

15 February 2018

Committee Secretary
Parliamentary Joint Committee on Intelligence and Security
PO Box 6021
Parliament House
Canberra ACT 2600

Dear Committee Secretary

Review of Foreign Influence Transparency Scheme Bill 2017

UnitingCare Australia appreciates the opportunity to provide this submission to the Review of the *Foreign Influence Transparency Scheme Bill 2017*.

We support the intention of the Bill to help provide transparency to the Government and to the Australian public concerning the forms and sources of foreign influence on Australia's democratic process. However, as the Law Council of Australia has noted in its submissionⁱ, the Bill as drafted may not only 'unduly impact those that have no intention to disrupt Australian democracy and sovereignty' but also lack 'the ability to curb the types of influential behaviour that is of identifiable concern'.

UnitingCare Australia represents the network of community service activities of the Uniting Church in Australia, the largest network of community service organisations in the country. Our network employs over 40,000 staff and 30,000 volunteers with a collective annual turnover of \$2.5 billion.

Our advocacy is informed by these services and their beneficiaries, and is designed to contribute to robust and informed debate and decision-making around a just and fair Australian society. The values that motivate us are publicly available and are reflected in all our advocacy work. Imposing regulations that would limit this work by subjecting it to additional administrative and reporting arrangements will not progress the stated aim of the Bill and is, in any case, unnecessary given that the charitable sector is already very well regulated in Australia.

We note that our sector makes an important contribution to the health of our democracy, first through giving a voice to those who least able to speak for themselves, and second, through encouraging debate on important issues that might otherwise fall off the political agenda. This Bill would inhibit both debate and participation, to the detriment of our democratic future.

Under the proposed legislation, funds received from an individual who is neither an Australian citizen nor a permanent Australian resident could not be used for activities such as lobbying Parliamentarians or the Executive, or even for general communications on political issues. The donations which the Uniting Church receives from its diverse and varied congregations may be used for advocacy and grass roots campaigns as well as service delivery.

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To comply with the requirements of the Bill, we understand that the Church would potentially need to identify the residency status of every person who made a contribution to the collection plate, in case their contributions exceeded the \$250 annual threshold for registration. This would clearly mean a significant reduction in the fundraising capacity of ourselves and our service agencies, therefore reducing vital services to those most in need. Such an outcome would surely be an unintended, as well as an undesirable, consequence of the Bill.

We concur with Law Council's recommendation that charitable entities registered with the Australian Charities and Not-for-Profits Commission be exempt from the registration scheme.

We would welcome the opportunity to provide further information in support of this submission.

Yours faithfully

A handwritten signature in black ink, appearing to be "Claerwen Little".

Claerwen Little
National Director
Uniting Care Australia

ⁱ https://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Intelligence_and_Security/TransparencySchemeBill/Submissions