

Commissioning Guideline

Purpose

This Guideline¹ provides practical guidance to public authorities on the principles and approaches to Commissioning. It reflects the Australian Productivity Commission's (2017) four-step Commissioning cycle adapted for a South Australian context and is intended to create a shared understanding of the core concepts, processes and terminology applied in Commissioning and to facilitate collaboration and communication across government and the not-for profit (NFP) sector.

What is Commissioning?

Commissioning is *'a cycle that involves planning the service system, designing services, selecting, overseeing and engaging with suppliers, managing contracts and undertaking ongoing monitoring, evaluation and improvement'* (Productivity Commission, 2017:21).

Commissioning takes place within a complex environment shaped by changing policy and social landscapes and involves a wider range of processes, skills and capabilities than by procurement and contracting alone. It incorporates the tasks and decisions that translate government policy into services and systems that are responsive to community needs and seek to achieve clear outcomes that reflect the aspirations of the community. It puts people at the centre of services and recognises the specialist knowledge and value of the service sector.

Commissioning is a structured activity that aims to ensure every available dollar is spent optimally and in the best interest of the community.

The Commissioning Context

Commissioning operates within the context of complying with legislation and guided by best practice principles and design criteria:

Legislation, Policies and Guidelines.

Public authorities are required to comply with the legislation and policies that govern the operation of the South Australian public sector. For example:

- Treasurers Instructions
- [Procurement Services SA policies and guidelines](#)
- [South Australian Funding Policy for the Not For Profit Sector \(PC 044\)](#)
- [Not-for-profit Sector Freedom to Advocate Act 2013.](#)

Best practice principles

Commissioning is guided by the best practice principles for government and not-for-profit funding relationships set out in the *South Australian Funding Policy for the Not-*

¹ Procurement Services SA acknowledges the South Australian Department of Human Services in the adaptation of this Guideline

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For-Profit Sector (PC 044):

- *Robust planning and design* – the Commissioning approach supports efficient, effective, economical and ethical administration of public money, and reflects circumstances where funding strategies are based on evidence of community need, clearly defined outcomes and measures of success, and transparent and accountable funding processes.
- *Collaboration and partnership* – in order to grow and maintain strong, ongoing relationships, public authorities work collaboratively and flexibly with the not-for-profit sector to achieve shared outcomes, create opportunities for connections and collaboration between its funded services and, wherever possible, offer longer term contracts and apply methods that promote open, transparent and equitable access to funds.
- *Proportionality* – processes and actions required by the administration of funding are as simple as practicable whilst still being robust and accountable and are proportional to the risks involved and outcomes sought.
- *An outcomes orientation* – outcomes are clearly defined and include quantitative, qualitative and milestone information that is realistic about what the funding is intended to achieve; outcomes are also reviewed regularly to ensure they remain fit for purpose.
- *Achieving value with relevant money* – value for money is achieved by establishing ongoing, joint monitoring arrangements for the life of the funding agreement, considering both cost and non-cost factors, and implementing processes that promote the proper use of public funds.
- *Governance and accountability* – Commissioning staff have the necessary skills, knowledge and experience, maintain excellent records, and strive to minimise red tape and increase reporting efficiency and consistency.
- *Probity and transparency* – Commissioning processes are transparent and systematic in application, funding decisions are impartial, appropriately documented, publicly defensible and lawful, and potential conflicts of interest are identified and managed.
- *Community development principles* – funding should, where possible, help to build resilience in the community and the capacity to respond to change and crisis.

Service Design Criteria

Service (or program) design criteria identify those practices and conditions proven to enhance the effectiveness of services and maximise social impact (i.e., the best road to take). These are:

- *Evidence informed*: analysis of available data, research on risk factors, best practice and innovations, drawing from local and supplier knowledge, and engaging those with lived experience. What qualifies as evidence informed

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practice and interventions in human services includes a broad range of inputs that are not confined to traditional forms of data or research.

- *People centred approaches*: activities are culturally appropriate, strengths-based approaches, include service user experience and voice, and responsive to individual contexts and needs.
- *Systemised alliances*: recognises and encourages formal and informal place-based networks and assets, establish partnerships for continuum of care, manage transition points and connection to community.

