

CHARITIES BILL 2003 SUBMISSION

29th September, 2003

**Prepared by The Executive Committee of The DeafBlind Association of South Australia.
Submitted by Emma Gordon – Chairperson.**

1. What is the name and contact details of your charitable organisation?

The DeafBlind Association of South Australia.
PO Box 196
Christies Beach SA 5165

Phone: 8326 3369
SMS: 0402024316

Email: dba-sa@ihug.com.au

2. What are the dominant purposes of your charitable organisation?

Our aims include lobbying to ensure that deafblindness is recognised as a disability with unique and different needs to those services provided to the much larger organisations that cater for blind or deaf alone.

We also seek to raise awareness of the existence of deafblindness to the general community. We assist deafblind persons in seeking services, equipment or funding for specialised equipment. We also receive donations to purchase or assist with the purchase of such equipment.

We aim to expand the support available in SA in the areas where deafblindness presents a unique challenge, such as communication or education.

3. What are your principal reasons for making a submission on the workability of the Charities Bill 2003?

A small organisation does not have the resources to provide services to the extent we believe are needed. If an organisation is not recognised as being charitable because its small size precludes direct charitable service provision, it can never progress to become a self supporting body.

4. Is your organisation currently endorsed with the Australian Tax Office as an Income Tax Exempt Charity (ITEC)? If yes, do you assess that you would still be entitled to endorsement on the basis of the Charities Bill 2003? If not, why?

We are currently endorsed with the Australian Tax Office's ITEC.

If taking some of the possible interpretations of the new act in a strict negative sense our activity in seeking to have deafblindness recognised as a distinct disability and requesting special services may be interpreted as disqualifying is.

Also we are concerned about whether or not such a low incident disability (which has far reaching consequences to the individuals concerned) may be classed as being 'numerically negligible'.

6. Would the Charities Bill 2003 impose any additional administrative burden on your charitable organisation? How? What additional compliance costs do you anticipate?

We hope that we face no additional compliance costs if we continue to be recognised.

However, if we are not recognised as a charity we doubt the Association would survive/continue to exist. It would be difficult to re-create the Association and avoid the need to seek to lobby for recognition of the problems presented by the combined disability.

7. In your assessment does the Charities Bill 2003 provide the flexibility to ensure the definition can adapt to the changing needs of society?

No. It discourages people from feeling they can submit suggestions for improvement or change in society. They fear that in approaching Government for a better system they will lose their taxation entitlements and no longer be able to function.

Flexibility does not seem to be the correct word when one fears being judged non-compliant.

8. If the public benefit test were further strengthened by requiring the dominant purpose of a charitable entity to also be altruistic, would this affect your organisation. If so, how?

Currently DBASA is largely run by non deafblind volunteers. Our hope is that deafblind people become more active in policy and management of the deafblind organisation. If it is run by deafblind people for the wider deafblind community it can still be seen as altruistic.