



## Sydney Wildlife response to the OEH NSW Volunteer Wildlife Rehabilitation Sector Strategy Consultation Draft

17 April 2019

Sydney Wildlife appreciates the opportunity to comment on the Consultation Draft NSW Volunteer Wildlife Rehabilitation Sector Strategy.

Sydney Wildlife applauds the recognition of the importance and value of volunteer wildlife rescue organisations and members expressed in the vision statement: *“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.”* P1

Sydney Wildlife also welcomes the additional funding of \$5.25 million dollars, although we would like stakeholder organisations to have input into how this money is used/spent. (Page 1) There is no indication in the detail on page 13 that stakeholder volunteer organisations will have any direct access to this funding nor any input into how it is used.

*“A key element of the strategy will be the introduction of a system of accreditation for volunteer wildlife rehabilitation organisations that is underpinned by consistent standards of operation.”* Page 1 Accreditation works best when initiated either from within or introduced using extensive and genuine consultation with all relevant stakeholders, especially those being accredited – volunteer organisations. It remains to be seen if this takes place. At worst, accreditation introduced from without may add an administrative burden of red tape and have little or no benefit. Indeed, many of these native animal rescue and rehabilitation organisations such as Sydney Wildlife rely upon the donation of individual member’s scarce time and resources to maintain essential functions. The imposition of additional administrative burdens may be detrimental to such organisations and may even have the unintended effect of making them unviable. The issue is that accreditation needs to be reasonable and flexible, but most importantly needs to have a clear purpose: to improve native animal outcomes.

Sydney Wildlife welcomes the recognition of the important role that veterinarians make to native animal welfare in NSW: *“Private veterinary practices and wildlife hospitals are also crucial partners in the assessment and humane treatment of native animals in distress. Our veterinarians and veterinary nurses treat over 21,000 free-living native animals and provide more than \$1.8 million in free services*

*and products to wildlife each year. Balancing the running of a private practice with the lack of time, facilities and resources for treating free-living wildlife is very challenging.”*

### **Timeline for the Development of the Strategy P5**

Sydney Wildlife recommends that June-July 2019 is an unrealistic timeframe for the completion of a final strategy, if indeed genuine consultation with stakeholders was envisaged.

### **List of planned actions P9**

Sydney Wildlife welcomes the following two planned actions and the details provided

- *Improve standards of governance*
- *Help new leaders adjust to their role*

We are skilled in the implementation of standards of care when it comes to wildlife. However, we are not experts when it comes to conflict management and resolution. Management of interpersonal disputes and aspects of governance of a large volunteer workforce requires a professional level of expertise. Currently, groups have nowhere to turn to for assistance in serious complaints and conflict resolution. Some support in this area would be appreciated.

Sydney Wildlife would welcome the provision of sector-wide training in ‘people management’, or funding for group’s executive and leaders to acquire such training.

With regard to the following planned action:

- *Facilitate a unified peak body and new strategic agenda*

*We will seek to do this by encouraging the two main bodies representing wildlife rehabilitation volunteers in New South Wales to reform into a single peak body. Alternatively, we will consider creating an advisory board comprising members from government, existing wildlife rehabilitation organisations and non-government representatives from the animal welfare, veterinary and natural resource management sectors. P12*

Sydney Wildlife supports the aim of having a unified peak body. The current arrangement where all animal rescue and rehabilitation volunteer organisations belong to the NSW Wildlife Council, except for WIRES, the largest such group is clearly not ideal and has resulted in OEH treating the sector as a duopoly, WIRES and NWC. With respect to the ‘alternatively’ text on page 12, is this the backup plan if you cannot persuade WIRES to join NWC or simply an alternative vision, and who and how will the decision be made on which alternative to take? While Sydney Wildlife welcome the addition of stakeholders such as veterinary sectors, we are not sure what place ‘natural resource management sectors’ have at the peak body, or who is meant by this sector, other than Landcare mentioned on p13. What would be useful is more secretarial and administrative support for a peak body that struggles to cope with admin, meetings and coordinating responses to consultation documents such as this.

The NWC needs to comprise of, or have funding available to access, expert professional services. Where NWC executive members do not have the capacity or expertise to deliver specific services or advice to it’s member organisations, then they need to be able to outsource this.