System Delivery Principles

System delivery principles support Commissioning and strengthen partnerships between government and the community and family services sector through shared accountability, development of relationships and targeted capacity building. The aim is to identify supplier capability needs, establish robust relationship networks and have joint-stewardship of system quality so that it is more responsive and effective in generating social impact.

When Commissioning services, initiatives, or activities it is important to be guided by the system delivery principles as shown in the table below when defining need, designing, and selecting services, and engaging with suppliers. It is also important to clearly show how the selected service is expected to contribute towards the procurement objectives and ensure service design and delivery is evidence informed, person centred, and connected to the existing service system.

Service Delivery Principles	Descriptors
Shared accountability	<ul style="list-style-type: none"> • Agreed 'two-way' standards and expectations of accountability for quality services that meet needs • Focus on contribution • Partnership approach
Coordinated and aligned	<ul style="list-style-type: none"> • Public authorities work collaboratively and aligns strategic priorities and projects • Connection at all levels of government, non-government service providers (suppliers) and community • Coordination across service provision
Relationship based	<ul style="list-style-type: none"> • Relationship-based approach to investment: open, ongoing communication and information exchange • Understanding the conditions under which work is happening in the sector and current capabilities • Relational contracting where limitations and deficits are acknowledged and then addressed together in the partnership
Adaptive and responsive	<ul style="list-style-type: none"> • Adaptable and responsive to emerging and changing needs within long-term funding agreements

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	<ul style="list-style-type: none"> • Proactive and agile service and program design and delivery informed by data • Seizing opportunities, and being prepared for, and open to, new ideas
Robust evidence and evaluation	<ul style="list-style-type: none"> • Building sources of reliable data to drive decisions • Measurement of social impact and improvement over time • Informed by evidence and ongoing analysis of needs and gaps
Innovating and improving	<ul style="list-style-type: none"> • Adaptable and responsive to emerging and changing needs within long-term funding agreements • Proactive and agile service and program design and delivery informed by data • Seizing opportunities, and being prepared for, and open to new ideas

The broader landscape

Commissioning takes place within a complex environment shaped by changing policy and social landscapes (e.g., Commonwealth Government's National Disability Insurance Scheme, COVID-19 global pandemic). More recently, this landscape has been characterised by²:

- the growth of third-party providers (suppliers)
- increasing emphasis on consumer and end-user engagement
- improved data collection and analysis
- a more informed public, leading to greater awareness of policy and practice challenges
- competing demand for investment and calls for greater efficiency in spending social dollars
- better metrics for measuring investment value.

These changes have driven the move away from Commissioning for activity and towards Commissioning for outcomes. An outcome focus challenges governments and suppliers to work together in partnership and include service users and their families in system design and delivery.

Commissioning approaches must grow and adapt to accommodate new ways of working. Commissioning is often seen as a way to manage disparate markets and directly engage service users in the policy and investment cycle. Improved access to relevant and reliable data, both in terms of service need and service impact, enables Commissioning approaches to directly link investment to outcomes and tackle complex social problems both systematically and systemically.

² Community Services Industry Alliance and the Australian Centre for Social Innovation (2018) p.12.

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This means there are often new and emerging approaches to Commissioning services and defining need. It is important to remain aware and open to these approaches as they have the potential to improve the way to plan, deliver and adapt the service system over time.

Interacting with other service systems

A single public authority is not alone in providing support and resources to the South Australian community. A range of state government public authorities, local government, the federal government and philanthropic organisations are also responsible for funding services and supports across the South Australian community.

The presence of multiple purchasing bodies with potentially overlapping mandates and funding agendas presents both risks and opportunities.

The key risks relate to duplication, specifically in terms of service provision and obligations suppliers must meet to justify funding from multiple sources. Another issue is the lack of clarity surrounding the responsibility for addressing emerging gaps.

The presence of multiple funding bodies however often means communities have access to a wider pool of funds than may be available in the presence of any single funding body.

For this reason, public authorities are encouraged to support commissioned services to self-organise in ways that maximise benefit for the local community and to avoid service duplications or gaps. This may mean working in partnership, collaboration and sometimes co-location. Public authorities should explore opportunities to partner with other funding bodies who share similar goals and philosophy where this has the potential to increase the total value of funds available to the community in responding to an identified need.

