

12 August 2009

Dr Matthew Butlin  
Chairman  
Victorian Competition and Efficiency Commission  
GPO Box 4379  
Melbourne  
VIC 3000

Dear Dr Butlin,

**RESPONSE TO DRAFT REPORT: VCEC INQUIRY INTO THE SHARING OF GOVERNMENT AND COMMUNITY FACILITIES**

The Victorian Council of Social Service (VCOSS) once again welcomes the Victorian Competition and Efficiency Commission's inquiry into the sharing of government and community facilities.

As the peak body of the social and community services in Victoria, VCOSS would like to reaffirm the importance of this inquiry on behalf of our members, many of whom use shared facilities as a natural part of existing partnership arrangements within the community services sector. These shared facilities arrangements provide a variety of important accessibility benefits for vulnerable and low income communities.

VCOSS welcomes the Commission's overall recommendation to increase sharing of government and community facilities in Victoria and endorses the proposal to increase sharing of private facilities that have been built using public resources, such as facilities in independent schools. VCOSS continues to be concerned about for-profit use of public assets and the risks and costs highlighted by the collapse of ABC Learning Centres. As a result, VCOSS recommends that private sector participation in the sharing of facilities be accompanied by adequate guidelines that ensure that for-profit providers do not use facilities for commercial gain.

VCOSS welcomes the recommendation that successful sharing arrangements are characterised by appropriate resourcing, governance, and institutional arrangements, committed leadership, early planning, active management and community involvement. It is vital that these factors are at play in the sharing of facilities to enable the creation of sustainable arrangements that allow ongoing benefits for communities.

VCOSS endorses the proposal to provide better support for community groups in forming and managing shared facilities through greater access to facilitation, brokering and mentoring. We welcome the examples of good practice included in the Commission's draft report that highlight the benefits for communities in sharing government school facilities but we also recognise that there are significant challenges for these arrangements. For example, the limited capacity of teachers and other professionals within government schools to initiate, develop and sustain partnerships is a critical limitation. This limited capacity in turn affects the ability of community groups to broker, facilitate and sustain partnerships for effective governance of facilities.

VCOSS supports the recommendation to improve flexibility and efficiency of government resources used to support shared facilities. This recommendation applies well to a number of policy areas where gains can be achieved. For example, the draft report has recognised the potential for opportunities to maximise sharing of facilities in independent and Catholic schools, in addition to government schools. With a flexible approach to sharing arrangements, these schools would be well placed to enter into such arrangements, particularly where they receive government funding for infrastructure.

VCOSS commends the draft report's recognition of the great potential that lies in exploiting these opportunities for communities, such as the facilitation of a more integrated service system in the area of education and early childhood development. Further opportunities for flexibility also exist in enabling greater efficiency of community transport resources in rural areas.

VCOSS also concurs with the recommendation to reduce regulatory burden affecting shared facilities. The impediments created by burdensome regulations are evident in the case of school buses, which have the potential to be a valuable transport resource, especially in rural communities where no alternative transport options are available. Currently, non-school students cannot travel on rural school buses as they are restricted by the terms of the Department of Education and Early Childhood Development's Duty of Care policy. This policy requires school principals to grant permission for non-student passengers to take school buses. It is the recommendation of VCOSS that the removal of this policy would reduce regulatory burden in order for school buses to be utilised more widely as a greatly needed community resource.

VCOSS once again welcomes the opportunity to contribute to the VCEC Inquiry into the sharing of government and community facilities and commends government efforts to maximise the use of public assets for the greater good of communities.

Yours sincerely,



Cath Smith  
Chief Executive Officer