*"A new, fairer process is needed to ensure that decisions cannot be made by either (a) a group of members who represent less than 50% of volunteers in the sector, or (b) one or two member organisations dominating the decision-making process: For example, this could be achieved by requiring a vote by members who represent 65% or more of the total volunteers for that resolution to be carried. That would also infer that meetings require attendance from representatives whose membership equates to at least 65% of volunteers in the sector to form a quorum, which is currently not possible".- WRSC*

Despite there being a 'peak body' in existence already, the sector is poorly serviced with technology solutions and standardised operational practices. All groups operate completely independently, re-inventing the wheel. There is very little shared best practice and coordination of resources between groups (eg. Animal transfer policies and coordination between groups). We all have different versions of all our organisational documentation, etc.

The draft paper is silent on how such a body would be funded and this needs to be resolved. The additional funding mentioned in the strategy does not appear to be recurrent.

Nor is the composition and terms of reference for such a body discussed in detail. Sydney Wildlife would like to know if it is proposed that it will have some disciplinary functions over its volunteer organisations and/or their members?

Veterinary involvement in the peak body is supported.

- *Standard induction and specialised species training for volunteers*
- *Enhance mentor and species coordinator support*
- *Wildlife care training for vets and vet nurses*
- *Update triage and treatment protocols*

This set of planned actions, under the heading Standards of care and training, will need much careful and detailed consultation and close discussion with stakeholder volunteer groups, as organisations such as Sydney Wildlife have invested a great deal of time, expertise and resources on volunteer induction and training, along with triage and treatment protocols often included in training. Currently, in several specialised species groups, eg Wombats, Sydney Wildlife and WIRES share courses and training materials. In principle, Sydney Wildlife supports these planned actions. Done well they could enhance the work of volunteer rescue groups and their members.

Who will pay for these deliverables – will wildlife groups be expected to contribute to costs?

The time and effort it will take to update/modify/replace all our existing resources, just to be replaced with nothing better than what we already have, will be a significant burden.

- *Create service provider access to standard compliance assessment tools and continue random audits*

I am unaware of any random audits at present, so perhaps the word 'continue' is inappropriate. Sydney Wildlife undertakes facilities inspections and 'audits' internally, as needed and appropriate. Rather than officers from OEH or equivalent performing random audits, which, realistically, is unlikely to happen on any substantive basis, the planned action should read:

- *Create service provider access to standard compliance assessment tools and support random audits within rescue organisations with guidelines, standard protocols and other resources*

Under the heading 'Knowledge and information access', Sydney Wildlife supports these planned actions:

- *Streamline reporting and improve access to data*
- *Connect volunteers to other professional networks*
- *Conduct post-release monitoring of rehabilitated animal*

*Many groups struggle to implement updated technology and systems to support their operations. The provision of a generic wildlife records system would be helpful.*

The following planned action is perhaps the single most contentious item:

- *Introduce a single wildlife rescue number*

**Sydney Wildlife does NOT support this proposal** (for the Sydney metropolitan area).

While Sydney Wildlife understands the motivation in terms of Community Awareness and recognition, its implementation across the greater Sydney Metropolitan region has particular issues for Sydney Wildlife. Both Sydney Wildlife and WIRES provide wildlife rescue and rehabilitation services across Sydney, and any simplistic method of splitting or sharing calls to this single wildlife rescue number may well result in reducing the effectiveness and particularly timeliness of services provided by both organisations. Further consultation and discussion, along with more detail on how this might work, is needed before this planned action is adopted. Sydney Wildlife would advise that this planned action is NOT included in the suite for any timetable for introduction in 2019.

Sydney Wildlife supports the following Community awareness and recognition and Government regulation and support planned actions

- *Guide community education about wildlife*
- *Promote awareness about volunteer participation in wildlife rehabilitation*

and these under the heading Government regulation and support.

- *Implement a more flexible policy framework*
- *Provide ongoing strategic support service*

The following planned action under the heading Government regulation and support

- *Introduce a system of accreditation for volunteer wildlife rehabilitation organisations*

needs to be discussed with more detail on the table to be able to be commented upon. It could result in more red tape if done poorly, and contradict the *implement a more flexible policy framework* planned action.