It is important to acknowledge that there can be tension between the need for collaboration across suppliers and reliance on a competitive tendering process to drive increased effectiveness and efficiency across the service system.³ Furthermore, there is the potential for Commissioning processes to erode the independence of the not-for-profit sector, particularly when Commissioning public authorities dictate what and where services will be delivered.⁴

Public authorities are guided by the [Not-for-Profit Sector Freedom to Advocate Act 2013](#) which prohibits State contracts or agreements from restricting or preventing not-for-profit entities from commenting on, advocating support for or opposing changes to State law, policy or practice.

³ Community Services Industry Alliance (2016)

⁴ Productivity Commission (2017)

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Public authorities will act to balance the need within its Commissioning approaches by respecting the value and autonomy of the not-for-profit sector and engaging in collaborative processes wherever possible and appropriate.

Commissioning Objectives

A public authority's approach to Commissioning should reflect the broader public policy shifts towards a focus on outcomes and not just outputs which is reflected in the following objectives.

When undertaking Commissioning activities public authorities will work to ensure that:

1. **Commissioned services meet the needs of the target populations they serve.** Public authorities should ensure the right proportion, type and mix of services is Commissioned to respond to an identified community need.
2. **Commissioned services demonstrate outcomes.** Public authorities should Commission services that achieve demonstrable outcomes for the community, employ evidence-informed service models, and are evaluation ready.⁵
3. **Commissioned services provide good value for money.** Value for money is achieved by Commissioning services that are collaborative, integrated and that actively work to leverage existing community resources and partnerships. The outcomes achieved justify the level of investment under arrangements that allocate financial risk fairly.

Key skills and competencies

To achieve a high degree of success, the Commissioning process is dependent on commissioners possessing and practicing a range of key skills and competencies.⁶ Of particular importance are project management skills, negotiation and conflict management skills, and change management skills.

Project management skills

Project management is the ability to successfully bring a project from start to finish. A good project manager is organised, an excellent communicator and collaborator, an effective problem solver, and able to multi-task. Project managers can clearly state the vision for the project and lead others towards achieving that goal.

In a Commissioning context, project management skills are essential to gathering, organising and communicating information to diverse stakeholders in a timely way that reflects the Commissioning principles and approaches contained within this Guideline.

⁵ That is have capability for good evaluative thinking and able to develop a clear theory of change, accompanied by indicators, measures, appropriate data gathering, and reporting

⁶ <https://www.nao.org.uk/deCommissioning/>

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Negotiation and conflict management skills

The Commissioning process can sometimes highlight key differences between stakeholder positions. In these circumstances, commissioners may be called on to negotiate a way forward that is acceptable to all parties, while also ensuring the continuation of strong working relationships between stakeholders. Negotiation and conflict management skills are an essential tool in a commissioner's toolkit. Effective negotiators are those who listen attentively, control their emotions, are practical and empathetic in their dealing with others, and possess an assertive communication style.

Change management skills

Commissioning is a change process and requires individuals to manage often highly complex, participative and transformative activities. Commissioners need to be able to:

- ensure stakeholders understand why change is needed and how that change will enable improvements
- demonstrate leadership, perseverance, and determination to ensure change happens
- be clear about the vision and intended outcomes and communicate this in a consistent and honest way to all interested parties
- empower people and organisations to champion and lead the change effort
- create short-term wins by outlining early objectives and outcomes that are easy to achieve
- embed changes into daily operations to ensure their longevity.

Key Actions

To grow competency in the above areas visit:

