



Tuesday, 30 June 2015

Department of Foreign Affairs and Trade
Overseas Aid Gift Deduction Scheme

Via email: oagds@dfat.gov.au

Re: Submission regarding the review of the Overseas Aid Gift Deduction Scheme guidelines and processes

St John Ambulance Australia (St John) thanks the Overseas Aid Gift Deduction Scheme (OAGDS) team for conducting a view of the OAGDS guidelines and processes.

St John has applied for admission to the OAGDS scheme three times (over the last three years) and has found the process very difficult, time consuming and costly. Not having OAGDS status has adversely and significantly affected St John's ability to undertake fund-raising activities for international projects—where time spent in applying for OAGDS status could have been spent in benefiting those communities we assist.

During our earlier (two) submissions, we found inconsistencies within the assessment information and a lack of willingness to engage with St John in assisting us to obtain OAGDS status.

With respect to our third (current) application, St John has welcomed the contact with the OAGDS team and the helpful, professional and explanatory nature of those interactions.

St John greatly appreciates the review of the OAGDS processes and guidelines with the aim of making the process easier, simpler and more robust in the future.

St John also attended the recent DFAT roundtable in Melbourne and would like to commend DFAT for recognising that changes are necessary, and for conducting an open review. Many of these recommendations were discussed at the roundtable and St John would like to add its support to simplifying the guidelines and reducing the red tape.

Background

Internationally, St John International is one the world's oldest health charities.

For over 130 years St John has given Australians the power to save lives with first aid. Recognised as the most reliable provider of first aid training, kits and event health services, St John is respected for its community support and event and emergency response. For the second year in a row, St John has been ranked as the third most reputable charity in AMR's Charity Reputation Index.

As well as providing a critical first aid response at events and during emergencies, St John empowers the community by increasing resilience through first aid learning. In 2014, St John issued 669,630 training certificates (being 2.85% of the Australian population trained in life-saving first aid), contributed over 3.3 million hours of ambulatory services, over 1.2 million hours volunteer service to the community and freely trained 260,000 students under our free First Aid Schools Program.

Additionally, St John also serves the community by providing a youth development program, various community care programs, a public access defibrillation program and ophthalmic programs. In some states/territories, St John volunteers also operate in rural and remote areas where emergency ambulatory services can be hours away, providing an emergency response that these communities would otherwise go without for extended periods of time.

St John is part of a large international organisation, including the St John Eye Hospital in Jerusalem, for which St John provides support for nationally. St John also facilitates community development programs in Oecussi, Papua New Guinea and the Solomon Islands.

Recommendations

Appoint a contact person

We recommend that a person be appointed as a contact person for each organisation applying for OAGDS status. Recognising the time required by the organisation in submitting an OAGDS application, a contact person could act as a sounding board for the organisation in achieving OAGDS status, including providing preliminary advice, providing advice for when an organisation is unsuccessful or required to provide additional evidence, and more generally maintaining contact with organisations regarding application progress. The overall aim would be for the contact person to work with the organisation in achieving their application. St John feels that this would make the process easier, and save time both for the organisation applying for OAGDS, as organisations would have a better understanding of the requirements, and would also lead to a higher standard of applications.

Guidance material

St John would like to see more guidance material and case studies available either within the Guidelines or on the website to assist organisations in formulating their responses to criteria within the application—a detailed checklist would also be useful. Illustrating what an appropriate response might be for questions under the criteria will save time in organisations ‘getting it wrong’ as the question has been interpreted incorrectly. In addition, such an illustration might also provide organisations with an indicator of the depth of information required to satisfy the requirement.

Review

It would also be beneficial where an application did not meet all the criteria for personalised guidance to be provided to the organisation, such as via a face-to-face meeting with the organisation’s OAGDS contact person to go through each area. While written feedback is currently provided, in the past we have found the feedback unclear and remained unsure as to what we needed to do differently.

As previously mentioned, St John found inconsistencies within the assessment information. For example, a criterion that was satisfied in a previous application was then not satisfied in a future application. This was due to different people assessing the application. However, you can appreciate how frustrating this is for organisations applying for OAGDS status.

Working with an organisation to satisfy all criteria (where an organisation believes they are able to do so) could potentially save both the organisation and DFAT time and resources.

Recommendation to remove the second criterion ‘Voluntary, not-for-profit and non-government’

St John agrees with the aim of the Government to reduce red tape and duplication of information currently requested of charities. In our first two applications, it was suggested to us that St John had not sufficiently proved charitable, not-for-profit and non-government status, despite achieving this status with both the ATO (and having this status for many, many years), and more recently satisfying Australian Not for Profits and Charities Commission (ACNC) criteria. As a result, St John has had to spend a great deal of time proving to DFAT our charitable status in order to potentially achieve OAGDS status. If an organisation is registered as a charity by the ACNC, St John believes this should be sufficient grounds for a charity to be accepted as voluntary, not-for-profit and non-government.

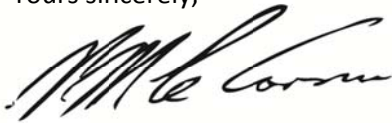
Recommendation to review the need for the minister to approve the applicant

St John recommends that the need for the Minister to approve the applicant should be removed. If the charity meets the guidelines we do not see a need to wait for the minister to sign off. Our understanding is that this process has meant that applications are only signed off twice a year which means that charities can sometimes wait an additional six months.

Conclusion

St John welcomes the opportunity to comment on the *OAGDS review*. I am happy to discuss any aspect of this submission.

Yours sincerely,



Peter LeCornu

Chief Executive Officer
St John Ambulance Australia