

June 26, 2020

Dear Victorian Parliamentary Scrutiny of Acts and Regulations Committee,

**RE: Long Service Benefits Portability Regulations 2020 consultation**

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

Grampians Community Health was founded in 1986 in Stawell and has expanded to serve the communities of the Grampians, Wimmera, Southern Mallee, Pyrenees and Central Highlands in Victoria. We are the only standalone Community Health centre between Ballarat and the South Australian border, and as a not for profit charity all funds are invested back into the services we provide. As a registered Community Health centre under the regulations and legislation of the Victorian Government, Grampians Community Health provides: family violence and homelessness support, intervention, case management and counselling; Drug, alcohol and gambling services including homebased withdrawal; youth and LGBTQI programs, Aged care and disability support, women's health and chronic disease nursing, and mental health respite and transitional programs to the communities we serve. Grampians Community Health is presently providing on behalf of the Northern Grampians Shire Council community education and awareness programs in response to the COVID-19 pandemic.

Despite the unique challenges facing Community Health centre's and acknowledged in the Regulatory Impact Statement, Grampians Community Health is disappointed that the draft Regulations have sought to include the Community Health centre's in the Portable Long Service Benefits Scheme (the Scheme). The unanticipated inclusion of Community Health centre's - despite previous assurance of exclusion - will require community health centre's, like Grampians Community Health, to make significant financial and administrative adjustments to comply with the Scheme. This will no doubt impact on our ability to continue providing services in the manner we have.

Given this, in consultation with the Victorian Healthcare Association and in collaboration with the further 27 Community Health centre's across the state, Grampians Community Health is seeking support for the sector to ensure an efficient and successful transition to meet the Scheme requirements.

Grampians Community 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 me on [TEXT REDACTED].

Yours Sincerely,



Greg Little

Chief Executive Officer