



REVIEW OF THE NATIONAL ACCREDITATION SCHEME OF COMMUNITY LEGAL CENTRES

Report prepared by Lisa Ryan and Brenda Currie
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Hecate Consulting
29 Searl Street Petersham 2049

lisa@hecateconsulting.net.au
M. 0419 228 180

www.hecateconsulting.net.au

PURPOSE. GROWTH. RESULTS.

Abbreviations

AC	Accreditation Coordinators
ACT	Australian Capital Territory
BNG	Breaking New Ground
CLC	Community Legal Centre
CLSP	Community Legal Services Program
CTM	Certification Trade Mark
KII	Key Informant Interviewee
LA	Legal Aid
MOU	Memorandum of Understanding
MSO	Management Support Online
NAC	National Accreditation Coordinator
NACLC	National Association of Community Legal Centres
NAS	National Accreditation Scheme
NSW	New South Wales
NT	Northern Territory
PII	Public Indemnity Insurance
RAC	Regional Accreditation Coordinator
RMG	Risk Management Guide
SA	South Australia
SPM	State Program Managers (Community Legal Services Program)
SPP	Standards and Performance Pathway
Tas	Tasmania
Qld	Queensland
WA	Western Australia
Vic	Victoria

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Executive Summary

The National Accreditation Scheme

The National Accreditation Scheme for Community Legal Centres is a sector-developed accreditation and certification process for community legal centres (CLCs) in Australia. The purpose of the National Accreditation Scheme (NAS) is “to provide a sector led accreditation and certification process for CLCs that will recognise and give support to achieving good practice in the delivery of community legal services throughout Australia.”¹ CLCs, Family Violence Prevention Legal Services (FPVLSs) and Aboriginal and Torres Strait Islander Legal Services (ATSILS) that are full members of CLC Associations can all be accredited through the NAS. Accreditation under the NAS is a requirement for full membership of the State and Territory Associations of Community Legal Centres (the Associations). The first full three-year cycle of the NAS was conducted from 2011-2014 and at the end of June 2014, 136 CLCs were accredited (approximately 75% of registered CLCs) and a further 32 CLCs (18%) were in the final stages of being accredited.

The review

This independent review was commissioned by the National Association of Community Legal Centres (NACLC) to assess the processes and outcomes of the NAS, to inform decisions about the future operation of the NAS and to identify any areas for future improvements should the NAS continue. This report presents the review’s findings and presents recommendations for the future development of the NAS. The review combined information derived from existing data and documentation held by NACLC; from 31 qualitative interviews with individual key informants; from four group sessions with key informants and from a (predominantly) quantitative survey with 108 respondents from CLCs.

The findings

The majority of survey respondents stated that the NAS had benefitted the sector (87%) and/or their own CLC (86%). Although a minority of CLC stakeholders did not consider

¹ Guidelines to the Certification and Accreditation Process for Community Legal Centres (11 May 2011, revised 28 June 2011).

accreditation to be the most effective approach to improving the quality of CLCs, the qualitative and quantitative findings indicate that the NAS is largely supported by its stakeholders. In addition, the majority considered that the NAS had positive effects on organizational management and administration (81%) and on governance (75%). These findings represent a significant achievement for an accreditation scheme in its first three-year cycle.

The review found that the National and Regional Accreditation Coordinators (ACs) were a critical factor for success during this first round of the NAS. The ACs were influential in engaging, guiding and supporting CLCs through the accreditation processes and many stakeholders singled them out personally and as a group for praise and positive comment. In addition, survey participants identified the support and assistance; the exit interview; and the recommendations and report provided by the ACs, to be highly effective elements of the NAS processes. It was noted by a number of key stakeholders, including some of the ACs themselves, that the ACs as individuals hold a lot of responsibility (for the NAS), and that their role is a physically and emotionally challenging one that is prone to isolation.

The on-line accreditation tools, the Standards and Performance Pathway (SPP) and the Management Support Online (MSO) which were commissioned by NACLC and tailor made for the NAS, were considered to be effective tools by most survey respondents, but a source of frustration for a few others. Key informants who were involved in the development of the tools identified them to be a central NAS component that significantly contributed to the high percentage of accreditations achieved within the first NAS cycle.

The majority of survey respondents were either satisfied or very satisfied with the governance and leadership of the NAS. Further, 70% of survey respondents were either very or somewhat satisfied with the coordination and administration provided by NACLC, and 67% were either very or somewhat satisfied with the coordination and administration provided by their State/Territory Association.

Stakeholders considered some aspects of the NAS processes to be less successful, and of particular concern were the resources and time required to participate in the NAS; the

time lost to direct service delivery; and the high levels of anxiety experienced by some CLC staff and managers. These concerns were ameliorated for some by the recognition that these aspects were particular to the first cycle of the NAS, but others were concerned that the costs have not been fully appreciated at the national level. Some stakeholders, including ACs, considered that more consistent and clearer communication from NACLCLC and from the Associations, coupled with better advocacy for and promotion of the benefits of the NAS, could have resulted in higher levels of engagement, greater clarity about the purpose of the NAS and less anxiety among participating centres.

However, the majority of stakeholders believe that, overall, the NAS has been a successful initiative. Some of the immediate effects identified include more participatory policy development processes in operation, more complete policies in place in CLCs and more consistency in policy implementation across the sector. In its first cycle, the NAS has delivered a sense of cohesion for some stakeholders; encouragement to others; permission and impetus to renew systems for many; and for others, a confirmation of the strength of the sector.

As the next cycle of the NAS proceeds, there remain opportunities for the National Association and the State and Territory Associations to engage in meaningful dialogue with the sector generally and with the NAS critics particularly, around both the successful and less successful aspects of the scheme in order to ensure that the NAS continues to deliver positive results that benefit all members of the Associations.

The challenges for the future at the national and jurisdictional levels are securing funding for the scheme, particularly for the NAS and the RAC positions; maintaining engagement with the sector around the next cycle of the NAS and building on the momentum of the first cycle of the NAS. At the CLC level the challenges will be balancing the demands of client service delivery with the implementation the NAS workplans and with continuous improvement processes. All these challenges will necessarily be met in an increasingly demanding and potentially contested environment.

Introduction

A review of the National Accreditation Scheme (NAS) was commissioned by the National Association of Community Legal Centres (NACLC) towards the end of the first three year cycle of the NAS's operations, in order to assess the processes and outcomes of the NAS and to inform decisions about the future of the NAS. More specifically, the objectives of the review were:

1. To evaluate the operational structure, outcomes, processes and tools of the NAS; and
2. To make recommendations regarding the future development, implementation and governance of the initiative, in line with the NAS's focus on continuous improvement.

The review was focused around key questions that considered

- The quality of the NAS program, tools and processes;
- The quality of the program implementation;
- The benefits of the NAS to the community legal sector, including individual CLCs;
- The barriers, enablers and lessons learned during the program implementation;
- The outcomes of the NAS implementation;
- How valuable the benefits and outcomes of the NAS were for individual CLCs, the CLC sector and (where possible to demonstrate) CLC clients;
- How valuable the benefits and outcomes of the NAS were relative to the resources required to attain accreditation; and
- Whether the NAS should continue and, if so, how it could be further developed.

The review was conducted by Lisa Ryan and Brenda Currie of Hecate Consulting, who are the authors of this report.

This report presents the review findings on the processes and outcomes of the NAS and recommendations for the future development of the NAS. The recommendations have emerged from the review results and processes and have been developed in consultation with NACLC.

The report has eight sections. In the first two the NAS is briefly described, as is the review methodology. The review findings are then presented in the remaining sections. Sections three and four outline the findings from the process and outcomes review; section five

describes the resources required to undertake the NAS; and section six discusses the future development and implementation of the NAS. Section seven summarises the review of the single accreditation process. Conclusions and recommendations are outlined in section eight.

Section 1: The National Accreditation Scheme

The National Accreditation Scheme (NAS) for Community Legal Centres is a sector-led accreditation and certification process for community legal centres in Australia. It was a joint initiative of the National Association of Community Legal Centres Inc (NACLC) and the State and Territory Associations of Community Legal Centres (hereafter, “the Associations”).

A brief history of the development of the NAS is given in Appendix 1.

Accreditation via the NAS is available to community legal centres (CLCs), Family Violence Prevention Legal Services (FPVLSs) and Aboriginal and Torres Strait Islander Legal Services (ATSILS) that are full members of a State or Territory Association of CLCs. The first full three-year cycle of the NAS was conducted from 2011-2014. By 30/06/14, the end of the first three-year cycle, 136 CLCs were accredited (which is equivalent to 75% of registered CLCs) and a further 32 (18%) were in the final stages of being accredited.

There were two original motivating factors for the project to develop and introduce accreditation for CLCs:

- to protect the CLC “brand” and CLC clients against ‘look-alike’ services that do not have the agreed characteristics or values of CLCs (e.g. they may be for-profit); and
- to assist in ensuring consistent quality services to CLC clients and effective and efficient operations².

The purpose of the NAS was subsequently defined as:

“to provide a sector led accreditation and certification process for CLCs that will recognise and give support to achieving good practice in the delivery of community legal services throughout Australia.”³

Given the above, the NAS was developed using an organizational and sector development framework, and the accreditation process was therefore designed to:

² Personal correspondence, Julia Hall, Executive Director, NACLC, 12/09/2014

³ Guidelines to the Certification and Accreditation Process for Community Legal Centres (11 May 2011, revised 28 June 2011)

- recognise existing good practice in the sector;
- support CLCs to consolidate good practice;
- establish and maintain sound and efficient community service organisations; and
- make further improvements in the delivery of community legal services and in establishing and maintaining sound and efficient community services organisations.

The key elements of the NAS are as follows:

- the Accreditation Criteria, which include the nine Service Standards of the Community Legal Services Program (current at 2011), the program under which the majority of CLCs are funded, and the Mandatory Standards of NACLC's Risk Management Guide;
- the Standards and Performance Pathway (SPP), the on-line portal which contains every Standard relevant for the community legal sector and which defines the evidence required to demonstrate compliance with each Standard;
- the National Accreditation Scheme Guidelines, which define the processes and principles which underpin the NAS; and
- the Certification Rules, which specify the requirements of the accreditation and certification process necessary for NACLC as Certifier to grant a licence for use of NACLC's Certification Trademark.

The Standards and tools are outlined in Appendix 2.

Roles and responsibilities

The NAS was developed and established as a joint initiative and project of the NACLC and the State and Territory Associations; NACLC and the Associations have complementary roles in the governance, development and implementation of the Scheme.

Under the model adopted, NACLC owns the Certification Trade Mark (CTM) and holds legal responsibility as the Certifier. NACLC may authorise one or more 'persons' to act as a Certifier and to grant licences to use the CTM in accordance with licence terms. In the first cycle, NACLC authorized the State Associations of CLCs in Queensland (Qld), New South Wales (NSW), Victoria (Vic) and Western Australia (WA) to act as Certifiers in accordance with the NAS.

NACLC is also responsible for the national coordination and administration of the overarching framework of the NAS, and charged with ensuring national consistency of its

higher level implementation. This work is undertaken by the NACLC secretariat and governed and supported by the NACLC Management Committee. (The leadership and coordination roles undertaken by NACLC do not, however, preclude the possibility of some variance in the manner of day to day administration at the state level.)

State and Territory Associations are responsible for leading, promoting, supporting and facilitating local implementation, and for distributing information about accreditation, including the purpose and processes of the NAS.

In addition, those State and Territory Associations in NSW, Qld, Vic and WA that have funded secretariats and have been authorized by NACLC as Certifiers, have the obligations of the Certifier as prescribed in the Rules. Also, they have each at different times and for different periods, employed and had responsibility for supporting and line-managing their Regional Accreditation Coordinator. In those jurisdictions, the arrangements are formalized via a Memorandum of Understanding (MOU) between NACLC and the Association, and MOUs between the State Association and each participating CLC.

