



The Institute of Public Accountants

**Submission to the Treasury on
Review of Australian Small Business &
Family Enterprise Ombudsman**



IPA INSTITUTE OF PUBLIC
ACCOUNTANTS
Partnership beyond numbers

April 2017

12 April 2017

Ombudsman Review
Small Business Policy Division
The Treasury
Langton Crescent
PARKES ACT 2600

By email: sbombudsmanreview@treasury.gov.au

Dear Sir/Madam

Review of the Australian Small Business and Family Enterprise Ombudsman

The Institute of Public Accountants (IPA) welcomes the opportunity to make a submission on the review of the Australian Small Business and Family Enterprise Ombudsman (ASBFEO).

We refer to the discussion paper and the questions on the advocacy and assistance functions of the ASBFEO, including whether there are any challenges or barriers in undertaking these functions.

Overall, the IPA believes the ASBFEO is undertaking its functions effectively. Given that it has been operating for a relatively short time, more time is needed to make an appropriate assessment. At this stage, we don't believe that any major amendments or changes are needed to the structure or office of the ASBFEO.

Assistance function

The IPA participated in the consultation on the establishment of the ASBFEO and its predecessor and various state based Ombudsman offices. We were mindful of the possibility of overlap and duplication with state based Ombudsman offices and also the possibility of gaps, especially with respect to the assistance/concierge function. To date we have not seen any duplication or gaps. However, we would expect a large measure of coordination and cooperation between the ASBFEO and all state based Offices if the current structure is to succeed in the longer term.

It may be that in the future the assistance function demonstrates duplication or a gap and that the functions of the ASBFEO need to be expanded, particularly in the area of alternative/external dispute resolution. We would also expect that the ASBFEO is undertaking its own monitoring and evaluation of the outcomes of matters that it assists/refers and that some type of reporting is being carried out. If this is not happening or not interpreted as being part of the legislative remit, then we believe this should be amended so that the assistance function is more than a 'mere' concierge/referral. Even though this may potentially lead to greater complexity overall, we believe that it would ensure greater coverage and comprehensive service for small business.

Advocacy function

Advocacy is conceptually difficult to measure and often the measures are qualitative rather than quantitative. However, in terms of the advocacy function, the IPA is of the view that a forward work program and over-arching strategy would be useful and would allow stakeholders to contribute to the work of the ASBFEO. A framework including criteria for identifying and selecting topics, issues and policies for advocacy would be beneficial for all stakeholders. This would assist in de-politicising issues and would ensure greater buy-in from a wider selection of stakeholders. In addition, it may also help in uniting various voices on a particular issue, which would also assist the ASBFEO. We are hopeful that the ASBFEO is prepared to take on difficult and contentious issues; and the IPA will certainly be urging government to accept and consider the advocacy of all issues as critical to the wellbeing of small business in Australia.

The IPA notes the inquiries the ASBFEO has undertaken (Small Business Loans Inquiry and Payment Times and Practices Inquiry) which are of interest to IPA members. Vicki Stylianou of the IPA was on the ASBFEO Payment Times and Practices Inquiry Reference Group. The IPA believes these inquiries have been effective in the way they were conducted, with coordination and collaboration across stakeholders, and the recommendations were balanced and practical. The IPA has been generally supportive of the recommendations and will be undertaking its own advocacy of key recommendations.

Raising awareness

The IPA believes that the awareness raising stage is still continuing and that more needs to be done, by all stakeholders such as the IPA, to raise awareness of the existence of the ASBFEO and its functions. In this regard, ongoing media, communications and outreach is critical. We would encourage the Ombudsman and her office to continue to engage with a broad range of stakeholders to amplify the voice of ASBFEO. Accountants as a group are an efficient way to reach small business owners who may otherwise not be aware of the Ombudsman. They are also at the forefront of many issues across the economy and across industry sectors, such as tax, superannuation, workplace relations, financial literacy, business planning, succession planning and so on, which are all highly relevant to the advocacy function of the ASBFEO.

We are extremely keen to ensure the success of the ASBFEO given the critical role and function that it plays in furthering the interests and wellbeing of small business across Australia. We have invited the ASBFEO to use our resources if and where appropriate. This includes the resources of the IPA Deakin University SME Research Centre.

If you require further information or wish to discuss any of the above, please don't hesitate to contact Vicki Stylianou at vicki.stylianou@publicaccountants.org.au or on mobile 0419 942 733.

Yours faithfully



Vicki Stylianou
Executive General Manager, Advocacy & Technical
Institute of Public Accountants