



26 June 2020

Victorian Parliamentary Scrutiny of Acts and Regulations Committee,

<https://engage.vic.gov.au/portable-long-service-benefits-scheme-draft-regulations>

Dear Victorian Parliamentary Scrutiny of Acts and Regulations Committee,

RE: Long Service Benefits Portability Regulations 2020 consultation

Connect Health & Community (Connect Health) welcomes the opportunity to provide feedback on the proposed *Long Service Benefits Portability Regulations 2020* and Regulatory Impact Statement.

Connect Health & Community is a registered community health service, helping residents in the south eastern Melbourne Bayside and Glen Eira areas with an emphasis on prioritising the vulnerable and at risk populations. We are a registered not-for-profit company limited by guarantee with an independent Board of Directors that receives funding from federal, state and local governments, and a range of partners.

We have been providing a range of prevention activities and health and wellbeing services to the local area for more than 40 years, with services including; Dental, Diet and Nutrition, Gambler's Help support services, Health Promotion, Hydrotherapy, Nursing, Occupational Therapy, Physiotherapy, Podiatry, Adult Speech Pathology, Children's Speech Pathology, Community Transport, Mental Health Services (therapeutic counselling), Youth Support, Diabetes Education, VicRoads' Safe Driving Program, Social Groups and Activities and NDIS services.

Our workforce of over 150 staff and 200 volunteers, operates from two sites; Gardener's Rd, Bentleigh East and Bay Road, Cheltenham. We also have staff co-located at other organisations across the southern metropolitan region. We work in partnership with consumers and other community agencies. Our Health staff are committed to providing quality health care to our community. For more information about us please visit our website, www.connecthealth.org.au

Despite the unique challenges facing community health centres and acknowledged in the Regulatory Impact Statement, Connect Health is disappointed that the draft Regulations have sought to include the community health centres in the Portable Long Service Benefits Scheme (the Scheme). The unanticipated inclusion of community health centres - despite previous assurance of exclusion - will require community

health centres, like Connect Health, to make significant financial and administrative adjustments to comply with the Scheme.

Given this, in consultation with the Victorian Healthcare Association and in collaboration with the further 27 community health centres across the state, Connect Health is seeking support for the sector to ensure an efficient and successful transition to meet the Scheme requirements.

Connect Health supports the following recommendations, as included in the submission made by the Victorian Healthcare Association:

- **Recommendation 1:** The VHA recommends that if community health centres are to be included, that comprehensive funding be paid to providers to cover the net cost impact and initial change management costs as they transition into the scheme. This funding would assist providers to maintain vital programs and services to serve vulnerable communities in greater need due to the effects of COVID-19.
- **Recommendation 2:** The VHA recommends that if community health centres are to be included in the scheme, after the first 12 months an audit is conducted of the administrative costs paid in compliance with the scheme, and the sector is reimbursed. This funding would assist to reimburse community health centres as they comply with the scheme and outlay significant administrative costs (such as software systems, staff training; personnel for processing and reporting, and auditing) associated with efficient, prompt and ongoing compliance.
- **Recommendation 3:** The VHA supports the submission made by the Victorian Hospitals' Industrial Association (VHIA) and calls for immediate clarification and fairness of implementation of overlapping LSL entitlements, changes to the employers covered, definition of 'community service work', and application of the double dipping clause in practice.
- **Recommendation 4:** To address the lack of clarity provided by the Authority on how the day-to-day operation of the scheme will function, the VHA recommends that clear directives and training for all employers be delivered to assist providers to embed the scheme as 'business as usual' within workplace practice.

- **Recommendation 5:** The VHA strongly opposes any retrospective backdating of the proposed Regulations and recommends that, in consideration of the substantial financial impact on the sector, only prospective payment of the levy is applied from the date of implementation of the permanent Regulations. This would assist providers to maintain vital programs and services to serve vulnerable communities in greater need due to the effects of COVID-19.

If you require further information, please contact CEO Amanda Murphy [TEXT REDACTED].

Sincerely

A handwritten signature in black ink, appearing to read 'Amanda Murphy', with a large loop at the end.

Amanda Murphy

Chief Executive Officer