In those jurisdictions where the Association is not the Certifier, but where NACLC performs that function, the National Accreditation Coordinator undertakes the accreditation review for each CLC and decisions regarding accreditation and certification are made by NACLC. In those jurisdictions, NACLC has MOUs, essentially the same as the States', with each of the participating CLCs.

Accreditation Process

The key steps in the accreditation process for participating CLCs are as follows:

- The CLC completes an on-line self-assessment via the portal, and a work plan is automatically generated.
- The Accreditation Coordinator reviews the self-assessment report and evidence pack and requests further documents and evidence.
- A site visit is conducted by the Accreditation Coordinator including interviews with key staff, volunteers and a client, a safety & access audit, and a review of the most recent professional indemnity insurance (PII) cross-check report.

- Prior to completion of the site visit, the Accreditation Coordinator conducts a comprehensive exit interview with key management staff, to inform them about the recommendations to be made and the next steps.
- In consultation with the CLC, the Accreditation Coordinator prepares a draft report which the CLC uses to develop their final workplan. That workplan includes dates for completion of tasks and the person/people responsible for each action.
- The Accreditation Coordinator completes the report including a recommendation as to the appropriate accreditation tier, and submits the report, agreed workplan, and evidence of PII crosscheck result to the relevant Certifier
- The Certifier may ask for further information prior to making her/his accreditation and certification decision.

Accreditation Tiers

There are three accreditation tiers.

Tier 1 – Accredited

The organization has demonstrated compliance with all the Standards at the time of the onsite visit. A CLC which is assessed as Tier One then develops (in consultation with the AC) a workplan outlining how it will implement selected quality improvement activities over the next period. This workplan is reported against on a six monthly basis.

Tier 2 – Accredited

The organization has achieved partial compliance against the Standards at the time of the onsite visit. The centre must develop an agreed workplan, demonstrate that it is actively working towards further compliance and report on its actions six monthly.

Tier 3 – Not Accredited

The centre cannot demonstrate a satisfactory compliance against the Standards and has not shown a satisfactory commitment to working towards reaching compliance.

CLCs that are found to have met the Accreditation Criteria are provided with an accreditation status at Tier 1 or Tier 2 level and certification and approval to use the NACLC CTM and display a Certificate of Accreditation and Certification. These provide a visible signifier to clients and stakeholders of the quality of the organisation's processes and management and its openness to external review.

Accreditation Coordinators

To support CLCs in their preparation for accreditation and to coordinate the accreditation process nationally and regionally, the following arrangements were put into place:

- A National Accreditation Coordinator position was established within NACLCL to assist and assess centres in Tasmania (Tas), South Australia (SA), the Australian Capital Territory (ACT) and the Northern Territory (NT) for accreditation, and to provide national leadership and coordinate implementation of the scheme, ensuring national consistency;
- Plans were developed and funding secured to place four Regional Accreditation Coordinators (RACs) in NSW, Qld, Vic and WA. The RACs were sited with and managed by the State Associations.

Application to Family Violence Prevention Legal Services and Aboriginal and Torres Strait Islander Legal Services

The program structure of the Family Violence Prevention Legal Services (FVPLSs) mirrors that of the Community Legal Services Program, with some 80% of the CLSP standards also applicable to the FVPLS sector. Having seen NACLCL's SPP, the FVPLS Program Management section of the Attorney-General's Department paid BNG to develop a specific SPP for Indigenous Legal Services. Under this arrangement, Indigenous Legal Services that were full members of CLC Associations had the option of undertaking their assessment via the CLC SPP or utilising the dedicated Indigenous Legal Services SPP.

Related infrastructure

Establishment of the NAS required determining the boundaries between the Scheme and two pre-existing systems, namely the CLSP Service Standard audits, and the compliance cross-check conducted by PII cross-checkers under NACLCL's National PII Scheme in relation to compliance with the Mandatory Standards of the Risk Management Guide.

(i) Community Legal Sector Program acquittal

One of the long-standing requirements of the Commonwealth under the CLS funding Program was that the State Program Managers and the Commonwealth undertook Service Standards audits of at least 50% of funded services over the three-year period of the funding cycle.

In establishing the NAS, NACLC negotiated with the Commonwealth Government and some State Program Managers (SPMs) to trial 'a single process' for review, whereby SPMs would use agreed information generated through the Accreditation process to satisfy themselves that the requirements of the CLS Program were being met. Participating jurisdictions were NSW, ACT, SA, NT and Qld.

Routine audits of CLCs were suspended for the duration of the trial. However, SPMs retained the right to conduct an audit in exceptional circumstances.

(ii) Interaction with the PII cross-check process

At the outset of the cycle, it was agreed that the assessment of a Centre's compliance with the Mandatory Standards of the Risk Management Guide (RMG) was to continue operating as it was at that time under the National PII Scheme, and that the accreditation process would seek information from the State/Territory Coordinator of the National PII Scheme on RMG compliance.

Section 2: The NAS Review and Methodology

The review used a mixed methods approach and was grounded in the Actionable Evaluation framework pioneered by E. Jane Davidson, Ph.D. The review incorporated three elements: a review of existing data and documentation held by NACLCL; qualitative interviews and an on-line, predominantly quantitative, survey.

Analysis of existing documentation and data

Analysis was conducted on the following:

- Those items of the NACLCL Annual Census 2013 which sought feedback on the NAS;
- The number of registrants for the SPP and MSO, and other data reports generated by BNG;
- NAS tools, including the SPP and MSO;
- Data on the current accreditation status of CLCs (national and state, not individual);
- Draft and final versions of key definitional documents, including the *Guidelines to the Certification and Accreditation Process for Community Legal Centres*, and the ACCC-endorsed *NACLCL Certification Rules Governing the Scheme*;
- NACLCL grey literature on the establishment and implementation of the Scheme, including Memoranda of Understanding with Associations and CLCs; and
- Some background material outlining the development of the NAS model and feedback obtained on that model.

Interviews (qualitative data)

Semi-structured interviews were conducted either via telephone or face to face with 31 key informants, over the period March to August 2014. Key informants were selected in consultation with NACLCL and using purposive sampling⁴ to ensure adequate representation of the diverse stakeholders involved in the NAS. Those informants included:

- Representatives of participating CLCs (selected to reflect diversity including in location, service profile and size/resources) and Family Violence Prevention Legal Services;
- The State and Commonwealth CLS Program Managers;
- The Advisor, Indigenous Programs, Department of Prime Minister and Cabinet;

⁴ "Purposive sampling is one that is selected based on the knowledge of a population and the purpose of the study. The subjects are selected because of some characteristic", in this instance their role in relation to, or their perspective on, the NAS.

http://psychology.ucdavis.edu/faculty_sites/sommerb/sommerdemo/sampling/types.htm

- Each Regional Accreditation Coordinator;
- Key informants within each State/Territory Association;
- Some Executive Directors of Legal Aid;
- The relevant Director at Breaking New Ground;
- Members of the NACLC Management Committee;
- The NACLC Executive Director; and
- The National Accreditation Coordinator.

The full list of interviewees is attached at Appendix 3.

In addition, group consultations were conducted with:

- The Accreditation Coordinators (regional and national) (2 group consultations);
- The NACLC Management Committee; and
- Those Commonwealth and State Program Managers available on 12th March 2014.

Survey (quantitative data)

An anonymous, on-line survey was developed for the CLCs that had participated in the NAS. The survey, which was predominantly but not exclusively quantitative, was distributed to all participating CLCs in Australia. All CLC staff members and members of Management/Governance Committees or Boards were invited to complete the survey, and a total of 108 people responded. It is not possible to calculate the number of CLCs that responded to the survey as the survey was anonymous and some CLCs had more than one individual complete the survey (for instance, one CLC had surveys completed by the Executive Officer, Principal Solicitor and a Board member).

The survey respondents were as follows:

- **Role:** 43% of respondents were Executive Officers/Managers; 22% were Principal Lawyers, with the remaining 35% including Administrators, members/Chairs of Management Committees, lawyers and others;
- **Location:** NSW, Qld, Vic and WA accounted for approximately 20% of respondents each, with the remainder drawn from ACT (4%), NT (3%), SA (8%) and Tas (6%);
- **Service size:** the single largest proportion of respondents - 37% - were from CLCs with a total audited income in 2012-13 of between \$500,000-\$1,000,000; 24% were from CLCs with an income of less than \$500,000 and 11% were from CLCs with an income greater than \$2,000,000.

The survey instrument is attached at Appendix 4.

Comparing findings across roles and jurisdictions

There is relatively little apparent difference in survey responses across different roles. A few differences seem apparent between jurisdictions, and where this is the case that difference it has been noted in the report. However, not all respondents answered all the questions and the numbers are not high (approximately 20 respondents each from NSW Qld, Vic and WA). These comparisons may not be meaningful or statistically valid, and therefore should be treated with caution.

Section 3: Process Review

“We used the whole process as part of our overall reinvention under our new CEO . . . Brilliant process.” (Survey Respondent.)

“(The) resources were effective in getting accreditation. The resources were not effective at all in improving the CLC.” (Survey Respondent.)

Question 1. What was the quality of the program’s content and design and how well was it implemented?

Overall, the majority of respondents considered the program tools and processes to be of a high quality, and the program implementation to be effective. There was a high level of regard for the skillful and respectful ways in which the Accreditation Coordinators worked with the CLCs. Other stakeholders praised the tools and in particular, the Management Support On-line (MSO), the website and the quizzes, described by one stakeholder as “fantastic”. However, a small number of stakeholders experienced technical issues linked to lack of download capacity; the unwieldiness of the SPP and frustration with various aspects of documentation, including complexity, duplication and out of date information (e.g. the use of “probationary period” instead of “minimum employment” - KII). One survey respondent called for Plain English documentation, saying that the *“complex convoluted language used . . . made it hard to get others to participate”*. Several of the ACs echoed the concerns about the ‘overwhelming’ assessment tool, lack of clarity about the processes and inconsistent communication. The MOUs were considered to be unnecessarily complex by some stakeholders and there were perceptions that some of the Service Standards quiz questions replicate aspects of the PII crosscheck.

Looking specifically at the **tools and processes**, survey respondents identified the following elements as the most effective:

- The recommendations and the report by the Accreditation Coordinator (rated as effective or very effective by 92% of survey respondents);
- The support and assistance provided by the Accreditation Coordinator (rated as effective or very effective by 84% of survey respondents); and

- The exit interview at the end of the site visit, which are also conducted by the Accreditation Coordinators (rated as effective or very effective by 82% of survey respondents).

The majority of survey respondents considered the MSO and the Standards and Performance Pathways (SPP) to be effective and accessible to CLCs:

- Management Support On-line (rated as effective or very effective by 83% of survey respondents); and
- The Standards and Performance Pathways (rated as effective or very effective by 63% of survey respondents).

Key stakeholders also concurred that the tools and processes were accessible.

Qualitative data generated via the interviews and survey indicated that:

- A number of respondents were frustrated by some aspects of the SPP (for instance, the technical challenges in linking to documents previously uploaded). NACLIC and BNG have advised that the majority of these technical issues have been progressively resolved and further refinement of the SPP is underway;
- Some CLCs would have benefited from model policies that were CLC-specific, and that this could have been achieved through more tailored resources on the MSO or a stronger emphasis on peer support among CLCs;
- Some ACs commented that the processes and tools of the NAS were very effective for those services that willingly participated in accreditation, but there were limited strategies in place to engage and mobilise services that were reluctant;
- A number of respondents, in particular funders in the CLSP and FVPLS, expressed reservations about the utility of the Tier 2 category, noting that Tier 2 did not sufficiently distinguish between services that are very close to full compliance and services that were a long way from compliance with the Standards. Amongst those who identified this as an issue, there was strong support for moving to a more nuanced framework that included at least one additional tier; and
- A small number of interviewees noted that there is debate within the accreditation field as to the utility of graded or tiered accreditation. One interviewee commented “(funders) are entitled to know that the service is safe and reliable and meeting core industry standards; and that certain types of risk will be reported promptly if they arise”. In that context, NACLIC and the Associations should continue to monitor whether the tiered accreditation process is still a good fit with the purpose of the NAS;

Survey participants were asked to comment on how satisfied or dissatisfied they were with **implementation**, namely the coordination and administration roles undertaken by NACLC and the State/Territory Associations.

