



*Submission to the
Select Committee on Charity Fundraising in the 21st Century*

**Inquiry into the current framework of fundraising
regulation for charities and options for reform**

August 2018

Introduction

This submission outlines key areas of opportunity and concern for the Community Council for Australia (CCA) in relation to the Senate Select Committee Inquiry into Charitable Fundraising.

CCA welcomes the opportunity to engage with the Senate Select Committee on this very important issue.

CCA is a member of the *fixfundraising* coalition, has liaised extensively with Justice Connect and supports their submission. Parts of this submission reflect this convergence.

CCA has also consulted with other members (see listing in appendix 1) in framing this submission, however, it is important to note that this submission does not override the policy positions outlined in any individual submissions from CCA members.

The content of this submission includes: a brief background to CCA; an overview of the current context for the broader charities and not-for-profit (NFP) sector; seven informing principles for fundraising regulation reform; our shared recommendation; a discussion of key issues relating to the inquiry terms of reference; and a conclusion.

CCA welcomes this opportunity to provide input into this Senate Inquiry and is keen to engage in further discussion as the Select Committee's recommendations are developed and considered.

The Community Council for Australia

The Community Council for Australia is an independent non-political member-based organisation dedicated to building flourishing communities by enhancing the extraordinary work undertaken by the charities and not-for-profit sector in Australia. CCA seeks to change the way governments, communities and NFP organisations relate to one another. It does so by providing a national voice and facilitation for sector leaders to act on common and shared issues affecting the contribution, performance and viability of NFPs in Australia. This includes:

- promoting the values of the sector and the need for reform
- influencing and shaping relevant policy agendas
- improving the way people invest in the sector
- measuring and reporting success in a way that clearly articulates value
- building collaboration and sector efficiency
- informing, educating, and assisting organisations in the sector to deal with change and build sustainable futures
- providing a catalyst and mechanism for the sector to work in partnership with government, business and the broader Australian community to achieve positive change.

Our success will drive a more sustainable and effective charities and not-for-profit sector in Australia making an increased contribution to the well-being and resilience of all our communities.

Background context: the not-for-profit sector

The NFP sector encompasses over 600,000 organisations - from large to very small - and employs well over one million staff (around 10% of all employees in Australia). Australia's 54,000 charities collectively turn over more than \$130 billion each year and hold over \$260 billion in assets. In the last decade, sector growth has continued at more than 7% a year, a figure that is higher than any other industry group.

These facts tell only a small part of the story. The real value of the NFP sector is often in the unmeasured contribution to Australian quality of life. NFPs are at the heart of our communities; building connection, nurturing spiritual and cultural expression, and enhancing the productivity of all Australians. Collectively, they make us a more resilient society.

The importance of the NFP sector is now being internationally recognised with many governments putting in place measures to increase NFP investment and productivity. Smaller government and bigger community is a common theme, driven in part by savings, but also by a commitment to greater civic engagement, social entrepreneurship and productivity within the NFP sector.

The establishment of the Australian Charities and Not-for-profit Commission (ACNC) is the first time the NFP sector has had an independent regulator dedicated to serving their needs and enhancing their capacity. It has proved to be a positive step towards red tape reductions, increased transparency, and trust in the community by prospective volunteers and donors. The national charities register has also provided invaluable information.

While the recent history of the NFP sector is framed by growth and reform, new issues are emerging. The level of volunteering and individual philanthropic giving as a percentage of income has still not recovered to the highs of 2009. At the same time, revenue available to governments is effectively falling in real terms against a backdrop of increasing demands and higher community expectations. Competition for fundraising and services has increased.

Given the size of the sector and its critical role in our community, Government can achieve real economic and social benefits if it chooses to strategically invest in strengthening our communities and our NFPs. There have been numerous reports and recommendations relating to the NFP sector over the last decade, but relatively few have been acted upon.

The inability of governments to streamline their own regulatory processes, their tendering processes, contract management and programs monitoring has consistently been identified as a major barrier to improving productivity in the not-for-profit sector in Australia. The lack of certainty in the government regulatory environment, funding and contracting processes also undermines performance and ongoing investment in improving outcomes. For the sector to be more effective, these issues must be addressed.

