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Fundraising Institute Australia (FIA) submits the following in relation to that part of Draft Proposal 6 the Department of Communications and the Arts report on the Review of the Australian Communications and Media Authority (ACMA) dealing with the Do Not Call Register (DNCR).

### **About Fundraising Institute Australia**

Established in 1968, FIA's purpose is to advance professional fundraising through promotion of standards, professional development and measurable credentials so that members and their organizations deliver best practice.

The FIA's Principles & Standards of Fundraising Practice are the professional fundraiser's guide to ethical, accountable and transparent fundraising and are vital to how the fundraising profession is viewed by donors, government, the community and fundraiser. They also act as the tool for sector self-regulation

In order to achieve its mission, through its 1700 members comprising both individuals and organisations, FIA conducts the following activities;

- Promotes and enhances education, training and professional development of fundraisers.
- Advocates on fundraising practice and regulation to Government, industry and the community.
- Develop standards and codes of practice.

Promotes and encourages research into fundraising and philanthropic giving.

### **This submission.**

In its report the Department proposed that within a year ACMA examine whether the DNCR can be referred to industry for self-regulation in consultation with relevant industry bodies.

The Do Not Call Register Act contains an exemption for charities but the register itself and the subordinate regulations are relevant to FIA members because:

1. All fundraisers who contact donors and potential donors by telephone are subject to the Telemarketing Industry Standard which is administered by the ACMA
2. Many of the larger charities wash their lists against the Register and other small to medium charities would be likely to do so if access were less expensive.

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The issues for FIA in responding to the Department's draft proposal are as follows:

### **Industry Standard**

The Telemarketing and Research Industry Standard covers matters including permitted calling hours and caller line identification. The proposed examination into self-regulation would have to consider what would happen to this regulation.

Fundraising has been identified in recent reports as the most regulated part of the Not For Profit sector and FIA encourages and supports measures to reduce unnecessary red tape. For instance late last year FIA actively discouraged the Queensland Government NFP Reference Group from recommending Queensland-only calling hours for telephone fundraising on the grounds that such a measure would be unnecessary as the calling hours in the Industry Standard already applied in Queensland and a non-uniform approach would be a backward step.

FIA would have no problem with the remainder of the Industry Standard being referred for self regulation but there is a continuing need for a commonly accepted standard national set of permitted calling hours as indicated above.

### **Access to the Register**

Access to the Register is a two-step process involving becoming a subscriber and utilizing the washing service. Access to the washing service is only available to subscribers and this process is both too expensive and difficult for small charities.

FIA submits that the proposed examination of the DNCR and ACMA be charged with considering simplified and less costly access for charities and other NFP organisations.

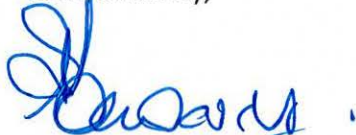
If this access issue is part of the examination FIA would consider it appropriate for it to be one of the 'industry bodies' to be consulted.

### **Process**

As a matter of procedure and perception, FIA questions whether the ACMA is the most appropriate organisation to conduct the proposed examination into its own activities.

For further information please contact the undersigned.

Yours sincerely,



Rob Edwards  
Chief Executive Officer  
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