Quantitative data indicated that the majority of survey respondents were either satisfied or very satisfied with governance and leadership of the NAS, with 70% of survey respondents either very or somewhat satisfied with the coordination and administration provided by NACLC, and 67% either very or somewhat satisfied with the coordination and administration provided by their State/Territory Association.

Levels of satisfaction with implementation by NACLC and State/Territory Associations

	Very satisfied	Somewhat satisfied	Neither satisfied nor dissatisfied	Somewhat dissatisfied	Very dissatisfied
NACLC (N=93)	31 (33%)	34 (37%)	21 (23%)	5 (5%)	2 (2%)
S/T Association (N= 89)	34 (38%)	26 (29%)	21 (24%)	8 (9%)	0 (0%)

Qualitative data generated via the interviews and survey indicated that:

- The majority of respondents (including CLCs, Program Managers and other stakeholders) were satisfied with the governance and leadership roles taken by NACLC and the Associations and considered that NACLC and the Accreditation Coordinators had provided strong and consistent leadership and management of the initiative;
- Respondents were largely very satisfied – and often extremely impressed – with the skillful ways in which Accreditation Coordinators were able to guide CLCs and the sector more broadly through the accreditation process;
- A minority of respondents – predominantly drawn from CLCs – questioned whether accreditation is the most effective approach to improving the quality of CLCs and protecting the CLC brand or CLC clients. In that context, they were critical of the decision by NACLC and the Associations to establish the NAS and to direct resources to accreditation rather than other service and sector development activities;
- Some respondents felt that the communication from NACLC regarding the purpose and process for the NAS had not been sufficiently clear or consistent. Themes from the qualitative data included: frustration with the lack of consistent communication from NACLC and the Associations early in the implementation phase; and the lack of ongoing communication about the purpose and benefits of accreditation. These respondents felt

that clearer communication from NACLC and the Associations would have resulted in higher levels of engagement around the NAS, greater clarity about its purpose and less anxiety among participating centres;

- Some respondents commented on the variable degrees of commitment and activity among State and Territory Associations. It was noted that some Associations had been very active in contributing to the development of the NAS at a national level and providing a range of strategies to support CLCs. However, others some Associations were considered not to have been sufficiently active in their leadership and support roles. This was seen as a missed opportunity to provide support for CLCs going through the accreditation process and was perceived to have increased the burden on Accreditation Coordinators to both champion and implement the NAS. This view was expressed by State and Territory Associations, Accreditation Coordinators and members of the NACLC Management Committee.
- Whilst NACLC was widely praised for its efforts in building a scheme that was robust, ambitious and nationally consistent, some respondents – including State Associations, Accreditation Coordinators and CLCs – felt that a more collaborative approach would have resulted in the Associations feeling a greater degree of ownership for the NAS and thus being more proactive at a local level.
- A small minority of respondents – including some CLCs and some Program Managers – expressed the view that allowing centres to take a long time to complete the self-assessment had been helpful for some centres but for others had contributed to a loss of momentum and some inefficiency in completing the accreditation tasks;

Overall, the less successful elements of the program's content, design and implementation processes were:

- Lack of consistent communication between NACLC, the State/Territory Associations and CLCs about the purpose and benefits of the NAS to the sector, to the services, and to clients;
- Some overly complex and repetitive documentation;
- The less user-friendly elements of the SPP, and the generic nature of the MSO; and
- The timeframe from commencement to accreditation.

Question 2. What were the barriers and enablers to the NAS?

“The process was too complicated and time consuming, requiring adherence to too much detail where principles would have been better and detail only necessary where essential.” (Deputy CEO, CLC. Survey Respondent.)

“ . . . long, involved, time intensive process, particularly for small centres . . . (but) predominantly a first time implementation problem.” (Accreditation Coordinator, KIL.)

The key enablers of successful implementation of the NAS were access to and support from the Accreditation Coordinators; the skill and expertise of CLC staff; internal support from management committees; and the MSO resources. The key barriers to the NAS implementation were the amount of time and effort required to participate in the NAS processes; the lack of existing policies in some CLCs; and a concern that centres that did not complete the accreditation would not be fully compliant with CLSP standards⁵. Other unintended consequences, for some centres, included the unexpected levels of stress and anxiety resulting from participation in the NAS; the overburdening of staff inexperienced in management roles; and a perception that the NAS created policies for policies' sake. One interviewee commented, “At the start it was daunting. I had to continue servicing clients and supervising junior staff while working on accreditation. I looked around and thought ‘we’re going to get kicked out of NACLCLC’” (Principal Lawyer, rural CLC).

Enablers

Survey respondents indicated that the following factors or resources assisted their centre to undertake the accreditation process:

- Access to and assistance of the Accreditation Coordinator (93%);

⁵ This concern arose because the Accreditation Standards are drawn from the Standards of the CLSP funding program. In this context, some CLCs were concerned that failure to attain accreditation would imply that they were not compliant with their obligations under the funding program. However, the volume and depth of evidence required to attain accreditation far exceeds that required to demonstrate compliance with the CLSP Standards. These differences are well understood by both State/Territory Associations and NACLCLC in their function as certifiers, and by the CLSP Program Managers in their function of ensuring compliance with funding agreements.

- The Centre’s existing policies and procedures (74%);
- Experienced and skilled staff (68%);
- MSO resources (69%); and
- Board/Management Committee support (46%).

Qualitative data generated via the interviews and the surveys indicate that support, open dialogue and a systematic approach were all critical factors for success. At the national level, support combined with a cooperative approach from NACLC provided strategic focus. At the jurisdictional level, both comprehensive and task-based support provided by the NAC and the RACs built capacity and created buy-in and motivation. At the CLC level, a supportive management committee and executive officer was an enabler when present and a barrier when absent. A number of respondents said that the different tier levels were helpful as CLCs were not “just in or out”. Locally based RACs with a remit to work with centres were able to build trust and relationships; deal with specific issues and questions and discuss how policies and procedures could meaningfully support the operations of individual CLCs. (Although the NAC seemed to achieve this too with centres in the jurisdictions she worked directly with.)

A number of respondents, in particular Program Managers for CLSP and FVPLS, noted that the accreditation process had highlighted the lack of sharing and peer support between organisations, with one interviewee commenting “high performance organisations tend to share policies and collaborate on initiatives” (Program Manager, KII).

Thematic analysis of the individual and group interviews conducted with ACs indicated the great benefit of the support provided to the RACs by the NAC, including the regular AC telephone and bi-annual face-to-face network meetings. Among the ACs, it was felt that this support enabled them to be more effective in their engagement with the CLCs and resulted in a sharing of strategies, e.g. around engagement; dealing with difficulties; addressing barriers; and led to a national consistency in approach and a more supportive working environment.

Barriers

From the survey, the key barriers to centres undertaking the accreditation process were:

- Lack of time (84%); and
- Lack of Centre's existing policies and procedures (33%).

Qualitative data captured from the interviews and the survey supported the findings that the staff time required to undertake the NAS was a significant barrier for some CLCs. Some respondents, including Associations and ACs, also indicated that this factor was exacerbated by the amount of information that centres were required to work with, which felt overwhelming for some. This may have contributed to a lack of understanding in a few centres about the availability of or the use of the supportive tools provided. Stakeholders noted that the site visit by the RAC or the NAC often ameliorated or resolved these issues, but that the extent of the difficulties being experienced by some centres was often unclear prior to the visit.

“Stressed Manager!!! Spent more time on it than I needed to as I was so anxious I went over things a number of times.” (Survey respondent.)

In addition, other stakeholders noted that there are no 'early warning systems' to signal either that centres are in trouble with the general processes relating to their accreditation or with specific critical issues, like their financial processes.

“Financial standards need review and updating, with emphasis on MC to overview to ensure financial accountability and reports to SPM to change to provide simple financial data to assess operating within budget.” (Survey respondent.)

Administrative or technical issues were also cited as barriers by a small number of respondents, including unclear or inconsistent use of terminology; out of date information in the documentation; the length of the report and the prescriptiveness of the workplan. Some centres with smaller download capacity experienced technical difficulties and others had a lack of computer skills among critical staff. There were no reported access barriers in relation to culture, language or disability.

Lack of buy-in from leaders, including some CLC boards, coupled with issues around the communication about the NAS to and from some management committees were seen as barriers by a (noteworthy) minority of respondents. Some stakeholders felt that the worthwhile purpose of the NAS was both inadequately communicated by NACLCL and the State/Territory Associations and overshadowed by a focus on the details of the accreditation processes. While some respondents felt that the voices of opposition were disproportionately loud and may not have represented the full picture, others felt that those voices were not adequately heeded. One AC noted that there is no written guidance or informal agreement about how to work constructively with centres that were less willing to engage with the NAS.

The role and approach taken by the Accreditation Coordinators was widely praised by CLCs, CLSP Program Managers and some State and Territory Associations. However, it was also noted that the positions themselves were quite challenging for the incumbents:

- It was the exception rather than the rule that ACs were well supported by their employing Association;
- Accreditation Coordinators often carried a disproportionate burden of the responsibility for championing and leading implementation at a local level, and they were on the front-line of any resistance to implementation of the Scheme;
- The requirement that information garnered through the accreditation process remain confidential limited the ability of ACs to debrief and access peer support from others working in the Association; and
- The positions were largely part-time and involved substantial travel.

“The process of Accreditation especially the site visit has confirmed that we have a pretty good system that needs some work in some areas but is essentially strong and is known by all staff. Gaps were identified clearly with some guidance on how to address them and with a required time line. Good for me as a manager to realise that I was on track with my work and that progressing the accreditation has given me increased knowledge and competency across the entire organisation.” (Survey respondent.)

Section 4: Outcomes Review

(The NAS) “. . . links to reliable, robust client delivery.” (Accreditation Coordinator, KII.)

Question 3. What were the outcomes of the NAS?

A range of stakeholders, including CLCs, members of the NACLIC Management Committee, Program Managers and Accreditation Coordinators, consider that one of the ultimate goals of the NAS is to improve outcomes for clients. One interviewee commented, “(Services) need to be able to address outcomes” (Program Manager). It was, however, noted by many of those stakeholders that measuring client outcomes is difficult given the lack of longitudinal data on clients and the limited investment to date in research on these issues in Australia.

“These gains are hard to quantify but I think any CLC will need to honestly say it led to improvement across all areas.” (Survey respondent.)

That notwithstanding, a number of informants identified the intermediate outcomes of the NAS as including:

- CLCs having more participatory policy development processes;
- CLCs having more complete policies and procedures; and
- There being more consistency in implementation of policies and procedures across the CLC sector.

These respondents were of the view that these intermediate outcomes lay the foundations for longer-term outcomes such as more effective practices within CLCs. In turn, these lead to more effective and more sustainable organisations (with improved employment outcomes such as retention rates), and improved client services.