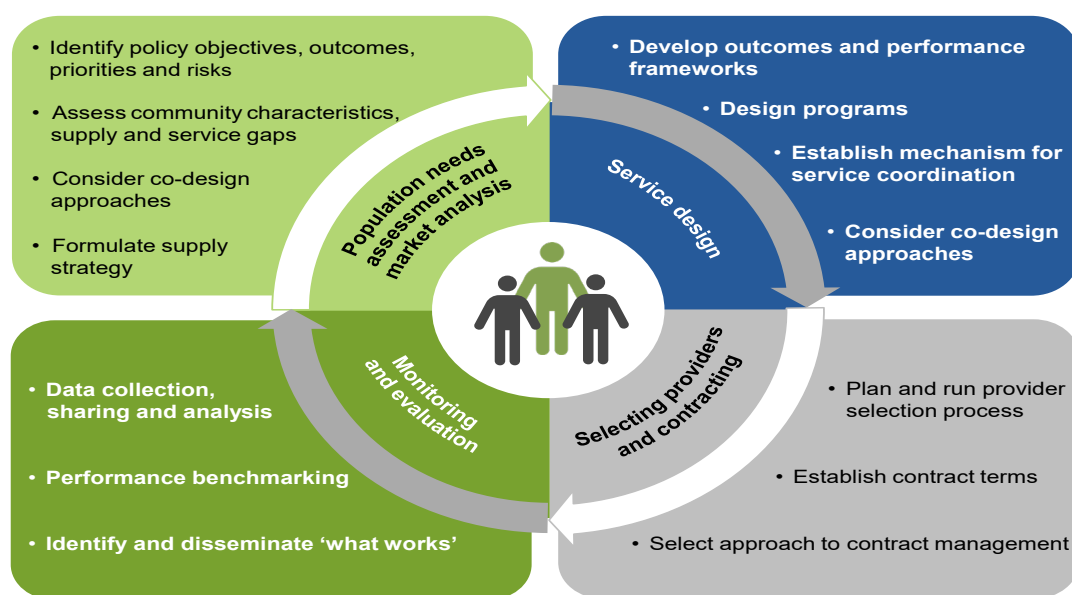
- [Procurement Services SA Capability Development](#)
- [The Institute for Public Administration Australia \(IPAA\)](#)

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The Four Phase Commissioning Cycle

Commissioning is the ongoing process of planning, procuring, contracting, monitoring, evaluating and improving services to deliver better client (service user) outcomes. It involves making decisions about the capacity, location, cost and quality of services, as well as who will deliver them and how.

Public authorities are guided by the Commissioning cycle set by the Australian Productivity Commission and adapted to a South Australian context. The Productivity four-phase cycle aligns to key procurement activities and includes: population needs assessment and market analysis; service design (i.e. planning); selection of providers (i.e. sourcing) and contracting; monitoring and evaluation (i.e. contract management).



Productivity Commission (2017, p.22). Reproduced with permission

The time taken to complete each stage of the Commissioning cycle can vary depending on a range of factors including political and social context, scale and complexity of need, and market maturity. The following timeline presents general guidance on the expected minimums for completing the first three phases of the Commissioning cycle.



⁷ **Note** that a minimum 6-month notice period may apply in the existing contract prior to ceasing or renewing funding for the incumbent supplier. Short-term contract extensions to accommodate delays to tendering processes should be avoided wherever possible.

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Population needs assessment and market analysis phase

Key questions: *What are our clients' (service users) needs? What have they told us they need and want? What services are available in market? Where are the service gaps? What outcome/s are we seeking? What change is our investment aiming to achieve?*

This stage of the process is concerned with identifying the community need to be addressed, understanding the supply market and clearly defining the outcome/s sought. The planning and information gathered during this phase will set the foundation for later stages in the process.

When seeking to identify community need, public authorities may draw from a range of inputs from, including client feedback, industry and sector input, community voice, research and evaluation reports, government policy and departmental learning.

Public authorities may also conduct a market analysis to better understand the resources and support available to a specific community.

It is important, wherever possible, to listen and work with key stakeholders to define the desired impact or change being sought through funded services and the broader system. Also consider the extent to which the outcomes sought align with government policy, the public authority's strategic directions, and any other relevant guidelines.

In conducting this work, procurement planning through assessing supply market capability and capacity may build greater understanding of market readiness for alternative forms of Commissioning.

The assessment and analysis activities conducted during this phase should be proportional to the scale and risk profile of the funding activity.

Key Actions
<input type="checkbox"/> Identify the problem or need to be addressed.
<input type="checkbox"/> Assess community characteristics, supply and service gaps.
<input type="checkbox"/> Define the desired outcome/s, goals or change being sought.
<input type="checkbox"/> Engage with clients, suppliers, industry and sectors, and the community as appropriate

Service design phase

Key questions: *What works to create better outcomes and/or address client need in the current context? What have our clients (service users) told us is important to them? How do we integrate services and remain responsive to clients with complex needs?*

Service design is the process of planning and arranging resources to achieve a desired impact or change. It may involve creating an entirely new service or adapting an existing service.