Positive change often requires increased collaboration, recognition of shared goals and shared ways of achieving outcomes. Given the size of the NFP sector and its critical role in improving Australian well-being, there is scope to boost productivity by working constructively with the NFP sector in developing more responsive and effective programs and services, seeking to achieve shared goals and outcomes.

Informing principles for fundraising regulation reform

1. Never has it been more critical for charities to diversify their income and build their capacity. For this reason, CCA believes the first principle of any proposed new fundraising regulations should be to **encourage and support fundraising activities** undertaken by charities.
2. There is no evidence to indicate the Australian public lack trust in charities or are concerned about widespread inappropriate fundraising activities. The goal of any new regulation should not be seen as addressing a market failure, but to **promote more charitable giving**.
3. The current regulatory system applying to charities engaged in fundraising is broken. Separate jurisdictional fundraising regulatory regimes in Australia is not justifiable, especially given the diminishing relevance of geographical boundaries. **Fundraising regulation need to be workable, efficient and fit-for-purpose**. Current regulations fail this basic test.
4. CCA is **opposed to the establishment of additional regulations and compliance burdens for charities** unless there is good evidence that the proposed new regulations will contribute to efficiencies, a reduction in compliance costs, and further increase public trust. The goal in relation to fundraising regulation should be to reduce not increase compliance costs.
5. Fundraising regulations must take account of the existing criminal law, consumer protection laws, common law and others, as well as the role of the Australian Charities and Not-for-profit Commission (ACNC). **Duplication of existing laws in fundraising regulation makes no sense**.
6. It is the **purpose of the charity** and ensuring money raised supports achievement of the charitable purpose that matters, not just the nature of the fundraising activity undertaken.
7. The emphasis in any fundraising regulatory framework should be on the actual fundraising behaviour, the way the agency involved has acted. It should not be about compliance, reporting and accurate filling in of forms. This includes **ensuring appropriate enforcement options for the very small minority of charities doing the wrong thing**.

CCA recommendation (shared with Justice Connect and others)

The Federal Government should actively support and assist with the development of a nationally-consistent, contemporary and fit-for-purpose charitable fundraising regime for implementation no later than mid-2019 by:

1. initiating (or at least supporting) amendments to the Australian Consumer Law to ensure its application to fundraising activities for and on behalf of charities (and other not-for-profit organisations) is clear and broad;
2. urging the repeal of existing fragmented State and Territory fundraising laws; and
3. working with other Australian Consumer Law regulators, the Australian Charities and Not-for-profits Commission, self-regulatory bodies and sector intermediaries to draft and consult publicly on a core mandatory code to be enforced under the Australian Consumer Law multi-regulatory framework.

Response to Inquiry Terms of Reference

The impact of current fundraising regulations on charities

This area addresses the following four terms of reference:

- (a) whether the current framework of fundraising regulation creates unnecessary problems for charities and organisations who rely on donations from Australian supporters;*
- (b) whether current fundraising laws meet the objectives that guided the decision to regulate donations;*
- (c) whether current fundraising compliance regimes allow charities to cultivate donor activity and make optimal use of resources donors provide;*
- (d) the loss in productivity for the thousands of charities who try to meet the requirements of the seven different fundraising regimes;*

It is inconceivable that anyone could support the current fundraising regulations in Australia. By any measure, they are not workable, effective, or fit-for-purpose.

In practice many charities are non-compliant with the existing regulations, not because they seek to avoid transparency or are doing the wrong thing, but simply because to comply with existing regulations is a very difficult, time consuming and pointless exercise. Not only is the regulatory process onerous, it is also not enforced, making compliance with fundraising regulations one of the most futile activities undertaken in charities across Australia.

Below is a very brief outline of what one charity had to do to comply with Australian fundraising regulations in relation to a largely web based fundraising campaign.

	ACT	NSW	SA	TAS	VIC	QLD	WA
Advertising requirements for a public notice						X	
Amount intended to raise in jurisdiction	X						X
Appeal manager details					X		
Auditors details	X	X	X			X	X
Bank account details		X			X	X	X
All Directors details (name, position and address)			X		X	X	
All Directors signatures					X		
Certified copies of supporting documents						X	X
Copies of supporting documents (not certified)	X	X			X		
Covering letter							X
Dates required for the licence				X			
Fundraising activities to be undertaken	X		X				X
Third party fundraising provider details			X		X		
Police check					X		X
State address if intending to fundraise in that state		X			X		
Statement of purpose			X	X	X	X	X

In undertaking to comply with the requirements under existing fundraising regulations, this charity encountered many challenges. Each state and territory in Australia, with the exception of the NT, required different information and the level of detail required for each application varied significantly.

