive practices
- networking with ethnic communities and other stakeholders, and
- assisting the department's regions in the appraisal of annual Cultural Action Plans.¹²

1.4.2 Statewide Equity and Access Coordinator

The Equity and Access Projects supporting Cultural Action Plans are, in turn, supported by a Statewide Equity and Access Coordinator who is located with and auspiced by Action on Disability within Ethnic Communities (ADEC).

The Statewide Equity and Access Coordinator works with all Equity and Access staff across the state, including those with responsibilities for Cultural Action Plans, clients of Aboriginal and Torres Strait Islander (ATSI) background, clients with dementia, and people at risk of, or who are homeless . The responsibilities of the position are to:

- coordinate the Equity and Access staff
- provide advice and support to this group
- prepare resources for the field
- conduct forums for the Equity and Access staff each year, and
- assist with the annual assessment of Cultural Action Plans.¹³

1.4.3 Service Providers

Service providers are required to prepare, submit and implement their Cultural Action Plans on an annual basis, each September.

1.4.4 The Department of Human Services Regions

The department's regions have a regional planning and contract management role in relation to Equity and Access Projects.

¹² Eidelson, M (2005) Summary Report: The Implementation of Cultural Action Plans in Victoria 2004-2005, ADEC

¹³ www.adec.org.au

The role and responsibilities of the regional Program and Services Advisers (PASAs) with regards the projects with cultural planning responsibilities include:

- monitoring Funding and Service Agreements, and
- ensuring that Cultural Action Plans are submitted as a condition of funding.

In most regions, they are also responsible for assessing the Cultural Action Plans and providing feedback to service providers. This task is sometimes undertaken in collaboration with the Equity and Access staff.¹⁴

1.4.5 The Department of Human Services Central

The department's central office primarily has a policy, planning and evaluation role in relation to Equity and Access projects.

The *Best Practice Guide* states that the department's central office has responsibility for:

- reviewing policies regarding Equity and Access Projects
- assisting in reviews of the Equity and Access model
- providing information to Equity and Access Projects as appropriate, and
- recommending an auspice to facilitate the Equity and Access forums in consultation with regions.

¹⁴ ADEC (2001) *The Best Practice Guide to Home and Community Care Equity and Access Projects*

2. Policy and program context

2.1 Legislation

The following legislation¹⁵ underpins and supports the intent of the Cultural Planning Strategy:

- *Home and Community Care Act 1985*
- *Disability Discrimination Act 1992* (Commonwealth)
- *Equal Opportunity Act 1995* (Vic)
- *Racial and Religious Tolerance Act 2002* (Vic)
- *Multicultural Victoria Act 2004*
- *Victorian Charter of Human Rights and Responsibilities Act 2006*.

2.2 Whole-of-Government approach

The benefits of a population rich in cultures and languages are acknowledged in these key government policy documents: *Valuing Cultural Diversity*¹⁶, *the Multicultural Victoria Act 2004*, *Growing Victoria Together, A Fairer Victoria* and the *Charter of Human Rights and Responsibilities Act 2006*.

Valuing Cultural Diversity (2002)

The Government's *Valuing Cultural Diversity* policy statement outlines the core principles for promoting cultural diversity:

Valuing Diversity

- fostering a community that recognises the values and benefits of a culturally rich and diverse society
- actively promoting respect and harmony and discouraging racism and negative stereotypes.

Reducing inequality

- recognising the rights of people of diverse national , ethnic , religious and linguistic backgrounds to practice, enjoy and share their culture
- having in place systems and procedures that will enable all Victorians access to government services and programs free from undue impediment
- ensuring government policies and strategies are responsive to all Victorians.

Encouraging participation

- encouraging an inclusive society that provides opportunities for all people to fully participate in public and civil life
- using appropriate media and promotional channels as a means to ensure government information reaches all
- identifying and addressing any barriers to full participation.

¹⁵ These pieces of legislation have been referenced chronologically

¹⁶ DHS (2006) *Cultural Diversity Guide*

Promoting the social, cultural and economic benefits of cultural diversity for all Victorians

- promoting the benefits of a culturally and linguistically diverse society and the social, cultural and economic opportunities this provides
- promoting to the Victorian community the benefits gained from cultural and linguistic diversity.

Multicultural Victoria Act 2004

The *Multicultural Victoria Act 2004* requires all government departments to report annually on their responses to the needs of their clients from culturally diverse backgrounds.

The Act:

- establishes a number of important principles of multiculturalism
- strengthens the Victorian Multicultural Commission, and
- establishes reporting requirements for government departments in relation to multicultural affairs.

Importantly, the Act:

- does not create 'new rights'
- does not impose obligations on any Victorians to comply with other cultural norms or modify their own belief and customs, and
- does not create new offences.

The Act enshrines the Victorian Government's commitment to all Victorians. It ensures that all Victorians are treated with equality, fairness and respect and recognises the social, cultural and economic contribution of Victoria's multicultural community.¹⁷

Growing Victoria Together (2005)

Growing Victoria Together: A Vision for Victoria to 2010 and beyond (Victorian Government 2005) identifies critical challenges ahead and provides clear measures and targets for central issues.

The key target areas include high quality health and education; a healthy environment, and caring communities. This last area has the two foci of:

- building friendly, confident and safe communities, and
- a fairer society that reduces disadvantage and respects diversity.

A Fairer Victoria (2005)

A Fairer Victoria – the Victorian Government's Social Policy Action Plan was released in April 2005 by the Department of Premier and Cabinet. It is a long term action plan by the Government to tackle disadvantage and create opportunities for all Victorians.

In June 2006 the Deputy Premier released *A Fairer Victoria – progress and next steps*, with an investment of a further \$848 million for action in 14 strategy areas. The focus of this document is:

¹⁷ www.multicultural.vic.gov.au

- meeting the needs of Melbourne’s growth areas and Victoria’s disadvantaged places
- disadvantage caused by homelessness
- disadvantage within multicultural communities, and
- improving community transport.

This whole-of-government document requires that all departments compile cultural diversity plans which address the provision for culturally sensitive service delivery to Victoria’s communities. That is, Departments will be required to:

- incorporate culturally appropriate training for their staff into the delivery of services to CALD communities
- ensure that information on services is readily accessible to CALD communities, and
- include assessment of the effectiveness of service delivery to CALD communities as an integral part of program evaluation.¹⁸

Victorian Charter of Human Rights and Responsibilities Act 2006

The *Victorian Charter of Human Rights and Responsibilities Act 2006* was passed by the Victorian Parliament and became law in July 2006.

Human rights are about the fair treatment of individuals and are put in place to ensure people are treated with dignity and respect. The rights enshrined within this legislation include:

- the right to vote
- recognition and equality before the law
- protection from torture and cruel, inhuman or degrading treatments
- freedom of movement
- freedom of expression
- freedom of thought, conscience, religion and belief
- protection of families and children
- cultural rights
- freedom of association and peaceful assembly
- rights to privacy.¹⁹

2.3 The Department of Human Services policies and initiatives

2.3.1 The Culturally Equitable Gateways Strategy, 2004

The *Culturally Equitable Gateways Strategy* (CEGS) was initiated in 2004 with the objective of improving CALD access to the HACC services provided by local government. Comparison of ABS population data to HACC usage data in 2003 had indicated that CALD communities were under-represented in core HACC services in relation to their numbers.

¹⁸ Victorian Government *A Fairer Victoria – progress and next steps 2006*

¹⁹ *Charter of Human Rights and Responsibilities Act 2006*, No. 43 of 2006

In conjunction with councils, ethno-specific and multicultural organisations, the Ethnic Communities Council of Victoria (ECCV) and the Municipal Association of Victoria (MAV), a series of projects were developed to:

- help selected councils, with the assistance of ethno-specific agencies, provide a culturally friendly gateway to HACC services
- help selected ethno-specific agencies provide practical support to local councils to offer culturally appropriate services and support service linkage
- support leadership and sectoral development by the MAV and ECCV
- support the recruitment of bilingual and multicultural staff to deliver HACC services and
- increase the ability of agencies servicing small and emerging communities to respond with flexibility to people from CALD backgrounds who are eligible for HACC services.

Evaluation of CEGS

The CEGS evaluation report was published in May 2007. Data analysed for the evaluation indicated that there was a positive overall improvement in the participation of people from CALD background accessing services in the local government areas targeted by CEGS.

The evaluation indicated that all organisations reported positive outcomes from participating in the Strategy. Most reported that the Strategy had provided the opportunity to dedicate time and resources to enhance their HACC services or their community's understanding of the HACC service system. Two areas were described as producing the most positive outcomes:

- Capacity building within the sector to provide culturally appropriate access, and
- Partnership and relationship development between a variety of organisations and individuals.

Future Directions

During the course of CEGS, concurrent work was undertaken on strategic directions in HACC assessment in Victoria. From the outset it was seen that the work undertaken in CEGS, particularly around CALD assessment and the support that CALD agencies provide to their communities to access services, would inform and influence overall work on HACC assessment and client care coordination. Therefore the overall focus of improving CALD access to HACC services into the future will be through implementing improvements in assessment for HACC services from December 2007. These improvements include:

- A 'living at home assessment' aimed at addressing all the issues that impact on a person's capacity to continue living independently at home, and
- Developing a capacity to actively help people to gain access to services where they are unfamiliar with or anxious about the agencies that deliver services. This capacity is called supported access.²⁰

²⁰ Department of Human Services (2007) *Future Directions for culturally appropriate access to HACC Program core services*

2.3.2 Language Services Policy, 2005

The Language Services Policy outlines the necessary requirements to enable people who speak no, or limited English, to access professional interpreting and translating services when making significant life decisions and where essential information is being communicated.

The policy also addresses the language needs of people who are deaf and use sign language as their primary mode of communication, particularly Australian Sign Language (AUSLAN).

The policy assists in the identification of critical points in each program area within the department to ensure people can make informed decisions about their lives and health.

Agencies funded by the department are encouraged to develop agency specific language services policies and procedures consistent with the *Language Services Policy*.

The department's programs and funded agencies are required to use translators and interpreters who have been accredited, at a professional level, by the National Accreditation Authority for Translators and Interpreters Inc (NAATI). For most programs, access to funding for language services (interpreting and translating) is via a credit line provided by ONCALL Interpreter and Translators Agency on behalf of the Department of Human Services.

2.3.3 Cultural Diversity Guide – Planning and delivering culturally appropriate human services, 2006

The *Cultural Diversity Guide* provides a framework for program areas across the department to follow in implementing policy, protocol and practice as it supports the human services system to meet its obligations under whole-of-government reporting on responsiveness and cultural diversity.

In addition, the purpose of the *Cultural Diversity Guide* is to assist programs and agencies by:

- identifying a range of available strategies to improve cultural responsiveness and levers to effect cultural change;
- illustrating the different strategies and levers with examples of good multicultural practice that already occur across the human services system, and
- providing guidance on additional supports for programs and agencies in managing cultural diversity.

2.4 The Home and Community Care (HACC) Program

The HACC Program is funded jointly by the Commonwealth and State Governments under the *Home and Community Care Act (Commonwealth) 1985* and amending agreements.

The Home and Community Care (HACC) Program is Victoria's principal source of funding for services that support frail aged people, younger people with disabilities, and carers. In Victoria the program supports over 220,000 frail older people and people with disabilities.

The program provides basic support and maintenance services to people living at home whose capacity for independent living is at risk, or who are at risk of premature or inappropriate admission to long term residential care.

The Victorian HACC funded sector is broad and is comprised of up to 500 agencies. Organisations funded to provide HACC services include local government, community health services, not-for-profit agencies, health services, ethno-specific organisations, Aboriginal Community Controlled Organisations and disability services.

The Victorian HACC Program is supported by the *Victorian HACC Program Manual*, originally compiled in 1993 and updated in 2003. The last iteration replaced the Victorian HACC Program Homeless Persons Policy Statement, the HACC Aboriginal and Torres Strait Islander Policy Statement and the HACC Ethnic Policy Statement.

The *Victorian HACC Program Manual* covers both policy and practice and was developed for use by all agencies in Victoria funded to provide HACC services.

2.4.1 HACC planning environment

In Victoria, HACC planning operates on a three year cycle. The aim of the current triennium (2006-2009) is to reach defined equity benchmarks for metropolitan and rural regions, expand HACC basic services and enhance access to these services for the Culturally and Linguistic Diverse population and Aboriginal clients.²¹

Many organisations funded to provide HACC services are also funded to provide a range of services funded by the Department of Human Services and the Commonwealth and consequently have significant reporting and acquittal requirements placed on them.

Agencies within the HACC sector such as local government, community and acute health services also operate within the context of sophisticated, whole-of-organisation, internal planning and quality management systems which ideally would be aligned with the requirements and timeframes of external reporting processes.

