



21 February 2020

Committee Secretary
Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Madam/Sir

Re: Telecommunications Legislation Amendment (Unsolicited Communications) Bill 2019 - RSPCA Australia submission

The RSPCA is one of Australia's most trusted and oldest charities and has a mission to prevent cruelty to animals by actively promoting their care and protection.

This submission regarding the proposal to remove charity exemption in relation to the Do Not Call (DNC) register is made on behalf of the RSPCA federation consisting of RSPCA Australia, RSPCA ACT, RSPCA Darwin, RSPCA NSW, RSPCA Qld, RSPCA SA, RSPCA Tas, RSPCA Vic and RSPCA WA.

The RSPCA makes an enormous contribution to the community, carrying out vital activities such as the enforcement of state-based animal welfare legislation through our inspectorate functions, caring for around 150,000 animals each year in our shelters across the country and educating on responsible pet ownership and animal welfare issues.

Nationally it costs the RSPCA in excess of \$174 million to operate each year. Only 6% of our funding is provided by governments, with donations and bequests from individuals making up 52% of our total income. Without this income the RSPCA would not be capable of fulfilling its important role and the proposal to remove the charity exemption for the DNC register would severely impact our ability to generate this financial support.

The RSPCA endorses the submissions and recommendations of the Fundraising Institute of Australia (FIA). In addition, we make the following comments:

- The suggested amendment removing the exemption for charities to call numbers on the DNC Register would result in substantial negative financial impacts for the RSPCA and other Australian charities, given around 50% of all phone numbers nationally are on the DNC Register, including a large percentage of the RSPCA's existing and prospective supporters.
- Our tele-fundraising agencies data demonstrates substantial success in securing financial donations from generous individuals who are very happy to donate over the phone, on the DNC register, therefore representing a substantial loss of income for the RSPCA were the proposed amendments actioned.
- Insight Charity Fundraising Services (administrators of the RSPCA's raffle including telephone fundraising) indicate the proposed amendment would reduce their usable database by half, with expected income reduced by three quarters.
- In 2019, Insight Charity Fundraising Services conducted tens of thousands of calls and received a total of only two notices from the Australian Communications and Media Authority, indicating a level of understanding and acceptance from the public regarding charities being exempt from the DNC register.

RSPCA Australia

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- RSPCA Societies are members of the Fundraising Institute of Australia and therefore follow the FIA Code of Conduct which includes following the principles pertaining to respecting privacy and vulnerable calling policies to mitigate any distress placed on the community through fundraising efforts.

Please do not hesitate to contact me if you would like further information.

Yours sincerely

Richard Mussell
Chief Executive Officer