

30 October 2024

Department of Justice
Office of the Secretary
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Re: Registration to Work with Vulnerable People Amendment Regulations 2024

Volunteering Tasmania appreciates the opportunity to provide feedback on the proposed changes to the Registration to Work with Vulnerable People scheme.

About Volunteering Tasmania

As the peak body for Volunteering in Tasmania, we work to see an inclusive, thriving, and celebrated culture of community participation across the state by strengthening and enhancing volunteering through leadership, education, and connection. We work to ensure community-based volunteering is sustained, valued and integral to community resilience and wellbeing.

In-principle support for phase 1 scheme changes

While Volunteering Tasmania supports the intent behind the *Registration to Work with Vulnerable People Amendment Regulations 2024*, we urge the Department to carefully consider the potential impacts on both volunteers and volunteer-involving organisations (VIOs). The success of these regulatory reforms will depend not only on their implementation but also on the provision of support measures that mitigate any impacts. For example, removing registration fees for volunteers and offering tailored information, can help ensure that Tasmania's vibrant volunteering industry continues to thrive, while safeguarding vulnerable people.

We provide specific considerations below and in the context of expansion of the scheme over the next two years.

Exemption: work or volunteer with children in a 'regulated activity' for 7 days or less in a calendar year

While we support in-principle the proposal to remove the existing 7-day exemption, there are specific considerations for the volunteering industry. In general, increased time, cost or complexity of registration could inadvertently deter some people from volunteering, especially for one-off events, short-term or episodic roles.

It is also best practice for VIOs to reimburse volunteers for out of pocket expenses such as Registration to Work with Vulnerable People (RWVP) and National Police Check fees. Expansion of the scheme invariably has a financial and administrative impact on both volunteers and VIOs, many being not-for-profit organisations, least able to absorb these

additional costs. There are costs to recruit, induct, orient, train and manage volunteers, as there are for paid workers. There are also expenses to ensure the right structures are in place to support volunteers, and to provide them with safe working conditions and environments.

Volunteering forms Tasmania's largest industry in terms of economic, social and community benefit and is driven by the largest cross-sector workforce in the state. The *State of Volunteering Report 2023: Key Findings* research found that 332,100 (69.8%) Tasmanians aged 15 years and over volunteered their time in 2023, with a \$12.1 billion economic benefit for the state.

In addition, the volunteer workforce plays a critical role supporting the community including Tasmania's children, youth and vulnerable populations. Despite the economic and social contributions, Tasmania remains one of only three Australian jurisdictions that charges volunteers for RWVP registration – and it is the most expensive.

Volunteering Tasmania continues to urge the Government to absorb the RWVP registration cost for volunteers. Noting the three phases of proposed regulatory changes will expand the scheme and require more volunteers to register, it is timely for Tasmania to align with other jurisdictions that do not impose registration fees for volunteers and review the fee structure to ensure it does not serve as a barrier to volunteering. In addition, a reasonable transition period should be provided to assist volunteers and VIOs impacted by scheme changes. Workshops, Q&As on any changes to the scheme, with tailored information for the volunteering industry, would be valuable. We have appreciated our involvement with the Office of the Independent Regulator to date and welcome collaboration for the benefit of our members.

Exemption: Emergency volunteers and workers

Volunteering Tasmania is proud to play a role in connecting emergency volunteers and their skills to people, places and organisations who need it most during times of disaster. We are funded by the Tasmanian government to provide an online registration system for volunteers who want to contribute to recovery efforts following an emergency incident (see: [Emergency Volunteering - Volunteering Tasmania](#)). Given emergency management work is not a regulated activity requiring registration under the scheme, we acknowledge the existing regulatory exemption is not necessary and will be removed.

Recommendations

We recommend the following actions to help the volunteering industry with the impact of increased regulation:

1. **Removal of the outward costs for RWVP volunteer registration:** This would remove a significant barrier to volunteering, support VIOs to increase the safety of volunteering and foster Tasmania's strong culture of volunteering.
2. **Tailored Information for volunteers and volunteer-involving organisations about changes to the scheme:** VIOs can be diverse and vary in size so the potential impacts of reforms on organisations will be different. We would welcome collaboration to assist volunteers and VIOs understand scheme changes and manage any transition smoothly.

Phase 2 of the Amendment Regulations

Volunteering Tasmania looks forward to receiving further details about phase 2 of the scheme changes. A draft timetable of regulatory reforms and implementation dates would be useful. Understanding the future scope and timing of changes will allow the volunteering industry to better prepare for any additional reforms.

Thank you for the opportunity to provide a submission.

Yours sincerely



Mel Blake
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Volunteering Tasmania