

SUBMISSION

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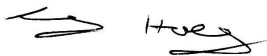
Australian Charities and Not-for-profits Commission Taskforce

In response to the

Implementation Design Consultation Paper, 9 December 2011

27 February 2012

Authorised on behalf of Community Employers WA by:



Chris Hall
Co Chair



Tony Pietropiccolo
Co Chair

Introduction

Community Employers WA (CEWA) is a registered Employer Organisation with the Industrial Relations Commission of Western Australia, and represents non-government, not-for-profit employers in the community services sector of Western Australia.

CEWA's primary objective has been to secure a 30% increase in government funding to non-government, not-for-profit community service organisations in Western Australia, to create the capacity to allow organisations to improve salaries and wages for staff so that they are fair and just and to ensure that vital community services remain viable. CEWA also seeks to improve the relationship between the community services sector and government.

CEWA is solely funded by its member organisations, which demonstrates the commitment of these organisations and the importance they place on CEWA's aims and objectives.

CEWA currently represents 115 community service organisations in Western Australia; its membership continues to grow, along with its increasing importance in representing the interests of community sector employers.

ACNC Implementation Design Consultation Paper – Discussion Items

CEWA would like to express its position on some key elements of the Consultation Paper regarding the ACNC implementation design.

Simplification not Complication

A key objective is the reduction of red tape and duplication with regards to compliance, accountability and transparency. This is not obvious at this stage and needs to remain pivotal for the sector and the ACNC. The different contractual compliance of all the different Government departments is a major factor. If the ACNC is not to add to the burden of compliance then it must first work out how its role relates to the other entities that the sector already reports to. It would be very helpful if not-for-profits only had to provide financial and other compliance requirements to one entity i.e. one entry point for service providers.

At the Taskforce's own admission (WA Sector Consultation, 3 February 2012), there is likely to be an initial increase in administrative burden. The ACNC will therefore be judged on the administrative impact in the medium term. At this stage, it seems that an additional layer of bureaucracy is being added.

Framework Harmonisation - Link Between State and Federal Governments

The link with a State's requirements and the harmonisation of the framework between Federal and States/Territories is crucial. The Taskforce has stated that it will proceed irrespective of the situation with the respective States (WA Sector Consultation, 3 February 2012). This could have disastrous consequences in terms of duplication of reporting, accountability and compliance requirements for NFPs.

Reporting

Further consultation needs to be undertaken to assess the impact of the new reporting requirements for Tier 1, 2 and 3 organisations, in terms of what they currently do, how this will change and what resources are required to change.

For NFPs in Western Australia, this reporting is a new level of reporting, one that is not currently required. This will add an additional impost on organisations.

The qualitative reporting requirements seem to mirror much of what is included in an organisation's Annual Report. To minimise duplication, it is suggested that an organisation's Annual Report could be submitted to meet this requirement.

The need to outline fundraising activities is not clear, especially for organisations that do not rely on fundraising for the majority of their income. It is suggested that this section is either removed or reviewed.

Website Information

Further information and consultation with the sector is needed on what organisational information will appear on the Charity Register on the ACNC website. It is important that certain confidentiality and privacy is maintained.

Other Considerations

Some other considerations include:

- The financial year of organisations in the sector. While a 30 June end of financial year is relatively standard across the sector, it is necessary to be cognisant of, and flexible towards, organisations that may have different financial years.
- The reporting deadline of 31 October coincides with other current reporting requirements. A later deadline should be considered to avoid unnecessary bottlenecks in the system.
- The exact role definition and responsibilities of the many different reporting, advisory and compliance bodies is extremely confusing. This needs to be simplified so that all NFPs are able to understand the structure, how the different bodies relate to each other and the subsequent implications for the sector.

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Attachment 1 - Members as at 30 June 2011

Activ Foundation Inc
Advocacy South West Inc
Agencies For South West Accommodation (ASWA)
Anglicare WA Inc
ARAFMI
Armadale Community Family Centre
Association For Services To Torture & Trauma Survivors (ASeTTS)
Association for the Blind WA
Asthma Foundation WA Inc.
Baptistcare
BJL Connecting Communities
Bluesky Community Group
Bunbury Pathways '92 Inc.
Burdekin – Youth In Action
Care Options
Centacare Family Services
Centrecare Inc
Child Inclusive Learning and Development Australia Inc (CHILD Australia)
Communicare
Community Housing Coalition of WA
Community Legal Centres Association (WA) Inc
Community Vision Inc
ConnectGroups
Cyrenian House
Derbarl Yerrigan Health Services Inc
Drug ARM WA Inc
Ethnic Communities Council of WA
Extra Edge Community Services
Financial Counsellors Association of WA Inc.
FPWA Sexual Health Service
Fremantle Multicultural Centre Inc.
Good Samaritan Industries
Gosnells Women's Health Service
Health Consumers Council (WA) Inc
Hills Community Support Group Inc.
Holyoake The Australian Institute For Alcohol & Drug Addiction Resolutions
Identity WA
Ishar Multicultural Women's Health Centre Inc
Joondalup Youth Support Services Inc
Kids Camps Inc
Koolkuna (The Eastern Region Domestic Violence Services Network Inc)
LAMP Inc
Landsdale Family Support Association Inc
Lifeline WA
Margaret River Community Resource Centre Inc
Meath Care Inc
Melville Cares Inc
MercyCare
Metropolitan Migrant Resource Centre
Midland Joblink Inc.
Mission Australia
Mosaic Community Care Inc

Multicultural Services Centre of Western Australia Inc
Ngala Family Resource Centre
Nulsen
Outcare (Inc)
Palmerston Association Inc
Parkerville Children Youth Care Inc
Pat Thomas Memorial Community House Inc.
Peel and Rockingham Volunteer Resource Centres
Peel Community Living
People with Disabilities (WA)
Perth Home Care Services Inc
Red Cross WA
Relationships Australia (Western Australia) Inc
Richmond Fellowship
Rocky Bay Inc
Ruah Community Services
Secca
SEMYA
Serenity Lodge
Silver Chain
South Coastal Women's Health Services
Southcare Inc
Southside Care
St Patrick's Community Support Centre
St Vincent de Paul Society
Swan City Youth Service
Swan Emergency Accommodation
Technology Assisting Disability WA
Tenants Advice Service
The Salvation Army
The Spiers Centre Inc
The WA Aids Council
Therapy Focus Inc
Uniting Aid
UnitingCare West
Valued Independent People Inc
Vincentcare
Wanslea Family Services Inc
We Can Community Services
Westcare Inc
Western Australian Association for Mental Health (WAAMH)
Western Australian Council of Social Service Inc (WACOSS)
Western Australian Network of Alcohol and Other Drug Agencies (WANADA)
Women's Council for DFV Services (WA)
Women's Health Resource Centre
Women's Health Services
Women's Healthworks
YMCA Perth
Youth Focus