

Date: 15 September 2023
Our reference: 877743

Caine Chandler
Department of Government Services

Feedback on Ministerial Guidelines Relating to Payment of Rates and Charges

Dear Mr. Chandler,

Strathbogie Shire Council appreciates the opportunity to provide feedback on the "Ministerial Guidelines Relating to Payment of Rates and Charges." We wish to express our desire for enhanced clarity in specific aspects outlined in the draft guidelines. We have consolidated our recommendations into three key points, and we trust that these suggestions will be thoughtfully considered and integrated into the final version of the guidelines.

1. Clarification on Ratepayer Categories

In the landscape of ratepayer categorisation, numerous distinct segments coexist. As identified by current legislation, ratepayers are expressly defined as individuals who have attained the age of 18, with incorporated entities being intentionally excluded. Presently, the council's policies exclusively revolve around properties designated as primary places of residence, inadvertently excluding ratepayers who hold investment properties and land holdings. Therefore, it is good to establish a precise definition of the ratepayer to whom these guidelines shall apply. This will enable the council to implement these distinctions effectively and accurately.

2. Involvement of Third Parties in Assessing Financial Hardship

Our council staff possess a high level of expertise in assessing financial hardship. However, they are not the subject matter experts. At present, they have the option to engage the services of financial counsellors or other relevant third parties to ensure an equitable evaluation process. However, if the proposed wording, "Councils must not mandate that an applicant ratepayer involve third parties (such as financial counsellors) in the assessment or verification of their claims of financial hardship," is adopted, it may potentially curtail the council's capacity to utilise this valuable resource. Consequently, this might jeopardise the fairness of the assessment procedure.

3. Broadening the Scope of Hardship and Financial Hardship Policies

This section also addresses the concern raised in the previous point. The existing policies of the council exclusively extend hardship measures to primary places of residence. Nevertheless, the proposed section aims to broaden the applicability of these policies to all ratepayers, including those with investment properties and landholdings. The establishment of a clear and comprehensive definition specifying which ratepayers should be subject to these guidelines will furnish councils with unambiguous directives.

In addition we support the submission made by FinPro (Local Government Finance Professionals). In particular, we bring to your attention, items 6, 8, 10, 11, 12, 14, 15, 16, 17, 19, 20, 23 and 24 which are strongly supported.

For any additional information, please do not hesitate to contact Amanda Tingay, Acting Director of People and Governance, at 03 5795 0000.

Sincerely,



Julie Salomon
Chief Executive Officer
Strathbogie Shire Council