The requirement for signatures of all Directors was challenging as the Directors are not located in the same state or territory. This was made harder for the Victorian application as each Director was required to sign on the same application form. Coordinating this process required considerable time.

Some of the applications required the charity to pay for additional information, for example; the West Australian application required the charity to organise and pay for the police checks. Again, this was a time-consuming task as police checks were required to be submitted with the application.

The requirement for a public notice advertisement as part of the Queensland application process also proved challenging as hard copies of the advertisement were required to be provided to the Queensland authority within seven days of the application being lodged. This again added extra compliance costs.

Some of the applications required the charity to outline how much money would be raised in the state or territory and when that money would be spent. As all the applications were for a new licence for a new fundraising campaign, it was difficult to provide the exact amount that would be raised, therefore making it difficult (and not particularly useful) to nominate an estimated amount that will be raised.

All the license applications work was completed in January and February, with all license applications being lodged by mid-February. It took until mid-June before the fundraising licenses were approved.

More than one month of work from a full-time staff person was used to cover this application process, but that is not the end of the administrative burden. Some jurisdictions demanded more details including; follow up details on the amount of money raised, where the money raised was to be spent (how much in our state) and by when (some required any money to be spent within a short time frame). This required the preparation of several different financial statements.

Some have estimated the current costs of compliance with fundraising regulations in Australia is more than \$15 million per annum. CCA believe these estimates of grossly understate the real cost of having such confusing and conflicting regulations. Below is a case study where a major corporate supporter chose not to engage in a fundraising campaign because of the current fundraising regulations:

A well-known charity approached CCA recently seeking assistance in working with one of their major corporate partners. This corporate had approached the charity with a national fundraising campaign idea to roll out in all their stores. The corporate then went to their legal department for due diligence and discovered there was no viable way for them to legally run a national fundraising campaign as every state had differing legislation and multiple conflicting regulations - namely the length of time allowed to hold the funds on behalf of a charity before distributing those funds. Despite assurances from CCA that it was highly unlikely there would be any consequences if they acted in good faith and complied with as much as they could of the regulations, the corporate supporter chose not to continue with the national fundraising campaign. This cost the organisation a minimum of \$500,000 in lost fundraising and many weeks of team members and legal support in trying to resolve this issue.

Aside from the ridiculous administrative burden of compliance activity, the lack of any meaningful enforcement when charities are doing the wrong thing is a concern for the majority of charities. Charities acting inappropriately damage the brand and reputation of all charities.

When enforcement action is taken in relation to fundraising, it is almost invariably not in relation to State and Territory fundraising regulations, but more commonly fraud (e.g. pretending to be a fireman collecting money after bushfires), or breaching consumer law (e.g. Belle Gibson pretending to have cancer and to be raising money for charity).

It is also important to acknowledge that all the existing fundraising regulations were developed prior to the establishment of the Australian Charities and Not-for-profit Commission (ACNC). The ACNC is a well-functioning and transparent regulator for the charities sector that collects and publishes annual information statements from all charities and investigates any complaints against a charity.

Enforcement, harmonisation, and a better way to regulate charities

This area addresses the following four terms of reference:

(e) whether the current frameworks for investigation and enforcement are the best model for the contemporary fundraising environment;

(f) how Federal, State and Territory Governments could work together to provide charities with a nationally-consistent, contemporary and fit-for-purpose fundraising regime;

(g) the appropriate donor-focused expectations and requirements that should govern fundraising regulation in the 21st century;

(h) how the Australian consumer law should apply to not-for-profit fundraising activities;

In any discussion of fundraising regulations, it is very important to emphasise that charities trade in trust. Charities want to limit inappropriate behaviour by the very small minority of charities that behave badly and undermine community confidence. Charities want transparency and accountability to their donors. Charities believe in building strong relationships with their donors – it is the best way to create effective giving programs where donors and the charity work together towards shared goals.

