

5th December 2011

The Manager
Philanthropy and Exemptions Unit
Personal and Retirement Income Division
The Treasury
Langton Crescent
PARKES ACT 2600

Women's Housing Limited Submission – Definition of a Charity

The purpose of this letter is to provide a response to the proposed introduction of a Statutory Definition of Charity as set out in the consultation paper "A Definition of Charity".

Women's Housing Ltd (WHL) is a recognised charity dedicated to the provision of housing to women in need. WHL was established to assist women who are vulnerable to poverty particularly due to housing stress. This is driven by the fact that women's incomes are generally lower than those of men, which in turn, is influenced by the gender wage gap, intermittent and part-time workforce attachment, as well as occupational segregation into lower income industries. Women are also more vulnerable to changing social and market conditions as their economic position is more likely to decline with divorce and separation and; as Australia's aged population (with its higher proportion of women) increases, affordable housing will become an even more pressing issue.

WHL currently has a portfolio 171 properties that house over 300 residents and we operate as a not for profit organisation. Our tenants include low income women who have experienced domestic violence, women with disabilities, elderly women, women with young children and women exiting the corrections system.

WHL clearly falls within the Common Law definition of 'Charity' and is recognised as such by the State and Federal Government Authorities. While we understand the Government's desire to introduce a Statutory Definition of 'Charity' to address those organisations whose operations and purposes may not be as clearly charitable or mixed purposes, we are concerned that the introduction of a statutory definition may not only increase the compliance workload but also create uncertainty where none currently exists for our organisation.

Accordingly, following our review of the consultation paper 'Introducing a Statutory definition of Charity', WHL recommends:

- Support the retention of the presumption of public benefit for the 'relief of poverty' in particular for organisations such as WHL whose dominant purpose is the provision of social and affordable housing.
- Seek inclusion of 'accommodation' in the definition of Charitable Purpose consistent with the UK, Scotland, Northern Island and New Zealand position.

If you require further information or clarification regarding our recommendations, please contact me at WHL on 94126868.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Judy Line', with a large, stylized flourish at the end.

Judy Line
Chief Executive Officer