“. . . There is a growing recognition of the importance of organisational good practice.” (EO of S/T Association, KII)

Recognition of existing strengths (good practice)

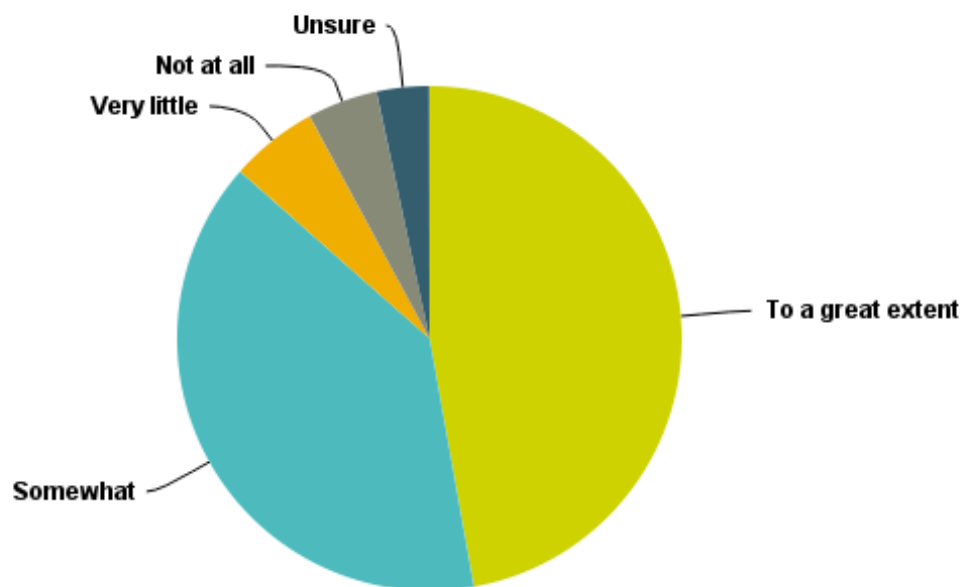
Almost half of survey respondents (47%) strongly agreed and over a third (39%) somewhat agreed that the Scheme recognises and supports existing and ongoing good practice.

Many stakeholders agreed that the NAS focuses thinking around good practice and that it helps to identify areas for improvement. One interviewee commented, “the process recognised existing good practice despite the issues in governance” (Principal Lawyer, rural CLC). One person felt that while it did recognise good practice, this aspect could be strengthened and another felt that it did so, but it is a blunt and broad instrument (AC, KII). In contrast, a few others said that the processes either did not recognise or did not affect good practice; one felt that that it added layers and others that it focused attention unduly on policies and processes to the detriment of focusing on how centres are run and “what makes a centre a better centre”.

Survey respondents consider if the NAS recognises existing good practice in CLCs?

Q20 From your centre's experience, does participating in the NAS recognise the good quality of the work your centre is already demonstrating (also known as existing good practice)?

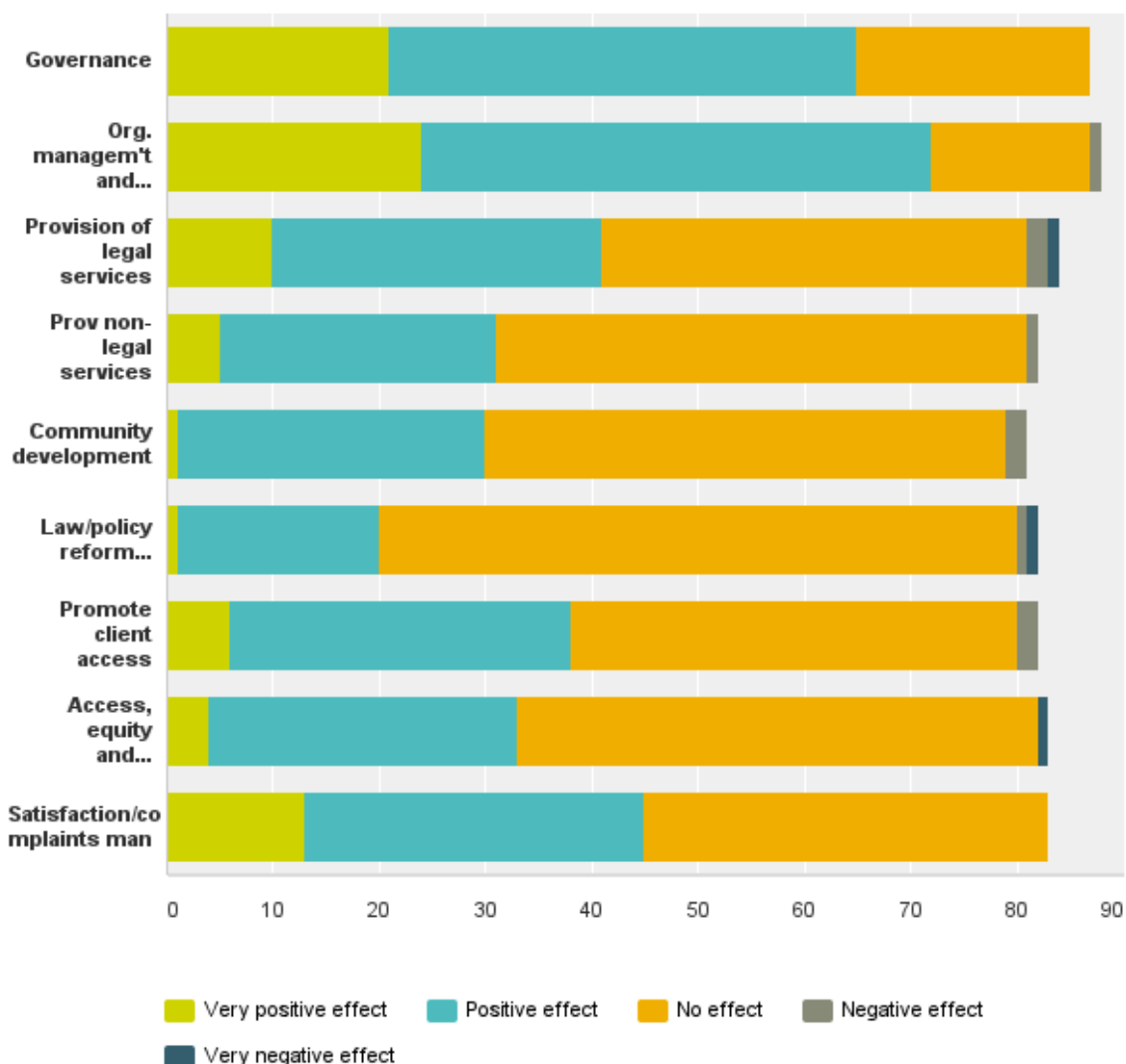
Answered: 89 Skipped: 19



The effects for CLCs of their participation in the NAS

Q18 What effect do you think participating in the NAS has had to date on your centre's:

Answered: 89 Skipped: 19



Outcomes relating to the four Service Standard domains

The NAS appears to have had, in this first cycle, larger positive effects in management and administration (81%) and in governance (75%); and smaller effects in the provision of legal services (49%), and in aspects of client services (40% - 54%). The longer-term outcomes from the NAS cannot yet be expected to be apparent.

It should be noted that smaller effects could be due to the existence of an already comparatively robust and highly functioning system (e.g. the RMG cross-check process for CLCs' legal practice management) and those areas (client service delivery) being

historically more significant focuses of the organisations; and that larger effects may have ensued where there were more opportunities for development; i.e. the effect size in each domain will be in some part related to the status and quality of existing policies and procedures within individual CLCs, as outlined in the following quote.

“While I say no effect – no effect for CLE and law reform as we do this really well as a Centre and had nothing to “improve” on!! . . . of course . . . we can always get better . . .” (Survey Respondent.)

Governance, Management and Administration

“It allows state and territory associations to identify gaps in consistent approaches to governance and risk management and sits very well with the cross check process to provide an overview of each CLCs circumstances. Ultimately the information must be used to ensure quality and not just be lip service to the ideals. This may require some hard decisions for state peaks. But it does give them the imprimatur to take tough decisions especially where there is a long history of failures to comply with good governance or service provisions standards.” (Survey Respondent.)

Three quarters of survey respondents (75%) thought that the NAS had resulted in very positive or positive effects on governance. This area produced the most positive outcomes according to some stakeholders: *“The questionnaire really showed the needs for our governance to be improved at management committee level and at Centre level.”* In particular, stakeholders considered that participation in the NAS has clarified lines of both responsibility and accountability in some CLCs; and had broadened the understanding of risk management in others, i.e. that risk management applies across the whole organisation, not just in the legal practice. However, a few respondents expressed a concern that, while the NAS had contributed to improved financial management, it had not done so sufficiently, and that this was an area that could be improved.

The majority of survey respondents (81%) agreed that the NAS had had positive or very positive effects on management and administration. In addition, some interviewees commented that the NAS is a good compliance tool that supports organizational

management. Specifically, some services used the NAS as an incentive to update existing policies and procedures or to generate new ones. Others commented that useful recommendations stemmed from their accreditation review. A number noticed that the NAS has effectively caused centres that did not have them to create an induction program for staff that makes people aware of what happens in the service.

In addition, 92% of survey respondents reported that staff members are consulted during the development of new policies and procedures; 58% reported that staff know about the workplan; 74% reported that the Board have seen the workplan; and 55% reported that staff are actively involved in accreditation issues (e.g. accreditation is regularly discussed at staff meetings).

Provision of Legal Services

Fewer survey participants, just less than half (49%), saw a positive or very positive effect from the NAS on the provision of legal services. This may be explained by the observations of some key informants that the provision of legal services was an area of existing focus and strength, and that the PII cross-check process assesses a range of requirements in this domain and has been in place for many years.

They also noted however, that in this domain the NAS still proved a useful support and focus for ongoing processes, for instance updating casework policies and procedure documents; clarifying client access criteria, and ensuring that legal files are firewalled (for centres that are transferring to electronic record keeping).

A majority of survey respondents (73%) were of the view that the NAS had not had significant (positive or negative) effects on law and policy reform activities, although almost a quarter of respondents (24%) thought the NAS had a positive or very positive effect on law and policy reform activities. In addition, some stakeholders identified a level of uncertainty in this domain about how the NAS relates to the PII crosscheck.

Community development, education and reform activities

This was an area that was identified by some stakeholders to be relatively straightforward for larger CLCs but particularly problematic for smaller CLCs. Survey results indicate that

while over a third of respondents (37%) felt that the NAS had had a positive effect on community development and around a quarter (24%) felt that the NAS had had a positive effect on reform activities, over half of respondents (60%) felt that the NAS had not had significant (positive or negative) effects on community development and almost three quarters (73%) felt that the NAS had not had significant effects on reform activities. However, other stakeholders believe that the NAS encourages research about and a focus on client need that will lead to positive changes in this area.

Client Access

One stakeholder noted that the NAS had highlighted the issue of client access and that client access was good in some places and not in others. This is consistent with the results of the survey, with 51% of respondents expressing the view that the NAS had not had significant (positive or negative) effects on strategies to promote client access (51%), and 46% expressing the view that the NAS had had a positive effect in this area.

On promoting access, equity and non-discrimination for clients, again more than half (59%) felt that the NAS had not had significant (positive or negative) effects on this, while less than half (40%) felt it had had positive effects. More than half of survey respondents (52%) thought that the NAS had very positive or positive effects on the assessment of client satisfaction and on complaints management. However, several stakeholders expressed concern that while some CLCs have reasonable practices in relation to client access or client complaints, the practices may not be transparent, or articulated or recorded, and this was perceived to be a potentially problematic situation for clients and funders.

“The main problem was not that we didn’t do things, but that we didn’t have written procedures for some of those things.” (Survey respondent.)

These outcome results are consistent with the feedback from the RACs, who generally were of the view that:

- The NAS was extremely successful in establishing standards and accountability across the sector;

- The NAS was also particularly helpful in addressing governance and administrative management issues;
- The NAS was less successful in developing the capacity of the sector to deliver client services and achieve client outcomes; and
- It is somewhat premature to assess client outcomes arising from the NAS at the completion of the first cycle.

How valuable are the outcomes and the benefits to the organisation and its clients?

Overall, however, many respondents did consider that participation in the NAS has advantages for clients, themselves as staff members, their own CLC or the CLC sector:

Were there any advantages associated with undertaking the accreditation process for: *	Responses (N=92)
Clients	32 (35%)
Myself as an individual staff member	39 (42%)
My organisation	66 (72%)
The CLC sector	44 (48%)

*Multiple responses possible

Queensland had the highest proportion of respondents (55%) who thought that the NAS had benefited their clients, with the next highest being WA (26%). NSW had the lowest proportion of respondents who felt that the NAS had benefitted their organisation (50%), with the next lowest being WA (74%). Some stakeholders experienced the NAS as creating greater national consistency and shared definitions about the purpose and priorities of the community legal sector. Others observed that the recognition provided by the NAS has led to improvements in staff morale in CLCs. In addition, some stakeholders noted that the NAS had created opportunities to reflect on practice, resulting in a more purposeful allocation of resources. These intermediate outcomes are expected to lead to longer term positive impacts on service delivery for clients and on building better, more sustainable organisations.