Within this context, CCA believes the solution to reforming fundraising regulation is relatively straight forward. As noted earlier, CCA supports the recommendation developed through Justice Connect and the *fixfundraising* coalition:

The Federal Government should actively support and assist with the development of a nationally-consistent, contemporary and fit-for-purpose charitable fundraising regime for implementation no later than mid-2019 by:

- 1. initiating (or at least supporting) amendments to the Australian Consumer Law to ensure its application to fundraising activities for and on behalf of charities (and other not-for-profit organisations) is clear and broad;**
- 2. urging the repeal of existing fragmented State and Territory fundraising laws; and**
- 3. working with other Australian Consumer Law regulators, the Australian Charities and Not-for-profits Commission, self-regulatory bodies and sector intermediaries to draft and consult publicly on a core mandatory code to be enforced under the Australian Consumer Law multi-regulatory framework.**

The Justice Connect submission outlines ten main reasons why, with minor amendments and supported by a well-structured code of conduct, Australian Consumer Law is the best fit-for-purpose regulatory framework for fundraising. These are cited below:

1. ***The core policy objectives of the ACL are congruent with the substantive policy objectives of fundraising regulation.*** *The ACL is founded on policy objectives of preventing practices that: are unfair or contrary to good faith; are unconscionable or deceptive; help people make informed decisions and protect them when they have been treated unfairly; and penalise those who have acted unfairly.¹ Fundraising laws are similarly concerned with fairness and ensuring that people can make informed decisions.*
2. ***The ACL represents a modern, principles-based approach to regulation of people and organisations:*** *ensuring that individuals and fundraisers are aware of their obligations without overly onerous registration and reporting requirements by the State-based legislation which essentially seeks the same outcome; transparency, accountability, and good conduct.*
3. ***Through jurisdictional cooperation, the ACL can, in its current form, apply to any person (natural or corporate or resident overseas) that operates in Australia – the application of provisions of the ACL to fundraising will not encounter the same State and Territory jurisdictional barriers, or have any constitutional barriers requiring a referral of State powers.***
4. ***The ACL is a well-understood piece of law*** *(and the recent fundraising guidance assists this) which means it is easier to explain to fundraisers and donors and is likely to more quickly improve fundraiser behaviour. A survey in 2016 showed awareness of the ACL among all Australians at levels of 90% plus – a great base for building more specific public awareness about the role of the ACL in fundraising and other not-for-profit activities.²*
5. ***The ACL does not impose any additional regulatory burden on fundraisers and has been shown to be an effective method for both private enforcement and redress (not available under State- based laws) as well as regulatory pursuit of misconduct where it does occur.***

Private rights are important - they provide for individuals to hold charities accountable for unethical and unfair fundraising practices and private action effectively complements and reinforces the multi-regulatory enforcement model upon which the ACL rests. We note the comments of the Australian Securities and Investments Commissioner: “if private litigation can achieve an outcome that we might have done previously then we should let the private litigation pursue that outcome, because we can use those resources to devote to another area.”³
6. ***The minor amendments to the ACL that we propose would be cost effective to implement and serve to further broaden the remedies available to all ACL regulators.***
7. ***The ACL contemplates the development and enforcement of voluntary and mandatory industry codes, which would be appropriate and helpful in the fundraising context (as outlined above this forms part of our proposed model).***

¹ Australian Government, The Treasury, *The Australian Consumer Law: A framework overview* (January 2013); Productivity Commission, *Review of Australia’s Consumer Policy Framework*, Report, No. 45, 30 April 2008; Standing Committee of Officials of Consumer Affairs, *An Australian Consumer Law Fair markets — Confident consumers*, 17 February 2009.

² Australian Consumer Law Review, Interim Report, October 2016, p 9 – reference is to consumers 90% and business 98%. Donors are also consumers.

³ Australian Securities Investment Commission (ASIC) Chairman, Greg Medcraft, cited in “ASIC backs private litigation” accessed at <http://www.moneymanagement.com.au/news/financial-planning/asic-backs-private-litigation> on 23 November 2016.

