



9 June 2014

Professor Ian Harper
Chair
Competition Policy Review Panel
The Treasury
Langton Crescent
PARKES, ACT 2600

Transmitted via email

Dear Professor Harper,

RE: Competition Policy Review

The purpose of this submission is to provide Community Employers WA's (CEWA) brief comments on the Competition Policy Review which is currently being undertaken by the Federal Government. We shared these principles with panel member Su McCluskey at the recent community consultation forum in Perth, however would also like to reiterate them with the full panel.

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 125 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 10,000 staff and are supported by over 10,000 volunteers. A list of our members is attached in Appendix 1.

The importance of an effective competition policy is well understood and broadly accepted by CEWA members, as is the need for a periodic review. We are, however, also conscious of the importance of keeping a broad perspective throughout the review, particularly in areas which relate to services provided to support the most vulnerable and marginalised in our community.

Within this context, CEWA believes that in reviewing Competition Policy, the Panel should also actively consider areas beyond the minimising of cost or price for goods or services.

We encourage the panel to consider the framework of an effective competition policy with a clear focus on principles which are arguably more important than the traditional accounting and economic drivers, including:

- The ongoing sustainability of services to support people in need
- The critical importance of strengthening the sense of community connectedness and social cohesion
- The benefits of supporting and promoting Civil Society
- The risks of trying to create a market for services when it doesn't exist and the potential consequences when there is market failure
- The important contribution of values based organisations which operate outside the influence of a market simply because they see a need
- The encouragement of volunteering and philanthropy.

Australia is at an important juncture across many areas of our economy. For the NFP sector, the rollout of NDIS, the increasing pressure on budgets at all levels and the heightened globalisation of services, are but three areas which are presenting challenges. Overarching these is the question around sustainability of services. CEWA members remain committed to continuing to work effectively with all levels of governments and with the people we support. For this to be achieved, our collective endeavour needs to be underpinned by a sound and holistic Competition Policy.

CEWA implores the panel when reviewing Competition Policy, to develop and maintain a broad set of principles that include the aspects outlined above. We believe that both the short and long term benefits and Social Return on Investment will be significant. Conversely the consequences of maintaining a hard line approach to removing all protections and narrowing the focus will stifle innovation, reduce the localisation of service delivery and impact the community support which are fundamental to so many.

Yours sincerely,

John Bouffler
Executive Director

Cc: Senator Chris Back
Senator Dean Smith
Senator Rachel Siewert
Senator Sue Lines

APPENDIX 1

CEWA Members as at June 2014

Aboriginal Legal Services of WA Inc
Accordwest
Activ Foundation Inc
Advocacy South West Inc
Advocare
Albany Youth Support Association
Alzheimer's Australia WA
Anglicare WA Inc
ARAFMI
Armadale Community Family Centre
Association for Services to Torture & Trauma Survivors (ASeTTS)
Association for the Blind WA
Asthma Foundation WA Inc.
Australian Red Cross WA
Baptistcare
Beehive Industries of WA
BJL Connecting Communities
Bluesky Community Group
Bunbury Pathways '92 Inc.
Burdekin – Youth in Action
Calvary Youth Services Mandurah Inc
Care Options
Centacare Employment and Training
Centacare Family Services
Centrecare Inc
Child Inclusive Learning and Development Australia Inc (CHILD Australia)
CLAN WA
Coeliac Western Australia
Communicare
Community Housing Coalition of WA
Community Legal Centres Association (WA) Inc
Community Vision Inc
ConnectGroups
Consumers of Mental Health WA
Continence Advisory Service of WA
Cyrenian House
Derbarl Yerrigan Health Services Inc
Ethnic Communities Council of WA
Ethnic Disability Advocacy Centre
Extra Edge Community Services
Family Support WA Inc
Financial Counsellors Association of WA Inc.
FPWA Sexual Health Service
Fremantle Multicultural Centre Inc
Good Samaritan Industries
Gosnells Women's Health Service

Headwest
Health Consumers Council (WA) Inc
Holoake The Australian Institute For Alcohol & Drug Addiction Resolutions
Hope Community Services
Identity WA
Inclusion WA
Interchange
Ishar Multicultural Women's Health Centre Inc
Kids Camps Inc
Koolkuna (The Eastern Region Domestic Violence Services Network Inc)
LAMP Inc
Lifeline WA
Linkwest
Margaret River Community Resource Centre Inc
Meath Care Inc
Melville Cares Inc
MercyCare
Metropolitan Migrant Resource Centre
Midland Joblink Inc.
MIFWA
Mission Australia
Mosaic Community Care Inc
Multicultural Services Centre of Western Australia Inc
National Disability Services WA
Ngala Family Resource Centre
Nulsen
Outcare (Inc)
Palmerston Association Inc
Parkerville Children Youth Care Inc
Pat Thomas Memorial Community House Inc.
Patricia Giles Centre
Peel and Rockingham Volunteer Resource Centres
Peel Community Living
People with Disabilities (WA)
Perth Home Care Services Inc
Relationships Australia (Western Australia) Inc
Richmond Fellowship
Rise Network
Rocky Bay Inc
Ruah Community Services
Secca
Serenity Lodge
Shelter WA
Silver Chain
South Coastal Women's Health Services
Southcare Inc
Southside Care
St Bartholomew's House
St Patrick's Community Support Centre
St Vincent de Paul Society
Swan City Youth Service

Swan Emergency Accommodation
Technology Assisting Disability WA
Tenancy WA
The Gowrie (WA) Inc
The Salvation Army
The Spiers Centre Inc
The WA Aids Council
Therapy Focus Inc
Uniting Aid
UnitingCare West
Uniting Church in the City
Valued Independent People Inc
Vincentcare
Volunteer Task Force Inc.
WA No Interest Loans Inc.
WANADA
Wanslea Family Services Inc
We Can Community Services
Westcare Inc
Western Australian Association for Mental Health
Western Australian Council of Social Service Inc
Women's Council for DFV Services (WA)
Women's Health Resource Centre
Women's Health Services
Women's Healthworks
Yaandina Family Centre
YMCA Perth
Youth Focus
Youth Futures WA