²¹ *Planning to expand HACC services 2006-09*, Victorian Government Health Information website

2.5 Other program areas within the Department of Human Services

2.5.1 Disability Services CALD Strategy

The purpose of the Disability Services CALD Strategy is to assist disability funded services to plan for and deliver culturally appropriate supports for people with a disability, their family and carers of culturally and linguistically diverse backgrounds, including people who are deaf and share the language and culture of the deaf community.

The goals of the Disability CALD Strategy include:

- understanding people and their needs
- encouraging participation in decision making
- providing culturally relevant and accessible information
- a culturally diverse workforce
- using language services to best effect
- meeting the specific needs of different communities, and
- promoting the benefits of a culturally diverse Victoria.

It is aligned with several policy frameworks including:

- the Victorian Government's Valuing Cultural Diversity 2002
- the Victorian State Disability Plan 2007-2012, and
- the Department of Human Services' *Cultural Diversity Guide 2006*.

Each year Disability funded organisations are required to report on activities that address the needs of people with a disability from CALD backgrounds, through existing processes and systems, specifically:

- the annual Integrated Quality Management Approach (IQMA) Organisational Quality Plan and Improvement Activity Report for Victorian Disability Supports, and
- the Service Excellence Framework (SEF).²²

Information provided through the Quality Improvement Reports is collected and analysed centrally through Disability Services Division's Quality Branch and published on the Division's website. The majority of Disability funded organisations reporting on CALD activities have consented to share their information with other service providers. Regional Disability CALD Representatives follow up with service providers to promote examples of good practice, and provide them with information and assistance where required.

Monitoring and reporting through the SEF involves several stages:

- self assessment
- validation by the CALD representatives, and
- continuous quality improvement.

²² The SEF is based on the Australian Business Excellence Framework, which also uses self-assessment and validation. Self-assessment and validation against a framework encompassing contemporary business excellence ideals have become accepted as powerful processes through which organisations can identify opportunities for quality improvement.

These reports are submitted to and reviewed by the department's central office.

Other data systems that collect information relevant to service usage by people with a disability of CALD background include the:

- Disability Services' Quarterly Data Collection (QDC)
- Department of Human Services Client Relationship Information System (CRIS), and
- Disability Services (Funded Language Services) Credit Line System which supports access to interpreters and translations for people of CALD background.

A series of policies and guidelines have been developed by Disability Services Division to support the implementation of the *Disability Act 2006 (Vic)*²³, including a *Policy on Culturally Appropriate Practice*. This policy has been drafted and is aligned with the department's *Cultural Diversity Guide* and the *CALD Strategy* and at the time of writing has been distributed for comment/feedback by key stakeholders.

2.5.2 Health Service Cultural Diversity Plans

The Victorian Government required that by June 2006 every Victorian Health Service had established a cultural diversity committee to develop, oversee and implement annual health service cultural diversity plans (HSCDPs).

From 2007, each health service is required to report annually on the plan's accomplishments through the health service's *Quality of Care Report*. HSCDPs should be linked to each health services' strategic planning and implemented within a quality and safety improvement framework, for example, *Better quality, better health care* (Victorian Quality Council 2003).

The Health Service Cultural Diversity Plans:

- identify current policy direction and evidence, key result areas and strategies for action to improve health service responsiveness to CALD issues
- document, evaluate and promote best practice 'multicultural' examples across the health service
- offer a central coordinating mechanism for responding to and initiating CALD planning at the local health service level
- support the Victorian Government's whole of government reporting framework on responsiveness to cultural diversity, and
- integrate CALD issues into the broader planning mainstream of the health service through the quality and safety plan framework, quality reporting requirements and appropriate service delivery plans.²⁴

2.5.3 Mental Health Services

The *Cultural Diversity Plan for Victoria's Specialist Mental Health Services 2006-2010* provides a framework for improving mental health services' accessibility and responsiveness to Victoria's culturally and linguistically diverse communities.

²³ The Disability Act 2006 (Vic) replaces the Intellectually Disabled Persons' Services Act 1986 (Vic) and the Disability Services Act 1991 (Vic).

²⁴ Department of Human Services *Health service cultural diversity plans*

The plan has identified six strategies for increasing the accessibility and responsiveness of public mental health services to Victoria's culturally and linguistically diverse communities.

These include:

- culturally competent practice within mental health services and recognition of this as a core skill required by staff
- action by mental health services to understand the needs of local within communities, consumers and carers and to incorporate these perspectives into service and workforce planning
- action to address the barriers to the appropriate use of language services (interpreting and translating) in mental health settings
- action to address the specific mental health needs of refugees
- mental health involvement and representation in government initiatives to improve the wellbeing of culturally and linguistically diverse communities and address barriers to appropriate use of mental health services, and
- stronger government mechanisms for monitoring mental health services' accessibility and responsiveness to culturally and linguistically diverse communities.

A very clear message through the development of this plan was that a strong emphasis on cultural and linguistic diversity should be incorporated into existing quality monitoring and accountability mechanisms.

From 2007 the Mental Health Branch will encourage all clinical mental health services to have input into their health services' cultural diversity plans.²⁵

²⁵ *Cultural Diversity Plan for Victoria's Specialist Mental Health Services 2006-2010*

3. Methodology

This section summarises the approach Effective Change took to the conduct of the *Evaluation of the Cultural Planning Strategy (CPS)*.

The methodology was designed to provide both program clarification and program improvements. A range of evaluation methods were utilised to provide rigour, balance and conclusive outcomes.

The Evaluation was conducted in three key stages:

- planning,
- data collection and analysis, and
- reporting.

3.1 Planning

3.1.1 Project establishment, scoping and planning

The consultants met with the Project Managers to:

- finalise the methodology, key milestones and timelines
- finalise the project meeting, management and reporting requirements
- obtain an in-depth briefing on the project, and
- collect relevant documents eg. policy and program data, MDS data, consumer records and program data available at this point of the project.

3.1.2 Develop evaluation framework

Effective Change developed an evaluation framework (see Appendix 2) which described the:

- evaluation focus
- strategy components to be investigated
- indicative key research questions
- evidence sources, and
- associated research methods.

3.1.3 Develop data collection instruments

The consultants designed the data collection instruments (see Appendix 3) based on the agreed evaluation framework and the key evaluation questions. These included:

- document analysis framework
- action plan review framework
- equity and access project review framework
- data analysis framework
- semi-structured interviews
- service provider workshop outline, and
- service provider survey.

3.2 Data collection and analysis

3.2.1 Data collection

At Stage 2 the consultants collected information using the agreed methods.

Desktop Analysis and Review

The following documents were reviewed:

- the *Cultural Planning Tool Planning for Multicultural HACC Services* (1996, reprinted 2001)
- *The Best Practice Guide to Home and Community Care Equity and Access Projects* (2001)
- *The Better Ethnic Access to Service Kit – A resource for Primary Care Partnerships* (2003)
- *The Victorian HACC Program Manual* (2003)
- Summary Report: The implementation of Cultural Action Plans in Victoria 2004-05 (2005)
- *Guidelines for Reviewing and Updating Annual Cultural Action Plans (2005-2006)*
- *Disability Services CALD Strategy (2006)*
- *Health Services Diversity Plans (2006)*
- *The cultural diversity plan for Victoria's specialist mental health services 2006-2010*
- other government and Department of Human Services policy documents (see section 3.3).

A sample of cultural action plans from each of the department's regions was reviewed. Two plans were selected from each of the following organisation types to ensure a comprehensive cross section:

- acute health services
- community health services
- ethno-specific organisations,
- local government, and
- not-for-profit organisations.

In total, 80 plans were reviewed. HACC Equity and Access Project reports were requested from each region. While not all were provided, those that were submitted were reviewed by the consultants.

Data analysis

The analysis of MDS data and consumer survey data commenced from the initial stages of the project and was on-going throughout the project.

Structured interviews and group meetings

The following cohorts were consulted during the project through interviews or group meetings:

- HACC Equity and Access staff:
 - ten interviews were held with Equity and Access staff in department's eight regions. All of the fourteen Equity and Access

staff with responsibilities for cultural action plans participated in an interview. Three managers of Equity and Access staff also participated in interviews;

- The department’s Regional staff:
 - a Department of Human Services contact officers’ meeting
 - an electronic feedback form was developed and forwarded to all Program and Service Advisers (PASAs). Four were returned.
- The department’s central staff:
 - one interview was held with the Manager, HACC Service Development
 - two interviews were held with the department’s Diversity Unit, and one with the department’s Disability Program staff.
- Key informants :
 - two interviews were held with the Statewide Equity and Access Coordinator and the ADEC Education Unit Coordinator
 - one interview was held with a relevant representative of the Municipal Association of Victoria (MAV), and
 - one interview was held with a relevant representative of the Ethnic Communities’ Council of Victoria (ECCV).

Service Provider workshops

In order to provide opportunity for as many service providers as possible to have input into the evaluation of the CPS, two Service Provider workshops were conducted in metropolitan areas and two in rural regions.

Each of the workshops were extremely well attended and provided opportunity for service providers to contribute detailed and qualitative information, from their perspective, on:

- the implementation of the CPS, in particular practices and processes developed and implemented within agencies
- the structures, resources and tools supporting the strategy
- compliance with the CPS, and
- the effectiveness of the strategy in increasing culturally responsive practices and processes.

In total, 166 people attended the workshops (including 12 staff from the Department of Human Services), representing 125 HACC funded agencies. The following table indicates the number of attendees at each workshop:

Workshop Location	Number of Attendees
City	47
Darebin	67
Ballarat	27
Shepparton	25
TOTAL	166

Service Provider Survey

Effective Change also developed a survey (see Appendix 4) which replicated the workshop discussion questions for those service providers unable to attend the workshops. A copy of the survey was emailed to all Victorian HACC funded agencies (approximately 500²⁶) through their regional Program and Service Adviser (PASA) and returned directly to the consultants via email. A total of **108** surveys were returned representing a return rate of approximately 21 per cent.

Service Provider Networks

At the request of the PASAs, a feedback form was developed to enable local service provider networks to provide feedback. These were emailed by the PASAs to regional networks. Four networks submitted feedback, emailing their responses directly to the consultants.

Total Service Provider Participation

A total of 211 agencies funded to provide HACC services (approximately 42 per cent of agencies in the HACC sector) provided input into the *Evaluation of the Cultural Planning Strategy* either through attending a workshop or submitting a completed survey.

The table below provides a breakdown of service provider participation by metropolitan/rural location and agency type.

Agency Type	Metro	Rural
Aboriginal Community Controlled Organisations	0	3
Acute Health Services	7	29
Community Health Centres	16	13
Ethno-specific Agencies	12	0
Local Government	19	30
Multicultural Organisations	3	2
Non-government Organisations	36	29
Nursing Providers	1	8
Other	1	2
TOTAL	95	116

3.2.2 Data analysis

Data from all sources was collated and analysed against the key evaluation questions.

At the completion of the data collection, Effective Change prepared an overview of the analysis, identifying the draft key findings which were presented to the Project Managers and the Project Reference Group.

At this stage, Effective Change also presented a draft structure for the report and received feedback from the Project Reference Group.

²⁶ Approximate number provided by DHS Central Office

3.3 Reporting

3.3.1 Draft reporting

Effective Change prepared a draft report on the evaluation which comprised the following:

- Introduction
- Strategy background
- Policy and program context
- Methodology
- Evaluation findings on:
 - The overall strategy, including:
 - relationship to complementary strategies
 - effectiveness in increasing culturally responsive practices and processes
 - Structures, resources and tools of the CPS
 - Strategy implementation, with a focus on:
 - practices and processes developed and implemented
 - agency compliance with the CPS, and
 - regional variations and developments
 - Equity and Access Projects
 - Potential improvements, and
 - Conclusions and recommendations.

The report was submitted to the project managers for discussion and comment.

3.3.2 Final reporting

The consultants incorporated feedback from the project managers and key stakeholders to finalise the report. An Executive Summary was prepared to accompany the report and the document delivered to the Department in hard copy and electronic formats.

4. Findings

4.1 Introduction

Section Five of the report presents the findings in relation to the evaluation of the Cultural Planning Strategy. The discussion and findings are aligned with the four key components of the strategy contained in the Evaluation Framework of:

- overall strategy
- implementation
- processes
- outcomes.

The two additional areas of:

- tools and resources, and
- roles and responsibilities

are included as the quantity of information collected on these areas justifies their discussion as discrete topics, rather than including them under the broader components of 'Implementation' and 'Processes'.

The discussion for each topic presents a synthesis of the information collected from:

- *service providers* through the service provider survey; the service provider workshops and written feedback submitted from regional service provider networks
- *the Department of Human Services Program and Service Advisers (PASAs)* through the focus group; feedback form and selected interviews
- *key stakeholders*, including HACC Equity and Access Staff; the Cultural Planning Strategy Statewide Equity and Access Coordinator; representatives from the ECCV, the MAV and the department's central office through semi-structured interviews
- reviews of:
- policy and program documents and guidelines, including regionally developed tools and resources
- a selection of Cultural Action Plans
- Equity and Access project workplans and reports to the department
- an analysis of selected MDS data and the HACC Consumer survey feedback.