## **Details in body of strategy**

**Volunteer support and culture:** facilitating a unified peak body and new strategic agenda P13

*The Office of Environment and Heritage will partner with the newly configured peak body (or Advisory Board) in the development of a plan that meets the ongoing strategic priorities of the sector over the next three years. Key initiatives would include:*

- *co-designing standards to be adopted by the sector*
- *developing strategies that increase volunteer participation in the sector including opportunities for participation from a wider demographic group*
- *establishing resources to manage volunteer stress including reviewing conflict resolution guidelines*
- *enhancing support for mentors and species coordinators*
- *developing a charter for volunteer engagement with veterinary practices*
- *creating a list of trainers endorsed to deliver speciality species*
- *training to the sector and developing resources to help train new and inexperienced trainers within wildlife rehabilitation groups*
- *connecting the sector with other participants in the wildlife and natural resource management sector such as Landcare*
- *promoting more efficient management of wildlife rehabilitation organisations' fiscal and volunteer services*
- *exploring opportunities to augment home-based care with enclosures built by wildlife rehabilitation providers on government or corporate owned land*
- *introducing a volunteer wildlife rehabilitator of the year award*

*We will formalise this new relationship with the coordinating body with a new 'Service Partnership Agreement'.*

Broadly, Sydney Wildlife supports these initiatives. However, who will be responsible for implementing all these strategies and standards? Does this mean much more work for the volunteer management team in each group?

### **Standards of care and training Pages 14/15**

#### *Standard training for volunteers*

*An ambitious action under this strategy will be to introduce minimum standards for volunteer training. We will work with the sector to scope and develop a training framework that includes:*

- *essential learning outcomes and performance criteria needed to*
- *demonstrate achievement of these outcomes*
- *establishment of shared learning resources*
- *assessment methods required to assess competency.*

*We will also explore opportunities for experienced wildlife rehabilitators to stay in touch with developments in wildlife ecology, veterinary medicine and treatment practices, and interact within other professional networks. To help facilitate this, we will work with the sector to develop a program of priority workshops for wildlife rehabilitators in regional areas of New South Wales over the next three years, to augment their refresher training and help keep their skills up to date.*

So long as volunteer wildlife organisations such as Sydney Wildlife and other relevant experts/stakeholders such as veterinarians have input into these training materials, Sydney Wildlife supports these initiatives. While we understand the need for and emphasis on regional areas, this must not be to the exclusion of the large number (and proportion) of wildlife rescuers in the greater metropolitan Sydney area.

Sydney Wildlife also supports the initiatives detailed on pages 14 and 15 of the draft strategy regarding Mentors and species coordinator support and Wildlife care training for vets and vet nurses. Sydney Wildlife participates in vet training at the University of Sydney.

Updated triage and treatment protocols: While Sydney Wildlife regularly reviews, updates and publicises triage and treatment protocols, we welcome this initiative.

**Assessment of competency** is not something that should be expected to be done immediately following training. Competency can only be assessed after hands-on practise on what the training has taught.

**Mentoring and Species Co-ordination** are vital aspects of good rehabilitation management practices and all help in encouraging good systems will be welcome.

#### **Promoting stronger compliance**

*We will develop and make available to the sector standard templates for doing internal compliance audits against our codes of practice and future conditions of accreditation. Wildlife rehabilitation providers will need to implement periodic audits of their volunteers and maintain a record of compliance. **We will supplement this work by implementing a random inspection campaign to help the sector better enforce standards of care.***

Sydney Wildlife welcomes the initiatives that assist wildlife organisations to internally monitor and ensure compliance. Given the resourcing that OEH has available and competing priorities for these resources, we are sceptical that any random inspections would take place. Resources to assist volunteer organisations conduct their own inspections, however, would be welcome.

**Compliance templates** to ensure best practices are met would be of great value to groups.

#### **Knowledge and information access P16/17**

Sydney Wildlife recognises the benefit of accurate and timely data re wildlife rescues and outcomes, and supports the initiatives in this section.