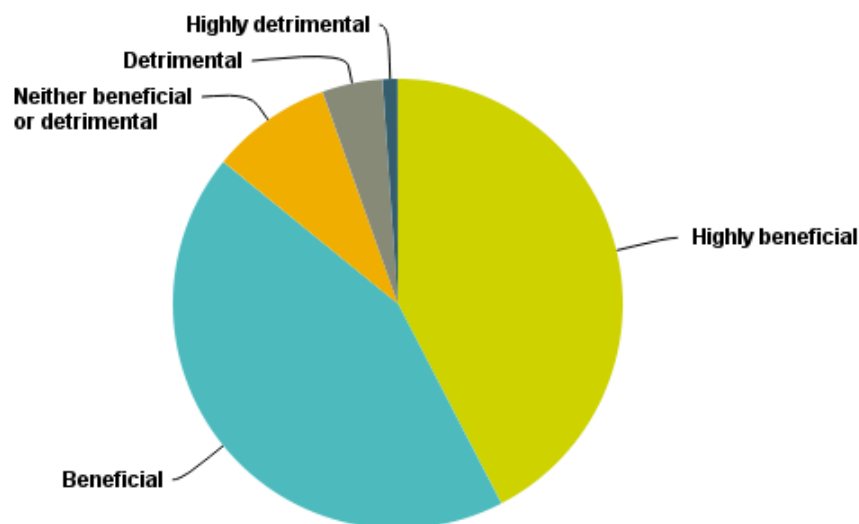
Some interview respondents (including some ACs and some Associations) were of the view that the NAS would have been more beneficial if it had been possible to use the

insights gathered by the AC to target sector development more effectively. It was noted that services appreciate some degree of privacy in undergoing accreditation, and that this privacy facilitates frank self-assessment. However, some Associations and ACs felt that the confidentiality provisions of the NAS as they understood them had prevented ACs from sharing even de-identified data with the Association or other informants. As a result, this data was not used to inform sector-wide planning and development. This is an area that may benefit from clarification between ACs, NACLC and the Associations.

Individuals consider whether their CLC’s participation in the NAS was beneficial

Q17 Looking back, was it beneficial (or detrimental) for your centre to undertake the accreditation process?

Answered: 92 Skipped: 16



“We are now accredited. We have a comprehensive set of policies and procedures that has made us a better, more organised, workplace with everyone knowing what is expected of them when they work here as paid employees or as volunteers. Clients benefit from a more accountable organisation.” (Survey respondent.)

Section 5: Resources required to undertake the NAS

“ . . . it has reaped dividends for the amount of resources spent.”

(EO, S/T Association, KII.)

Question 4. Overall, does the NAS provide sufficient benefit?

A substantial majority of key informants (including SPMs, individual CLCs, NACLC Management Committee members, Associations, and ACs) considered that the benefits provided by participation in the NAS outweighed the costs involved. This is consistent with survey data, which showed that:

- 80% of survey respondents believed that the NAS should be continued;
- 87% of survey respondents believed that the NAS had been beneficial for the sector; and
- 86% of survey respondents believed that the NAS had been beneficial for their centre.

However both the interviews and surveys showed a high level of concern regarding the resources required to participate in the NAS, including direct and indirect financial costs. The major resource cost cited in the survey was staff time, with 96% of respondents identifying “additional staff hours” as a cost, and 46% identifying “additional Board hours” as a cost; and a minority of respondents (15%) nominating “additional contractor hours” as a cost.

“Approximately 80 hours each for Coordinator and Principal Solicitor, 20 hours for legal admin officer, 20 hours for finance officer and 20 hours for additional Management Committee meetings (based on involvement as Executive member of the MC)” (Survey Respondent.)

The qualitative data also highlights concerns about the opportunity costs that impacted on clients and the personal costs borne by individuals, particularly within small centres. Specifically, informants were concerned that the amount of time required for accreditation was excessive. And that this was particularly costly for small CLCs, given that the competing priorities of leaders within those centres meant that participation in the NAS negatively affected client service delivery as some centres elected to re-direct Principal Lawyers or solicitors from casework to accreditation-related activities. In

addition, some Executive Officers and Principal Lawyers found the experience to be quite stressful. However, less than one tenth (7%) of survey respondents considered that participation in the NAS had had a detrimental effect on clients. Interestingly, individuals employed within CLCs as lawyers appeared to have more significant reservations about the benefits of accreditation than other (CLC-based) survey respondents or other stakeholders. WA had the highest proportion of respondents (42%) who identified disadvantages to themselves as individuals associated with undertaking the NAS, with the next highest proportion being NSW (19%).

Many stakeholders also recognized that many of the costs involved were related to the 'first time round' effect and that future cycles are likely to be less onerous for both individuals and for CLCs.

“Short term - too much work for overworked and underpaid CLC staff members. Of course, this loss may be offset by the long term gains - hopefully the future is bright for CLCs!” (Survey respondent.)

Section 6: Future development and implementation of the NAS

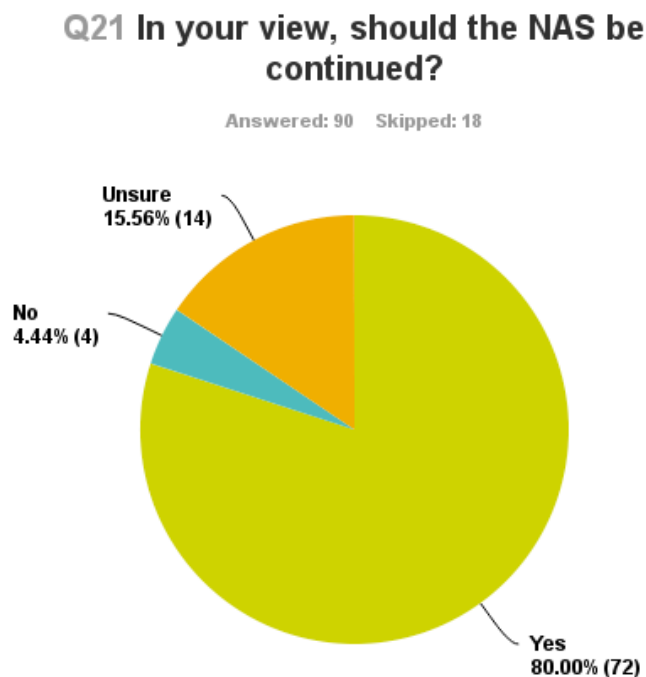
“ . . . should encourage collaboration . . . share resources to optimise service provision. We need to recognize specialties and support the diverse landscape that is there.” (CEO, Legal AID, KII.)

Question 5. What is needed to sustain the NAS and ensure it can survive and grow in an environment of limited resources?

Stakeholders were requested to contemplate the future of the NAS, and specifically to consider which features should be maintained, which changed and which elements would support the NAS.

When asked whether the NAS should be continued, 80% of survey respondents indicated that it should be continued. Importantly, 16% were unsure and 4% felt that it should not be continued (all of these respondents were either an EO/Manager/Coordinator or a Principle Lawyer/Responsible Person).

Should the NAS be continued?



Survey respondents were asked to identify which current features of the NAS should be maintained. **The practical assistance provided by the NAC and the RACs was the feature that most respondents wished to be maintained (86%).** Other features that were nominated by around three quarters of respondents were the final report and recommendations (79%); the system of workplan progress reports (75%); the site visit (72%) and the NAS Guidelines (72%).

Survey respondents consider which features of the NAS should be maintained

Current NAS features *	N (%)
One to one practical assistance from Accreditation Coordinators	73 (86%)
Final report and recommendations	67 (79%)
System of workplan progress reports	64 (75%)
Site visit	61 (72%)
NAS Guidelines	61 (72%)
Initial Improvement workplan	51 (60%)
State/territory role in coordinating and administering the NAS	50 (59%)
Current interaction of accreditation and RMG	47 (55%)
The tiered structure (e.g. Tiers 1, 2 and 3) of accreditation	49 (58%)
State/territory role in supervising Accreditation Coordinators	44 (52%) [#]
MOU between CLC and NACLC/State Association	40 (47%)
Sending report and documents to SPM	24 (28%)

*Multiple responses possible

[#]Ranging from 33% to 72% among states that were certifiers.

Some centres indicated that it was too early in their progress through the accreditation processes for them to constructively comment on future implementation plans.

Future challenges

“ . . . depends entirely on funding by government. There is no way it could have been done without the RACs and the NAC.” (EO, S/T Association, KII)

The key challenges identified for the next cycle of the NAS are as follows:

- Identifying and securing sufficient funds to continue the National and Regional Accreditation Coordinator positions. All stakeholder groups, including CLCs, see these positions as critical to the effective implementation of the NAS. Identifying funds will rely on NACLCLC and the Associations either being able to identify non-traditional funders, or to demonstrate the alignment between the NAS and the priorities Commonwealth and State Governments. One CLSP Program Manager commented that one of the key challenges for the NAS will be “ensuring that the scope of the NAS is compatible with the Australian Government’s dual priorities of improving client outcomes and reducing administration”;
- For participating CLCs, the key challenge will be continuing to balance the demands of client service delivery and ongoing organizational management with self-assessment and implementing their NAS workplan;
- For Associations and NACLCLC one of the key challenges will be to maintain engagement among CLCs and to support CLCs to continue to improve. A number of participants in this review noted that one strategy for engagement would be to profile the achievements of the first cycle and the direct and indirect benefits delivered for CLCs;
- Defining an aspirational but attainable continuous improvement agenda for CLCs at each tier;
- Developing and implementing an effective communication strategy that both reorients stakeholders to the purpose of the NAS and the benefits of the NAS thus far, and explains any changes made from the first cycle to the second;
- Ensuring that the NAS is able to use the achievements of the first cycle (in particular, the establishment of more robust policy and governance frameworks across CLCs) to support CLCs, particularly those less resourced organisations, to continue to improve, and to leverage off learning from the NAS to identify, develop and provide services and resources to CLCs that will improve CLC sector sustainability and the development and delivery of accessible and culturally safe services to CLC client groups; and
- Developing and implementing an effective communications strategy to explain any changes made to the NAS, to clarify and emphasize its purpose/s and processes and achieved and potential benefits.

“Being part of a network of accredited CLCs is beneficial; it shows we meet a standard and is good for funding.” (Principal Legal Officer, KII.)

Question 6. What was learned that could inform ongoing development of the NAS?

Some respondents considered that more consistent communication about the need for and the benefits of a national accreditation scheme would have supported the implementation of the NAS. Other respondents noted that the risks of doing nothing may not have been fully understood across the sector. In addition, the links between accreditation and expected better client outcomes could have been highlighted to reinforce the purpose of the NAS. And one respondent noted that the level of communication between the National and the State and Territory organisations and between the State and Territory organisations and local centres declined over the implementation period. Some stakeholders cited the importance of support and leadership; and the effects of their absence was noted by others, including by a few stakeholders who cited the lack of engagement by (some) Boards as an impediment to effective implementation. A few respondents suggested that the centres who were struggling may have benefited from more guidance about how to approach the NAS, for instance more help before the site visits; more leadership from their own boards and from NACLIC and the use of more participatory approaches during the introductory period. The survey results indicate future opportunities for board engagement with the NAS: Qld had the highest proportion of respondents (55%) who identified board support as a factor or resource that supported them in the accreditation process, with the next highest proportion being Vic (39%) then WA (37%).

Almost all the stakeholders who were interviewed commented on the reliance of the scheme on the Accreditation Coordinators. In many eyes, both the weight of and the responsibility for the success of the NAS are carried by the NAC and the RACs. Respondents frequently praised both the personal and the professional skills of the individual ACs as critical success factors.