The findings are presented after the discussion of each topic, based on an analysis of the triangulated data. Please note, after analysis of the selected MDS data, it was found that the data did not provide conclusive information. As such, it was agreed that this data would not add significant weight to the report and has therefore not been included. It is also acknowledged that the recent CEGS evaluation report includes a comprehensive analysis of MDS data.

4.2 Overall strategy

4.2.1 The overall impact of the Cultural Planning Strategy

Key evidence sources: Document analysis; service provider workshops; service provider survey

The high rate of agency compliance in submitting annual Cultural Action Plans across Victoria is well documented.³¹ The survey results showed that **95 per cent** of service providers submit an annual Cultural Action Plan. The most frequently cited impact of the Cultural Planning Strategy was that it *'put the issues on the agenda', 'it forced us to do it'*. The comments then generally expanded to explain that in undertaking this process, it *'provided an opportunity to educate service providers that the cultural issues were relevant to delivering a quality service irrespective of the number of CALD clients in the community'* (Regional PASA). One service provider expressed it the following way – *'I think that the strategy has set out to achieve what it needed to do and that was ensuring that agencies looked at their practices to both attract CALD consumers and to improve the service provision for CALD consumers so that they stayed using a service'*.

Planning for cultural diversity has become an organisational habit for most HACC-funded agencies across Victoria and this is clearly the most significant impact of the Cultural Planning Strategy.

Key finding 1:

The long term impact of the Cultural Planning Strategy has been to embed the concept and practice of cultural planning within HACC funded agencies across Victoria. The contractual requirement to complete Cultural Action Plans (CAPs) has obliged service providers to complete this task. By going through this process on a regular basis over the last 10 years, service providers have developed or extended their appreciation of the relevance of cultural planning to service quality.

4.2.2 The rationale for the strategy

Key evidence source: Analysis of strategy documentation; Key stakeholder interviews

The methodology for evaluating the Cultural Planning Strategy is based on the Owen's model of program evaluation³². It was designed to test the strategy for clarification and improvements. Key research questions to test for clarification are:

- *Is there a clear rationale for the strategy?*
- *Are the objectives of the strategy clearly stated?*

In examining the strategy guidelines and resources, no single clearly articulated rationale, or aims and objectives of the strategy was found. The *implied* rationale for the strategy is clearly about improving organisations' responsiveness by providing

³¹ Eidelson, M. *Summary Report: The Implementation of Cultural Action Plans in Victoria, 2004 – 2005*, (ADEC, 2005)

³² Lambert, F.C. & Owen, J.M. (1994) *A Guide to Program Evaluation*. Department of Employment, Education and Training, Commonwealth of Australia. Canberra

access to HACC services to all potential and existing HACC clients and achieving equity in that process. The *Best Practice Guide to the HACC Equity and Access Projects* provides information on the goal and objectives of this project, but there is no articulation of the relationship between this and the CPS.³³

In the absence of any articulation of the overarching goal, objectives and strategies for achieving each objective:

- the capacity to monitor and evaluate the strategy, both internally and externally, is weakened;
- the capacity to respond to, and align with complementary initiatives can be reduced, and
- the aims and objectives of the strategy are subject to personal interpretations.

Without a clear articulation of the rationale or goals of the strategy, it is not clear whether the overall aim is to increase the number of CALD clients receiving HACC services; improve service responsiveness to cultural diversity, a combination of both or something else. Key stakeholders expressed a range of views about the rationale for the strategy, including that it was 'not clear', 'not stated' or 'clear initially, but lost along the way'. One local government respondent commented that: "*It is unclear from the cultural plan if the emphasis is on increased CALD consumer utilisation of services and programs or if it is about broader organisational strategies.*" The prime emphasis for the strategy was variously reported as:

- language policies and services
- communication generally
- organisational policies and procedures
- staff training and education
- community development/community engagement, and
- relationship building.

In the absence of clear goals, it is not possible to systematically assess whether all or any of the above are in keeping with the aims of the strategy. In contrast, other initiatives in HACC, such as CEGS, Assessment and Care Coordination, or the Active Service Model clearly specify their goals, objectives and strategies. This enables the on-going monitoring, evaluation and continuous improvement of the initiatives.

It can be argued that the rationale for the strategy is self-evident and includes:

- the specification of people from a non-English speaking background as one of the five 'special needs' groups under the HACC program
- the need to respond to 21 per cent of Victorians who are from culturally diverse backgrounds in the provision of HACC services, particularly recognising the importance/impact of culture on people as they age, and
- the need to provide equity of access to services for all Victorians.

However, these issues could be addressed by a range of approaches, and therefore clearer links are required between the evidence base for the strategy; its overall goals and objectives, and the approach adopted through the initiative.

³³ ADEC, 2001 *The Best Practice Guide to HACC Equity and Access Projects*

Key finding 2:

The Department of Human Services HACC Cultural Planning Strategy (as opposed to the Cultural Planning Tool) is not designed in the conventional structure comprising:

- **an overarching goal**
- **broken down into objectives, articulating more specific and measurable aims**
- **a range of strategies to achieve the objectives**
- **anticipated outcomes**
- **(where possible) measurable benchmarks.**

This limits capacity for the strategy to be monitored and evaluated, either internally or externally, and continuously improved. It also leaves the strategy open to a range of individual interpretations which can not be either validated or discounted.

4.2.3 Coordination with other strategies and initiatives

Key evidence source: Document Analysis; Key stakeholder interviews

The Cultural Planning Strategy pre-dates a number of significant policy initiatives implemented in the HACC program or affecting the HACC program over the last ten years. These include:

- Service Coordination (in Primary Health, which includes the HACC sector)
- the Active Service Model Project
- the HACC Quality Improvement Strategy for Victoria, which includes triennial assessment by an external contractor of all HACC funded agencies against the National Service Standards Instrument (NSSI)
- the Culturally Equitable Gateways Strategy
- the HACC Assessment Framework
- the HACC Food Services review, and
- the HACC Workforce Development strategy.

From the perspective of HACC funded organisations, few (if any) linkages with other strategies and initiatives are evident. Lack of coordination and lack of clarity between:

- the Cultural Planning Strategy and CEGS
 - the Cultural Planning Strategy and Service Coordination, and
 - the Cultural Planning Strategy and the HACC Quality Framework
- were seen as the most obvious gaps.

Lack of coordination with the HACC Assessment Framework was seen by some key informants as an emerging issue. The perception of most was that the CPS operated in isolation, despite having considerable areas of common interest. In a couple of regions, the Equity and Access staff was also a CEGS worker within local government or had some level of regional responsibility for CEGS. The affect of this varied, but

with the experience only extending to a couple of regions, no clear conclusions can be drawn. A number of Equity and Access staff observed that there was considerable confusion when the CEGS was implemented as it was not coordinated with the Cultural Planning Strategy.

The HACC Service Development section of the Coordinated and Home Care Unit of the department's central office is essentially the link between the CPS and other service developments in HACC. In the past, representatives of the Unit attended the quarterly ADEC forum for regional Equity and Access staff. After a period of absence, this has resumed over the last 12 months. This provides the opportunity for two-way sharing of information. The department's central office does not have any formal management responsibility for the CPS nor is there a mechanism for consolidated reporting on the CPS to central office (see Diagram 1). Equity and Access staff, who are funded through Equity and Access project funds, report on their achievements through their organisational management to the relevant Department of Human Services regional office. Similarly, the Statewide Equity and Access Coordinator reports to the NWMR office of the department.

The perceived lack of connection between the CPS and other strategies and initiatives at a strategic level is borne out by the evidence. This does not mean that cultural diversity issues are not considered at strategic levels with the HACC Program. For example, the Central Office briefing to the consultants undertaking the HACC quality improvement assessment covers cultural action planning. Rather, it highlights that there is no systemic 'safety net' which ensures that the Cultural Planning Strategy is considered when service developments are under consideration or implementation. Further, it begs the question – if a significant amount of HACC funding is invested in the strategy to address issues of cultural diversity, why is it not represented at strategic levels?

Key finding 3:

The Cultural Planning Strategy does not have formal links to complementary initiatives, strategies and programs. This isolates the Cultural Planning Strategy from other strategies and limits opportunity to maintain its currency or implement improvements. Similarly, if Equity and Access staff are not exposed to strategic developments and initiatives affecting the HACC program, their capacity for building knowledge is restricted, in turn limiting their capacity to provide strategic advice to HACC Service Providers.

4.2.4 Coordination with other plans

Key evidence source: Document Analysis; Key stakeholder interviews

In 1997, when the Cultural Planning Strategy was introduced, the planning context for service providers was vastly different to the planning context in which service providers operate today. Strategic and business planning is now a well-established practice for HACC-funded organisations. The exception may be some of the very small,

volunteer-based organisations, which receive minimal amounts of HACC funding and operate exclusively with volunteer support. In 1997, the Cultural Planning Tool provided valued guidance on planning. While the strategy is designed around the function of planning, it has not kept pace with developments in this area. Consequently, the tool does not include reference to, or take account of the range of planning, quality management, data collection and reporting responsibilities currently incumbent on providers, such as (but not limited to):

- All HACC-funded organisations
 - triennial assessment by an external contractor against the NSSI
 - quarterly reporting of HACC Minimum Data Set (MDS)
- Local government
 - municipal public health plans
 - best value reviews
 - municipal strategic statement
 - quality and accreditation processes
- Community health
 - integrated health promotion plans
 - quality and accreditation processes
- Disability
 - Integrated quality management approach (IQMA) organisational quality plan and improvement activity report for Victorian Disability Supports
 - Service excellence framework (SEF) reporting
- Health services
 - health service cultural diversity plans reported through the annual quality of care report
 - quality and accreditation processes
- Mental health
 - meet requirements of the Cultural Diversity Plan for Victoria's specialist mental health services 2006-2010

The list above is indicative only of the plethora of planning and reporting requirements for service providers. While only a selection of the above would apply to individual agencies, the point is the multiple planning and reporting responsibilities on agencies. As one Disability service provider observed: *'We are reporting against seven quality assurances frameworks - this will increase to nine in the next 12 months'*.

While the Cultural Planning Tool needs to align with agency planning requirements, providers also noted the implications for funding bodies. The program 'silos' remain a barrier to integrated planning at the service provider level. The sentiment from providers is typified by the following quote: *'We endeavour to have an integrated management system. Funders could attempt to integrate the required reporting frameworks to assist agencies to be more effective and efficient in their reporting'*.

Key informants within the Department and from peak bodies are cognisant of the lack of coordination across program areas, and more broadly across government, and, of the burden this places on providers. The Victorian government is moving to reduce the

number of planning requirements on service providers, and this is also the aim of the Department of Human Services. This principle is also reflected in the Inter-governmental agreement 2006 which aims to increase the transparency, effectiveness and efficiency of service delivery through the three tiers of government. One of the intentions of the Inter-governmental agreement at the local government level is to reduce the doubling up of planning and reporting processes. It is also a goal of the RRHACS Division of the Department of Human Services.

There is an awareness in the department that not only are there multiple planning and reporting requirements, but that there is duplication of cultural plans for multiple-funded organisations. Further there is the view that *'a stand alone (HACC) cultural action plan has over more recent years had the effect of isolating this area from general organisation's planning and reinforcing the stereotype that it is not relevant (in rural areas with low populations) and not in the main game or relevant to quality assurance' (Regional PASA).*

Key finding 4:

There is no formal coordination of the Cultural Planning Strategy with the plethora of other planning requirements on Service Providers. There is strong support from service providers to reduce duplication and integrate plans where possible. There is in principle support for this from the Department of Human Services at the broad level and it is acknowledged that achieving this goal would require a coordinated approach from the department.

4.2.5 Coordination – general

Key evidence source: Document Analysis; Key stakeholder interviews

Diagram 1 sets out the reporting and communication relationships of the key partners in the Cultural Planning Strategy. It is evident from this diagram that multiple reports are made each year on work undertaken for the strategy (for example, to each regional office). Yet there is no method or functional responsibility assigned for coordinating and collating this information. The annual reports from the Equity and Access staff are essentially funding acquittals documenting activities undertaken throughout the year.

Knowledge of organisational strategies and practice is built up through contact between the Equity and Access staff and the field, and contact between the Equity and Access staff and the Statewide Equity and Access Coordinator. The Equity and Access staff and the Statewide Equity and Access Coordinator have a good working knowledge of practices, but there is no substantial documentation of this. The Summary Report³⁴ prepared in 2005 provides some good practice snapshots, as do some of the acquittal reports. Essentially though, information on the history of the CPS and the practices implemented under its banner are not easily accessible or well documented. There is no central repository or clearing house of information on the strategy. The bulk of history and information is held in people's heads. Given that

³⁴ Eidelson, M (2005) *ibid*

periodically there is substantial turnover of Equity and Access staff, even this is tenuous. This is also mirrored at the regional level, with the exception of the Eastern Metropolitan Region. In the EMR, Cultural Action Plans are recorded on a tailor-made database and an annual Action Plan report is produced which documents and analyses the strategies proposed by service providers in their Cultural Action Plans. As the report is prepared annually, comparisons over time can also be drawn.

