



Patron: His Excellency General the Honourable
Sir Peter Cosgrove AK MC (Retd)

1 August 2017

Senior Adviser
Individuals and Indirect Tax Division
The Treasury
Langton Crescent
Parkes ACT 2600

Dear Sir/Madam

Thank you for the opportunity to provide feedback on the discussion paper regarding Tax Deductible Gift Recipient (DGR) Reform Opportunities.

beyondblue is a national, independent, not-for-profit organisation working to promote good mental health. Our vision is that all people in Australia achieve their best possible mental health. As a national population mental health organisation, we have a range of integrated initiatives to prevent depression, anxiety and suicide and to support people who experience these conditions to get the right services and supports at the right time. We work to create change to protect everyone's mental health and improve the lives of individuals, families and communities affected by depression, anxiety and suicide.

beyondblue recognises the need for transparency, accountability and good governance, and supports initiatives that strengthens the not-for-profit sector. However, we believe that such strengthening of the reporting initiatives should not become an administrative burden (and therefore cost) for the not-for-profit sector. In times of resource constraint, we believe that our funding should be invested, as much as possible, into direct provision of programs, resources and services to promote better mental health in the community.

beyondblue supports the proposal to streamline registration and regulation of DGRs under a single body. We believe that The Australian Charities and Not-for-profits Commission would be the most appropriate choice to administer this streamlined registration and regulation process. Additionally reporting that coincides with current annual reporting expectations would further simplify this process. We support, recertification of registration at designated intervals to ensure organisations still meet the DGR requirements which would reinforce good governance and inspire community confidence in DGR organisations. However, we consider an annual review would be too frequent – every 3 years would be a more reasonable timeframe, particularly for well-established organisations.

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With regard to the recommendation of linking governance requirements to advocacy activities this is a complex process, which may have negative outcomes. It is critical that the not-for-profit sector is empowered to have a strong and independent voice to inform and influence policy development and implementation, and represent their beneficiaries – in the case of *beyondblue*, the millions of Australians that are affected by depression, anxiety and suicide. Any measures that restrict a not-for-profit organisation's ability to effectively advocate for evidence-based policies and funding decisions would be detrimental to the community. Any restrictions or additional reporting requirements on advocacy activities should therefore not be pursued.

Thank you for the opportunity to comment on these reform options. We would be pleased to discuss our recommendations further.

Yours sincerely



Susan Anderson
Deputy CEO, *beyondblue*