“The Accreditation Co-ordinator played a very important role in the acceptance of, attitude towards and usefulness of the accreditation process.” (Survey Respondent.)

There were a number of questions from stakeholders about whether the current management structure for the RACs is the most effective one and whether they should report directly to NACLC. Importantly, there was a strong view among some of the RACs that reporting to the NAC and being formally part of a national team, would provide them with the best structure and support to carry out their work. They all wished to stay located at State Association offices and be actively engaged at the State level. However, as the RACs are seen by some MCs to 'belong' to them or to their association, changes to the management structure may impact on the influence of the RACs on effective NAS implementation. On the other hand, it may be that what is of most important to CLCs is the physical location of the RAC and their active involvement with their state's CLCs, rather than their view in relation to the RACs line management. There are clearly a number of factors to consider and there is currently no conclusive data to fully inform this discussion and indicate one clear 'right' answer.

A considerable number of stakeholders called for less prescriptive, more flexible approaches that are suited to the realities of complex environments, and this was seen as particularly applicable in the context of smaller CLCs. More certainty around ongoing and future funding for the NAS was also cited as a prerequisite to sustainable progress.

Suggested actions to strengthen the future implementation of the NAS include:

- Celebrate, advertise and share success, including engaging champions within the sector to promote the benefits;
- Consistently communicate the value of accreditation and the risks of not being accredited;
- Clarify and simplify documentation where possible;
- Clarify the respective roles and parameters of accreditation and the PII cross-check (and reduce any duplication where possible);
- Show/share examples of what good practice looks like;
- Increase the sharing of information, know-how and resources among CLCs and between CLCs and other legal services; and
- Create more certainty around funding in relation to the NAS (in particular, the AC positions).

Other changes suggested by survey respondents include:

- A "shift to a greater emphasis on improving CLCs rather than ensuring that documentation is completed" (quote from survey respondent working in a CLC). Thematic

analysis of the qualitative data from CLCs and the broader group of stakeholders revealed that a proportion of respondents felt that NACLC and the Associations should focus more on providing practical support to CLCs to improve their practice and to develop their organisations, and that this group of respondents perceived the NAS as being oriented to compliance with documentation rather than genuine service development;

- Engage in clearer communication between NACLC/State and Territory Associations and CLCs about the purpose and process for accreditation;
- Move away from a “one-size-fits-all model”, in particular to recognise the specific issues for smaller centres”. (Quote from survey respondent working in a CLC). This links to the broader theme of reducing expectations on smaller services and will be addressed at least in part by the mooted move to delineate core and non-core requirements;
- Consider including more than one site visit, in particular for centres struggling with accreditation;
- Ensure that, to the extent possible within NACLC’s role, changes to the Standards are minimised once the triennial accreditation cycle is underway;
- Improve the SPP, including reducing repetition;
- Develop and publish to participants and relevant stakeholder, the process whereby a centre, AC or Certifier can initiate a review of a centre’s accreditation status during the course of the period of accreditation, for example, where a Tier 2 centre has taken action and wishes to be considered for accreditation at Tier 1 ; and
- Refine the financial standards/requirements.

Section 7: Review of the single assessment process

“We all want the same thing, good quality centres; good quality services . . . (we should) work together to get that.” (State Program Manager, KII.)

Stakeholders were consulted about the pilot of a single assessment process model, whereby the NAS would function as both the mechanism for CLCs to attain accreditation and for CLCs to demonstrate compliance with the Service Standards requirements of CLSP funding. Some respondents viewed the single review process as an opportunity, while others perceived it to be problematic, particularly with regard to the amount and nature of information that should be shared with the SPMs. Others thought this was not such an important issue, especially as SPMs can conduct an audit and require this information at any time.

Benefits of a single review process

The majority of interviewees acknowledged the benefit to both the sector and to funders in having an accreditation process that also met the CLSP Service Standards requirements. Specifically, stakeholders considered that the single assessment process saves time, encourages transparency and strengthens the system.

From the perspective of the sector, an industry self-regulation model was seen as preferable by most (though not all) respondents, and as a marker of the maturity of the sector’s processes. One respondent commented that the NAS can be politically useful by reminding government what CLCs do.

From the perspective of the Commonwealth and State Program Managers involved in administering the CLSP and FVPLS funding, the benefits of the NAS and the single process for accreditation and demonstrating compliance with Service Standards are:

- It supports quality service delivery, in that services that have robust, explicit policies and are more likely to be well managed and effective, and those that do not have robust, explicit policies and procedures and sound practices are less likely to be well-managed and more likely to be vulnerable to the effects of staff turn-over. One interviewee

commented that “more professional organisations achieve outcomes” (Program Manager, KII);

- The NAS is a strong scheme that provides the funders with all the information they require to gauge the performance of the service against the Service Standards, and indeed is a more robust system that works better than the Service Standard audits;
- It is an efficient model, which delivers both industry self-regulation and accountability to funders;
- The NAS includes independent review by Accreditation Coordinators (including both review of policies and procedures and site visits that test the application of those policies and procedures);
- The tools and processes are well-developed and fit for purpose;
- The sector is engaged with the NAS, unlike the more mixed response to the Service Standards audits; one SPM commented, “. . . it was really good that the NAC did the accreditation process because she is neutral. (Some of the services) are terrified of me because I am from the government and they fear losing funding if they tell me about difficulties they are having” (State Program Manager, KII).

Issues around a single review process

The key issues in relation to the single review process were as follows:

- Some Program Managers who had not participated in the trial felt that they had not had sufficient information about either the local implementation of the NAS or the trial process underway in other jurisdictions and thus their support for the establishment of a single model nationally was based on their impressions rather than more complete information.
- There is not agreement at this time as to the level of information that should be provided to SPMs:
 - SPMs advocated for access to a broad range of information and a number indicated that their preference would be to have access to the SPP itself;
 - CLCs had a range of views about the level of information they would be willing to provide to SPMs;
 - A number of other stakeholders, including Associations, noted the importance of confidentiality if services are to accurately self-assess; and
 - Some stakeholders are of the view that SPMs need to make a financial contribution to the NAS if they are to access the data generated via the NAS.
- Interestingly, services accredited via the FVPLS process did not report that funders being able to access the full report and the portal was an issue for those services and their willingness to participate in the NAS.

Section 8: Conclusion and Recommendations

Overall, the results of this review are extremely positive and strongly support the achievements of the NAS in its first three years. An overwhelming majority of survey respondents reported benefits of the NAS for the sector and for their Centre (over 85%).

Importantly, the NAS was seen by the vast majority of survey respondents as recognising the good quality of the work that CLCs already undertake. This is critical to the ability of the program to continue to work with CLCs over the long haul in an ongoing cycle of quality improvement.

The data from the review strongly supports the continuation of the scheme; it is having a clear impact on improving the standards of CLCs and 80% of survey participants want to see it continued.

These are particularly noteworthy results given that one might expect in the early stages of such an ambitious program that there would be greater resistance, teething difficulties and frustrations than was evident in survey responses and interviews. The positive results of the review are a credit to NACLIC and the State/Territory Associations who developed and rolled out the scheme, to the Accreditation Coordinators who supported and encouraged Centres and to the Centres themselves for their commitment and dedication to best practice and ongoing improvement.

Not surprisingly improvements to the scheme are called for; this is to be expected. Fine tuning of processes and systems surrounding the scheme, efforts to decrease the amount of time and paper-work required, better and more consistent communications and consideration of the future placement of Accreditation Coordinators are some of the things that should be considered in re-casting the NAS for the next period. Most importantly it is hoped that the next phase of the NAS will be less onerous and that participation will require less time and resources from all parties.

The survey responses and interviews indicated some specific changes that would benefit the NAS in the next period, and the recommendations set out below represent the

consultants' views about some of the areas for improvement which should be focused on. The recommendations have emerged from the results of the Review and have been developed in consultation with NACLC.

Recommendations

1. Continuation and further development of the NAS

- 1.1. That the National Accreditation Scheme (NAS) be continued.
- 1.2. That the NAS build on the achievements of the first cycle and identify strategies for NACLC, the Associations and the AC to assist the sector to improve the quality of services in the following cycle. This may include, but not be limited to:
 - 1.2.1. Explicitly reframing the purpose of the NAS to incorporate continuous improvement; and
 - 1.2.2. Supporting services to ensure that the policies developed in the first cycle are being consistently implemented.

2. Promotion and communication

- 1.1 That priority be given to better communicating the purpose of accreditation and in particular the link between the benefits of accreditation, improved service delivery, improved organizational management and client outcomes. This could include disseminating domestic and international evidence showing the link between accreditation, service delivery and outcomes.
- 1.2 That strategies be developed and implemented by CLCs and State/Territory Associations to engage members of Boards and Governance Committees in accreditation, in particular to inform them about the benefits and processes for accreditation, and to convey their role in relation to accreditation.
- 1.3 That strategies be implemented to engage EOs, Managers, Coordinators, Principal Lawyers and Responsible Persons, to inform and upskill them about the benefits and processes for accreditation.
- 1.4 That communication material produced by NACLC and Associations – including newsletters and annual reports - profile the achievements of the sector, including the achievements of CLCs in relation to accreditation.

3. Tools

- 3.1. That the SPP be retained and further streamlined so as to reduce any unnecessary duplication and address challenges related to uploading substantial documents and other feedback from this review, if not already done.
- 3.2. That modifications to the SPP maintain access arrangements for FVPLS Program Managers.
- 3.3. That the MSO be retained and continue to be promoted as a resource to support organizational development.
- 3.4. That, if practicable, resources be allocated to developing and including on the MSO more good practice examples, resources and tools tailored to community legal assistance services.
- 3.5. That, where practicable, the State/Territory Associations identify strategies to promote dialogue within the sector on accreditation and encourage CLCs to provide to their Accreditation Coordinator or the National Accreditation Coordinator, copies of good practice, examples of policies and other relevant resources that can be uploaded if suitable to the NACLC MSO.
- 3.6. That the MOUs be revised to simplify and clarify their purpose and content.
- 3.7. That the Guidelines and other documentation supporting the NAS, including report templates etc., be reviewed and updated, and simplified if possible and appropriate.

4. Processes

- 4.1. That the existing accreditation architecture (self-assessment, preparatory work for site visit, site visit, report and recommendations and improvement work plan) be retained for the coming accreditation cycle.
- 4.2. That the site visit be retained as a core element of the NAS (that is, to be conducted at least once within a three year cycle), with consideration on a site-by-site basis of attempting to:
 - 4.2.1. Engage, wherever possible, a member or members of the governance committee during the site visit;
 - 4.2.2. Conduct the visit over more than one day where warranted (i.e. either two sequential days, or one visit followed by a second visit some time later).
- 4.3. That the six monthly reviews of progress be retained as a core element of the NAS.
- 4.4. That the existing three-tier model be examined and that the following changes be considered. Either:
 - 4.4.1. Expand the model to create four tiers and identify core and non-core standards and requirements for each tier; or

- 4.4.2. Move from the tiered model to a more streamlined model in which CLCs are considered either accredited or not accredited.
- 4.5. That an agreed timeframe be set for each CLC to progress from initiating self-assessment to completion of accreditation, in order to assist CLCs to maintain momentum and to receive feedback in a timely fashion.
- 4.6. That further guidelines be developed for the following: engaging and supporting Centres that are assessed as Tier 3, and for working with and engaging Centres that are reluctant to engage with the accreditation process.
- 4.7. That the appeals process by which CLCs can challenge the accreditation decision is reviewed and the process elaborated and clarified or revised as appropriate, and that any amendments be incorporated into the Certification Rules and related guidance.
- 4.8. That arrangements be formalized for reassessing Centres who are considered 'borderline' in their Tier status (in particular, any CLCs assessed as Tier 2 but in effect borderline Tier 1).
- 4.9. That agreement be reached between NACLC, the State/Territory Associations and the ACs to develop strategies to use **de-identified** data from the NAS to tailor sector development activities.

