



27 February 2012

ACNC Implementation Design Discussion paper  
ACNC Implementation Taskforce  
Treasury Building  
Langton Avenue  
Parkes ACT 2600

Dear Taskforce,

**Re: SCOA's submission on the discussion paper ACNC Implementation Design**

The Settlement Council of Australia (SCOA) is pleased to provide this submission into the Australian Charities and Not-for-Profit Commission. SCOA represents the broad network of nearly 70 settlement agencies around Australia. As advocates and service providers, the sector has a unique knowledge of the realities of the settlement experience, over time, across the country, and among hundreds of different ethno-cultural communities. While not all SCOA's members are registered charities, many are, and almost all are not-for-profit organisations. As such the not-for-profit reform process has a direct bearing on the settlement sector.

SCOA welcomes the establishment of the Australian Charities and Not-for-Profit Commission as an independent regulator for the not-for-profit sector. It is hoped and expected that the ACNC will strengthen the not-for-profit sector, reduce red tape and increase community confidence in the work undertaken by not-for-profits across Australia.

SCOA's submission is informed by ongoing member consultation across Australia, which has highlighted the administrative burden many agencies in the settlement sector face in terms of complying with various government and contractual regulations. The settlement sector welcomes improvements in accountability and transparency, and is currently working towards the development of national settlement service standards. However, there are concerns that processes designed to reduce red tape will not.

SCOA is also conscious of the short timeline for some steps involved in the implementation process of the not-for-profit reform agenda. These concerns relate to the internal operations of the ACNC, and the role of the ACNC in communicating with the sector, and whether the timeline will allow sufficient time to connect with agencies and support them through the process. There have been an admirable range of consultations and discussion papers, however it has been challenging to keep up with the swift pace of change and provide informed comment on significant changes and important reforms proposed.

SCOA wholeheartedly supports efforts to streamline registration processes. It is important that materials and processes acknowledge the multicultural reality of Australia, and adequately address the needs for culturally and linguistically diverse groups in terms of access – in particular language

and support. Purely on-line resources will not be effective for some in the community who are not strongly computer literate, but who are nevertheless making significant volunteer contributions to the community.

Many member agencies are involved directly in supporting newly arrived communities from a wide range of backgrounds establish community organisations and associations, some of which would be classified as charities (and all of which would be classified as not-for-profit). Communities need support navigating the legal process of registration – it is complex, involves high levels of English language skills, and much filling of forms. Any regulation and registration process also needs to address the diversity of organisational forms that exist within the charity and not-for-profit sector.

SCOA feels that the ACNC should have a strong and ongoing role in relation to community education, both within the not-for-profit sector, and the community at large. Community education, capacity development and empowerment lie at the heart of a strong community sector, and it is important that the ACNC invests sufficient resources into this area. In our experience investments in education and capacity development pay long and strong dividends.

SCOA is pleased to put forward these comments based on member input to the Commission. Ensuring a strong, accountable and transparent not-for-profit sector is an aim SCOA greatly supports, as a strong not-for-profit sector will in turn strengthen the community and the clients we serve.

Please feel free to contact me should you require clarification or further information on any of the points raised.

Yours sincerely,



Sky de Jersey  
Executive Officer