



28 April 2020

Royal Commission into National Natural
Disaster Arrangements

Dear Royal Commissioners,

The St Vincent de Paul Society National Council of Australia Inc. (the Society) is a lay Catholic charitable organisation that comprises over 60,000 volunteers and members and over 3,000 employees who provide on-the-ground assistance in the form of emergency relief and other support and community services cross Australia.

The Society's National Council represents the Society in Australia. The National Council undertakes activities that assist the State and Territory Councils who have responsibility for operational matters. National Council has a Secretariate that works with the States and Territories to provide public policy advice and advocate on behalf of people who are disadvantaged.

The Society's members and staff have provided direct relief to those affected by the 2019-20 bushfires through the Vinnies' centres/shops, helplines, home visits and attendance at community events and Recovery Centres.

The following submission provides information with respect to the Royal Commission's terms of reference (a) and (d), namely the responsibilities of, and coordination between, all levels of governments relating to natural disasters and any relevant incidental matter.

The Society will also be preparing a submission to the Senate Finance and Public Administration Reference Committee's, *Lessons to be learned from the Australian Bushfire Season 2019-20*.

Background

To date, the Society has raised \$23.4 million in donations, distributed \$12.35 million and assisted 4835 (NSW, ACT, Vic) people, mostly during the crisis phase. This has entailed:

- providing food, clothing, essential items and grocery vouchers to people who have lost everything
- providing cash payments of up to \$3,000 from the Vinnies Bushfire Appeal to those who have experienced significant property loss or damage during the emergency response phase and up to \$10,000 in the recovery phase, depending on assessed need
- paying unexpected bills as people go through the recovery process
- referring people to other organisations that provide crisis accommodation and specialised services
- assisting students returning to school with books, uniforms, laptops and dongles
- giving emotional support and practical assistance after homes are lost, and
- assisting with community development and recovery programs.

The Society also received an additional \$11.059 million in Commonwealth Emergency Relief Funding. Just over 40 percent of Emergency Relief funding has been expended, through cash payments and other emergency relief assistance.

The Society has an extensive history of providing emergency assistance, with multiple grant agreements in place with the Commonwealth Government for emergency relief and drought assistance and other levels of government for a range of services. The Society delivers services with minimal overheads due to its large volunteer base in all states and territories and is able to mobilise resources quickly in the aftermath of disasters (for example, Black Friday bushfires, 2011 Brisbane floods, 2018 Cyclone Debbie, 2019 Townsville and NW Qld Floods).

The Society is accountable to the Australian Charities and Not-for-Profit Commission (ACNC) and complies with fundraising laws and the Australian Consumer Law.

Response

Commonwealth Emergency Relief Funding

The Society appreciated the additional Commonwealth Emergency Relief funding made available to its State and Territory Councils for the purpose of providing financial assistance to those affected by the bushfire crisis.

However, the Society's experience of delivering these funds was that administrative requirements impeded the nature of what could be provided, when and by whom. The Society is cognisant of the onus on all non-corporate Commonwealth entities to comply with the *Public Governance, Performance and Accountability Act 2013* (Cth) and the better practice principles of grants administration as contained in the Commonwealth Grants Rules and Guidelines 2017 (CGRG).

In ordinary times, the requirements to develop grant opportunity guidelines, conduct selection processes and assess applications to determine value for money are effective and laudable when identifying suitable grant recipients. However, these processes take time. There is currently very little latitude within the CGRGs for exemptions or flexibility, or recognition of the fact that in some circumstances, such as natural disasters, an immediate solution is required.

Consequently, government agencies are forced to rely on existing grant opportunity guidelines and fund only those who already have grant agreements in place, through grant variations. Fortunately, the Society is a significant provider of emergency relief and was therefore able to receive additional funding to increase its service response.

The concern is that in some locations, other providers may equally be able to provide assistance but are unable to do so because they do not have an existing grant agreement in place and departments do not have the time required to run a process. This impedes the Commonwealth Government's ability to enter into grant agreements with local services. The Society worked closely with local services to ensure that, where possible, goods and services were sourced locally. This was considered important as the capacity to re-invest in local communities is essential to restoring business and community confidence.