There is an obvious gap in the information available on the strategy. After ten years of operation, there is essentially only one report which includes any documentary record of the overall work of the strategy³⁵ and three EMR regional reports. This has a range of impacts. There is no solid record of the work of the strategy – this can only occur through piecing together material from interviews and examination of a wide range of documents, such as individual cultural action plans and Equity and Access funding acquittals. It means that there is no point where a representative range of activities can be considered. Without some systematic consolidation of information, there is no regular, systematic analysis of what is happening in the field; no identification of common issues or trends or consideration of how the strategy could respond. There is limited development of resources, and therefore limited opportunity to pool resources.

The annual assessment process (see 5.3.3) is an opportunity for some reflection at the regional level, but no substantive reports are produced from any region other than the EMR. Further, the involvement of the Equity and Access staff in the assessment process varies across regions. Information is shared anecdotally at the HEAP forum, but service providers do not have access to that forum. The Equity and Access staff go through a planning process as a group each year, but it is a fairly informal process. Only a handful of resources have been developed at a central level.

Regional best practice forums occur, but there is no real mechanism to share this with other regions other than informally at the Equity and Access forum. New Equity and Access staff essentially start from scratch, although they generally undergo an orientation meeting with the Statewide Equity and Access Coordinator. Most importantly though, without any consolidation or clearing house of information, the strategy does not document its record of achievements; nor systematically reflect or analyse activities, trends or needs, or promote good transferable practice as a means to stimulate good practice or innovation.

Key finding 5:

The CPS does not have a system for consolidating information on the activities and achievements of the strategy. Consequently, after 10 ten years there is a very limited record of the work of the strategy. This system gap also highlights that there is no solid process for reflection and analysis in order to inform future work priorities. Exceptions to this are models in place in the EMR, where Cultural Action Plans are submitted electronically and recorded on a database, and the NWMR where information is consolidated and reported to the region each year. This enables the tracking of change in the region over time.

³⁵ Eidelson, M (2005) ibid

4.2.6 The structure of the strategy

Key evidence source: Document Analysis; Key stakeholder interviews

The way the CPS is structured inherently limits its potential for integration or coordination. This is evident in two key areas: the benchmark information collected and the nature of the partnership managing the strategy. Each of these areas is discussed below.

The only significant benchmark or performance information monitored through the CPS is based on the cultural action plans. The number of individual organisations to submit a cultural action plan is collated in each region every year. The assessment outcome of the plans (high/medium/low assessment) is also collated in most regions. However, the result of this is that the only substantial information available to the CPS is information with a *prospective* focus (what the agency *intends* to do) rather than any *retrospective* information (what the agency did) or *comparative* information (intention versus actual). As one service provider observed, *'There are few checks made on what really happens within organisations. I feel the department is just ticking the box'*. This was a typical comment of those who were dissatisfied with the quality of assessment feedback. Others were more satisfied with the process. The information collected through the EMR provides a greater level of detail, and can track whether more or less agencies are focusing on particular objectives or not. This information gap statewide indicates an inherent structural weakness in the strategy.

Secondly, the strategy is managed through a partnership between the government and the non-government sector (see 5.4.1 Roles and responsibilities). However, it appears that this contributes to the lack of coordination between the strategy and other strategies and planning processes. The outsourcing of the coordination role to the non-government sector, with no equivalent within the department understandably results in a lack of coordination with other initiatives emanating from the Department.

These structural limitations appear to explain the dearth of information available on the strategy; the lack of coordination and integration of the strategy at a strategic level and the limited change or evolution of the strategy over the years.

Key finding 6:

There are structural weaknesses in the CPS. Firstly, the strategy's primary benchmark is the number of cultural action plans submitted. But this only provides prospective information (what the agency intends to do). There is no broad-scale collection of retrospective data (what the agency did) or comparative data (intention versus actual).

Secondly, the strategy is managed through a partnership arrangement. Responsibility for coordination of the strategy is delegated to the non-government sector. Overall management of the strategy sits with the department but there are no resources dedicated to day to day management. There are communication and reporting lines between the coordinator and the department's central and regional offices, but this overall structure inevitably distances the CPS from other strategic initiatives.

4.3 Implementation

4.3.1 Cultural Action Planning

Key evidence source: Service provider survey; service provider workshops; document analysis; key stakeholder interviews

Does your organisation:	Yes	No
Submit an annual Cultural Action Plan?	95%	5%
Monitor achievement of actions?	91%	9%
Evaluate its Cultural Action Plan?	83%	18%

Source: Evaluation of the HACC Cultural Planning Strategy, Service Provider Survey, March 2007

Cultural Action Planning is undertaken by the vast majority of HACC funded organisations in Victoria. This is borne out by data from the regional offices and supported by the service provider survey results reported above.

While the submission, monitoring and evaluation of Cultural Action Plans is widely adopted as indicated by the survey data above, the qualitative feedback gathered through interviews and the service provider workshops indicated concerns about the process. The most substantive concern expressed by stakeholders was that the cultural planning process had been 'reduced to an administrative/tick the box exercise' and was not seen as a living plan. Consequently, the process was often seen to lack meaning. Comments such as, '*Program demands and time constraints do not allow for an effective evaluation of the cultural action plan although it is reviewed on a six monthly basis*' were typical of this view.

These themes came through strongly in the key stakeholders' interviews and the service provider workshops. Factors contributing to this perception were:

- the requirement to adhere to the template, which has not been updated since 1997, although regional variations and resources were generally perceived as improvements
- the requirement to submit the plan in September which did not fit well with other organisational planning and reporting requirements
- separation of the process from core business planning and often undertaken by a staff member sitting outside core service delivery responsibilities, and
- the assessment process which (in most regions) assigns a high/medium/low rating but was seen to lack real meaning.

There was often an acknowledgement that, initially, separation of the process provided the benefit of raising awareness and 'putting the issue on the table' and achieving particular outcomes in relation to areas such as training or language policies. However, with the plethora of planning and reporting requirements on agencies in 2007, it was felt that the separation now diminished the focus on diversity issues.

The 'one size fits all' nature of the plan was also raised by key stakeholders and Service Providers at the workshops, with views variously expressed that the plan

should be modified to suit certain circumstances, such as:

- organisations with minimal HACC funding
- small organisations (for example, 5 EFT or less; limited number of HACC services provided)
- areas where CALD communities only make up a small proportion of the population of the catchment area
- large organisations, with head and regional offices across different Department of Human Services regions
- CALD-specific agencies.

While CPS guidelines indicate that organisations can modify the template, the clear perception is that the template must be followed. This was evident not only in the feedback from service providers and PASAs, but was also apparent in the review of cultural action plans which followed the template very closely.

Key finding 7:

While Cultural Action Planning is widely complied with, qualitative feedback indicated the process is often perceived as lacking in meaning because the system is not aligned with any other core business processes of the organisation. Strong support was recorded for integrating the process with other planning and reporting requirements.

4.3.2 The planning process

Key evidence source: service provider survey; service provider workshops; document analysis; Ke stakeholder interviews

	Satisfied	Not satisfied	Don't know
Submitting plans in September?	81%	18%	6%
Monitoring of achievement of goals by your organisation?	83%	12%	5%
Monitoring of achievement of goals by Department of Human Services?	61%	15%	24%

Source: Evaluation of the HACC Cultural Planning Strategy, Service Provider Survey, March 2007

Feedback on the planning process uncovered a wide variety of approaches which ranged from sophisticated and integrated approaches, where the plan was used in other processes, such as program planning; staff training and/or orientation to those where cultural planning was seen as an imposition. The majority of responses were somewhere between these extremes, where the process was adhered to, but was often seen as lacking relevance.

There were some broad patterns apparent in the above responses. Those organisations adopting integrated approaches were generally medium to large organisations. There were as many examples of integrated approaches from rural regions as there were from metropolitan regions. Similarly, they were also as likely to come from health services, community health services or local government

organisations. Acute health services often cited the involvement of their Cultural Diversity Committee, which health services are required to establish in order to oversee the development of annual Health Services Cultural Diversity Plans. When a more integrated approach was taken to the planning process, service providers were more likely to be reporting that they had effective systems in place to monitor and review their plans and links to program and service planning. The following response from a Shire Council is indicative of this: *The plan is connected to other departmental practices or tasks, such as development and delivery of an annual training plan for direct care staff. The connections to other plans / documents / tasks assists on ongoing monitoring.*

Rural organisations were more likely to express frustrations with the process, with comments indicating that they felt the process either lacked relevance or was *'much too onerous for our organisation given our demographics'*. One of the main frustrations was the need to update the plan each year even when there was little or no change to the demographics of the local community.

The majority view – that the planning process was adhered to, but was generally seen as an add-on process – was recorded from across the full spectrum of HACC funded organisations. Comments such as *'has not been of great benefit at this stage to our organisation'*, *'have never really evaluated the plan (except when it came to rewriting it at the end of 12 months)'* were typical of these.

The survey results indicate that more than two thirds of service providers were either dissatisfied or did not know how the department monitored their action plan. In qualitative feedback, this response was usually linked with comments about the lack of relevance of the process and a perception that the plan was developed and assessed, but nothing further occurred with the plan.

Timing issues were frequently raised in discussions around the cultural action planning process. The most frequently raised comments centred on:

- the need to align the process with other planning processes such as strategic or program planning, and
- the need to move to a triennial process in line with HACC processes, such as funding and the triennial HACC assessment.

Key finding 8:

A variety of approaches to cultural action planning have been adopted by HACC funded organisations. Some have taken the initiative to integrate cultural action planning with other organisational processes, however the majority report that the process is undertaken in isolation from other organisational processes. Further there is a level of dissatisfaction with the monitoring of the plans from the Department. There is also strong support to move to a triennial planning process.

4.3.3 Quality framework

94 per cent of service providers monitor achievement of actions

84 per cent of service providers evaluate their Cultural Action Plan

Source: Evaluation of the HACC Cultural Planning Strategy, Service Provider Survey, March 2007

The service provider survey results indicate that HACC funded organisations undertake monitoring and evaluation of the Cultural Action Plans. However, qualitative feedback from key stakeholders and service providers indicated that there were concerns that the planning process was not embedded in a quality framework. There was considerable support expressed through the Service Provider survey and at the service provider workshops for achieving greater integration between cultural action planning and the HACC Quality Framework. Multi-funded organisations made the point that they were required to meet a range of quality management processes. In that context, they questioned the value of undertaking a planning process which was not aligned to any quality system.

The absence of any benchmarks or standards against which progress and achievements could be measured objectively was raised in numerous key stakeholder interviews, including Equity and Access staff, Department of Human Services' staff and peak body representatives. This was less supported through the service provider survey and feedback from the workshops indicated that it ranked as a lower priority than linking the process to an established quality management system.

Key finding 9:

There was strong support for integrating the Cultural Action Planning process within the HACC quality management system, and any developments in HACC quality management.

4.3.4 Assessment

Key evidence source: Service Provider survey; Service Provider Workshops; Document Analysis: Key stakeholder interviews

Are you satisfied with:	Satisfied	Not satisfied	Don't know
The assessment process?	62%	15%	23%
The way feedback is received?	65%	23%	12%

Source: Evaluation of the HACC Cultural Planning Strategy, Service Provider Survey, March 2007

The survey results indicate that around one third of providers are either not satisfied or don't know about the assessment process or the way feedback is received. Information collected from the Equity and Access staff and the department's PASAs indicates that the assessment process has been reviewed and modified in a number of regions. PASAs also noted that it was a particularly resource intensive process and acknowledged that this could impact at times on the timeliness and quality of the feedback.

Qualitative feedback on the assessment process included:

- concerns about the transparency of the process
- that the process had been reduced to a superficial assessment of whether a plan had been completed/whether a plan looked good, rather than asking 'What is your evidence base?'
- concern about receiving generic feedback or feedback lacking any sense of direction for the future
- the dilemma of how to assess practice, especially through a paper-based exercise, and
- the dilemma of assessing well-presented plans with the knowledge that the agency is not 'doing much' and the opposite situation – lack lustre plans from agencies which are really achieving a lot in terms of culturally responsive services.

