

10 January 2025

The Secretariat of the ASBFEO Review
Justice and Licensing Reviews Branch
Small and Family Business Discussion
Treasury
Langton Cres
Parkes ACT 2600

Via email: ASBFEOReview@treasury.gov.au

Dear Sirs,

Re: Review of Australian Small Business and Family Enterprise Ombudsman (ASBFEO)

Clubs Australia appreciates the opportunity to comment on the review of the ASBFEO.

Clubs Australia represents over 5,000 clubs across Australia that employ more than 140,000 people. Clubs are not-for-profit, member-owned organisations whose central activity is to provide sporting and recreation infrastructure to their members and the wider community. As a highly regulated industry, clubs have embraced a strong governance and compliance culture.

Small clubs tend to be run by volunteer directors with few, if any, paid staff, with many only open one or two days per week, such as during weekend sports. Small clubs generally rely on membership subscriptions as revenue because they conduct limited commercial activities. Small clubs are therefore sensitive to increases in the cost of doing business, as their ability to scale up their services is limited.

Small clubs have expressed concerns about the rapidly evolving regulatory environment and the burden of the costs associated with compliance. For context, the number of regulations introduced between 2010 and 2019 doubled compared to the previous decade. Due to financial difficulties, an increasing number of venues are considering amalgamation as the 'child' club, with administration and compliance costs being a significant factor.

Clubs Australia:

1. Supports and recommends the ASBFEO continue its advocacy for small business, particularly in key policy reform areas including privacy and cyber.
2. Supports the resources that the ASBFEO provides for small businesses, particularly in the areas of cybersecurity, financial wellbeing and changes to Australian workplace laws.
3. Recommends that the ASBFEO create a central portal where guides, templates and policies for small businesses can be stored.
4. Would welcome the opportunity to continue engaging with ASBFEO to support their engagement and advocacy for small businesses.



If you have any questions about our submission, please contact us at

[REDACTED]

Yours sincerely,

[REDACTED]

Alison Tehan
Deputy Executive Director
Clubs Australia