

06 August 2018

Committee Secretary
Department of the Senate
PO Box 6100
Parliament House
CANBERRA ACT 2600
AUSTRALIA

Transmitted via email – charityfundraising.sen@aph.gov.au

Dear Sir / Madam,

Re: Charity Fundraising in the 21st Century

The purpose of this submission is to provide Community Employers WA's (CEWA) brief comments on the Senate Inquiry into Charity Fundraising in the 21st Century.

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 has over 140 members comprising many of the largest and smaller Community Services Sector employers in WA, and continues to grow in numbers and influence. Our members employ in excess of 25,000 staff and are supported by over 10,000 volunteers. A list of our members is attached in Appendix 1.

- CEWA is supportive of harmonisation of the State based fundraising regimes, and a move to a single national approach. The range of current regimes are burdensome for many organisations and there is often unnecessary duplication across state jurisdictions. We have also had members express concern about the unintended consequences of setting up a donation facility online in WA, without realising the need to register in every state. A national approach will address this issue
- If a move to a national approach is adopted, it should be undertaken on the basis that the new regime is fit for purpose
- The levels of registration, compliance and reporting in a national approach should be no higher than current obligations for charities operating in any individual state (ie a 'Better Off Overall Test' should be adopted). For example, if a charity is only operating and fundraising in Western Australia, any new approach should not increase their registration, compliance and reporting requirements

- If a national approach is to be adopted, prior consultation should be undertaken with a cross section of charities and relevant stakeholders in various states, to ensure that a new system is going to be effective and with a minimal compliance burden. It may be worthwhile running focus groups or a test environment with users as part of the implementation process
- The primary focus of adopting a national approach should be on reducing costs and simplifying processes, rather than increasing regulatory controls. A positive approach to working with charities to reduce their workload and costs is more likely to promote higher confidence in charities and the NFP sector as a whole
- A key objective and important outcome of a national approach, should be to seek to instil a high degree of trust of charities in the broader community and in particular, donors and philanthropists
- Any costs of adopting and implementing a national approach should not be borne by charities.

We thank you for the opportunity to comment and would be pleased to clarify any of the above comments.

Yours sincerely,

John Bouffler
Executive Director



CEWA MEMBERSHIP AS AT 1 JULY 2018

Aboriginal Legal Services of WA Inc
Accessibility WA
Accordwest
Activ Foundation Inc
Advocacy South West Inc
Advocare
Albany Youth Support Association
Alzheimer's Australia WA
Anglicare WA Inc
Armadale Community Family Centre
Association for Services to Torture & Trauma Survivors (ASeTTS)
Asthma Foundation WA Inc
Australian Red Cross WA
Avivo
Baptistcare
Beehive Industries of WA
Black Swan Health Ltd
Bladder and Bowel Health WA
Bluesky Community Group
Brightwater Care Group
Burdekin – Youth in Action
Cahoots Org
Calvary Youth Services Mandurah Inc
Cancer Council WA
Centacare Employment and Training
Centacare Family Services
Centrecare Inc
Child Inclusive Learning and Development Australia Inc (CHILD Australia)
Chorus
Coeliac Western Australia
Communicare
Community Legal Centres Association (WA)
Community Vision Inc
ConnectGroups
Consumer Credit Legal Service WA Inc
Consumers of Mental Health WA
Cyrenian House
Derbarl Yerrigan Health Services Inc
Desert Blue Connect
Diversity South
Employment Law Centre of WA
Enable WA
Escare Inc
Ethnic Communities Council of WA
Ethnic Disability Advocacy Centre
Family Inclusion Network (WA)
Family Support WA Inc
Financial Counsellors Association of WA Inc
Foodbank WA
55 Central
Fremantle Multicultural Centre Inc
Fremantle Women's Health Centre
Goldfields Individual and Family support Association
Good Samaritan Industries
Gosnells Women's Health Service
Headwest
Health Consumers Council (WA) Inc
Helping Minds
Holyoake The Australian Institute For Alcohol & Drug Addiction Resolutions
Hope Community Services
Identity WA
Independent Living Centre
Indigo Junction
Interchange WA
Ishar Multicultural Women's Health Centre Inc
Juniper
Key Assets WA Inc
Koolkuna (The Eastern Region Domestic Violence Services Network Inc)
LAMP Inc
Lifeline WA
Life Without Barriers
Linkwest
Margaret River Community Resource Centre
Meath Care Inc
Melville Cares Inc
MercyCare
Metropolitan Migrant Resource Centre

MIFWA
Mission Australia
Mosaic Community Care Inc
Multicultural Services Centre of Western
Australia Inc
National Disability Services WA
Ngala Family Resource Centre
Nulsen
Outcare
Palmerston Association Inc
Parkerville Children Youth Care Inc
Pathways Southwest
Pat Thomas Memorial Community House
Inc.
Patricia Giles Centre
Peel Volunteer Resource Centres
People with Disabilities (WA)
Perth Inner City Youth Service
Pivot Support Services
Relationships Australia (Western
Australia) Inc
Richmond Wellbeing
Rise Network
Rocky Bay Inc
Ruah Community Services
SECCA
Sexual Health Quarters
Shelter WA
Silver Chain
SMP Personnel
South Coastal Women's Health Services
Southwest Community Legal Centre
South West Refuge Inc
Southcare Inc
Southern Cross Care (WA) Inc
Southside Care

Starick Support Services
St Bartholomew's House
St John of God Outreach Services
St Patrick's Community Support Centre
St Vincent de Paul Society
Sudbury Community House Association
Swan City Youth Service
Technology Assisting Disability WA
Tenancy WA
The Gowrie (WA) Inc
The Salvation Army
The Spiers Centre Inc
The WA Aids Council
Therapy Focus Inc
360 Health & Community
Uniting Aid
UnitingCare West
Uniting Church in the City
Visibility
Volunteering WA
WA Blue Sky Inc
WANADA
Wanslea Family Services Inc
Westcare Inc
Western Australian Association for Mental
Health
Western Australian Council of Social
Service
Women's Council for DFV Services (WA)
Women's Health and Family Services
Yaandina Family Centre
YACWA
YMCA Perth
Youth Focus
Youth Futures WA