#### **Community awareness and recognition P18/19**

##### *A single wildlife rescue number*

*The Government has announced funding through the NSW Koala Strategy to introduce a single wildlife rescue number, to make it easier for people to find the right person to help them if they find sick or injured wildlife. We intend to have standard road signage to accompany the number and a marketing campaign will be used to promote the new service.*

*The number will be the first point of contact for people across New South Wales who require wildlife rehabilitation services. It will help increase community recognition of the services provided by all wildlife rehabilitation providers in the state and enhance measurement and reporting of rescue locations*

While Sydney Wildlife understands the motivation in terms of Community Awareness and recognition, its implementation across the greater Sydney Metropolitan region has particular issues for Sydney Wildlife. Both Sydney Wildlife and WIRES provide wildlife rescue and rehabilitation services across Sydney, and any simplistic method of splitting or sharing calls to this single wildlife rescue number may well result in reducing the effectiveness and particularly timeliness of services provided by both organisations. Further consultation and discussion, along with more detail on how

this might work, is needed before this planned action is adopted. Sydney Wildlife would advise that this planned action is NOT included in the suite for any timetable for introduction in 2019.

Member comment: “Also concerned about the one number telephone service - very tricky in Sydney with 2 organisations operating and with different operating hours and with different forwarding methods for our afterhours service - how will that work with mobile forwards on top of mobile forwards etc. and remotely. We have concerns about donations etc. and any potential impact on Sydney Wildlife. WIRES are quite aggressive with their funding campaigns and send a letter seeking donation to everyone that calls – this may impact SW operation and we would be uncomfortable to see that potential extended further.”

A **Welcome Kit** for new volunteers is supported.

The **wildlife rehabilitator of the year award** is supported.

## **Government support and regulation Pages 20/21**

### *Accreditation of volunteer wildlife rescue and rehabilitation organisations*

*All volunteer-based organisations that organise and promote themselves as providers of a wildlife rescue and rehabilitation service will require accreditation under the Biodiversity Conservation Act 2016. The intended benefits to the sector include greater community recognition of service; improved volunteer support and management; transferability of skills between organisations and stronger compliance with established codes of practice. It will also reduce regulation and provide a more flexible framework for accredited volunteer organisations to operate in New South Wales.*

*Accreditation will be administered by the Office of Environment and Heritage and be assessed in accordance with the following six categories of volunteer support and service delivery:*

**Governance:** *The structures, activities and operations of a wildlife rehabilitation provider are in accordance with the principles of legal compliance, probity, transparency and accountability.*

**Training and support:** *There is a structured program of training and support in place that ensures fauna rehabilitators are competent to effectively perform their role.*

**Standards of animal care:** *There is a system of quality assurance in place for the management of animals in care.*

**Service capacity:** *There is an efficient phone rescue service and sufficient capacity to effectively respond to calls for assistance.*

**Record keeping:** *There is a system in place that ensures data integrity in reporting, and organisations have a demonstrated history of compliance with Office of Environment and Heritage reporting obligations.*

**Veterinary services:** *There are policies and protocols in place that ensure interactions with veterinary practitioners are conducted in a consistent, positive and ethical manner*

Accreditation works best when initiated either from within or introduced using extensive and genuine consultation with all relevant stakeholders, especially those being accredited – volunteer organisations. It remains to be seen if this takes place. At worst, accreditation introduced from

without may add an administrative burden of red tape and have little or no benefit. Indeed, many of these native animal rescue and rehabilitation organisations such as Sydney Wildlife rely upon the donation of individual member's scarce time and resources to maintain essential functions. The imposition of additional administrative burdens may be detrimental to such organisations and may even have the unintended effect of making them unviable. The issue is that accreditation needs to be reasonable and flexible, but most importantly needs to have a clear purpose: to improve native animal outcomes.

Accreditation needs to be discussed with more detail on the table to be able to be commented upon sensibly. It could result in more red tape if done poorly, and contradict the *implement a more flexible policy framework* planned action.

The six categories detailed above appear appropriate.

Governance: Groups must be able to deal with non-compliant members more effectively so that time and energy is not spent on lengthy investigations and protracted steps in order to remove someone who has breached organisational policies from the organisation.

The five focus areas listed on page 9 appear appropriate, but there is no/little detail on how the planned actions will be achieved – much more consultation is required.

Sydney Wildlife suggests that funding be provided to assist groups with 'community awareness and recognition', as well as 'standards of care and training' – cost of training venues, printing and education materials is significant.