VCOSS submission to the *Review of the Vulnerable people in emergency policy Discussion Paper*

February 2018

About VCOSS

The Victorian Council of Social Service (VCOSS) is the peak body of the social and community sector in Victoria. VCOSS members reflect the diversity of the sector and include large charities, peak organisations, small community services, advocacy groups, and individuals interested in social policy. In addition to supporting the sector, VCOSS represents the interests of vulnerable and disadvantaged Victorians in policy debates and advocates for the development of a sustainable, fair and equitable society.

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VCOSS acknowledges the traditional owners of country and pays its respects to Elders past and present.

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Executive Summary

VCOSS welcomes the opportunity to provide this Submission to the Review of the *Vulnerable people in emergencies policy* Discussion Paper*.*

The review is an important step in improving emergency management policies to better meet the needs of people who may be additionally vulnerable in an emergency.

To help inform this submission, VCOSS convened a consultation forum for more than 35 community and social service organisations to provide feedback on:

- the role of community organisations in emergencies
- the impact and effectiveness of the *Vulnerable people in emergencies policy*
- key challenges faced by organisations in implementing the Policy
- ideas for the future development of the Policy

Recommendations from this submission include:

- Expand the scope of the *Vulnerable people in emergencies policy* to include all hazards across all geographic areas of Victoria.
- Expand the definition of 'vulnerable' to cover all people at highest risk in emergencies.
- Use the term 'people at risk' in policies that are designed to support vulnerable people in emergencies and disasters.
- Work in partnership with the community sector to build the resilience of people at risk using a strengths based approach.
- Fund community organisations to implement the *Vulnerable people in emergencies* policy
- Develop a framework to support organisations to implement the policy, including through ongoing training and capacity building.
- Retain the evacuation component of the Vulnerable people in emergencies policy.
- Develop a state-wide framework for people at risk to ensure that all Victorians are better prepared for and can recover from emergencies and disasters.

Vulnerable people in emergencies policy

Expand the scope of the policy

> **Recommendation:**
>
> • Expand the scope of the *Vulnerable people in emergencies policy* to include all hazards across all geographic areas of Victoria.

The *Vulnerable people in emergencies policy* was developed as a result of recommendations made by the 2009 Bushfire Royal Commission in response to deaths caused by the 2009 bushfires. It applied to the 64 local government areas covered wholly or partly by the CFA.

The policy has since been expanded to include severe weather. The geographic areas to which it applies have not been expanded.

Feedback from community organisations included the need to expand the policy to encompass all hazards including extreme heat, storms, flood and pandemic.

Community organisations also agreed that the policy should be expanded to include all areas of Victoria, consistent with existing state-wide policies such as DHHS' Heat Health Alerts.

Expand the definition of 'vulnerable people'

> **Recommendation:**
>
> • Expand the definition of 'vulnerable' to cover all people at highest risk in emergencies.

The definition of 'vulnerable' for the purposes of the policy is very narrow, having been developed in order for the Vulnerable Persons Register (VPR) to be of a manageable size. The definition of vulnerable in the policy as it relates to evacuation is used to describe people at highest risk during an emergency.

Feedback from community organisations indicated the current policy excludes people who are homeless or who are socially isolated. VCOSS recommends expanding the definition of vulnerable for the purpose of the Register to consider all people who are at highest risk during an emergency.

There is increasing understanding of the impacts on people who may be additionally at risk in an emergency. While research has largely focused on particular demographics or cohorts, there are a range of complexities and factors that lead to people being more at risk during an emergency or disaster.

It should be noted that the *Vulnerable people in emergencies policy* does not meet the original intent of the recommendations made by the 2009 Bushfire Royal Commission. In reviewing the findings of the deaths as a result of the 2009 bushfire, none of the people who died as a result of the fire, and for whom the policy was developed, would have been eligible for evacuation support under the existing policy.

In addition to the groups listed in the Discussion Paper, organisations agreed that people that may be at greater risk during an emergency include:

- older women
- frail older people
- women with a disability
- people living in poverty
- asylum seekers and refugees
- people facing homelessness and rough sleepers
- people who are socially isolated.

Adopt people-first language

> **Recommendation:**
>
> - Use the term 'people at risk' in policies that are designed to support vulnerable people in emergencies and disasters.

Language is a powerful tool that can be used to create a sense of empowerment, identity and purpose. VCOSS recommends the policy adopt people-first language. This puts the person first, and any additional vulnerability second. We suggest 'people at (increased) risk' is an acceptable term to describe people who may be additionally vulnerable in an emergency.

Adopt a strengths-based approach to build resilience of people at risk

Recommendation:

- Work in partnership with the community sector to build the resilience of people at risk using a strengths based approach

The shift to shared responsibility and resilience building has seen the onus of emergency preparedness increasingly resting with individual people and households. While noting the emergency management sector's desire for a strengths based approach to community resilience, there needs to be an acknowledgement and understanding of the existing challenges that can threaten resilience or that can lead people to being at greater risk during an emergency or disaster.

It should be noted that the community sector is highly skilled in using strengths based approaches to working with people who are disadvantaged or vulnerable. Community organisations work closely with clients and families to reinforce the qualities and skills that people have to cope or manage daily stress and to navigate through different life situations. The emergency management sector can learn much from the community sector around how to best engage people who may be at greater risk during an emergency, and how to build their resilience to emergencies and disasters, using approaches that support their strengths, abilities and potential.

With the increasing recognition of the role that community organisations can play in supporting people before, during and after emergencies, VCOSS recommends that the emergency management sector work in partnership with community organisations to build resilience, particularly for those people who are at greater risk during an emergency

Review roles and responsibilities

> **Recommendations:**
>
> - Fund community organisations to implement the *Vulnerable people in emergencies* policy.
> - Develop a framework to support organisations to implement the policy, including through ongoing training and capacity building.

