



Australia's Charities and Not-for-profits

Written Submission

The Options Paper, Australia's Charities and Not-for-profits sets out proposed replacement arrangements for charities in Australia. The paper outlines policy directions proposed by the Government to introduce effective replacement arrangements that reduce the burden of regulation on the civil society sector.

The paper is being released to seek feedback from charities and interested parties on the proposed replacement options. Comments and feedback will inform development of the replacement arrangements. A summary of written submissions will be provided on the Department's website in September 2014.

Please use this submission template to provide your feedback on the proposed replacement arrangements for charities in Australia.

Instructions for completing the Submission Template

- Download and save a copy of the template to your computer.

Completed submissions are to be sent by 20 August 2014 to:

consultationwithcharities@dss.gov.au (preferred method) OR

Civil Society and Programme Delivery Policy Branch

Department of Social Services PO BOX 7576

Canberra Business Centre, ACT 2610

Submissions received after 20 August may not be considered.

Unless otherwise stated, the information and feedback you provide may be used for publishing purposes. Please state if you do not wish for your comments to be published.

- Refer to the *Options Paper, Australia's Charities and Not-for-profits* for context and discussion questions.
- You do not need to respond to all of the questions.
- Please keep your answers relevant to the topic being addressed, we ask that submissions be limited to two pages.

Response to Options Paper:

Submitted by: **Evelyn O'Loughlin**
On behalf of: **Volunteering SA-NT**
State: **SA**
Contact email: **Evelyn.OLoughlin@volunteeringsa-nt.org.au**

For more than thirty years **Volunteering SA&NT** has promoted and supported volunteers, volunteer involving organisations and the principle of volunteerism in South Australia and now the Northern Territory.

Volunteering SA&NT is governed by a citizen board, responds to a body of members and works extensively with volunteers, volunteer managers, volunteer resource centres and volunteer involving organisations. As the peak body for the voluntary sector in South Australia and the Northern Territory it has an integral leadership and advocacy role for that community. As the peak body it is funded by State and Federal Governments to provide a range of services including advice to government, training for volunteers, volunteer managers and volunteer involving organisations, referrals, research and policy development.

During the time that this organisation has been in operation, it has engaged in consultations and provided submissions with and for all levels of government on a wide range of issues and topics. This submission marks the first occasion on which the organisation has been invited to submit according to a template that restricts its input to options that are unacceptable.

As a peak body representing tens of thousands of volunteers who spend their time building community in South Australia and the Northern Territory, we feel constrained to protest at the manner in which this particular consultation has been conducted. We note that we are offered the opportunity to comment on proposed replacement arrangements for the Australian Charities and Not-for-profits Commission but that the questions posed pre-determine the responses. We are thus prevented from putting the view of our sector to government. Over 80% of the sector has demonstrated support for the continuance of the Commission and does not accept that there is any valid reason to change the existing arrangements. This view has been made clear to government and yet has apparently been dismissed.

Voluntary associations are key elements of democratic civil society, providing a critical niche for the operation of active citizenship. In addition to providing services that are funded by levels of government, they also provide community driven services and activities that contribute to the amenity of Australian life. As actors at the "grass roots" they represent a storehouse of knowledge of the views and aspirations of their members, participants and their professional staff. As such the sector represents a significant resource which is accessed by means of effective consultation.

For consultation to be effective there needs to be some assurance that the matter at issue may be influenced by the outcome of the process. In addition, consultation should occur at policy and program level not just in relation to the administrative matters that have been listed for comment in the Options Paper. It would appear that the views of the sector on the wider issues are being disregarded and not only that but that government is not prepared to hear these views. This must be a cause of major concern. The actuality of these views is outlined in the Community Council for Australia's submission in relation to the Options paper, which is supported by **Volunteering SA&NT**.

Volunteering SA&NT would be pleased to participate in a consultation that:

- occurs undertaken at the earliest possible stage in the decision-making process
- demonstrates inclusive and continuous stakeholder engagement
- offers scope to influence the outcome or where the scope of the consultation is delineated clearly and those areas where there is room to influence development are distinguished from those that are non-negotiable
- ensures the widest spectrum of relevant (or at least a representative cross-section of) stakeholders are involved
- allows for timely and constructive feedback to stakeholders
- demonstrates transparency and accountability
- explains how stakeholders' views are to be taken into account
- demonstrates that results have been carefully analysed
- uses convenient and accessible tools
- allows for free and open responses
- accounts for the difference between evidence and opinions
- communicates results clearly and directly
- guarantees feedback that indicates how decisional outcomes are reached
- is not tokenistic
- values stakeholder contribution