



**TELECOMMUNICATIONS LEGISLATION (UNSOLICITED COMMUNICATIONS) BILL 2019**  
**SENATE STANDING COMMITTEE ON ENVIRONMENT AND COMMUNICATIONS LEGISLATION COMMITTEE**  
**INQUIRY**  
**SUBMISSION BY**  
**CORNUCOPIA CONSULTANCY PTY LTD**  
**FEBRUARY 2020**

Cornucopia Consultancy Pty Ltd (“Cornucopia”) has operated as a fundraising agency specialising in the recruitment of regular, ongoing donors for our charity clients since 2002. During that time, we have moved from being solely a face to face agency to incorporating telefundraising into our business operations. We are highly regarded in the sector as a high-quality service provider who is committed to compliance and transparency.

Since 2015 we have operated a dedicated call centre currently employing some 50+ callers, some of whom have struggled to find paid employment due to a variety of circumstances. We have worked on behalf of many of Australia’s and the world’s leading and best-known charities.

Cornucopia has raised substantial amounts of money through fundraising on behalf of our charity clients, both face to face and telefundraising, over the past 18 years.

We fully support the submission made by the Fundraising Institute of Australia (“FIA”) which does not recommend the adoption of the proposed amendments to the DNCR charity exemption.

Further to all points raised in that document, we would like to submit the following:

**Damage to Charities’ Income Stream and Cornucopia’s Business Operations and Employment Capacity**

The effectiveness of telefundraising is not in dispute, our charity clients recognise that this is an excellent source of revenue which can provide a steady and dependable income stream as well as providing the facility to reactivate lapsed donors, to upgrade existing donors, to respond to donors whose payments decline at the bank, and to gauge interest in a donor leaving a gift in their will through a bequest.

The impact of this amendment would be seriously detrimental to both our charity clients and our own business. To remove such a large percentage of numbers from any form of telephone contact would result in a substantial reduction in the number of callers Cornucopia could employ, which in turn would impact on the number of support and administrative staff required by our business.

**Safeguards, Codes of Conduct and Policy already in place**

With regard to Senator Griff’s claim that “Older Australians are the prey that some charities cherish”, we dispute this in the strongest terms. As noted in the submission made by the FIA there are a number of steps, checks and balances in place to ensure vulnerable Australians of any age are not deliberately targeted. Not only are we required to adhere to the FIA Code, we have our own policy and processes in place for dealing with such vulnerable Australians. All callers receive initial and ongoing training and guidance for dealing with



vulnerable people including how to identify a person contacted may be considered vulnerable and how to respectfully close the conversation and remove that person's name and contact details from our calling database.

Cornucopia is committed to compliance with all aspects of fundraising and other legislation and has policy and process in place to assist with adherence.

The sector, as a whole, is already heavily regulated and Cornucopia works closely with all regulatory bodies, sector authorities such as the FIA and the PFRA, and any other local, state or federal authority as required to ensure we are aware of and adhere to all rules, regulations and applicable laws.

**Recommendation not to proceed with adoption of amendment**

In light of the significant amount of funds raised via telefundraising and the severe impact on not only our clients' income stream and ability to contact existing donors but also on our viability to continue in business thus jeopardizing the employment of a number of current and future employees, Cornucopia recommends that the Senate Committee **not recommend** the adoption of the proposed amendments to the DNCR charity exemption.