Additionally, the time taken by the Department of Finance to approve variations to existing grant opportunity guidelines means that grant funds can only be expended on activities already defined in existing grant guidelines. This restrictive approach means that a provider can only use grant funds on the defined activities and sub-contracting arrangements are also limited to these defined activities. Commonwealth Emergency Relief is defined as help with immediate basic needs for individuals and families in times of crisis. It includes providing food, supermarket vouchers, petrol vouchers or assistance to pay utility bills. If a need arises outside of the defined activities (e.g. purchase of tools, provision of trauma counselling), the provider is unable to respond. We do not believe the Government would want to constrict the range of monetary-based supports needed by survivors of an emergency.

The Society recommends that the *Public Governance, Performance and Accountability Act 2013* (Cth) and the CGRGs be reviewed to provide more flexibility for non-corporate Commonwealth entities to expedite grant arrangements and variations in times of national emergency.

Delays in Processing Payments – Additional Assessment Criteria and Cash Payment Limitations

For bushfires, the scope of Commonwealth Emergency Relief funding was expanded to include cash payments of up to \$1,000. To qualify, applicants had to demonstrate that they were at imminent risk of not being able to pay their bills, over 18 years of age and living or working in a bushfire area. The payment was limited to one per household and the applicant had to declare that they had not accessed any other Emergency Relief payments. The requirement of being 'at imminent risk of not being able to pay their bills' caused a lot of angst. Many people were reluctant to agree to this for many reasons including personal pride, even if they had been heavily impacted by the fires.

The Society conducted most assessments face to face, at Recovery Centres or through home visits. This took time as members were also supporting people, determining what else was needed and how to get that assistance to them when road closures were in place and there were few other services. The

time required to assess need and meet the additional criteria in order to make the Commonwealth Emergency Relief payments made it difficult to get these funds out quickly. To expedite the distribution of funds, the Society requested that these cash payments be increased from \$1,000 to up to \$3,000, particularly as cash payments of up to \$3,000 were also being made from the Vinnies Bushfire Appeal Fund. The request was rejected, and the Society advised that the funding limit had been set by Government.

On the other hand, once an applicant satisfied the Society's assessment criteria for cash payments from its Bushfire Appeal Fund, these funds could be expended as needed. This approach provided people with dignity and autonomy. A flexible, client-centred approach is essential as people's needs are variable. A 'one-size fits all' approach, that 'shoe-horns' people into prescriptive responses runs the risk of failing them. For example, many in 'bush areas' did not have reticulated water and were not on the national electricity grid. Their needs revolved around purchasing tanks and related plumbing and emergency generators. Not only was the Commonwealth \$1,000 cash payment inadequate, it could not be used for this purpose.

Conditions of funding

The Society is still receiving requests for funding, some six to seven months after the bushfires. These people are now coming to terms with their losses and making judgements on what they need to purchase to keep their businesses (mostly farming) going. Most of the fires in the inland northern area of NSW were across farmlands. Quite a few of these farmers did not qualify for funding assistance. The ability of the Society to draw on donations enables some of these people to be provided with small amounts to assist them in their immediate needs. Guidelines and criteria developed by governments to determine who qualifies for funding need to be more flexible.

The Society recommends that the minimum cash payment available under the Commonwealth Emergency Relief program be increased to up to \$3,000 and that flexibility be built into all government program guidelines.

Future Processing of Government Cash Payments

The Society also processes cash payments under the Commonwealth's Drought Community Support Initiative. Processing is initially done on-line, with follow-up calls from a central point. Applicants are asked if they need additional Vinnies support and, if they do, this request is forwarded to the state/conference network for further action. This approach takes time because evidence that identifies the applicant and supports the claim must be submitted and verified. Similar evidence was also required to validate claims for cash payments through the Emergency Relief funding and, as outlined above, this slowed the process.

In circumstances where there has been a sudden and significant event (that involves the damage or destruction of property), the capacity to make quick cash payments is vital to allaying fear and anxiety within a community. The Commonwealth Government is best placed to do this because many people already have a myGov account. As such, their identity has been verified and they have a Customer Reference Number (CRN). Checks can be made on where the person resides, what government assistance they are receiving and what they have claimed. Applications can be processed quickly, with payments automated. To some extent, this was already being done by Government through the assessment and processing of disaster recovery assistance and allowance payments.