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Having identified the community need to be addressed and the outcome sought, the service design phase considers how to arrange and implement available resources to achieve that outcome. Actions and activities important during this phase of the Commissioning cycle include:

- outlining the level of demand for service and potential scale of impact
- developing a program theory that describes what a service does and how it will contribute to the outcome sought (i.e., service inputs, outputs and outcomes)
- considering a range of service models and the strengths and weaknesses of each in an effort to identify the most appropriate model for the context
- designing solutions that overcome potential issues or limitations
- identifying mechanisms for service coordination
- contextualising the service within the broader system (e.g., alignment to public authority objectives and government policy).

Service design may be informed by practice expertise, examples of sound and empirically supported interventions, and/or evidence related to service implementation in specific contexts. It may also be informed by co-design.

Co-design is a process where service users become active partners in designing, shaping and resourcing services⁸. It is more than just consulting with service users and suppliers, co-design relies on a range of communication methods focussed on identifying practical solutions, challenging orthodoxies and assumptions, and working together to test and refine ideas in pursuit of an agreed goal/outcome. The co-design process can also benefit from involving participants with unique or different perspectives who may offer new ideas to solve long standing issues. The goal is to identify resourcing requirements, elements associated with service success, and opportunities to mitigate risks to building an effective and efficient system.

Collaboration and partnership with a range of key stakeholders (including consumers, carers and supporters, families, professionals and researchers, and peak bodies) remains essential to informing service design and coordination, minimising duplication, and sharing learnings.

Key Actions

- Consider how to arrange available resources to achieve desired outcomes.
- Engage with relevant experts, evidence and experience.
- Develop a clear program logic and outcome hierarchy.
- Establish mechanisms for service coordination and demonstrate alignment with broader system goals.

⁸ Australian Productivity Commission, 2017

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Selecting Providers and Contracting

Key questions: *How do we direct investment towards outcomes? How do service provider (supplier) attributes relate to achieving outcomes? How can we build community capacity through service provision?*

Public Authorities will be guided by Procurement Services SA policies and guidelines when selecting potential suppliers and establishing and managing contracts. During the selecting (sourcing) process this typically require a public authority to:

- ensure that all processes and activities are proportional, timely and robust
- maintain probity, accountability and transparency in procurement operations
- choose suppliers that will achieve the outcomes and demonstrate good value for money.

During the contracting process this typically require a public authority to define monitoring and evaluation requirements for the service, and ensure they are proportionate to the risk, complexity and value of the contracts. During the contract management process service/contract managers are likely to:

- use monitoring and evaluation data as the basis for ongoing discussion about opportunities to improve service user experiences and service impact
- support the capacity of services and programs to adapt practice mid-contract in the interest of improved service user experience and service impact⁹
- support open and genuine communication processes ensuring the flow of two-way feedback, and other sources of ideas and knowledge to stimulate innovation.

Key Actions

- | |
|--|
| <input type="checkbox"/> Plan and run provider selection process.
<input type="checkbox"/> Negotiate contract terms with successful provider.
<input type="checkbox"/> Identify an appropriate approach to contract management.
<input type="checkbox"/> Encourage adaptability and innovation in response to emerging evidence of client experience to ensure services remain fit for purpose. |
|--|

Monitoring, evaluation and learning phase

Key questions: *How will we know whether a service is achieving outcomes? Is there sufficient room and courage to change course if the service is not working? Are clients (service users) confident the service is meeting their needs and adding value to their lives?*

⁹ Service/contract managers should be aware of the process for exercising variation and extension options that may be available under the contract

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Outcomes-focussed Commissioning is about planning for, creating and contributing to a system that learns. It requires courage to trial new approaches, and a considered and thorough engagement with monitoring and evaluation.¹⁰

The Commissioning process includes ensuring that services are 'evaluation ready' and supporting suppliers to adapt to emerging conditions in the interest of achieving improved client outcomes.

