

coalition of **community**boards

Friday, 4 August 2017

Senior Adviser
Individual and Indirect Tax Division
The Treasury
Langton Crescent
PARKES ACT 2600

To whom it may concern.

RE: Tax Deductible Gift Recipient Reform Opportunities - submission

The Coalition of Community Boards (CoCB) is a volunteer run not for profit organisation whose mission is to work with small organisations at committee and board level to strengthen their capacity and connection with each other.

The CoCB has a geographic spread across three key locations in Queensland, The Sunshine Coast, Whitsunday, Isaac, Mackay regions and Logan.

This submission has been prepared with CoCB member groups. Given the complexity of the paper and our collective stretched resources, we have chosen to respond to a few broad key areas of concern and to endorse the Community Council of Australia's (CCA) submission (Attached).

The CoCB believes that the regulations relating to DGR require change, and in light of this it is positive to see that the Australian Government has released a discussion paper and that there is intention for reform.

Small organisations form the lifeblood of Australia's civil society. They spring from the heart of our communities, linking into multiple facets of daily life, particularly in regional Australia.

The sector we represent is the local bowls club, the community centre, the sports club, the kennel club, the local Hall and so on. These are community groups that provide the embrace for the emerging football star, provide space for social enterprise, hold the individuals who are struggling to feed their children and sit with the lonely people in their homes.

They provide a voice for remnant bushland to be felled for development and fight the fire that threatens to engulf a village. They are the fabric of the local community and create an embrace akin

to an extended family. They are essential and are constantly scraping to survive, both financially and by stretching their human resources.

Many of these groups may not have the capacity or the resources to seek DGR status, however others fulfilling slightly larger roles in the community sector do and may consider it useful to their operation to seek or maintain DGR and or Charity Status to help channel much needed funds into their essential operations in our communities.

The current process to seek DGR is complex, time consuming and the process off-putting. Organisations are challenged by fundraising, are being asked to do more with less, and are being asked to go to great lengths and detail to acquit and measure the resources they do get from government.

We believe that any extra reporting requirements would have a negative impact on small groups who enjoy DGR/Charity Status. Government requirements and processes that are streamlined, simple channels for investment would ease pressure on small community groups and enable them to more easily go about the business of why they exist – to enrich and support their communities.

In regard to specifics relating to consultation questions 5-7 and 9-11, the ACNC should not request additional information from all charities about their advocacy activities for the following reasons:

- Advocacy by charities should be encouraged, not restricted as Advocacy by charities is critical to a well-functioning democracy
- Extra reporting that is unnecessary to the purpose of the organisation and its accountability in delivering that purpose to the community is red tape and time wasting.
- Similarly rolling reviews of programs and a general five year sunset clause would also create more paperwork for all organisations and in particular small organisations whose time is better spent on delivering services to the community.

Finally, consultation question 12 where views are sought on requiring environmental organisations to commit no less than 25 per cent of their annual expenditure from their public fund to environmental remediation, and whether a higher limit, such as 50 per cent should be considered, the CoCB like the CCA believe that any reform of DGR concessions needs to be systemic and based on considered policy goals, consistency and careful application across the whole charities sector.

Regards

Ana Greenfield for the Coalition of Community Boards.

Contact Ana Greenfield, project officer Sunshine Coast Coalition of Community Boards.

President Dr Ann Ingamells.