

## Telecommunications Legislation (unsolicited communications) Bill 2019

### Submission by WWF-Australia, February 2020

Public fundraising is a critical source of income for WWF-Australia, as it is for many charities. The telephone plays an important part in driving these donations, and consequently the loss of the Do Not Call Register (DNCR) exemption would have a significant impact on our ability to raise vital funds.

Telephone plays a key role in supporting our regular giving program, which provides the backbone of the organisation's income. It is not just the acquisition of new supporters, but also the ability to reengage with lapsed donors as well as ensuring that current supporters' details are kept up to date. For example, on a monthly basis around 4% of our EFT transactions fail usually because a donor has new payment card details. Without the ability to contact donors in order to update these details on our records, we could see a 4% decline each month of our most critical income stream.

Telephone is also an important engagement tool. Donors expect and deserve to be thanked for their generous donations. We utilise phone communication to reach out to supporters to convey gratitude, and also to welcome new donors when they first join. Testing has proven this to be effective stewardship for retaining longer term support as it fosters a positive relationship between charities and the donor.

Charitable giving for many Australians is an important part of who they are. Donors give because they care about causes close to their heart, and their financial gifts allow them to have an impact in a way they may not otherwise be able to. However, from years of sector research we know that people are far less likely to give proactively, hence why it is so important for charities to be able to make 'the ask'. By restricting charity's ability to do so via the telephone would have a massive impact on the not-for-profit sector, and our ability to deliver services for good at a time when they are most needed.

At WWF-Australia we record feedback and complaints received in relation to our various fundraising channels as we are always striving to improve the donor experience wherever possible, and take action as soon as this detail is received. Should anyone request we no longer contact them by phone, their record will be flagged as 'do not call' and they will subsequently be excluded from any future contact through this channel. Our telephone programs receive very few complaints—there were 18 logged in FY19, and only three to date in FY20. More widely, the latest statistics on telemarketing complaints show that complaints in regard to charity telephone fundraising is in decline, and that charities constitute a small fraction .8% of total complaints, just 310 of the 36,583 complaints to ACMA.

We work very closely with the agencies we engage to deliver our telemarketing programs, to not only ensure their full compliance with existing telephone regulation but also so their staff are well trained to provide a high quality experience to our supporters. We regularly undertake call monitoring to ensure that standards are consistently high, and that all regulatory requirements are being upheld.

In 2016 the Fundraising Institute of Australia (FIA), of which WWF-Australia is a member, introduced donor care provisions to its Code to protect vulnerable people along with training for members, and compliance monitoring and reporting through an independent Code Authority. We take care not to contact people below or above key ages, and always check that our telephone agencies have their

own vulnerable person policy and that all callers are fully trained on what to do should they suspect they are talking to a vulnerable person.

Considering the loss of income to charities due to inability to contact donors by telephone and the low level of complaints about charity calling due to effective fundraising self-regulation, as well as the additional compliance costs and administrative resource that would be required to manage such a change, it is therefore our view that the Senate Committee reject the proposed amendments to the DNCR charity exemption.