



COMMUNITY EMPLOYERS WA

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