8. *The reasons for changing from a fragmented approach to one national consumer law as stated by the Hon Joe Ludwig, Special Minister for the State and Cabinet Secretary on the Second Reading Speech on the ACL, apply equally to the fundraising context:*

...“While these laws may work well for many purposes, each of them differs—to the cost of consumers and business. Australian consumers deserve laws which make their rights clear and consistent, and which protect them equally wherever they are. At the same time, Australian businesses deserve simple, national consumer laws that make compliance easier. A single national consumer law is the best means of achieving these results...”⁴

9. ***The regulators with oversight of consumer law are the same regulators concerned with fundraising laws, and therefore the institutions involved in regulating fundraising activity could largely remain unchanged if regulation of fundraising derived from the ACL alone, ensuring existing experience regulating not-for-profits can be retained.***
10. *The current regulatory approach of the ACCC and State-based regulators of the ACL is a risk-based, proportionate approach that we consider is appropriate for the regulation of fundraising.*

CCA understands there is some reluctance within the ACCC to adopt this solution, but their reluctance should not be a road block to long overdue reform. The amendments proposed by Justice Connect are well thought through, have been professionally developed, and would be relatively simple and cost effective in their application. For all involved, this solution would greatly improve the accountability of charities engaging in fundraising activities, while also cutting a significant amount of pointless red tape and compliance activity.

Third-party fundraisers

This area addresses the following terms of reference:

(i) what are the best mechanisms to regulate third party fundraisers and to ensure the culture of third party fundraisers matches community perceptions of the clients they work with;

CCA believes that it is appropriate to adopt a definition of third party fundraisers as entities that raise funds on behalf of a charity in return for a financial or other direct benefit. Voluntary fundraisers should not be seen as third party fundraisers under this definition.

CCA also supports the requirement for all third party fundraisers to state the name of the charity they are fundraising on behalf of, to disclose that they are working on behalf of this charity, and to provide contact details for the charity.

It may be appropriate to consider a voluntary self-registration system for third party fundraisers. This could be a sub section of the ACNC website and enable details of third party fundraising organisations and their activities to be made publicly available. Beyond this self-regulatory approach, it is difficult to justify the administrative and other costs of developing and sustaining a more formal regulation or accreditation program for all third party fundraisers.

⁴ Commonwealth, Parliamentary Debates, Senate, 24 June 2010, the Hon Senator Joe Ludwig, p 4283.

Transparency in relation to foreign donations and political influence

This area addresses the following terms of reference:

(j) whether a harmonised, contemporary fundraising regime could help in addressing concerns about the potential influence of foreign money on civil society and political debate in Australia;

CCA is not aware of any major concerns in relation to foreign donations being used to in some way to force a charity to advocate against its charitable purpose on behalf of some foreign principal. A homelessness group does not suddenly receive a big grant from a Chinese businessman and start advocating for the Chinese One Belt One Road policy.

CCA is aware of charities receiving overseas donations to pursue their charitable purpose – overseas aid groups receiving money to advocate for overseas aid. This is exactly what the community and all regulators would expect – a charity pursuing its charitable purpose. Where a charity is not pursuing its charitable purpose, it should be referred to the ACNC for investigation and the ACNC can strip it of its charitable status.

CCA is aware that some business groups resent advocacy from charities that is not in their financial or vested interests. Mining groups often complain that environmental charities unduly influence public policy, alcohol producers complain about the influence of public health groups, etc.

The reality is that the big influencers of Australian politics are almost invariably those with the most money and power, and that is not charities. Unlike charities the rich and powerful vested interests can donate to political parties, support particular candidates, offer various inducements to political parties and candidates (including lucrative future employment contracts) and even distribute how to vote material etc. Charities cannot engage in any of these activities.

As far as reforms to charitable fundraising and the relationship to foreign donations, consumer law enables any Australian to challenge whether they have received what they paid for including whether a charity has been misleading or deceptive. At anytime anyone can lodge a complaint with the ACNC about any charity that they believe is behaving inappropriately.

The need for action

This area addresses the following terms of reference:

(k) the cost to the charity and not-for-profit sector, and the communities they serve, of postponing fundraising reform;

For more than a decade, charities have been calling for reform of our fundraising regulations. For more than a decade, the more diligent and well-resourced charities have sought to be compliant with an inept and senseless framework of red tape and reporting that has cost millions in wasted effort.

CCA wonders whether such a dysfunctional regulatory system would have been allowed to continue if it had been applied to a for-profit industry area. Would business tolerate such restrictions of trade with seven different compliance regimes?

The time has well and truly come when this farce of regulatory control should be abandoned and replaced with a more workable, efficient and fit-for-purpose solution.

