



**Legislative Assembly** for the  
**Australian Capital Territory**

Select Committee on Financial  
Management and Government  
Procurement Legislative Compliance

# Submission cover sheet

## Inquiry into Financial Management and Government Procurement Legislative Compliance

Submission number: 10.1

Submitter: Melanie Wilde

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## **SUPPLEMENTARY SUBMISSION**

**Ms Melanie Wilde**

### **Inquiry into Financial Management and Government Procurement Legislative Compliance**

April 2026

This supplementary submission provides clarification and some additional analysis on two matters raised in my original submission.

#### **1. Clarification of Section 16: cross-Directorate funding data**

To further contextualise the data from the 2021 ACTCOSS *Counting the Costs* report: it found that 52 per cent of ACT community sector organisations surveyed were receiving funds from a single Directorate, and a further 30 per cent from two Directorates. More than 80 per cent of the sector therefore operates within one or two commissioning relationships. Only 6 per cent were funded across four or more Directorates.

The pattern holds across organisation sizes, though with notable variation. 63 per cent of small organisations (less than \$1 million in annual revenue) are single-Directorate-funded, and 52 per cent of very large organisations (\$5 million and above) are as well. Perhaps counter-intuitively, it is the mid-sized organisations (\$1–5 million) that are most diversified, with only 40 per cent single-Directorate-funded and 16 per cent operating across four or more Directorates.

A diversified funding base across multiple commissioning relationships is generally consistent with organisational resilience, entrepreneurial capacity, and reduced vulnerability to single-relationship capture. Heavy reliance on a single Directorate relationship, by contrast, is the configuration that resource dependence theory and the Australian literature on peak bodies (referenced at Section 10) associate with advocacy chill, reduced independence, and market thinness over time.

My original submission emphasised the need for cross-Directorate visibility of providers drawing significant ACT public funding, independent of organisational size. The data also supports a further point: that because organisational scale does not straightforwardly explain the single-Directorate pattern (with small and very large organisations more concentrated in single-Directorate relationships than medium-sized ones), there is a clear case for deliberate market stewardship by commissioning agencies.

This includes broadening the base of credible, capable providers competing for ACT work, and supporting diversification of funding relationships for providers currently operating within narrow commissioning arrangements.

## **2. Supplementary observation relevant to Section 1.3: framing of uncompensated staff work and reserve drawdowns**

The 2021 ACTCOSS *Counting the Costs* report and the December 2024 *Sector Sustainability Final Report* both reference widely-reported practices within the ACT community sector, including the use of uncompensated staff overtime and the drawing down of organisational reserves to maintain service delivery. These practices have been framed primarily as evidence of inadequate sector funding.

That framing has merit and the underlying funding pressures are real. However, these same practices may also reasonably be read as indicators of governance and management weakness. In any other regulated employment context, openly reporting reliance on uncompensated staff work would constitute a wage theft and work health and safety concern, and would attract Board-level accountability. Sustained reserve drawdowns absent a credible recovery plan would, in the private sector or in regulated public administration, constitute a material risk requiring direct Board action and disclosure.

Both readings can hold simultaneously. The risk is that, in the absence of explicit attention to the second reading, the first comes to function as a complete explanation, and significant questions about governance, financial management capability, and employment practices in publicly funded organisations remain unexamined. This is consistent with the broader concern set out at Section 1.3 of my original submission regarding the conflation of overall resourcing adequacy with structural efficiency, governance integrity, and accountability.

**Melanie Wilde**