5. Elements

- 5.1. That the requirements of the NAS relating to financial management be further developed and strengthened.
- 5.2. That consideration be given to the Accreditation Standards and/or requirements being defined as core and non-core to support participation by smaller centres.
- 5.3. That, if it is considered practicable taking into account the extent of these requirements and centres' limited resources, additional standards/requirements be introduced relating to:
 - 5.3.1. Cultural safety/competency,
 - 5.3.2. Environmentally sustainable practice, and
 - 5.3.3. Creating child-safe/child-friendly environments.

6. Infrastructure

- 6.1. That the roles of National and Regional Accreditation Coordinators be continued.
- 6.2. That the Regional Accreditation Coordinators continue, at a minimum, to be hosted by the State Associations and be closely involved, as appropriate, in state CLC activities, such as state conferences and sector development.
- 6.3. That securing funding for the positions of Accreditation Coordinator continue to be considered an urgent and important priority and, that if it is not possible to secure

external funding, that NACLCL continues to identify opportunities to invest its own funds in those positions.

- 6.4. That the face-to-face RACNAC meetings and phone link ups continue on a regular basis, as a peer support and professional developmental network and to support national consistency in implementation of the NAS.

7. Governance and leadership

- 7.1. That the roles and responsibilities of State and Territory Associations are clarified, particularly in relation to communicating with CLCs about accreditation, championing the NAS and developing local activities to support centres in relation to accreditation.
- 7.2. That each Association determines its level of commitment to the NAS and implements a program of action, in conjunction with NACLCL, to deliver that commitment.

8. Related infrastructure

- 8.1. That the State Associations confirm with their member CLCs that they agree to one accreditation assessment process, with agreed specified documents to be provided by the CLCs to the SPMs.
- 8.2. That, subject to confirmation from the State Associations in relation to 8.1, NACLCL makes its best efforts to negotiate a formal agreement with the Commonwealth and State Program Managers that the NAS permanently replace *routine* CLSP audits.
- 8.3. That NACLCL and the State Associations make their best efforts to agree a set of specified documents and/or level of information to be shared with the Commonwealth and SPMs, and the mechanics by which this information will be shared, and that these agreements are documented and promulgated to maximize clarity and transparency.
- 8.4. That the interaction between the NAS and the PII cross-check be further clarified, and strategies put in place to clarify the different roles and to reduce perceptions of duplication.
- 8.5. That the SPP Quiz Questions be modified to replace the current question regarding “documented procedures to ensure the organization will talk to the PII representative . . . and will not make any admission of liability” with the following two questions:
 - Are you aware of, and do you comply with, the following mandatory standards in the Guide:
 - to talk to your PII Representative and notify the broker/insurer in writing of claims or potential claims as quickly as possible; and
 - not make any admissions of liability.

- Are these specific mandatory standards incorporated in your organisation's legal practice policy/ies?"

9. From compliance to improvement

9.1. That a major focus of NAS-related activity and resources (e.g. the RACs' and the NAC's time) be organisational development and support, especially for less resourced centres, in the next cycle, while still undertaking the tasks necessary to monitor and assess compliance, as required.

10. Monitoring and evaluation

10.1. That a plan be developed to monitor the future impact and outcomes of the NAS.

10.2. That the monitoring plan incorporate questions relating to: CLC accreditation rates; movement between tiers; levels of board involvement; levels of staff engagement; changes to client outcomes (e.g. improvements in access for priority populations); removal of barriers to improvement; consolidation of enablers to improvement and progress of accepted recommendations from this review, e.g. changes to financial reporting.

References

Alkhenizan, A and Shaw, C. *“Impact of Accreditation on the Quality of Healthcare Services: a Systematic Review of the Literature”*. Annals of Saudi Medicine. 2011 Jul-Aug; 31(4): 407–416. <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3156520/>. doi: 10.4103/0256-4947.83204. Accessed July 2014.

Davidson, E. J. *Actionable Evaluation Basics: Getting succinct answers to the most important questions*. 2013. Real Evaluation.

NACLC. *Guidelines to the Certification and Accreditation Process for Community Legal Centres*. (11 May 2011, revised 28 June 2011).

NACLC. *Certification Rules Governing the Scheme*, (2008).

UC Davis, University of California:

http://psychology.ucdavis.edu/faculty_sites/sommerb/sommerdemo/sampling/types.htm

Accessed August 2014.

Documents that were analysed for the review

Draft and final versions of key definitional documents, including the *Guidelines to the Certification and Accreditation Process for Community Legal Centres*, and the ACCC endorsed *NACLC Certification Rules Governing the Scheme*.

NACLC. *National Census of Community Legal Centres, 2013*. (NAS related sections).

Background material outlining the development of the NAS model and feedback obtained on that model.

NACLC grey literature on the establishment and implementation of the Scheme, including Memoranda of Understanding with Associations and CLCs.

Data on the current accreditation status of CLCs at the national and state levels (not individual CLC data).

The NAS on-line tools, including the SPP and MSO.

BNG reports and data relating to registration numbers for the SPP and MSO.

Australian Government, Attorney General’s Department, Social Inclusion Division.

Commonwealth Community Legal Service Program Guidelines (2014).

Appendices

Appendix 1: A brief history of the development of the NAS

Development of the NAS was informed by the existing body of knowledge and theory regarding accreditation. The body of knowledge is particularly well developed in relation to healthcare and education, with one meta-analysis of accreditation programs in health care finding that “(both) general and subspecialty accreditation programs significantly improve the process of care provided by health care services by improving the structure and organization of health care facilities . . . Several studies showed that . . . accreditation programs significantly improve clinical outcomes”⁶.

Formal development of the National Accreditation Scheme commenced in 2008, when the Proposed Common Membership Rules and draft Accreditation Criteria, including Service Standards and the ACC endorsed *NACLCL Certification Rules Governing the Scheme*, were developed. The NACLCL secretariat developed these, guided by the NACLCL Management Committee and in consultation with the State and Territory Associations and, at various points, with CLCs. State and Territory Associations were charged with the ongoing informing of and consulting with their members, the CLCs.

The remaining elements of the NAS framework, model, online tools and additional supporting documents (such as the *Guidelines to the Certification and Accreditation Process for Community Legal Centre*) were developed over the period 2008 – 2010. The proposed Memoranda of Understanding were finalised and circulated in mid-2011.

Some steps, such as considering and adopting the Proposed Common Membership Rules, became lengthy processes in the different jurisdictions, that involved member CLCs agreeing to adopt new Constitutions and Rules for their peak body associations.

The Common Membership Rules were a critical part of the infrastructure, and introduced, for the first time in CLC history in Australia, an agreed definition of some essential

⁶ Alkhenizan, A and Shaw, C. *Impact of Accreditation on the Quality of Healthcare Services: a Systematic Review of the Literature*: p 407

characteristics of a CLC, including that it be not-for-profit; and a requirement that a full member of a CLC Association must comply with the Accreditation Criteria.

Alternative models for governance and implementation of the NAS were then scoped, consultation was conducted with key stakeholders (including CLCs and State Program Managers) and final agreement was reached between NACLCLC and the State/Territory Associations. With these agreements and structures in place, the NAS was formally launched in October 2010.

Related initiatives

The NAS was one project in a package of measures that were developed to improve quality assurance in CLCs, and protect the CLC 'brand' and CLC clients. The other measures included:

- the development of Proposed Common Membership Rules for State and Territory CLC Associations;
- the development of NACLCLC Accreditation Criteria;
- the registration of a NACLCLC Certification Trade Mark;
- the development of Certification Rules; and
- a major revision of the NACLCLC Risk Management Guide including to identify mandatory standards from recommended good practices.

Appendix 2: Standards and tools

The Service Standards cover the following areas:

Section A: Governance, Management and Administration

A1 Organisational Management (including governance, planning, staff management, financial management and risk management)

A2 Information Management (including management of Information and data; and publications and media-related criteria)

Section B: Provision of Legal Services

B1 Information, Assessment and Referral

B2 Provision of Advice and Casework

B3 Supervision of Legal Practice by the Responsible Person

B4 File Management (Open files; file closure; file review)

B5 Specialist Projects Auspiced by the Centre

Section C: Community Development, Education and Reform Activities

C1 Community Information and Legal Education

C2 Research, Advocacy and Law Reform

Section D: Client Service

D1 Accessibility

D2 Assessing client satisfaction and managing complaints.

Tools and processes

The on-line self-assessment is completed via NACLC's Standards and Performance Pathway (SPP). The SPP is a tool developed by Breaking New Ground Inc (BNG), and this version was specifically developed by BNG for the NAS. It is an on-line assessment tool that includes the Accreditation Criteria Standards, that is, the CLSP Service Standards and RMG Mandatory Standards, other requirements gleaned from other core documents of the CLSP, for example, the Program's Guidelines and the CLSP Funding (Service) Agreement, and Standards from all the funding programs that were identified by NACLC and BNG as possibly being relevant for CLCs, for example the OATSIH Risk Protocol and the Family Relationships Program Standards. These are cross-mapped so that a service

with multiple funding need only complete one set of questions and produce one set of evidence to address common requirements of different funding programs. Beneath the Standards are quizzes that reflect indicators and evidence requirements.

The tool allows CLCs to record their self-assessment, compile an evidence pack, and obtain individual work plans (automatically generated by performing the self-assessment) and a report, and also to monitor their centre's progress against the requirements and compare themselves with the national CLCs' average.

A separate portal, the Management Support Online (MSO), complements the SPP. It provides CLCs with access to a library of resources, diagnostics and self-assessments; self-directed training programs; model policies; and organizational development and good practice guidance. Some of that material is specific to CLCs, whilst the remainder is drawn from the broader body of practice and theory relating to the community services sector.

Access to the SPP and MSO is funded as follows:

- The initial three-year licence for the SPP was funded via one-off funding from the Australian Government Attorney-General's Department. NACLC has subsequently purchased an additional three years licence using NACLC core funding; and
- Access to the MSO was initially and continues to be funded by the Australian Government by way of one-off grants.

Appendix 3: Key informant interview list

Name	Organisation and /or job title
1. Julia Hall	NACLC Executive Director
2. Diana Dagg	NAS National Accreditation Coordinator
3. Michael Smith	NACLC Management Committee Chair
4. Hugh de Kretser	NACLC Management Committee
5. Julie Nyland	BNG Director
	Regional Accreditation Coordinator (NSW)
6. Meg Houston	
7. Cate Kennedy	Regional Accreditation Coordinator (VIC)
8. Kerry Marshall	Regional Accreditation Coordinator (WA)
	Regional Accreditation Coordinator (QLD)
9. Jude Clarkin	
10. James Farrell	Queensland S/T Association EO
11. Liana Buchanan	Victoria S/T Association EO
12. Alistair McEwan	New South Wales S/T Association EO
13. Iris Lennon	South Australia S/T Association
14. Philip Kieran	Western Australia S/T Association
15. Deb Phippen	ACT S/T Association
16. Chris Young	Tasmania S/T Association
17. Caitlin Perry & 18. Olivia Henderson	Northern Territory S/T Association
19. Tony Woodyatt	Queensland PILCH Director
20. Giselle Negri	Cairns CLC Director
	(Former) Association-based sector development worker, Victoria
21. Claudia Fatone	

22. Joan Jardine	Director, CLSP, Attorney-General's Dept.
23. James Park	Legal AID ACT SPM
24. Rosemarie Coxon	Legal AID QLD SPM
25. Roy Reekie	Legal AID VIC SPM
26. Bronwyn McCutcheon	Legal AID NSW CLSP Manager
27. Benjamin Dougall	Legal AID NSW
28. Allison Harris	Legal AID WA SPM
29. Leesa Bevan	Legal AID Tasmania SPM
30. Mary Perla	Legal AID SA SPM
31. John Boersig	Legal Aid ACT CEO

In addition, group interviews were conducted with the following

32. Accreditation Coordinators	2 group interviews/consultations
33. The NACLC Management Committee	1 group interview/consultation
34. Those Commonwealth and State Program Managers available on 12 th March 2014.	1 group interview/consultation

Appendix 4: *Survey questions* is provided on the following pages.