During the bushfires, the amount of time taken to process payments led to public criticism of charities, including by government officials. This reputational damage not only impacted on the flow of donations, it made operational circumstances difficult for our volunteers, at a time when they needed support. Further, the criticisms implied that the Society was holding on to funds when, in fact, nothing could be further from the truth. The Society prides itself on operating with minimal overheads and is compliant with the ACNC and relevant fundraising laws. Compliance requires transparency with respect to how funds are sought and expended. At a time when the Society needed to direct all of its resources to responding to need, its efforts were instead diverted to managing and responding to criticisms. Reporting to government was also increased, even though existing accountability requirements were already being met. Most concerningly, it appeared that assessment of services was based solely on expediency and not quality.

While the Society has a strong history of emergency relief provision, it is not a first responder. Charities can and do make cash payments all the time but where immediacy of payment is essential, the Commonwealth Government is best placed to do this. The Society's service model involves spending time with people, identifying their needs and working out the best way to address those needs. The Society's strength is providing follow up through personalised and tailored assistance delivered by local people who understand local issues and have the capacity to be there for the long haul, well after other services have left.

The Society recommends that in circumstances where an immediate, up-front cash payment is required, the Commonwealth Government (through Services Australia) should undertake this activity.

Planning data

The inability to access up to date data at the Local Government Area level made response planning very difficult. It took a considerable amount of time for useful bushfire data (such as number of homes, outbuildings damaged and destroyed) to be released by NSW government. Other relevant data held by the Commonwealth Government, such as disaster recovery payment allowance and pension by Local Government Area, were also not available and would have been helpful.

The nature of the fire, with some localised areas being very hard hit, meant that typical data analytics (such as population/census data at local government level) were of limited value. Funding allocations based on population levels resulted in the less populated but more bushfire-affected areas not receiving funds commensurate with the high levels of demand being experienced in these areas. Almost all in these communities were affected on multiple levels, with many being physically isolated due to road closures, and having to manage health issues alongside other practicalities such as replacing damaged homes, businesses and infrastructure.

Amount of Government Reporting

Although the grant variations for additional Commonwealth Emergency Relief Funding indicated no changes to government reporting, weekly reports to the Department of Social Services were required and this has only just been changed to fortnightly. Different fortnightly reports are also required by the National Bushfire Recovery Agency. While the Society understands the need for reporting with respect to Commonwealth grants, there has been pressure to report regularly on bushfire donations and expend these funds early in the bushfire response. However, a significant portion of funding is required for the recovery phase, where the number of requests will be less than that experienced during the crisis phase but are likely to be more complex. A nationally consistent reporting framework would reduce the administrative burden of having to report on different items to multiple agencies.

As a registered charity, the Society is required to meet the ACNC's reporting requirements. The additional reporting requirements with respect to bushfire donations (not Commonwealth grants) has added to our administrative overheads. While the data provided to the Department of Social Services has resulted in an increase in Commonwealth Emergency Relief Funding, there is limited visibility of how data being provided to the NBRA is being used.

Accessing data to assess need in real time

When meeting with people to determine their need, it would have been helpful to know what they had already received from governments and other charities. A way of accessing this information, in real-time and without contravening privacy legislation, would have expedited our assessment process and avoided people having to provide the same information to multiple agencies, many times over. Data sharing between and amongst charities, emergency services, and all levels of government needs to be improved.

This service and payment information would be useful, not just in the immediate aftermath of the bushfire, but longer term, when people are transitioning from crisis to recovery. A quick check would enable the service provider to identify what has already been received and provide advice on what else is available. The Society is open to sharing data, so long as consent from those we assist is obtained and we are compliant with privacy legislation. The process must be efficient, accessible, accurate and, ideally, done in real-time. Currently, data entry efforts are being duplicated by different agencies

unnecessarily. Data files should be created so that they comply with Government reporting requirements. This approach would enable all of us to work better together, assess need quickly and allocate resources where most needed. It would also avoid duplication of effort, eliminate gaps in service provision, reduce the risk of fraudulent activity and streamline reporting requirements.