These issues, added to the discussion about the role of the Equity and Access staff (see 5.4.1) raise the following questions:

- *Is there capacity within the system to do justice to the process of assessing Cultural Action Plans?*
- *What is the purpose of assessment? If it is to motivate service providers to continually improve their planning, are there other ways to reach this goal?*

Further, Equity and Access staff and to a lesser extent, service providers raised the issue of compliance. Agencies are required to submit their Cultural Action Plan as a condition of the Funding and Service Agreement. As a result, there is very high (but not 100 per cent statewide) compliance with this condition. While the inclusion of this condition was seen as a powerful change management strategy, one of the concerns held by Equity and Access staff, and some other key stakeholders, was that there was no real consequence for non-compliance. Non-compliant agencies would be followed up numerous times by the Equity and Access staff and the PASAs within the department's regions, but there was no further action to take. There were no examples of funding being withheld or withdrawn. It may be considered along with a range of other matters if an agency was under review, but would not be grounds for review on its own. This was a source of some frustration to Equity and Access staff and other stakeholders who felt that the strategy 'had no teeth'.

Key finding 10:

A range of issues were raised in relation to the transparency and value of the assessment process. Further, it was found that despite the mandatory requirement to submit CAPs, there is no meaningful process for dealing with non-compliance.

4.3.5 Regional variations

Key evidence source: Service Provider survey; Service Provider Workshops; Document Analysis; Key stakeholder interviews

86 per cent of service providers believe that regions should have the flexibility to add to statewide tools/guidelines.

Source: Evaluation of the HACC Cultural Planning Strategy, Service Provider Survey, March 2007

In general, there was support for allowing for regions to modify tools and guidelines to suit the particular circumstances of the region, be they demographics, the structure of the HACC sector or other factors. Consequently, regionally developed tools and guidelines were generally supported. However, most key stakeholders supported implementing standardised assessment processes, in order to achieve consistency and transparency.

PASAs and other key stakeholders suggested adopting a layered approach, with some prescribed minimum standards, with 'extra performance targets depending on selected variables, e.g. population, size etc'.

Key finding 11:
The field supported the suggestion that regions should have the flexibility to modify statewide cultural planning tools and guidelines in order to meet local needs and priorities. Feedback also indicated that this approach should be balanced against some minimum, core requirements applicable to all, in the interests of fairness, consistency and transparency.

4.4 Roles and responsibilities

4.4.1 Roles and responsibilities for the Cultural Planning Strategy

Key evidence source: service provider survey; service provider workshops; document analysis; key stakeholder interviews

Are the roles of the various parties involved in the Cultural Planning strategy clear and appropriate:	Yes
Service providers	97%
HACC Equity and Access project staff	80%
The department's regional offices	91%
The Statewide Equity and Access Coordinator	66%
The department's central office	65%

Source: Evaluation of the HACC Cultural Planning Strategy, Service Provider Survey, March 2007

The survey results indicate that from the perspective of Service Providers, roles and responsibilities are generally clear, with the exception of the role of the Statewide Equity and Access Coordinator and the department's central office. This is to be expected, as service providers would have most contact with their regional Equity and Access staff and the department's regional office.

The views of Equity and Access staff varied from this. A number indicated that initially they were unclear about their own role. In regions where assessment was not approached as a joint activity with the regional office, Equity and Access staff generally did not have access to the region's Cultural Action Plans. They felt that this caused some difficulties in fulfilling their roles. Most staff reported some tensions occurring at some point between the Equity and Access staff or their auspice agency

and the department's regional office over the last ten years. Most were satisfied with the current levels of support from the regional offices. There were some recent tensions in a couple of the regions, generally sparked by different views in relation to the assessment process.

All Equity and Access staff were satisfied with the support they received from the Statewide Equity and Access Coordinator. Views varied on the value of the ADEC forum, with most indicating that they preferred to attend only if the topics were relevant to them.

Some interviewees indicated that the HEAP role was potentially very isolated – working with HACC providers but sitting outside the direct HACC service system, auspiced by a non-government agency which often was not a HACC provider. Most Equity and Access staff indicated that they received appropriate support from their auspice agency. However, they are located in an unusual and complex structure, with:

- line management reporting to their agency manager
- project reporting to their Department of Human Services regional office, and
- communication with the Statewide Equity and Access Coordinator (problems; issues; resources)

while essentially conducting their day to day work with the staff of HACC service providers (see Diagram 1). In that capacity, they have no authority or mechanism to deal with issues of non-compliance, for example. The role of the Statewide Equity and Access Coordinator mirrors this to some extent. If for example, an issue arose in a region, the Statewide Coordinator has the status of the position, but no real authority to deal with issues within a regional office or with a service provider.

Some stakeholders identified what were perceived as inherent anomalies with the role and responsibilities of the Equity and Access role. These included:

- Equity and Access staff knowledge of the operational pressures experienced by HACC-funded organisations and policy developments across the HACC sector are necessarily limited by their distance from the direct HACC service system, yet, their primary role is to provide advice to the HACC sector.
- Equity and Access staff support to, and consultations with, agencies, typically focuses on the development of the Cultural Action Plan, with little if any support to the agency for the plan's implementation, monitoring or evaluation. While all stages of the planning process are important, the focus on the development of the plan is driven by the fact that the only accountability measures of the strategy relate to:
 - the submission of the plan to the department and
 - its subsequent assessment
- remuneration for Equity and Access staff is generally in line with Community Development work, yet their key function is to advise on planning which is generally remunerated at significantly higher levels (for example, in local government) with expectations of higher order and specific skills, qualifications and experience in planning.

In five of the eight regions, the Equity and Access staff have an integral role in the assessment of the Cultural Action Plans. In some regions, this is provided as a support and content-advisory function; in two regions, they are the sole assessors.

The Equity and Access staff involvement (or not) in the regional process of assessing the Cultural Action Plans was another area identified as inherently anomalous. Involving the person who supported the development of the Cultural Action Plan in the assessment of the same plan inevitably raises the question of a conflict in the role. Discussion of this issue in one region has focused on the 'right' of the department to essentially engage the Equity and Access staff, through the Equity and Access Project funding, to undertake this activity. The counter argument is that, as submission of the plans is in fact a contractual obligation under the agency funding and service agreement, assessment should be undertaken by the department as part of their contract management. However, this is largely a distraction of the central issues which are:

- the propriety of involving the Equity and Access staff at all in the assessment of plans on which they have provided advice and support
- the arms length of the PASAs from Cultural Action Planning, which limits their knowledge of the key issues on which to assess the plans
- the 'overcrowded' nature of the PASAs role which generally is the barrier to taking on the assessment process single-handedly, and
- the structure of the system which concentrates the content knowledge and expertise outside the department in the Equity and Access staff while the Department of Human Services has the contractual management responsibility of ensuring that Cultural Planning occurs.

The provision of training/education sessions by Equity and Access staff within the region and one to one support for agencies were the most valued by service providers. Equity and Access staff also found these aspects of their job role the most satisfying. Providing training, advice and support were the areas where there was a good alignment between skills, knowledge, relationships and networks of Equity and Access staff and their auspice agencies, and the needs of service providers. Equity and Access staff were often very skilled in working in a community development framework, with a clear appreciation of how and when to establish relationships with communities, gain trust, provide information and support to access HACC services.

Department of Human Services PASAs indicated that they were reasonably clear in their role, but raised the issue of high administrative loads. PASAs also indicated that the success of the strategy within the region was greatly influenced by the working relationship established between the PASA and the Equity and Access staff. Most regions indicated that they currently had effective working relationships, but most had experienced some challenges over the years.

At the central level, there is no specific allocation of responsibility for managing an overview of the strategy or for its monitoring and evaluation. Thirty five (35 per cent) of survey respondents were not clear about the role of the department's central office.

Qualitative feedback indicated that there was an understanding that the central office has a policy setting role. A number of staff working in Equity and Access roles indicated that they believed the central office should take a more active role in the management of the CPS.

Key finding 12:

In terms of roles and responsibilities, it was found that:

- at a regional level, the Equity and Access staff works independently
- the role contains some inherent anomalies in terms of participation in the assessment of CAPs
- Equity and Access staff are skilled and well-positioned in the NGO sector to provide support to service providers which requires community development knowledge and expertise
- the role of the department’s regional office is critical, yet the role is perceived as ‘overcrowded’ and lacking capacity to dedicate appropriate time and energy to the CPS
- the coordination of the CAP Equity and Access staff is outsourced to the NGO sector
- there is essentially no assignment of responsibility for overall management of the strategy at a statewide level.

4.4.2 Roles and responsibilities within agencies

Key evidence source: service provider survey; key stakeholder interviews

The survey responses indicate that allocation of responsibility for Cultural Action Planning is spread across the following positions and committees:

Committee of Management	3
CEO	8
Home and Community Care/Aged and Disability Services Manager	35
Director of Nursing	12
Other manager, for example, Quality; Professional Development; Community Services	9
CALD specific staff, for example, Multicultural Officer; CEGS Officer; Cultural Diversity worker	11
specifically created Cultural Diversity Committees	7
existing committees, such as Quality Committees	2
Other officer in non-managerial role	7
Not stated	14

Source: Evaluation of the HACC Cultural Planning Strategy, Service Provider Survey, March 2007

It is evident from the survey responses there is wide variety in allocation of the responsibility for CAPs. The issue is often related to the level of integration of the process. When the strategy is well integrated, there is clearly a sharing of management responsibility and accountability. Key stakeholders raised some concerns about an off-line member of staff being responsible for Cultural Action Planning, as there is a risk that the process can be viewed as an add-on, which can be cut-off.

4.5 Tools and resources

Key evidence source: service provider survey; service provider workshops; document analysis; key stakeholder interviews

Seventy-four per cent (74%) of service providers believe that the current Cultural Planning Tool and guidelines should be updated.

How would you rate the guidance of:	Very useful	Useful	Not useful	Don't know/ don't use
The Cultural Planning Tool	15%	75%	7%	3%
Guidelines for HACC providers	17%	71%	6%	7%
Any regional tools or resources	13%	42%	2%	43%

Source: Evaluation of the HACC Cultural Planning Strategy, Service Provider Survey, March 2007

Qualitative feedback from key stakeholders and service providers highlighted that the Cultural Planning Tool:

- does not seek information about outcomes or timelines
- is unclear about the setting of objectives and strategies
- is too complex, unwieldy and confusing
- does not collect benchmark data which prevents capacity to monitor and evaluate, including measurement of progress
- does not include measurable standards
- does not capture or identify all the relevant work and achievements of an organisation, and
- is 'a series of questions, not a strategic planning tool'.

In general those critiquing the Cultural Planning Tool, felt that it was very outdated (predating the Victorian HACC Program Manual; the introduction of Service Coordination; planning requirements implemented over the last ten years; the department's Cultural Diversity Guide and the department's Language Services policy) and had been outpaced by many agencies that are working at amore sophisticated level. As the survey results above indicate, there is a substantial proportion of service providers who do find the Cultural Planning Tool useful, but 75 per cent also believe that the Tool needs to be updated.

Survey responses recorded below provide a representative indication of the views of service providers.

Update

The above were particularly useful in the initial development of the plan; however the plan has continued to evolve beyond many of these tools/guidelines.

Rural Health Service

The copy I have is dated 1996 and refers to NESB rather than CALD clients. (Perhaps there is a later edition that I don't have).

Rural council

Management/evaluation

Start with some core standards that are consistent with best practice regardless of the client group, get agreement about their definitions, and application...update because...you need as much universality as possible and the sector suffers unnecessarily from regions suggesting that they are "unique". This results in duplication, expense and an inability to do benchmarking across regions, agencies and client groups.... Include robust evaluation strategies.

Metro CHS

There should be one consistent approach across departments. Those of us who receive funding from multiple sources are doing multiple reports all of which vary slightly. Cultural planning applies across the whole spectre of service and should only require one set of tools which should remain static for a given period.

Disability service

Simplify

The cultural planning tool is cumbersome to work with. It needs to be simpler, and more practical and action based.

Rural Health Service

Long and at times repetitive. ...Goals often unachievable especially when there are so many other requirements. Cultural planning should be part of the overall organisational plan and not a separate document.

Outer metro CHS

Modify

The current tools fail to provide for the cultural diversity which exist within the larger community groups eg between the younger members and older members of a particular group in the community.

Rural Health Service

Most of the resources are for larger agencies who are specifically funded for CALD services and have high populations of CALD people and have capacity to deliver such services.... There needs to be consideration of "like agencies" when developing resources or sharing best practice models. There is little use in providing a rural council with a best practice model of a city based council. A range of resources needs to be developed that will fit the diversity of agencies out there.

Rural Council

Key finding 13:

There was wide agreement that the current CPS tools and resources require updating.

