



NSW Wildlife Council Inc.

Achieving optimal outcomes for Australian wildlife

## NSW Volunteer Wildlife Rehabilitation Sector Strategy

### Consultation Draft – Comment

The New South Wales Wildlife Council (NWC) acknowledges and thanks the Office of Environment and Heritage (OEH) for its recognition of the value to the community of wildlife rehabilitation activities undertaken by the large volunteer workforce. NWC commends OEH's aspirations to support the critical role of these volunteers in their work with Injured, sick and orphaned Australian native animals. The \$27 million investment quoted as the value of this service to the community, government and the environment is highly notable considering it is currently funded by volunteers and is an avoided cost to government:

*“The Office of Environment and Heritage vision for the more than 5600 volunteers in New South Wales is that they are supported to continue to deliver this important service. We want volunteers to feel understood, respected and appreciated and be equipped with the necessary skills and resources to perform their role. Their work provides a significant public good and is of high value to the community, government and the environment.”*

Skills and resources are key factors in enabling the sector to continue to deliver this recognised important service.

**Funding:** Funding for the work of the sector remains a key consideration. The NWC notes the Victorian model where the sector is provided grants of close to \$200,000 for facilities and equipment. The Wildlife Rehabilitator Survey identified that 60% of volunteer wildlife rehabilitation participants earn less than \$50,000 per year, making it a struggle for them to afford to provide Code of Practice-compliant rehabilitation facilities and equipment. The NWC has instituted an annual Rehabilitator Equipment Grants scheme; however the \$10,000 annual budget currently on offer is insignificant and can benefit only an infinitesimal number of wildlife rehabilitators each year. Significant and direct government funding, or facilitated access to grant funding, is required to support the large volunteer hours and financial outlay provided by the sector.

The forward commitment to the funding by OEH towards the public liability insurance on P22 is welcomed and makes for a considerable ease on the financial burden of individual groups in the sector. This funding should not be limited to the Public and Products Liability insurance but should extend to the volunteers accident insurance component that is currently funded.

The additional funding of \$5.25 million dollars commits \$4.05 million to the Koala Strategy and NWC notes there is no detail on how it is envisaged the remaining \$1.2 million of funding will be allocated. P13 states “.....(\$1.2 million) .....will be used to develop a program to support and engage wildlife

*carers in the important work they do*". NWC would expect consultation with stakeholders on how this funding would best support the wildlife rehabilitation sector on a priority needs basis.

Such consultation should also extend to the matter of the proposed **single wildlife rescue number**. The NWC notes the inclusion of the stated project to bring NSW under a single phone number and would like to reinforce the extreme unease of the NWC members in the detail and rollout of this project. Despite the NWC's attempts to explain to member groups that this proposal will not be a staffed telephone service that actually answers any phone calls, rather it will be technology that transfers incoming calls directly to the relevant licensed/accredited group in the location of the animal needing assistance; there is still misunderstanding in the Sector about the proposal. We do understand the benefits would be a single number for the public to call that can be placed on road signs and avoid the need for travellers to know who to call in any given area. The value and recognition that volunteers currently get from the wider community is based on continuous daily feedback by grateful callers who are able to get resolution to what are often confronting and distressing situations. The NWC members are not regularly receiving feedback that it has been difficult to find who to call and there are actually often seamless and efficient exchanges of information and contacts of callers between groups as they are redirected. So while understanding that the NSW government seems fixated on introducing this single number it now becomes imperative that the detail and success of the project doesn't erode what could be argued as the one thing that does work well in most cases for the sector. NWC's concerns are whether there are technological options for a double-divert of telephone calls from the original caller via the single number to the relevant group's wildlife rescue telephone service that may also be on divert. Other major concerns are where there is more than one licensed group in a geographic locality and situations where a 24 hour person-answered service is not offered to the public.

**Peak Body:** The role of the NSW Wildlife Council has been invaluable in providing a platform for the individual member groups to meet and work together to support each other, and improve practices throughout the sector. The networking opportunities NWC has provided groups has been invaluable particularly in the development of the Rehabilitation Code of Practice, followed by Codes of Practice for Flying-foxes, Koalas, Wombats, Birds of Prey and Macropods.

NWC would like to recognise the reinforcement of a peak body for the sector through the words stated in P12-13 of the strategy. The intention that OEH will partner with NWC in developing a strategic priority plan is a useful forward platform that can have multiple benefits. Any such priority plan needs to be supported by enabling manpower and financial resources. The partnership will seek to address the findings from the survey which identified a lack of understanding and value of a peak body for the sector. It will help provide a united basis for groups to work together on a shared agenda that is targeted to ways that provide tangible benefits to the sector and best outcomes for volunteers and native animals.

The NWC supports a peak body that includes both the current arrangement along with the inclusion of WIRES and would be pleased to work with OEH and WIRES to bring about this unified body. NWC is not supportive of a more diluted Advisory body model that takes decisions that affect the day to day operations and administration of the constituent NWC groups' and their core business work with

injured and orphaned native animals. However NWC would support an Advisory Panel that positions NWC in the mainstream of the environment and conservation sectors, improving access to up to date information, systems, processes, advances, and funding to meet objectives and for specific projects.

