



**Dear Sir/Madam**

Mansfield Autism Statewide Services as a Not for Profit Organisation would like to offer comment on the Exposure draft legislation that intends to limit the benefits of tax concessions on salary packaged entertainment benefits.

As a small not for profit organization who assists over 420 families each year in Victoria , all who have at least one child with an Autism Spectrum Disorder, and the majority of these children being “High Needs”, we require a workforce that is skilled, committed and accordingly compensated for the difficult role they play in each child's treatment and behaviour support plan. Our clients stay at least one full term with us, both at school and a residential facility eg: 24/7, we also employ MAP's Mansfield Autism Practitioners who are a mobile workforce and travel to each child's home to offer support and planning sessions with their families and others in the child's immediate community.

**Our main issues will be:**

- **NDIS** – we need to acquire and sustain a robust workforce to manage the number of clients we are currently servicing. The low hourly rates being provided by the NDIS coupled with the removal of the Fringe Benefits Tax will hit our ability to attract staff extremely hard.
- **Rural** – many of our clients reside in Rural Victoria, and the ability to provide ongoing support to families , with all the associated travel/fuel/mileage allowance/accommodation costs already restricting our service delivery, this additional removal of concession will add further to our growing cost structure.
- **Parity** - currently employing qualified teachers, many who come to our organization from the Education Department and are paid under the D.E.T Award. With the withdrawal of the Fringe Benefits Tax Concession we will lose a valuable tool allowing us to attract staff into our organisation and more importantly the field of Disability Services.
- **Promotional Opportunity** – As alluded to above , one of our main employee attraction strategies is the ability for staff to salary package.
- **Cost Benefit Analysis**- we assume that this has been rigorously costed out in terms of the delivery of cost benefits to the Government, we believe that in the

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case of the smaller service providers that it will certainly increase costs to the government, as many of the smaller Disability service providers may be forced to disengage or case care provision for the “High Needs” clients, many who will then be required to seek services from the Department, especially in cases involving relinquishment of the child into state care.

- **Small vs Larger** -It is a shame that small organisations such as ours will no longer benefit from this concession, and that we will find it increasingly difficult to maintain current service provision levels. It appears to be directed at many of the larger organisations such as Health Services with many high paid medical practitioners taking advantage of the current Tax Concession Benefits. Our staff however are on the lower spectrum of the pay scale and as such this will hit them and us hard, the risk of staff seeking employment elsewhere is very real.
- **Integrity**- You state that this will improve the integrity of the Tax System by introducing a limit on the use of these benefits. We believe that a graded cap capacity system would be a fairer way to introduce the reduction of the concessions, whereby smaller organisations can maintain the ability to attract qualified staff into the Disability Field.

Please feel free to contact me if any further clarification of the above is required.

Regards  
Jenny Cleeland

A handwritten signature in black ink that reads "Jenny Cleeland".

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Director  
19<sup>th</sup> August 2015