Support for contracted services could include:

- working with the sector to undertake robust planning and transparent discussions about how outcomes could be measured and external factors that may influence service performance
- proactively sharing and disseminating research and data analysis
- leading discussions around research, monitoring and evaluation opportunities during each phase of the Commissioning cycle
- implementing a business intelligence system to monitor service and system performance and respond to emerging trends in client and community needs
- continuing to strengthen evaluation capacity within the sector and public authorities through training and development opportunities.

Other options for ensuring services are 'evaluation ready' that could be implemented through contractual settings include:

- ensuring budget availability for evaluation and outcome reporting
- establishing reporting requirements that reflect short and long-term outcomes produced from the investment (i.e., results-based accountability)
- requiring each service to have both performance management and data collection frameworks in place
- requiring similar service types to have consistent outcome measures to facilitate comparisons between services and programs.

Key Actions

- Identify how client outcomes will be measured.
- Establish processes to ensure accurate, reliable, and relevant data is collected.
- Regularly analyse and discuss data collected to inform service and program delivery.
- Identify and implement opportunities for monitoring and evaluation.

¹⁰ Community Services Industry Alliance and the Australian Centre for Social Innovation (2018), p.33.

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Decommissioning

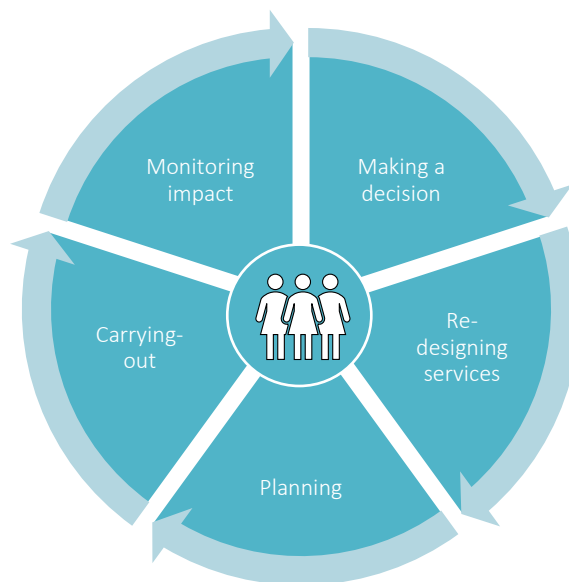
An important part of the Commissioning process is recognising when a service no longer meets community needs or expectations. Sometimes a different service or approach offers improved outcomes or a better return on investment.

Decommissioning enables costs to be reinvested in more responsive, effective and/or innovative services and/or programs.

'Decommissioning is stopping provision of a service or a significant part of a service in order to bring about an improvement to existing service provision.' [UK National Audit Office Decommissioning Toolkit]

The UK National Audit Office¹¹ has developed a toolkit to support commissioners in decommissioning. Like the Commissioning process, decommissioning has clearly defined steps that are intended to trigger an ongoing cycle of consultation, decision making and review (See below).

The UK National Audit Office is careful to point out that decommissioning is not the same as cost-cutting. Decommissioning presents an opportunity to think carefully and sensitively about community need, service efficiencies and quality, and how to reduce costs over the long-term through strategic investment. Cost-driven decisions often leave communities worse off and disperse costs elsewhere, while a considered decommissioning process can leave communities and suppliers feeling that they were appropriately consulted and fairly treated.



Staged approach to decommissioning - Adapted from UK National Audit Office Decommissioning Toolkit

¹¹ <https://www.nao.org.uk/deCommissioning/>

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A staged approach to decommissioning

Step 1 - Making a decision to decommission

Similar to the Commissioning process, decommissioning starts with a gathering of evidence. It is important to understand current and future demand for a service, service costs, savings and benefits, supply market structure and diversity, existing contractual obligations, and the policy context. Commissioners may draw from existing sources or gather new information. Consultation with key stakeholders, including service users, is as important to decommissioning as it is to the Commissioning process. Most importantly, commissioners should avoid the temptation to pick and choose from the evidence to justify a pre-determined decommissioning decision.