NWC notes the proposed items for a strategic agenda for the Peak Body of the sector going forward includes the statement on P13 that the new arrangement would “formalise in a new ‘Service Partnership Agreement’”. The Review of the Wildlife Rehabilitation Sector at P21 states “*All members of the NWC are volunteers who also contribute significant amounts of time to their own group. The sourcing of sufficient core funding to employ a part-time staff member was considered essential to helping the peak body progress its strategic agenda.*” The expectation would be that any new service level agreement would also be forthcoming with some paid NWC Secretariat support as history has shown it is not possible to meet priorities with a workforce that operates on a totally voluntary basis. For too long we have been expecting too much from “already extremely busy and committed” volunteers.

### **Accreditation:**

Provided accreditation has a clear intent, is reasonable and flexible and will lead to optimal outcomes for native animals NWC supports transitional accreditation. As described in the strategy it will be based initially on existing OEH policy requirements and licence conditions and good management practices currently implemented across most of the sector under these broad categories

1. Governance
2. Training and support
3. Standards of animal care
4. Service capacity
5. Record keeping
6. Veterinary services.

NWC believes it is necessary that OEH identifies best practice documents already in existence which will meet accreditation standards so NWC member groups do not need to reinvent the wheel. It must be remembered that any alteration of rules for Incorporated Associations can only be made by a Special Resolution of the association at a Special General Meeting for which 21 days’ notice in writing must be given to all members. Some groups find it difficult to meet regularly and do so only at Quarterly intervals and it can be difficult to reach a quorum of members for those groups spread over a large geographic range. Adopting new Rules, Policies or Procedures can be a human resource and time-consuming process for groups and there is a cost to lodge the changes with Fair Trading. Provision, or identification, of sample acceptable accreditation documentation that can easily be presented and formally adopted would ease the anxiety currently experienced by many groups concerned about their ability to tick all the accreditation checklist boxes. NWC is anxious to develop a shared resource inventory to diminish the administrative burden on its groups.

It is not clear between the accreditation document and the strategy document whether there will be the three year time frame for OEH to work with the Peak Body to refine the accreditation standards.

The NWC would appreciate some more clarification on the process of accreditation in the following areas:

What standards will be used for the July 2019 to December 2019 period of transitional accreditation?

What is the minimum accreditation benchmark for the accreditation supporting checklist documents?

Will OEH identify existing documents that will meet accreditation standards?

Will applicants be able to provide evidence of working towards meeting an accreditation benchmark?

Is it expected these transitional standards will need to be changed in the following three year period?

### **A more flexible policy framework**

While supported by some NWC groups, the proposal to allow a more flexible approach whereby up to 20% of a group's membership could reside outside the group's boundaries without a Memorandum of Understanding with the neighbouring group, raises loud alarm bells to others. Some groups within NWC believe this could lead to unintended splintering within and between groups, would be extremely difficult to monitor and manage volunteers, and could lead to unintended bad outcomes. Reasons should be given why a volunteer wishes to affiliate with a neighbour group rather than the group licensed in the area that volunteer resides. Improved governance and superior processes resulting from accreditation could lead to better management and stop the need for volunteers to affiliate with outsiders.

### **The following Focus areas mentioned in the Strategy are supported by NWC,**

Training Standards

Mentors and Species Co-ordinators

Training of Vets and Vet Nurses

Update triage and treatment

Compliance

Data Reporting

Post Release Monitoring

Welcome Kits

However, it is questioned whether groups have the ability with their financial and manpower constraints to be proactive in easily meeting all requirements in a timely way. It is quite clear through the aspirations and goals in all the wildlife rehabilitation strategy documentation that there is little understanding of the work undertaken by volunteers to interact with wildlife and at the same time administer active and viable seven day a week volunteer "businesses" with no formal financial or administrative support.

***In Conclusion:*** The Strategy introduces a range of ideas for what could be argued will be additional governance (some may call this red tape) by way of Accreditation areas of assessment, revised

Rehabilitation Policy, new training standards, a devolution of audit arrangements down where volunteers will have to do what was previously an OEH responsibility, Charters for Volunteer engagement with vets, potential adoption of the Volunteering Australia Standards and the list goes on. NWC urges OEH to take great care to introduce only that which makes a tangible difference and is cognisant of the 100% volunteer nature of this sector. NWC recognises the importance of governance but there seems to be a lot here which will provide additional work for busy wildlife group committees. NWC would suggest OEH needs to provide a governance map to show transparently what all the governance elements are intending to be, how they fit and where they can be found and what support OEH will be providing.

*The New South Wales Wildlife Council thanks OEH for the opportunity to comment on the NSW Volunteer Wildlife Rehabilitation Sector Strategy Consultation Draft and looks forward to continuing the close liaison with OEH and all volunteers to achieve optimal outcomes for Australian wildlife.*

*NWC Management Committee*

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