The Society recommends that the Commonwealth Government make relevant payment data (such as disaster recovery allowance) available by LGA through data.gov.au.

State and territory government agencies responsible for providing emergency services should release up to date data (e.g. on destroyed and damaged infrastructure) by LGA through data.gov.au.

Data should be sought once and used often. A national data and reporting framework and portal to enable data sharing should be developed. Once consent is obtained, personal information should be shared across government and non-government agencies. Payment data should be uploaded, in real time and linked with other service data, possibly through the CRN. Data files should align with the reporting framework. This would remove the need for charities to submit additional reports to government.

Other operational issues

Variation in service coverage and response

Feedback received by Society members indicates that, for the most part, Recovery Centres worked well. The amount and level of information available and co-location of different providers (Government, charities, relevant businesses) made it easier for people to understand what was available and how to access it. However, some locations (Cobargo, Batlow/Adelong) had access to very limited service provision. The need for Recovery Centres, where to place them, when and for how long, should be reviewed constantly in the immediate aftermath of a fire.

There were also significant cohorts of the population who were reluctant to come to town. These people tended to rely on information through 'trusted' agencies such as the NSW's Rural Fire Service (RFS). The Society worked closely with organisations such as the RFS and, where needed, conducted home visits. Some Recovery Centres also implemented an outreach model.

In Victoria, Society members were unable to access Mallacoota and Corryong for a number of weeks due to road closures. When the roads were finally reopened there was a mix of hardship and recovery assistance required. Even those not directly impacted by the bushfires had lost work and needed urgent welfare support.

Multiple charities in the one the location can work well together if the approach is coordinated, tasks or services are divvied up between the charities and roles and responsibilities are clearly delineated. For example, in Coonabarabran and Dunedoo the Society worked with The Salvation Army to deliver food, emergency relief and potable water; and with BlazeAid to purchase materials from a local fencing supplier. The local council identified what was needed and coordinated the service response, in partnership with the charities. Clearer delineation between first responders and other support agencies is essential particularly in Recovery Centres, where multiple agencies and charities are in attendance together and it is easy for people to become confused and angry about who is offering what.

If a real-time data portal is not available, clearer delineation between services and the amounts and types of payments available through the charities would benefit those seeking assistance. A case manager, or team-based approach to assessing need (e.g. conducted by panel of providers) would ensure that the applicant tells their story once, they are aware of and receive all available assistance and the response is coordinated. This information could be entered into a data system so that when the applicant seeks further assistance later, a record of what has already been provided is accessible. Currently, there is no handover of information between providers, such as from first responders to other providers.

The Society recommends that a coordinated approach to service responses be developed locally and in partnership with all levels of government and other service providers. Services and payments should be clearly defined and delineated.

The location of Recovery Centres should be continually reviewed throughout the crisis phase. Outreach models must be provided.

A case manager or team assessment approach should be adopted to enable agreement on identified need and allocate service responses.

Commonwealth Mobile Service Centre

The Commonwealth's Mobile Service Centre was an important resource for people. However, its operational hours were limited (from 9:00 to 4:00), it was not available on sequential days and not much notice given as to when it would be in a particular location. Recovery Centres also operated during business hours only. Consequently, many people were unable to get to the Mobile Service location or Recovery Centre as they could only do so after business hours. Daylight hours were spent cleaning up and attending to more basic needs.

Primary Health Network and access to other services

In general terms, medical services in the Far South Coast of New South Wales are limited at the best of times. Those presenting for assistance often needed referral to specialist trauma counselling. The time taken to provide information on and access to local mental health services available through the Primary Health Network was too long.

Additionally, mental health and wellbeing are not limited to sessions by trained professionals. The need to create community get-togethers and build community spirit is important. The Society's members are well positioned to assist with this, but this is now extremely difficult given social isolation requirements. Limited government funding was available to support this type of service response.

To some extent, the national bushfire response was not fully operational until fires had progressed to NSW, Vic, ACT and SA. As the Queensland fires occurred early in the season, service responses and assistance were limited. In some locations, the bushfires came on top of hardship already being experienced by the ongoing drought. In these circumstances, the Society was mindful of responding to those in need while at the same time caring for its members, who provided the assistance, with limited resources and access to other services.