Review of the National Accreditation Scheme

Welcome

This survey is one source of information for the independent review of the National Accreditation Scheme ('NAS') for CLCs commissioned by NACLC to evaluate and improve the Scheme.

For ease of reference, this survey uses the term "CLC" and "centre" for all member legal services, including FVPLS and ATSILS.

PLEASE NOTE: You will need to complete the survey in the one sitting. If you wish to think about your responses or consult with others in your CLC before completing the questionnaire, we encourage you to download and print this PDF. After you have consulted or thought about your responses, please enter them electronically at:

<https://www.surveymonkey.com/s/ReviewofNAS>

Why is this survey important?

NACLC's purpose in retaining an independent consultant to undertake this review is to evaluate and improve the NAS - your response can make the accreditation process better and easier for you!

Who should complete this survey?

The reviewers will be helped by hearing the experiences and perspectives of different people in participating centres. For that reason, we are asking that each centre encourages as many staff and Management Committee/Board members as possible to complete this survey.

How long will this survey take to complete?

If you have no or few comments, it will only take a very short time; if you have a lot of comments, it could take up to 15 minutes to complete.

Most questions are optional, except for those marked with an asterisk (*).

Will my CLC's privacy be protected?

Yes. The reviewers will not use any data generated from this survey in any way which could identify any service or individual respondent.

I have a question...

Please contact Lisa Ryan (hecate@zeta.org.au) Thank you for your and time and effort in participating in the NAS Review.

Closing date: 6pm, Wednesday, 16th July.

Click 'Next' to begin.

Review of the National Accreditation Scheme

Your CLC's profile

We would like to ask you a few "profile" questions about your CLC (and one about your position) to assist us to understand the impact the NAS has had on different types of centres and positions.

1. What is your position title (or nearest equivalent)?

- Executive Officer, Manager or Coordinator
- Principal Lawyer/Responsible Person
- Administrator
- Chair of Management Committee/Board
- Other member of the Management Committee/Board
- Other

Please specify 'Other':

*2. Which state/territory is your CLC located in?

- ACT
- NSW
- NT
- Queensland
- SA
- Tasmania
- Victoria
- WA

3. Which of the following descriptions best describes your centre?

- CLC - Community Legal Centre
- ATSILS - Aboriginal and Torres Strait Islander Legal Service
- FVPLS - Family Violence Prevention Legal Service

4. Which of the following best describes the type of service your CLC delivers?

- Specialist
- Generalist
- Generalist with specialist program(s)

Review of the National Accreditation Scheme

5. What was the total audited income of your CLC in the last financial year?

- Over \$2 million
- Between \$1.5 million and \$2 million
- Between \$1 million and \$1.5 million
- Between \$500,000 and \$1 million
- \$500,000 or less

6. Has your centre been accredited under the NAS for CLCs?

- Yes
- No
- In progress

Review of the National Accreditation Scheme

Implementation, processes and tools

The following questions focus on implementation and the quality and usefulness of the tools and processes that support the NAS.

7. What did you understand the purpose of the accreditation process to be when your CLC commenced accreditation?

8. How effective (or ineffective) were the following NAS-related processes and tools in assisting you to undertake accreditation:

	Very effective	Effective	No effect	Ineffective	Very ineffective
Standards and Performance Pathway ('SPP') quizzes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
System of work plan progress reports	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exit interview at the end of the site visit	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Site visit by the Accreditation Coordinator	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Final report and recommendations provided by your Accreditation Coordinator	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Initial improvement work plan	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
NACLCL Risk Management Guide ('RMG')	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support and assistance provided by your Accreditation Coordinator	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other MSO resources (e.g., guides, fact sheets, training modules)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Management Support Online ('MSO') template policies and procedures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please elaborate (if desired):

Review of the National Accreditation Scheme

Coordination and administration of the NAS

The NAS was a joint initiative of NACLC and the State/Territory Associations of CLCs. Its initial implementation and resourcing was largely provided by NACLC, which maintains a national coordination role. Day-to-day administration of the NAS is undertaken by the relevant State/Territory Associations in the four states with a funded Regional Accreditation Coordinator: NSW, QLD, WA and Victoria. The National Accreditation Coordinator, based at NACLC, undertakes the day-to-day administration of the Scheme for the ACT, NT, SA and Tasmania, as well as the national role.

9. How satisfied (or dissatisfied) are you with the manner in which NACLC is coordinating and administering the NAS at a national level?

Very satisfied

Somewhat satisfied

Neither satisfied or
dissatisfied

Somewhat dissatisfied

Very dissatisfied



Please elaborate (if desired):

10. How satisfied (or dissatisfied) are you with the manner in which your State/Territory Association is coordinating and administering the NAS for your state/territory?

Very satisfied

Somewhat satisfied

Neither satisfied or
dissatisfied

Somewhat dissatisfied

Very dissatisfied



Please elaborate (if desired):

Review of the National Accreditation Scheme

Advantages, disadvantages and costs

We are interested in hearing about the advantages, disadvantages and costs (if any) of the NAS.

11. Were there any advantages associated with undertaking the accreditation process?

Multiple answers possible.

- Yes, to clients
- Yes, to my organisation
- Yes, to the community legal sector
- Yes, to myself as an individual staff member
- Yes, to myself as an individual Management Committee/Board members
- Yes, to myself as an individual volunteer (non MC/Board members)
- Yes, to all of the above
- No
- Unsure

Please elaborate or give examples (if desired):

12. Were there any costs (human resource or otherwise) to your CLC in undertaking the accreditation process? Multiple answers possible.

- Additional staff hours
- Additional Board/Management Committee hours
- Additional contractor hours
- Additional volunteer hours
- Other

Please elaborate and (if possible) estimate any hours, financial costs or reallocation of resources (if desired):

Review of the National Accreditation Scheme

13. In addition to the time and hours your centre may have invested in accreditation, were there any disadvantages associated with undertaking the accreditation process?

Multiple answers possible.

- Yes, to clients
- Yes, to my organisation
- Yes, to the community legal sector
- Yes, to myself as an individual staff member
- Yes, to myself as an individual Management Committee/Board members
- Yes, to myself as an individual volunteer (non MC/Board members)
- Yes, to all of the above
- No
- Unsure

Please elaborate or give examples (if desired):

Barriers and enablers

The following questions are designed to identify the factors and resources which have affected your service's experience of the accreditation process.

14. What factors or resources (if any) assisted your centre to undertake the accreditation process? Multiple answers possible.

- Access to and assistance of National Accreditation Coordinator
- MSO resources
- Utilisation of volunteer support
- Technical support and advice from BNG
- Experienced and skilled staff
- Board/Management Committee support
- Access to and assistance of Regional Accreditation Coordinator
- Centre's existing policies and procedures
- Online quizzes of the NAS
- Other

Please elaborate on 'Other' factors or resources (if desired):

Review of the National Accreditation Scheme

15. What factors or resources (if any) acted as barriers to your centre undertaking the accreditation process? Multiple answers possible.

- Insufficient technical support from BNG
- Lack of centre's existing policies and procedures
- Lack of experienced and skilled staff
- Lack of Board/Management Committee support
- Insufficient training to complete SPP and to access MSO
- Lack of access to and assistance of Regional Accreditation Coordinator
- Lack of time
- Lack of access to and assistance of National Accreditation Coordinator
- Other

Please elaborate on 'Other' barriers (if desired):

Review of the National Accreditation Scheme

Benefits for both the whole sector and individual centres

The purpose of this section is to identify benefits (if any) of undertaking the accreditation process. We are interested in hearing your perspective on any benefits to both the whole community legal sector and to your individual centre.

16. Looking back, overall, was it beneficial (or detrimental) for the community legal sector to undertake the accreditation process?

Highly beneficial	Beneficial	Neither beneficial or detrimental	Detrimental	Highly detrimental
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please elaborate how or give examples (if desired):

17. Looking back, was it beneficial (or detrimental) for your centre to undertake the accreditation process?

Highly beneficial	Beneficial	Neither beneficial or detrimental	Detrimental	Highly detrimental
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please elaborate how or give examples (if desired):

Review of the National Accreditation Scheme

Effect of the NAS on your centre

The NAS Service Standards and the Standards and Performance Pathways ('SPP') online tool guides each CLC through assessing their organisation against the accreditation criteria relating to:

- * governance, management and administration
- * provision of legal and related services
- * community development, education and reform activities
- * client services.

We are interested to know whether the NAS had a positive, negative or no effect for your centre in these areas to date. After ranking the effect, we encourage you to elaborate on any effects.

18. What effect do you think participating in the NAS has had to date on your centre's:

	Very positive effect	Positive effect	No effect	Negative effect	Very negative effect
Promoting access, equity and non-discrimination for clients	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provision of legal services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Law and policy reform activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Governance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Assessing client satisfaction and managing complaints	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provision of non-legal services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strategies to promote client access	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Community development (e.g., community legal education)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Organisational management and administration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please elaborate (if desired):

Review of the National Accreditation Scheme

The NAS and changes at your centre

The following questions relate to changes in your service resulting from your participation in the NAS. When responding, please take into account both any immediate, incremental changes and/or (if any) longer term changes resulting from accreditation at your centre.

19. Based on your centre's experience in undertaking assessment for the NAS:

	Yes	No	Unsure	N/A
Are accreditation issues regularly discussed at team meetings?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do most staff know what the NAS Service Standards are?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do most staff know about the centre's work plan?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Are staff consulted in developing new policies and procedures?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Has the Management Committee/Board seen the work plan?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please elaborate on your centre's experience (if desired):

20. From your centre's experience, does participating in the NAS recognise the good quality of the work your centre is already demonstrating (also known as existing good practice)?

To a great extent	Somewhat	Very little	Not at all	Unsure
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Review of the National Accreditation Scheme

The future of the NAS: continuation and development

Taking into account the benefits obtained and the costs involved in undertaking accreditation assessment at your centre AND the costs and benefits incurred by the whole sector, we are interested in hearing your perspectives on whether the NAS should be continued and if yes, what current features should be maintained, modified or improved.

21. In your view, should the NAS be continued?

- Yes
- No
- Unsure

22. Assuming the NAS continues, what current features should be maintained? Multiple answers possible.

- NAS Guidelines
- 1-on-1 practical assistance from the Accreditation Coordinators to the CLC
- Site visit
- Sending report and documents to State Program Manager ('SPM') (applicable for ACT, NSW, NT, QLD, SA)
- The tiered structure (e.g., Tiers 1, 2 and 3) of accreditation
- System of work plan progress reports
- Final report and recommendations
- State/territory role in coordinating and administering the NAS
- State/territory role in supervising Accreditation Coordinators
- MOU between your centre and NACLIC or your centre and state/territory association
- The current interaction of the accreditation process with the RMG compliance process
- Initial improvement work plan
- Other

If you selected 'Other', please elaborate (if desired):

23. Assuming the NAS continues, what current features should be changed? We encourage you to list the features and the change(s) that would be most useful.

Review of the National Accreditation Scheme

24. Assuming the NAS continues, what additional focus areas do you suggest the Scheme focuses on in the future? Multiple answers possible.

- Cultural safety/competency
- Environmentally sustainable practice
- Creating child safe/child friendly environments
- Other

If you selected 'Other', please elaborate (if desired):

25. Please add any additional comments or recommendations for improving the NAS.

Review of the National Accreditation Scheme

Thank you

Thank you for the time and thought you've given to participating in this survey. We appreciate your feedback.

NACLC will keep you posted about progress of the independent review via their e-bulletin, *NACLC News*.

If you have any inquiries or further comments about the review, please contact us at hecate@zeta.org.au or currie.brenda@gmail.com.

Lisa Ryan and Brenda Currie
Hecate Consulting