Step 2 - Re-designing services

This stage is about building the case for change. It is important commissioners understand what is driving the need for change, the options that are available and the impact any changes are expected to have. For example, different decommissioning strategies may be required when the need for change is due to poor performance by a supplier compared to shifts in client need or demographic. Commissioners should consider alternatives to decommissioning, such as contract re-negotiation or stakeholder collaborations to improve efficiency, and clearly communicate the reasons for the chosen path of action. When exploring the potential impact of any changes to a service, it is good practice to involve service users, suppliers and other key stakeholders, and explore impacts beyond the immediate service and client-base.

Only by understanding and effectively communicating the case for change can commissioners hope to build consensus across diverse stakeholders for the decommissioning decision.

Step 3 - Planning for decommissioning

It is important to plan appropriately for decommissioning. This helps set stakeholder expectations, establish clear timeframes and lines of accountability, and identify risk mitigation strategies. Planning documents are likely to include a project plan, communication plan, governance structure describing stakeholder roles and responsibilities, transition plan and risk assessment. It is important to allow time for both formal and informal consultation with service users, suppliers and other key stakeholders, formal notice periods of contracts ending, any extension of service given to suppliers, and time for resolving contractual and technical issues. Having clear processes that are shared and made transparent to stakeholders helps to mitigate fear and facilitate a smooth transition process.

Step 4 - Carrying-out decommissioning

This stage puts planning into practice. It is important to ensure suppliers have as much formal notice of the decision to decommission as possible, engage expert advice and support as needed, and keep lines of communication open.

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Decommissioning can be alarming and stressful for those directly affected. Demonstrating empathy and sensitivity, providing regular updates on progress, and responding in a timely way to emerging questions can help minimise distress among service users and suppliers.

Step 5 - Monitoring the impact of decommissioning

Good Commissioning is intended to grow supply markets in a way that ensures improved service quality and value for money over time. It is important therefore to monitor both the intended and unintended consequences of decommissioning to ensure the decisions taken achieve improved outcomes that are in the best interest of the community.

Principles applied to good decommissioning

The UK National Audit Office identifies the key principles of good decommissioning, many of which are consistent with the principles of good Commissioning discussed elsewhere in this Guideline. Most important to the decommissioning process is the need for commissioners to be sensitive to the impact of their decisions on service users and suppliers, and to manage the uncertainty and fear that can arise when decommissioning is being considered. Foremost among the principles of good decommissioning is the need to establish, in consultation with key stakeholders, a clear and coherent case for decommissioning and then to communicate this case broadly. This will help to:

- avoid and combat feelings of mistrust, uncertainty and fear often described by service users, suppliers and other key stakeholders in response to the decommissioning process
- secure stakeholder support for the change and ensure a smooth transition to a new service
- ensure public authorities meet their responsibility to ensure public money is spent optimally and in the best interest of the community, and avoid the perception (or reality) that decisions are driven by a cost-cutting methodology
- help to avoid potentially significant financial, reputational and resource loss as a result of the decommissioning process
- ensure all stakeholders understand their role and responsibilities in the decommissioning process, and provides for agreed lines of accountability.

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References

Australian Council of Social Service (ACOSS) (2018). Commissioning and Getting Better Outcomes-Principles and Practice: an ACOSS Briefing Note. Strawberry Hills, NSW. Accessed 12 November 2020 from https://www.acoss.org.au/wp-content/uploads/2018/10/ACOSS-Briefing-note_Commissioning-and-Getting-Better-Outcomes.pdf

Community Services Industry Alliance and the Australian Centre for Social Innovation (2018). *Commissioning for Outcomes: An Industry-led Approach* May 2018, pp.44. Accessed 2 November 2020 from <https://csialtd.com.au/news/article/blg-92/an-industry-led-approach>

Community Services Industry Alliance (2016). Human Services: Identifying Sectors for Reform – Community Industry Alliance Submission. Submission PFR395 Accessed 2 November 2020 from https://www.pc.gov.au/_data/assets/pdf_file/0016/210418/subpfr395-human-services-identifying-reform.pdf

National Audit Office (2011). *Decommissioning Toolkit*. Accessed 7 January 2021 from <https://www.nao.org.uk/decommissioning/>

Productivity Commission (2017). *Introducing Competition and Informed User Choice into Human Services: Reforms to Human Services*, Productivity Commission Inquiry Report No. 85, 27 October 2017, p.423. Accessed 2 November 2020 from <https://www.pc.gov.au/inquiries/completed/human-services/reforms/report>