4.6 Outcomes

Key evidence source: Service Provider survey; Service Provider Workshops; Document Analysis; Key stakeholder interviews

4.6.1 Outcomes: General

In the last 3 years, has your organisation achieved demonstrable outcomes in any of the following areas?	Yes	No	Don't know
Access	75%	11.5%	13.5%
Cultural relevance	76%	9%	15%
Consultation	71%	19%	10%
Information	84%	10%	6%
Special program needs	54%	31%	15%
Service coordination	72%	13%	15%
Accountability	75%	11%	14%

The Cultural Planning Strategy contributed to these outcomes:	
Significantly	27%
Partially	57%
Not at all	16%

Source: Evaluation of the HACC Cultural Planning Strategy, Service Provider Survey, March 2007

The survey results indicate that around three quarters of service providers felt that demonstrable outcomes had been achieved over the last three years in most areas. More respondents reported demonstrable outcomes in relation to information (84 per cent) and fewer (54 per cent) in relation to special program needs. Around 25 per cent of respondents therefore felt that either no demonstrable outcomes had been achieved or they did not know if outcomes had been achieved. Further to this, only 27 per cent of respondents felt that the CPS had made a significant contribution, 57 per cent felt that it had made a partial contribution and 16 per cent felt that the CPS had not contributed at all. Qualitative feedback on the survey in relation to outcomes indicated that the CPS had prompted many organisations to review and improve their systems, policies and/or practices. Other views indicated that it had had little or no impact or that the changes would have occurred irrespective of the strategy.

Key stakeholders provided examples of achievements that they were aware of, but a number of stakeholders also reported that they were 'still not sure of the achievements' and that they were 'very micro'. In the workshops, fewer participants were involved in the small group discussions on outcomes than any of the other discussion topics. PASAs as group highlighted the fact that '*evidence of measurable outcomes of the strategy is not readily to hand*' but they also emphasised the impact of the Equity and Access staff – '*The value of a person supporting services at a practical level has been greatest... Major achievement is championing the issue and raising the profile and relevance of CALD needs*'. (Regional PASA)

The following quotes provide an indication of the outcomes reported by service providers and are consistent with the general views collected through the service provider workshops.

Embedded issues across the organisation

CALD working group recognised that CPS should not be only for HACC, it is relevant to whole organisation. If no CPS for HACC, we would not have progressed as we have.

Rural CHS

The cultural action plan provided the platform for the organisation to outline a strategy for the engagement and the service delivery to CALD groups within the catchment area. The organisation presently has a specific multicultural unit (MDU) that is CALD sensitive that works with and consults to organisation wide programs.

Metro health service

The CPS has ensured that CALD issues are embedded in the day to day thinking of staff at various levels. Operating as a distinct project gives reason to keep CALD issues on the agenda and serves to remind us as a service provider of varying community needs. Our organisation works with a number of different agencies to build collaborations and this has strengthened the banner under which we all work together.

Regional centre local government

Raised awareness, but...

Cultural planning strategy has encouraged this organisation to address these issues, but I do believe that that the planning framework is not broad enough.

Rural health service

Provides direction, keeps cultural planning on the forefront of program / service planning and delivery. It is important to note however that whilst the importance of the CPS is accepted, at times monitoring / review and renewal of the plan does seem "tokenistic" owing to the relatively low CALD resident status in [...].

Rural council

Achieved, regardless of CPS

Outcomes outlined above have been achieved regardless of cultural planning tool – treat all clients as individuals and endeavour to meet their needs. Promote access to all clients.

Rural health service

This agency always had a high proportion of CALD consumers because it was proactive in responding to community needs, which is indicative of good practices, so even though the strategy documented our practices and ensured that there were written inclusive practices it has not contributed significantly to outcomes.

Rural service provider

Cannot say – no evidence

In order to unequivocally demonstrate the cause and effect relationship between the c.a.p. and the outcomes listed above, it is necessary to conduct an explicit, well-resourced evaluation that involves an appropriate methodology. This agency does not receive sufficient resources to conduct an evaluation, nor could it be justified in terms of the CALD demographic or funded service types or levels we currently receive.

Metro CHC

Key finding 14:

Findings in relation to outcomes of the strategy were variable. There is clearly a gap in information on measurable outcomes. At the same time, the data clearly suggests that positive outcomes have been achieved. In some cases, these are clearly achieved as a result of the strategy. In other cases, the link between the strategy and outcomes is less clear, with the suggestion that they would have been achieved, regardless of the strategy.

4.6.2 Outcomes: specific

Limited information was collected through the Service Provider workshops on specific outcomes of the strategy. The survey asked service providers to provide specific examples or snapshots examples of achievements. There is no way to cross-check or validate this data, as there is no source of coordinated data on the outcomes of the Cultural Planning Strategy.

The following is a selection of these 'snapshots' of practice reported through the survey.

CALD community representation on Board of Management; increased use of interpreter service
Rural CHS

There have been programs developed for CALD groups for diabetes education even though the CALD communities are a small portion of the overall target group for [this] CHS
Outer metro CHS

Language services policy including translated information; [...] Arabic project established close links with the Arabic community leading to a locally based interpreters course
Rural hospital

Diabetes education groups for Greek community at their Greek meeting place included education for diabetes nurse educator; nutrition advice dietician that focused on their own foods and exercise in form Greek dancing conducted by physiotherapist. Long term outcomes is more of this community access programs at our service and continue to do their dancing and food sharing as part of their cultural social activities.
Outer metro CHS

Cook Islanders Planned Activity Group: ... identified need for a day program... employed a support worker who can speak the language. CHS secured ongoing funding for this successful group to continue meeting every week
Metro CHS

The organisation also has successfully formed partnerships with the Sudanese community and the indigenous community and employs a Sudanese worker.
Metro CSO

A cultural specific day was developed in response to demands from a Polish based community group. A day was designed to support these clients accessing dementia specific respite.
Rural CSO

Coordinated multicultural meals to be incorporated into main menu at the meals on wheels kitchen. Working on organising a social support group for those of CALD backgrounds.
Outer metro local government

We incorporate harmony day activities into our hostel and nursing homes. We have reviewed and updated our interpreters' policy. We have reviewed and updated our special needs groups policy that includes people from a CALD background

Rural hospital

Increased sharing of information to all staff (for example, distributed information during cultural diversity week; cultural diversity a standing agenda item at staff meetings). The development of an Equity Working Group, which will now be extended to others within the organisation. There is an ongoing commitment to making sure that cultural diversity is reflected in the development of policy.

Rural CSO

Building staff awareness of cultural diversity through highlighting diversity and background of staff through staff newsletter contributions

Rural CHS

Key finding 15:

Through the evaluation, data has been collected on a wide range of specific outcomes achieved by individual organisations. This data indicates a wide range of activities being undertaken. At the same time, it underscores the absence of any central collection of this valuable data.

5. Potential improvements

The evaluation sought views on potential improvements to the Cultural Planning Strategy from all stakeholders. This section of the evaluation report presents the themes which emerged in discussions, interviews and survey responses in relation to potential improvements to the strategy.

5.1 General

67 per cent of service providers believe that the Cultural Planning Strategy can be improved

Source: Evaluation of the HACC Cultural Planning Strategy, Service Provider Survey, March 2007

Throughout all interviews and discussions there was general agreement that the strategy could be improved. There was a sense that the strategy had been overlooked or not considered in some of the major reforms in the HACC program over the last few years, and therefore was not well aligned with contemporary strategies and frameworks in HACC.

5.2 Integrated planning

71 per cent of service providers would like to move to an organisation-wide (rather than HACC-specific) 'Cultural/Diversity Plan' (covering all diversity issues).

65 per cent of service providers would like to move to a single Cultural / Diversity Planning template (covering all department program areas).

65 per cent of service providers would like to integrate cultural / diversity planning within the organisation's overall strategic/business planning.

Source: Evaluation of the HACC Cultural Planning Strategy, Service Provider Survey, March 2007

16 small groups suggested integrating the Cultural Action Plan into whole of organisation strategic planning

4 small groups suggested integrating the Cultural Action Plan into service planning

3 small groups suggested adopting a cross program approach to cultural planning

Source: Service Provider Workshops, February–March, 2007

In terms of potential improvements to the CPS, the issue of integrating Cultural Action Planning into core business systems was the most consistently and frequently raised theme. The three most commonly suggested approaches were to:

- incorporate the Cultural Action Plan with the organisation's strategic or business plan
- create an organisation-wide 'Diversity Plan' and/or
- create a 'Diversity Plan' across the department, which would fit the requirements of all funding programs.

The key issues arising in these discussions were:

- the need to integrate cultural planning with broader planning functions, so that cultural planning is embedded with strategic direction setting, and program and service planning

- the need to consider issues of 'access' or 'diversity' under a single banner, and
- the need to prevent duplication of effort.

The above feedback was raised in key stakeholder interviews, group discussions, the service provider survey, the workshops and written feedback submitted by PASAs and networks. The overall message was that the process needed to 'make sense' to providers and it needed to result in a living plan that would be used throughout the planning cycle. Integrated planning was also considered '*more achievable than requesting individual plans related to different funding streams.*' (Regional PASA)

Some service providers indicated in discussions on this theme that it would be beneficial to have a broader, 'diversity' and/or 'access' perspective, recognising that many of the barriers experienced by CALD communities or clients are experienced by other clients for other reasons. Addressing these barriers therefore was seen in the context of improving overall quality and enhancing access generally. Symbols and better signage, for example would not only assist CALD clients, but also clients with literacy or speech problems who may be from an English speaking background. Integrating the Cultural Action Planning process with the organisation's strategic or business plan was seen as a way to ensure that issues of service access are considered at the appropriate point in the planning cycle, and then integrated in the next levels of planning, such as program plans and individual staff work plans. This would also ensure regular monitoring and reviews. Some service providers indicated that they had adapted their processes to use this type of approach, but the majority had not.

The cross-program approach to diversity planning was suggested by organisations receiving funding from other program areas within the department which also require a cultural / diversity plan, such as Acute Health or Disability. The principles of preventing duplication of effort and taking a broad and considered approach to the development of the plan also applied in this instance.

Some stakeholders argued against integration because they felt that this introduced the risk that the HACC-funded programs and services would be overlooked, particularly in large, multi-funded organisations. This was a minority view.

5.3 Integration with quality frameworks

70 per cent of service providers would like to integrate cultural/diversity planning within the organisation's overall quality management, including the HACC National Service Standards.

Source: Evaluation of the HACC Cultural Planning Strategy, Service Provider Survey, March 2007

10 small groups suggested integrating the process with quality management systems and frameworks. Of these, 4 small groups specified the HACC assessment process.

Source: Service Provider Workshops, February – March, 2007

Discussions under this theme reflected the view that cultural action planning dealt with planning and service delivery matters, albeit to a specific subset of the community –

people from culturally and linguistically diverse backgrounds. As planning and service delivery were considered to be quality issues, it was felt that cultural planning should be integrated into the organisation's quality frameworks. Integration with a quality management cycle would therefore provide greater rigour in terms of planning, monitoring, evaluation and, as appropriate, external assessment or accreditation processes. Under the current CPS system, there is no audit or review of planned actions against actual implementation. This was seen as a critical gap by many key stakeholders which would be addressed through integration with a quality management system.

Integration with quality frameworks would ensure the regular collection of benchmark information from service providers from across the state. The information would be standardised and would allow for regional and statewide comparisons, as well as identifying changes over time. This approach was also favoured because it would alleviate duplication of effort.

5.4 Triennial timeframe

77 per cent of service providers would like to move to a three year planning cycle, with annual goals and review.

Source: Evaluation of the HACC Cultural Planning Strategy, Service Provider Survey, March 2007

12 small groups suggested moving to a triennial timeframe, with annual review

Source: Service Provider Workshops, February – March, 2007

Moving to a three year planning cycle would achieve greater alignment between the strategy and other planning and review cycles in the HACC program, such as the HACC triennial planning process and the triennial HACC assessment against the NSSI. This concept was well supported by service providers and the department.

Service providers and the Equity and Access staff also indicated that the goals of a cultural action plan often required a long term focus and a three year approach was a more realistic timeframe.

The caveat on moving to a three year cycle was that the process would require on-going monitoring and annual review to ensure that the issues remained on the agenda and remained relevant. PASAs believed that this could be integrated into the annual review with agencies.

5.5 Flexibility in reporting requirements

71 per cent of service providers would like allowances in planning / reporting requirements made in areas where CALD communities only make up a small proportion of the population of the catchment area.

54 per cent of service providers would like allowances in planning / reporting requirements made for organisations with minimal HACC funding.

51 per cent of service providers would like allowances in planning / reporting requirements made for small organisations (for example, 5 EFT or less; limited number of HACC services provided).

Source: Evaluation of the HACC Cultural Planning Strategy, Service Provider Survey, March 2007

10 small groups suggested matching reporting requirements to: size of organisation/program/local demographics

Source: Service Provider Workshops, February–March, 2007

Non-metropolitan service providers in particular were of the view that the current Cultural Action Planning process required a level of detail and effort that was not justified given the number of CALD clients / potential CALD clients in their catchment area, and minimal demographic change from year to year. Despite the fact that the guidelines for preparing cultural action plans indicate that there is flexibility in the process, the widely held perception is that the template should be followed and each of the action areas addressed. Service providers indicated that they understood and could see the value in considering the issues affecting CALD clients in their catchment, including the high risk of isolation in the community. However, they did not feel that the current process was the best approach to realistically tackling the issues in their community. The key message was the need to match effort to requirements, and also not to overlay a metropolitan-based approach in non-metropolitan areas. There was a sense that the rural providers needed some rural-specific approaches. Rural providers were also likely to advocate for adopting a broader 'diversity' focus that encapsulated for example, Aboriginal and Torres Strait Islanders communities in their catchment; people with disabilities; people living in isolation; religious diversity and sexual preference.

