

Department of Justice
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Submission in response to the draft Registration to Work with Vulnerable People Amendment Regulations 2024

The Tasmanian Council of Social Service (TasCOSS) welcomes the opportunity to provide a response to the Department of Justice ('the Department') in relation to the current consultation on the draft *Registration to Work with Vulnerable People Amendment Regulations 2024* ('the Draft Regulations').

TasCOSS is the peak body for the community services industry in lutruwita/Tasmania. Our Vision is of one lutruwita/Tasmania, free of poverty and inequality, where everyone has the same opportunity. Our Mission is to challenge and change the systems, behaviours and attitudes that create poverty, inequality and exclusion, to ensure all Tasmanians have equal opportunity to live a good life.

Our membership includes individuals and organisations active in the provision of community services to Tasmanians on low incomes or living in vulnerable circumstances. TasCOSS represents the interests of our members and their service users to government, regulators, the media and the public. Through our advocacy and policy development, we draw attention to the causes of poverty and disadvantage, and promote the adoption of effective solutions to address these issues.

The Draft Regulations are the first step in a phased process to expand the current Registration to Work with Vulnerable People Scheme ('the Scheme') operating across Tasmania. The Draft Regulations propose two key changes to the Scheme:

- Removing an existing exemption which allows workers or volunteers to work in a 'regulated activity' for seven days or less in a calendar year without registering with the Scheme; and
- Removing the existing exemption for emergency management workers.

TasCOSS supports the proposed removal of the exemption for emergency management workers, as this work is not considered a 'regulated activity' for the purpose of the Act and the exemption is therefore unnecessary. To support the implementation of this change, we strongly recommend the Tasmanian Government also ensures that organisations providing emergency management support are aware their workers and volunteers are not required to register in the Scheme.

Whilst TasCOSS does not in principle oppose the proposed removal of the existing exemption of workers/volunteers who are engaged in regulated activities for seven days or less per calendar year, we are unsure why this change is being proposed. We cannot find reference to the need for this change within the final report of the Commission of Inquiry into the Tasmanian Government's Responses to Child Sexual Abuse in Institutional Settings, or a recommendation relating to the proposed removal of the exemption.

We also note and fully support the position outlined in the submission from Volunteering Tasmania, the peak body for volunteers and organisations working with volunteers in Tasmania,¹ and strongly recommend considerations of the recommendations they have outlined.

If you have any questions or would like to discuss these matters further, please contact our office.

Yours faithfully



Adrienne Picone
Chief Executive Officer

¹ Volunteering Tasmania, Submission to Department of Justice, 'Registration to Work with Vulnerable People Amendment Regulations 2024' (October 2024).