Conclusion

Earlier this year CCA was one of over 100 charities to sign an open letter to government on the issue of fundraising regulation and reform. In part this letter read:

Australia's fundraising regulations are a mess. In fact, it is so hard to comply with the current system of compliance that most of Australia's 55,000 charities do not bother. The charities sector employs over 1.1 million Australians and turns over more than \$134 billion annually. The loss in productivity involved for the thousands of charities that seek to meet all the requirements of the seven different fundraising regimes amounts to hundreds of millions of dollars annually.

It is time. The Commonwealth Government and every State and Territory Government can quickly and effectively provide charities and not-for-profit organisations with one nationally consistent and fit-for-purpose fundraising regime. The current Review of the Australian Consumer Law (ACL) is an important opportunity for real reform. The ACL can easily be clarified and amended to ensure charities are required to meet a clear set of consumer-focused expectations and requirements in all their fundraising activities. We do not need seven sets of onerous and unenforceable regulations.

For more than ten years charities and not-for-profits have been asking governments to #fixfundraising. Our feedback has been that this issue is not important enough for governments to bother. Cutting red tape for business is essential. Cutting red tape for charities is not.

We, the charities of Australia, who support and enable so many aspects of our lives including: education; the arts; health; housing; employment; recreation; social services; childcare; emergency services; family support; justice systems; international development; the environment, childcare, religion and spirituality, animal welfare; and many other areas that are crucial to Australia's productivity and well-being; are asking for your help.

Please, fix this fundraising mess so we can get on with what we do best – building flourishing communities.

CCA hope this latest inquiry into fundraising regulations does more than again highlight the problems. The concerns of charities have been repeatedly dismissed, our issues have been largely ignored, and we continue to waste substantial time, energy and resources complying with a useless set of regulations.

Just as importantly, many charities are concerned that not enough is being done to protect public trust and confidence in charities. We need to ensure that in the very small minority of cases where charities are behaving badly, there are clear sanctions and enforcement. The current fundraising regulations fail to offer the kind of protection of the charities brand that charities have called for.

CCA implore this Senate Committee to finally hear our voices and take action that will benefit our charities and communities long into the future.

Current Membership – Community Council for Australia *Appendix 1*

Access Australia's National Infertility Network
Adult Learning Australia
Alcohol, Tobacco and Other Drugs Association ACT
Arab Council Australia
Australian Community Support Organisation (ACSO)
Australian Council for International Development, Marc Purcell, CEO (CCA Board Director)
Australian Institute of Superannuation Trustees
Australian Major Performing Arts Group
Australian Research Alliance for Children and Youth
Australian Women Donors Network
Business Council of Cooperatives and Mutuals
Carers Australia
Centre for Social Impact
Church Communities Australia
Churches of Christ Vic and Tas
Community Based Support (Tas)
Community Broadcasting Association of Australia
Community Colleges Australia
Connecting Up
Ethical Jobs
Everyman
Foresters Community Finance
Foundation for Alcohol Research and Education
Foundation for Young Australians
Fragile X Association of Australia
Fundraising Institute of Australia
Good Samaritan Foundation
Good2Give
Hammondcare
Healthy Options Australia
Hillsong Church, George Aghajanian, CEO (CCA Board Director)
Justice Connect
Life Without Barriers, Claire Robbs, CEO (CCA Board Director)
Lock the Gate
Mater Foundation
Menslink

Mission Australia
Missions Interlink
Musica Viva Australia, Mary Jo Capps, CEO (CCA Board Director)
Non Profit Alliance
Our Community
OzHarvest
Painaustralia
Palliative Care Australia
Philanthropy Australia
Port Phillip Housing Association
Pro Bono Australia
Queensland Water & Land Carers
RSPCA Australia, Heather Neil, CEO (CCA Board Director)
SANE
SARRAH
Save the Children, Paul Ronalds, CEO (CCA Board Director)
Settlement Services International
Smith Family, Lisa O'Brien, CEO (CCA Board Director)
Social Ventures Australia
St John Ambulance
Starlight Foundation
Ted Noffs Foundation
The Lost Dogs' Home
Touched by Olivia
Variety Australia
Veterans Off the Streets Australia
Volunteering Australia
Wesley Mission, Keith Garner, CEO (CCA Board Director)
White Ribbon Australia
Work Place Giving Australia
World Vision, Tim Costello, Chief Advocate (Chair CCA Board)
World Wide Fund for Nature Australia
YMCA Australia