Around half of the survey respondents indicated that they would like some allowances made for either small organisations or organisations receiving minimal amounts of HACC funding.

Some respondents and stakeholders also wanted some allowances made for ethno-specific organisations, given that their raison d'être was to work with their communities. However, this view was not unanimous, and the counter argument put was that ethno-specific organisations are still dealing with diverse communities and should be encouraged to plan for the needs of the whole community.

5.6 Standardised approaches and roles

45 per cent of service providers would like 'minimum standards / benchmarks' which need to be achieved by all service providers.

Source: Evaluation of the HACC Cultural Planning Strategy, Service Provider Survey, March 2007

11 small groups suggested standardised/universal approaches, for example, to all aspects, roles, tools, minimum standards

10 small groups suggested that regional offices have a consistent approach, e.g. to assessment of Cultural Action Plans; timelines; more meaningful feedback and follow up

Source: Service Provider Workshops, February–March, 2007

Discussions in relation to standardised approaches and roles did not preclude having flexibility at the regional level. However, the view generally expounded was that on core matters, there should be fair and consistent approaches and requirements. Key stakeholders interviewed were more likely than service providers to be in favour of introducing some minimum standards or benchmarks. PASAs' feedback indicated support for benchmarks and/or minimum standards. While this suggests that service providers may have differing understanding of minimum standards, the point made by PASAs was that there is 'no adequate benchmark information available'.

Service providers indicated that the process for assessing the Cultural Action Plans should be standardised across regions. Service providers also clearly indicated that they would prefer to receive more individualised and meaningful feedback from the assessment, including some guidance on how to improve, and what the next steps should be for the organisation.

5.7 Communication/promotion

14 small groups suggested improvements to communication and promotion. Showcasing best practice was the most frequent suggestion, followed by improved processes for obtaining community feedback and involvement, and better information dissemination.

Source: Service Provider Workshops, February–March, 2007

Service providers indicated that they valued learning from their peers and networks, as this was a chance to hear about real changes, which they could potentially replicate or adapt in their own organisation. There was an emphasis on sharing information on best or good practice to inspire change and to acknowledge achievements.

Feedback was also received about improving communication processes generally. Suggestions included making better use of the website (many service providers were unaware that CPS information was held at a central point) and having a clearing house of information.

5.8 Funding

14 small groups raised funding issues, including increased funding for: translated materials; interpreters; implementation; Equity and Access staff, resources and tools.

Source: Service Provider Workshops, February–March, 2007

Funding was raised in a number of small groups. Translated materials and interpreters were the most frequently raised points.

Key finding 16:

There were a range of potential improvements to be made to the strategy, with considerable agreement in the way the improvements should be shaped.

In summary these included:

- **integration with other planning processes**
- **integration with quality frameworks**
- **introducing a triennial timeframe to align with the HACCC planning cycle**
- **standardised approaches and roles**
- **better communication and promotion, and**
- **enhanced funding.**

6. Conclusions

6.1 Introduction

This section of the report presents the conclusions of the Cultural Planning Strategy evaluation and the consultants' recommendations for the future.

6.2 Overarching Conclusions

The fundamental question of the evaluation of the Cultural Planning Strategy must be: *'Does the Cultural Planning Strategy increase the responsiveness of HACC services to people from CALD backgrounds across the range of services?'* Despite the extensive amount of information collected through the evaluation, the answer to this question is patchy and inconclusive because the historical data to conclusively support or disprove this proposition is not readily available. The conclusions that can be drawn about the strategy are that:

- there is high compliance amongst service providers with the requirement to submit Cultural Action Plans
- there is widespread understanding and acceptance amongst service providers of the need for organisations to plan and implement specific actions in order to increase the responsiveness of HACC services to people from CALD backgrounds
- amongst service providers, there is considerable goodwill and commitment to achieving equitable access and the best outcomes for their HACC clients and potential clients from CALD backgrounds
- there is evidence that the strategy has contributed to the implementation of culturally responsive programs, services and management practices.

The greatest achievement of the Cultural Planning Strategy has been to embed the concept of cultural action planning and develop this as a regular activity for organisations. Further, training undertaken through the Cultural Planning Strategy has raised the awareness and knowledge of the HACC workforce in relation to issues of cultural sensitivities and service responsiveness. Service providers have been supported to develop and implement culturally sensitive practices.

However, across the HACC service sector there are reservations about the currency and relevance of the Cultural Action Planning processes, tools and resources.

After ten years of operating within the current system, service providers have communicated clear messages that the process of Cultural Action Planning needs to be integrated into:

- the core business planning processes of organisations, and
- the core quality management systems of organisations.

On a more strategic level, it is evident that:

- very few stakeholders have a clear overview of the strategy as the roles and components of the strategy are fragmented across the department and the non-government sector
- across the partners involved in the strategy, no single role has overall responsibility for the strategy
- the strategy has not kept pace with developments across the HACC service system, such as Service Coordination or the HACC National Quality Assurance Framework
- there are no clearly articulated systems, processes or mechanisms for management and coordination of the strategy such as:
 - system-links between the *strategic level* within the department's central office and the *operational components* of the strategy which are shared across the non-government sector and Department of Human Services regional offices
 - mechanisms at the statewide level to coordinate information from the regions; gather data in addition to the number of plans submitted; systematically identify regional or statewide trends; implement on-going improvements and/or coordinate with other developments and initiatives in the HACC service system
- there are inherent weaknesses in the structure of the strategy, with its focus on collection of prospective data, rather than retrospective reporting (or a combination of prospective and retrospective data collection)
- there is no system for monitoring, evaluation or continual improvement of the strategy
- other than referencing the HACC National Service Standards, the CPS is not well aligned to the overall HACC Quality Framework including the three yearly assessment against the NSSI;
- there are limited cross-program links between the Cultural Planning Strategy and comparable requirements emanating from the department's Disability; Mental Health and the Acute program areas
- the potential for cross-program linkages (for example, consolidated 'Diversity Planning and Reporting') inevitably raises issues of coordination and responsibility within the department, monitoring and reporting by program area, and
- the Cultural Planning Strategy is not systematically integrated into the planning processes of individual agencies.

Fundamentally, the Cultural Planning Strategy is only nominally a strategy, and rather, is a number of resources, including staff, and a Cultural Planning Tool sitting together under the title of 'strategy'. When it was introduced in 1997, the concept of regular Cultural Action Planning was a forward thinking approach. However, over the last ten years it has largely been overtaken and outpaced by developments within the HACC service system and within many organisations, particularly in local government and larger organisations which typically have sophisticated planning and quality management systems in place.

6.2.1 Conclusions in relation to specific components of the strategy

The evaluation found that service providers and key stakeholders held concerns about specific components of the strategy including:

- the Cultural Action Planning process (separation of the process; timing)
- the absence of a quality framework, although the process does reference HACC National Service Standards
- the value, and at times, appropriateness of the Cultural Action Plan assessment processes
- the role and responsibilities of the Equity and Access staff, in particular the planning advisory function and the role in relation to the regional assessment of the Cultural Action Plans, and
- the need for the tools and resources to be updated.

It must be clearly stated that the Equity and Access staff are respected in the field and that their dedication and commitment is generally acknowledged. However, the evidence suggests that resourcing of a HACC cultural planning strategy by community-based staff located in the non-government sector is not necessarily making the best use of the skills of the HACC Equity and Access staff or supplying advice at the level required by service providers. While established as an innovative partnership approach, over time responsibilities for various components of the strategy have become diffuse and lack coordination.

6.2.2 Opportunities for the future

Both the strategic and the specific conclusions highlight the need for changes and improvement to the strategy. Any way forward needs to:

- ensure that the significant gains over the last ten years are protected in future changes
- ensure that there are appropriate checks and balances in the new system, and
- involve the appropriate stakeholders and map a way forward with a realistic timeline for implementation.

The inevitable conclusion for greater integration of cultural planning is timely considering similar trends in, or support for this direction from:

- the Victorian Government
- the inter-governmental level
- local government
- peak body representatives, such as the MAV and the ECCV
- service providers, and
- Department of Human Services.³⁶

This supports the prospect of implementing some significant change. The coincidental release of the CEGS evaluation also has major implications for the management of cultural diversity issues in the HACC sector and needs to be considered in relation to the future directions of the Cultural Planning Strategy. The implementation of new directions in HACC assessment will also have important implications for the strategy.

³⁶ 'Achieving greater service integration across program boundaries' is a goal of the RRHACS Division Policy and Funding Plan, 2006 - 2009

7. Recommendations

The brief for the Cultural Planning Strategy Evaluation required that 'recommendations for future development of the CPS, tools and Equity and Access worker / coordinator roles' be developed. This section of the report outlines recommendations, based on the findings and conclusions of the Evaluation of the HACC Cultural Planning Strategy.

7.1.1 Overall strategy

- 1. It is recommended that the Cultural Planning Strategy graduates to a new phase, with the focus of the strategy redefined to cover 'diversity' in a broad sense, acknowledging that barriers to accessing services are experienced by many who may be marginalised or disadvantaged for a range of reasons, including cultural diversity. The aims of the new phase should move from completion of plans, compliance and monitoring to local integration and continuous improvement.**

As such the strategy should be renamed to a 'Diversity and Access Strategy' to reflect its redefined focus.

- 2. It is recommended that the overall goal, aims and objectives of the strategy are clearly articulated and that a definition of the terms 'diversity and access' is developed.**
- 3. It is recommended that the Department of Human Services central office takes on a greater role in coordination of all diversity focused initiatives in the HACC program. This approach should provide greater sharing of information; greater coordination and integration of activities and greater analysis of issues and trends.**

Rationale for Recommendations

Broadening the focus and scope of the (current) Cultural Planning Strategy to that of 'diversity' and 'access' will ensure that the focus is on facilitating access to HACC services, recognising that a number of groups are acknowledged under the Home and Community Care Act as having 'special needs' because they experience barriers to access. In addition to people from culturally and linguistically diverse backgrounds, these groups include Aboriginal and Torres Strait Islander clients, people with dementia, people who are financially disadvantaged and people living in remote and rural locations. This approach would address concerns frequently emanating from non-metropolitan regions that the focus on CALD groups is somewhat artificial in their communities. In contrast, responding to the needs of Indigenous communities in their catchments is often a much more pertinent issue. This approach would give regions and service providers more ownership in defining and addressing local needs. It would also reinforce the message that addressing barriers to access results in a better quality service for all clients.

Articulation of the strategy will ensure that:

- the intent of the strategy is clear
- guidance is provided to all stakeholders
- the strategy can be effectively monitored and evaluated
- potential alliances with other initiatives in the HACC program or other program areas within the department can be clearly identified
- regions can focus on areas of greatest need in their region.

Coordination of the strategy at the central level will ensure that there is:

- improved understanding of the activities undertaken in this portfolio
- better coordination of information
- greater opportunity for strategic analysis and that
- greater opportunity for strategic coordination with service developments in the HACC program.

The roll out of the new HACC Assessment Framework is a good illustration of an area where there needs to be a central point from which to consider diversity and access issues in relation to a new initiative.

In keeping with the requirements of the brief to provide recommendations to assist in the future development of the strategy, a 'working statement' on Diversity and Access is provided below. This statement outlines the key points to be included in the strategy based on the evaluation research so that the recommendation can be clearly interpreted and, subject to acceptance, further developed.

Strategy component	Working statement on Diversity and Access	Further consultation?
Definitions	'Diversity' includes, but is not limited to cultural diversity	
	'Diversity' clients include (but are not limited to) those in the five 'special needs' groups under the HACC Act. In principle, therefore, 'Diversity' clients include those from an ATSI background, but this should be subject to the endorsement of the relevant ATSI Peak body, VICAD.	✓
	The aim of the Diversity and Access strategy is to be inclusive. The interpretation of diversity is therefore broad. Barriers to accessing services are shared by many who may be marginalised or disadvantaged for a number of reasons. The strategy targets clients who experience barriers to accessing services, based on their diversity from the mainstream population. This includes cultural diversity, as well as other factors which may create barriers, such as sexual preference, religious beliefs, learning disabilities or age or disability related factors.	
Overall goal	The overall goal of the strategy is to ensure that HACC services are inclusive of all clients in the HACC target group and that services can be equally accessed by all.	
	Achieving equity in access is essentially a quality issue, and therefore the strategy will adopt a quality framework.	

