



COMMUNITY EMPLOYERS WA

29 April 2013

Office for the Not-for-Profit Sector
Department of the Prime Minister and Cabinet
PO Box 6500
CANBERRA ACT 2600

Dear Sir / Madam,

RE: Draft Code of Best Practice for Engagement with the not-for-profit sector

The purpose of this submission is to provide Community Employers WA's (CEWA) brief comments on the Code of Best Practice for Engagement with the not-for-profit sector.

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 now has 120 members comprising many of the largest and smaller Community Sector employers in WA, and continues to grow in numbers and influence.

CEWA is pleased that the sector has been asked to comment on the Code of Best Practice for Engagement with the not-for-profit sector. In essence, CEWA endorses the principles of engagement in the Code and the philosophy behind its creation – much of which is effectively common sense. The relationship between the Government and the sector is a very important one and we welcome the opportunity to set clearer 'ground rules' on engagement.

This is the sixth Consultation paper we are aware of, to be released to the NFP sector in the past 5 months. In some ways, the sector has an understandable feeling of consultation overload. Indeed at present there are three consultation papers seeking simultaneous responses – the Annual Information Statement, the Definition of Charity and this paper on the Code of Best Practice Engagement. It was thus bemusing and somewhat incongruous to read in this draft paper that Government will undertake to co-ordinate consultations with other agencies, local governments and peak bodies to reduce **consultation fatigue** and minimise duplication of efforts. Clearly it would have been better if this was the first paper to be circulated so that government agencies would abide by the stated aims.

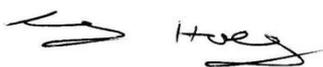
Additionally, the paper recommends to Government that sufficient time for consultation be allowed which may include time for peak bodies to discuss with the members and organisations to gain agreement from their boards. With each of the consultation papers which have been released, and indeed with this consultation paper, only 6 weeks have been allocated for interested parties to respond. This is simply not enough time – particularly for organisations such as ours which then seeks to undertake a consultation process with our 120 members. **CEWA would strongly recommend that the Code of Best Practice sets a minimum timeframe of 12 weeks for consultation** to enable more considered and meaningful responses. We would suggest that consultations not be undertaken over the Christmas / New Year period, when many community organisations take time for a much needed recharging of their workforce and downtime of boards.

CEWA recommends that **the Code be widely rolled out to all government agencies** and training be undertaken periodically to ensure there is universal understanding and compliance with the commitments made in the document. **We also seek the inclusion of the development of action plans by each government agency** as to how they intend to embed the principles of engagement articulated in the Code.

Lastly, we recommend that any evaluation of the Code is undertaken by government agencies as well as, and not just in relation to, the NFP sector.

Given the critical importance of the Annual Information Statement and the Definition of Charity consultation papers, we do not propose to explore or comment further on this Code of Best Practice paper at this stage.

Yours sincerely,



Chris Hall
Co-Chair



Tony Pietropiccolo AM
Co-Chair

Cc: Minister Julie Collins – Minister for Community Services

Cc: Shadow Minister Kevin Andrews – Shadow Minister for Families, Housing & Community Services