The *Vulnerable people in emergencies policy* recognises that community organisations work directly with people who may be at risk during an emergency and that they are well placed to identify people who may be eligible for the Vulnerable Persons Register. The policy also recognises the unique relationships that organisations have with clients and the opportunity this presents to support them with emergency preparedness planning.

Organisations can assist with assessing vulnerability and supporting emergency preparedness, but for the policy to be delivered effectively they must be resourced to do so. The support provided to organisations to implement the policy is uneven. A framework to support organisations, including ongoing training and capacity building, would ensure consistency of education and understanding.

There is some uncertainty about the levels of responsibility of staff in relation to the policy. Organisations consulted for this submission raised questions around the duty of care in relation to the policy and said the policy needs explicit guidance on levels of responsibility and liability.

In addition, there is a lack of clarity around which organisation should take the lead in implementing the policy. For example, some organisations work with people on an episodic rather than continuous basis. In such circumstances, it is unclear who should take responsibility for nomination and revalidation of the VPR.

Organisations noted the role of local government in the implementation of the policy. However there was some uncertainty about the future role of local government, as they are increasingly moving out of Home and Community Care (HACC) and other direct service provision.

While local governments have relationships with their communities, it is less often with individuals within those communities. To reach people, local government relies on groups and community service organisations that work closely with people within those communities, particularly people who may be vulnerable or at greater risk during an emergency.

Some organisations suggested that local government's role in emergency planning and its close connection to the community and community organisations could be utlised to help educate and train community organisations to implement the policy. However local governments vary widely in their capacity and capability to support individual people or organisations with emergency planning. The increasing expectations on local governments to undertake all emergency planning and resilience building efforts does not recognise their capacity and resource limitations. Unless there is significant investment in emergency planning and resilience building for local governments, they cannot be expected to undertake these additional roles.

Future roles and responsibilities

Community service organisations raised concerns that federally funded services such as the NDIS and My Aged Care do not appear to know about the policy or the VPR. There is concern that organisations operating under these new arrangements, and new organisations that will emerge over time, have no contractual obligations to plan for and respond to emergencies. In addition, organisations noted that with the NDIS operating as fee for service, there is no funding for emergency preparedness planning support.

In addition, the participant-centred approach of the NDIS can see multiple organisations providing services for one client. It is unclear which of those organisations would be responsible for nominating a client for the VPR or providing them with emergency preparedness planning support.

Some organisations suggested that emergency considerations be raised during the package planning, however this still leaves the onus of nominating for the VPR, emergency preparedness support and any ongoing emergency support with no clear pathway or responsibility.

Many organisations noted that the lack of case management within the NDIS is a particular concern for clients. Case managers can provide coordination, support and advocacy and are ideally placed to assess whether a client might need nomination to the VPE or support with emergency preparedness planning.

The split between federally funded and contracted organisations and state funded organisations will see increased complexity in implementing this policy. It is critical that mechanisms are put into place that link organisations operating in Victoria with the policy.

Future development of the *Vulnerable people in emergencies policy*

Recommendations:

- Retain the evacuation component of the *Vulnerable people in emergencies policy*.
- Develop a state-wide framework for people at risk to ensure that all Victorians are better prepared for and can recover from emergencies and disasters.

The current *Vulnerable people in emergencies policy* has two main actions attached to it:

- Nominating a person at high risk for the Vulnerable Persons Register for evacuation purposes
- Encouraging vulnerable people and the organisations that support them to undertake emergency preparedness planning.

Organisations consulted for this submission considered the Vulnerable Persons Register component a critical aspect of the policy.

However, organisations stated that implementing the planning component is much more difficult. This is due to a number of factors including limited resources, capacity and capability within community organisations.

There is a distinct lack of clarity around who supports emergency preparedness and planning for individuals and households. Emergency service organisations like CFA and SES have a clear role to play, and organisations that are funded to support emergency planning, such as Australian Red Cross, have traditionally provided emergency preparedness support to people and communities.

The *Vulnerable people in emergencies policy* has added a further layer of responsibility by nominating community organisations, and to some degree local governments, to support people who may be vulnerable with emergency preparedness and planning.

Given the importance of protecting those people at greatest risk during an emergency, VCOSS considers that the evacuation component of the current policy be maintained, subject to considerations raised earlier in this submission.

To support those people who are at risk during an emergency but who are not eligible for the Vulnerable Persons Register, VCOSS recommends a separate mechanism be developed to provide greater clarity around roles, responsibilities and accountabilities.

VCOSS recommends that a state-wide framework be developed to address the needs of people who may be greater risk during an emergency. VCOSS notes the framework recently developed by Australian Red Cross, the *People at risk in emergencies framework for South Australia,* and commends its collaborative, whole of community approach.

The role of community organisations is critical in addressing the needs of people who are at greater risk during an emergency. Community organisations provide services to people at risk on a daily basis, and they hold positions of trust and legitimacy in the community. They are ideally placed to assess whether or not people may need additional assistance with emergency preparedness.

Better coordination and communication between government, emergency services and community organisations can lead to improved outcomes for the entire community and help ensure that people at risk can be better prepared and can access services during response and recovery phases.

The new framework should recognise the strengths and limitations of all sectors involved, including state and local governments, community organisations and individuals. It should provide clear guidance for how they should work together to build resilience with people who may be at additional risk in emergencies. It should clarify the responsibilities of all sectors involved and provide clear roles and accountabilities, capacity and capability building, as well as training and resourcing. It is also important that ownership and governance of the framework be clearly identified.

The benefits of developing a stand-alone framework include:

- Improving the preparedness of people who are at risk in an emergency
- Sharing responsibility between people, governments, emergency services and community organisations
- Building resilience across communities.