Strategy component	Working statement on Diversity and Access	Further consultation?
	<p>There will be special mention of CALD clients and communities, because:</p> <ul style="list-style-type: none"> • cultural diversity can be a barrier to accessing services • the significant CALD proportion of the Victorian population • evidence of under-representation of CALD communities in HACC services. 	
	<p>There will be special mention of Aboriginal and Torres Strait Islanders in recognition of their status as one of the HACC special needs groups; issues of under-representation and need for specific cultural responses.</p>	
Rationale	<p>The rationale for the strategy should articulate:</p> <ul style="list-style-type: none"> • the genesis of the strategy, including its relationship to the Cultural Planning Strategy • the evidence base for the strategy, in particular under-representation of specific communities in HACC services • key findings from the Cultural Planning Strategy evaluation including the support from the sector for a more inclusive approach to diversity and a greater emphasis on re-dressing under-representation through organisations' overall management of service quality. 	
Purpose	<p>The purpose of the strategy is to provide direction to the sector, coordinate the allocation of resources and effort and encourage best practice in diversity management.</p>	
Objectives	<p>The objectives of the strategy should articulate the medium term changes sought through the strategy and should include:</p> <ul style="list-style-type: none"> • to ensure that HACC services are inclusive and open to all within the HACC target population • to acknowledge the diversity of the HACC target population generally and the need to provide equal access to services across the population • achievement of relevant triennial ministerial priorities • for organisations with a regional and local focus to understand and respond to the diversity of the regional or local HACC target population • to recognise and address factors such as linguistic or cultural background which may prevent an eligible client or community accessing HACC services • to embed planning for diversity in organisational systems • to embed a philosophy of 'inclusive and accessible service provision' in all facets of organisational management and service delivery 	

Strategy component	Working statement on Diversity and Access	Further consultation?
	<ul style="list-style-type: none"> • to ensure that services can respond to characteristics or factors which can set a client or community apart and in doing so, may artificially prevent them from accessing HACC services • for HACC service providers to work in partnership with other relevant organisations in order to best provide responsive and high quality services to those clients from diverse backgrounds • to resource and support the HACC sector through the regional Equity and Access staff. 	

7.1.2 Implementation

4. **It is recommended that cultural planning is integrated into appropriate strategic, business or diversity plans of HACC funded organizations from July 2008 (to coincide with the next, nationally aligned HACC triennium). In consultation with the department’s regional office, HACC funded organisations should have the opportunity to choose the appropriate platform for their ‘diversity and access plans’ and the appropriate focus for their local area. Guidance should be provided to Department of Human Services regional offices and to HACC Services Providers to assist in this transition. (see: Recommendations 14 and 15)**
5. **It is recommended that the ‘diversity and access’ strategy should be integrated into the HACC Quality Framework. Monitoring and assessment of ‘diversity and access’ plans should therefore occur through the triennial HACC assessment process. This will require adaptation of the external assessment tools and further briefing of the external contractors. There should be clear specification of the types of reports which should be available from the assessments to the regions and the central office.**

This integration of ‘diversity and access’ with the HACC Quality Framework should be clearly communicated to the HACC sector.

6. **It is recommended that ‘diversity and access’ plans should have a three year planning cycle, with annual reviews to be conducted as part of annual service agreement negotiations and visits undertaken by the regional PASAs.**

Rationale for Recommendations

These recommendations are designed to address the concerns of providers and the DHS that the CPS is not well integrated into the core business systems of HACC funded organisations. This approach recognises that there have been considerable gains since the late 1990's in terms of planning and quality systems. This approach does place day to day responsibility for planning, implementation and monitoring with the provider. The triennial external assessment, while less frequent than the current system, will provide greater rigour and more reliable data on outcomes. Through this approach:

- service providers and other stakeholders will have a clearer understanding of the strategy and their roles and responsibilities under the strategy
- service providers will have greater flexibility in the format of their plan and will have choice in deciding the most appropriate format for their organisation
- the strategy will no longer be perceived as an add-on, but will be integrated within organisational core business
- the strategy will be located within the HACC Quality Management system and there will be more rigour in assessing adherence to diversity and access planning, and
- regional and statewide analyses will be possible, as well as change over time analysis.

Strategy component	Implementation	Further consultation?
Planning priorities	<ul style="list-style-type: none"> • The department's central office will define core HACC diversity and access priorities for the state on a triennial basis. • The department's regional offices will review the state priorities and add specific regional or sub-regional priorities. 	✓
Planning platform	<ul style="list-style-type: none"> • Diversity planning for HACC services will be integrated into one of three options: <ul style="list-style-type: none"> ○ the organisation's strategic or business plan ○ an organisation's overarching diversity plan ○ a specific HACC diversity plan. • It is envisaged that the majority of HACC funded providers will take up the option of integrating diversity planning in their strategic or business plans. • It is envisaged multi-funded and/or large organisations, such as hospitals or disability agencies, with proportionally smaller HACC programs may take up the option of integrating diversity planning into an overarching diversity plan. • It is envisaged that those organisations which do not have the resources to undertake a business planning process will take up the option of developing a specific diversity plan for the HACC services. 	✓

Annual reporting	<ul style="list-style-type: none"> All organisations will be required to report on their diversity planning and implementation of diversity-focused strategies as part of their annual reporting to the department. Relevant plans will be submitted to the department. Evidence of implementation will be demonstrated. 	
Triennial NSS assessment	<ul style="list-style-type: none"> Implementation of diversity objectives will be assessed through the triennial NSS assessment. 	
Outcomes	<ul style="list-style-type: none"> Anticipated outcomes should include: <ul style="list-style-type: none"> Demonstrable increase in the level of access of HACC services by diverse client groups Greater diversity in the HACC client profile Greater responsiveness to diversity within local and regional catchments Greater satisfaction with HACC services from CALD, ATSI and other diverse client groups HACC management systems and practices able to demonstrate inclusiveness and responsiveness to diversity Cultural planning embedded in HACC quality systems Cultural planning embedded in organisational planning and quality systems Evidence of practice which is inclusive and responsive to diversity Evidence of strategic partnerships Sharing of inclusive and responsive practices within the sector. 	
Benchmark information	<ul style="list-style-type: none"> Benchmark information should be linked to achievement of the strategy's objectives. Benchmarks should be clear, specific and measurable. There should be consistency at state and/or regional levels on the benchmark information to be collected so that change can be demonstrated and that the evidence base can be developed. 	✓

7.1.3 Roles and responsibilities

- 7. It is recommended that a Diversity and Access Statewide Reference Group is established with appropriate representation from the Department of Human Services, peak bodies, service providers, the Statewide Coordinator and Equity and Access staff. The role of the Reference Group will be to oversee the transition from the CPS to the Diversity and Access strategy. The Reference Group will ensure that appropriate linkages are established between the strategy and other relevant policies or initiatives.**

- 8. It is recommended that the roles and responsibilities of the key stakeholders in the 'Diversity and Access' strategy are redefined in line with the strategy aims and objectives.**
- 9. It is envisaged that the role and focus of the HACC Equity and Access worker will change from preparing and monitoring Cultural Action Plans to a facilitating / enabling role, with a focus on resourcing organisations in the implementation of their plans. This will eliminate some of the conflicts which exist in the current system, and is a better match between the needs of organisations and the skills and expertise of the Equity and Access staff.**
- 10. It is recommended that the department's regional office, the Equity and Access staff and their auspice work together to define and negotiate an annual Diversity and Access plan for the region. The plan should fuse information from all sources – e.g. the regional office data and the content and local knowledge of the Equity and Access staff, to identify trends and issues for the region and its sub-regions.**
- 11. It is recommended that Equity and Access staff are provided with training and development opportunities to ensure that they have the appropriate content knowledge to provide advice to HACC funded organisations. For example, it would be appropriate to provide briefings to the Equity and Access staff on the new Assessment Framework so that they can assist organisations in its implementation, with an appropriate response to diversity and access issues.**

Rationale for recommendations

These recommendations aim to re-focus the role of the Equity and Access staff to provide more support to HACC funded organisations in areas where they require assistance. It is also aimed to ensure a better fit between the role of the Equity and Access staff and their skill sets and qualifications. This supporting / enabling role will also alleviate some of the unnecessary conflicts in the current system (e.g. in relation to the process for assessing Cultural Action Plans).

The recommendations also aim to create stronger partnerships at the regional level with a greater focus on addressing regional priorities and needs.

Strategy component	Roles and responsibilities	Further consultation?
Roles and responsibilities	<ul style="list-style-type: none"> • Role and responsibility statements are required for: <ul style="list-style-type: none"> ○ the department’s central office ○ a statewide Diversity and Access Reference Group ○ the Statewide Coordinator of the Diversity and Access strategy ○ the department’s regional offices ○ the Equity and Access Staff • The Statewide Diversity and Access Reference Group will initially oversee the transition period from the CPS to the Diversity and Access Strategy. The Reference Group will include appropriate representation from the HACC sector; the department’s central and regional offices and the peak bodies. Key tasks will include finalising the strategy and each of its components; overseeing the transition into quality management systems, including the NSS assessment and monitoring by PASAs. The Reference Group will have a clear role in making strategic links between the Diversity and Access strategy and other relevant policies and initiatives. • The Statewide Coordinator will have a greater role in liaison with the central office; participation on the statewide Reference Group; linking with other strategies; and supporting Equity and Access staff in moving to a new ‘enabling’ role in the HACC sector through training or other appropriate methods. • The Equity and Access staff will work more closely with regional offices to develop regional priorities. They will consult and support organisations to move from cultural action planning to develop and implement their diversity strategies. The Equity and Access Staff will inform organisations about the new strategy; promote and share information and best practices. 	

7.1.4 Tools and resources

12. The current tools and resources should be re-designed to fit the structure of the new ‘diversity’ and ‘access’ strategy. With a new focus on integrating diversity issues into existing organisational plans, the Cultural Planning Tool and the template should be replaced with guidelines and checklists, to be inserted in the HACC Program Manual. While service providers will have the option to choose whether to integrate their actions into an organisational diversity plan, a HACC plan or a business plan, they will need to ensure that a range of minimum requirements are addressed.

- 13. Additional tools and resources will be required. At a minimum the following will need to be designed:**
- **guidelines for the HACC Program Manual**
 - **a checklist for Diversity and Access planning**
 - **guidelines for the HACC NSS Assessment process**
 - **articulation of roles, responsibilities and expectations.**

7.1.5 Transition Planning

- 14. With the prospect of major change implementation, it is imperative a staged process is developed to implement these changes. In the short term, it is recommended that the status quo remains in place for 2008/2009.**
- 15. The Diversity and Access Strategy should be implemented from 2008/2009 and should align with the new Community Care Quality Standards System due in June 2008 and the next HACC Triennium commencing in the 2008/09 financial year.**

8. References

- Action on Disability within Ethnic Communities (ADEC) (2001) *The Best Practice Guide to Home and Community Care Equity and Access Projects*
- ADEC (1996, reprinted 2001) *The Cultural Planning Tool Planning for Multicultural HACC Services*
- Action on Disability within Ethnic Communities (ADEC) (2003) *The Better Ethnic Access to Service Kit – A resource for Primary Care Partnerships*
- Action on Disability within Ethnic Communities (ADEC) (2005) *Summary Report: The implementation of Cultural Action Plans in Victoria 2004/05*
- Action on Disability within Ethnic Communities (ADEC) (2005) *Guidelines for Reviewing and Updating Annual Cultural Action Plans (2005-2006)*
- Department of Human Services (2003) *Victorian HACC Program Manual*
- Department of Human Services (2006) *Cultural Diversity Guide*
- Department of Human Services (2006) *Health service cultural diversity plans*
- Department of Human Services (2006) *Cultural Diversity Plan for Victoria's Specialist Mental Health Services 2006-2010*
- Department of Human Services (2006) *Disability Services CALD Strategy*
- Department of Human Services (2007) *Future Directions for culturally appropriate access to HACC Program core services*
- Department of Human Services (2003) *Victorian HACC Program Manual*
- Department of Human Services and Inner Western Region Migrant Resource Centre (2002) *Diversity and Resource Kit for HACC and Disability Service Providers in the WMR*
- Eidelson, M. (2005) *Summary Report: The Implementation of Cultural Action Plans in Victoria, 2004 – 2005*, ADEC
- Lambert, F.C. & Owen, J.M. (1994) *A Guide to Program Evaluation*. Department of Employment, Education and Training, Commonwealth of Australia. Canberra
- Migrant Information Centre, Eastern Melbourne (2004) *EMR Cultural Action Plan Analysis Report*
- The Creative Skill Consultants (2000) *Living Together – Cultural Planning for HACC and Aged Residential Services*
- Victorian Government (2006) *A Fairer Victoria – progress and next steps*

Websites:

www.adec.org.au

www.multicultural.vic.gov.au

www.dhs.vic.gov.au