The Society recommends that the Commonwealth Mobile Service Centre operate outside business hours and that more notice is given on where and when it will be available. Alternatives for those who cannot or do not wish to come to the Centre must be provided.

Immediate access to health services is essential for those in disaster areas. Service provision through the primary health network took too long to get off the ground. Most funds were limited to health services and failed to recognise that other community support activities can help restore community health and resilience.

It should not require a disaster to occur across multiple jurisdictions before a full service response and payments are developed and implemented.

Transitioning to Recovery

The Society's bushfire response has now moved from the crisis to recovery phase although providing on the ground assistance through our usual means has been considerably hampered by COVID-19. Most of our follow up work, which normally would be done face to face, is being delivered by phone.

The Society is aware that transitioning from emergency to recovery can often bring frustration, exhaustion, despair, disappointment and sometimes blame. This will be exacerbated as communities are also dealing with COVID-19.

Over the coming months members will be providing additional support to individuals, which may be specialised and through a case worker, particularly for more complex matters. This includes assisting those living with disability, experiencing family violence, addiction, mental health challenges and trauma and who are at risk of homelessness beyond the temporary dislocation caused by the bushfires.

In Victoria, a substantial donation has been given specifically for the purposes of supporting young people in education. This has involved working with schools and Education Departments to identify what is required in the longer term. Grief counselling has been identified as an ongoing need and support has been given for the recruitment of school counselling services

Further financial assistance for individuals will be determined on a case by case basis, will take into account assistance given during the emergency phase and is likely to involve larger amounts (up to \$10,000 from bushfire appeal funds). The Society has asked the Government to again review the cash amounts payable through its Emergency Relief grant program.

Transitioning to recovery also means a shift from assisting individuals to assisting communities. However, individual assistance will still be provided, where required. The Society's service model accommodates fluidity between these levels to enable a full and tailored response to need.

Members and volunteers are reporting that many people now feel as if they are in a holding pattern, unable to progress to recovery and move on with their lives as they are waiting on the state government to clear bushfire-affected areas. The Society would ordinarily assist in this re-building phase through the funding of items such as essential household appliances, but this is difficult to progress if people are unable to rebuild their homes or find suitable accommodation.

The Society is also relying on members to identify community needs. This is ordinarily done on the ground but, again, social isolation makes this difficult. Assistance might take the form of supporting a local men's shed, community hall or school group. The need will vary from community to community.

A National Charter between governments and charities has been suggested as a method for improving disaster responses. The recommendations in this submission are based on the Society's extensive experience as a provider of emergency relief, particularly after a crisis. If implemented, we believe that these recommendations would result in improved and coordinated service responses.

The Society is mindful of the fundraising laws and of our obligation to donors to be clear about why funds are being collected and how they will be used. Every action is taken to use funds as requested by the donor. We are aware that donations are made to organisations for many reasons but it is reasonable to assume that the ethos of an organisation and its works are taken into account. The Society's governing documents are defined by The Rule which outlines our Vision, Mission, Aspiration and Values.

We are not sure how a National Charter would be operationalised, what it would mean for compliance with fundraising laws and how it could be done in a way that respects donor intent.

Having said that, members recall that some years back, the Mayor of the Blue Mountains Council set up a combined Donations Trust to collect all bushfire funds from the public, including those that came to the charities, into a single source. The various local government and charities who were in receipt of donated funds met regularly as a coordinating group to assess the short and long term needs, provide guidelines to all the members on the distribution of the funds and account to the public on how their donations were spent. The Society in NSW had a State Council representative on the Mayoral Fund distribution group. This model worked efficiently, effectively and transparently for the Blue Mountains. However, the viability of this model, on a larger scale, has not been tested.

The Society thanks its members, volunteers and staff, some of whom have also been directly affected by the bushfires. During this challenging period, the resilience, strength and generosity of the Australian spirit has shone through. We serve in hope and aspire to an Australia transformed by compassion and built on justice.

If the Royal Commission requires further information on operational issues, members and CEOs may be available to provide evidence.

Yours sincerely,



Toby oConnor
Chief Executive Officer