

Submission to the NDIS Review

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Overview

Volunteering is integral to the aims of the National Disability Insurance Scheme (NDIS), and yet government understanding and support for the involvement of volunteers in the NDIS has been largely lacking. Volunteers can add significant value to care and support services, and volunteering can play an important role in the lives of people with disability, offering opportunities for social, economic, and cultural inclusion. However, existing policy frameworks, funding models, and data collection efforts under the NDIS are poorly equipped to facilitate volunteer involvement in the sector.

The role of volunteering in the NDIS needs to be considered in the NDIS Review. This should involve developing an understanding of the desired level of volunteer involvement in the NDIS and finding ways to ensure that volunteer-supported services are sustainable and supported. The recommendations to be made to Disability Reform Ministers, aligned with the priority areas outlined in the 'What we have heard' report, should include the following:

- Develop a national disability services volunteering framework which clearly articulates the desired role of volunteer involvement in the NDIS workforce and how this aligns with reform objectives.
 - o While volunteers are acknowledged as workers by the NDIS Commission, they are overlooked in key workforce planning initiatives for the sector, such as the NDIS National Workforce Plan: 2021-2025.
- Develop a Disability Sector Workforce Census that collects data on volunteer involvement in disability services, including those delivered under the NDIS.
 - o Data on volunteer involvement in the provision of services under the NDIS is currently not available. This makes it difficult to plan for the involvement of volunteers in the NDIS workforce. Data on the disability support workforce should be collected through a workforce census, similar to the Aged Care Workforce Census conducted regularly by the Department of Health and Aged Care.
 - o Like the Aged Care Workforce Census, this census should include the number of volunteers and information on the kinds of voluntary work undertaken. In addition, information should be collected on volunteer-supported programs, including which organisations provide them, how they are funded, and what human resources are contributed to them.
- Introduce a streamlined, nationally-consistent worker screening process for volunteers.
 - o Worker screening processes are inconsistent between states and territories. This means that screening checks are not transferrable between jurisdictions. In some states, volunteers are required to pay for their screening checks, and application processes are not always accessible or designed with volunteer applicants in mind.
 - o An updated process should consider the number of volunteer applicants, aim to make screening checks portable between jurisdictions, and be made available to volunteers across Australia free of charge.
- Increase funding for the Information, Linkages and Capacity Building (ILC) Program, and extend this funding to resource volunteer involving organisations that deliver services under the NDIS.

- Although volunteers offer their time without financial gain, there is a cost associated with running volunteer-supported programs. It is therefore important for volunteering programs to be appropriately funded to ensure their viability.
- A recent report from Per Capita and National Disability Services reveals significant shortfalls in ILC investment and recommends additional funding for volunteer participation through this program.
- Recommend the formation of a small unit within the Department of Social Services which focuses on volunteer involvement in disability services and the way volunteering intersects with general policies, reforms, and regulations related to the NDIS.

Introduction

About the NDIS Review

The Minister for the National Disability Insurance Scheme, the Hon Bill Shorten MP, announced a review of the National Disability Insurance Scheme (NDIS) on Tuesday 18 October 2022.¹ The NDIS Review will examine 1) the design, operations, and sustainability of the NDIS, and 2) ways to make the market and workforce more responsive, supportive, and sustainable.

About this submission

This submission was drafted by Volunteering Australia in collaboration with the State and Territory volunteering peak bodies. The peak bodies reached out to their members (specifically those volunteer involving organisations working in disability services) to provide information for this submission.

This submission focuses on “Part 1: Design, operations and sustainability of the NDIS” as highlighted in the Terms of Reference. In particular, recommendations made in this submission to improve the involvement of volunteers in the NDIS support the following Part 1 objectives:²

- b. the effectiveness and sustainability of the NDIS, including the achievement of participant meaningful employment and lifetime outcomes and broader social and economic benefits, through the provision of reasonable and necessary supports and consider:
 - the effectiveness of: Information, Linkages and Capacity Building; Local Area Coordination and Community Connectors; and early childhood early intervention; and
 - the suitability of the NDIS outcomes framework and data to measure effectiveness, and options to improve the ongoing monitoring and evaluation of the Scheme’s effectiveness, including economic and social participation for participants and their families;
- c. ways to better ensure the delivery of value and outcomes for participants and government, including capacity building and assistive technology supports;
- e. efficiencies within the Scheme and improving the interaction between the NDIS and other significant related policies and systems, including mainstream services delivered by the

¹ <https://www.ndisreview.gov.au/about>

² <https://www.ndisreview.gov.au/about/terms-of-reference>

Australian Government, the states and territories, local government, and the community sector;

The recommendations made in this submission directly relate to and support two areas of the 'What we have heard report,' namely 'A complete and joined up ecosystem of support' and 'Measuring outcomes and performance.'³

The submission complements previous submissions made by Volunteering Australia on volunteering and people with disability, the NDIS, and disability services, including:

- [Submission on the National Disability Advocacy Framework 2022-2025](#)
- [First Submission to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability - Response to the Issues paper on Promoting Inclusion](#)
- [Second Submission to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#)
- [Submission to the Joint Standing Committee on the National Disability Insurance Scheme on the NDIS National Workforce Plan: 2021-2025](#)
- [Submission to the consultation on the National Disability Employment Strategy](#)
- [Submission to the development of the National Disability Strategy](#)
- [Submission to the Joint Standing Committee on the National Disability Insurance Scheme on the Market Readiness of the NDIS](#)
- [Response on the National Disability Insurance Scheme \(NDIS\) Costs](#)
- [Response to the Senate Community Affairs Legislation Committee on the National Disability Insurance Scheme Amendment \(Quality and Safeguards Commission and Other Measures\) Bill 2017](#)
- [Submission to the ILC Commissioning Framework Consultation](#)

Volunteering in the disability sector

Volunteers and the organisations that engage them contribute extensively to the disability services landscape. The latest national data on volunteering in Australia, collected as part of the Volunteering in Australia 2022 research, found that 4.7 per cent of volunteers were engaged by organisations in the disability sector.⁴ This equates to around 319,000 volunteers across Australia,⁵ who perform a broad range of roles across the disability services landscape. A study of volunteer-supported disability services in Victoria revealed seven program models operating in the sector. These programs facilitate social support and community participation, supported activities, skills

³ <https://www.ndisreview.gov.au/sites/default/files/resource/download/what-we-have-heard-report.pdf>

⁴ <https://volunteeringstrategy.org.au/wp-content/uploads/2022/10/Volunteering-in-Australia-2022-The-Volunteer-Perspective.pdf>, 42

⁵ Based on the count of the Australian population reported in the 2021 Census; <https://www.abs.gov.au/statistics/people/population/population-census/2021>

development, out of home support, practical support, organisational support, and advocacy.⁶ Many of these functions complement and support the work of paid staff.

Volunteers are often considered by service users and providers as separate from paid workers. Volunteer roles add unique value to programs and services in the disability space, and they are often integral to achieving the desired outcomes for participants. When asked about the value of volunteers, organisations often emphasise aspects of their programs that could not be achieved by paid staff alone. These include, among others, promoting genuine friendship, providing personalised support, creating opportunities for community engagement, and facilitating the extension of program reach.⁷

These services add significant value to the disability services sector. To cite only one example, Inclusion Melbourne, an organisation that provides personalised support to people with disability, facilitated 20,247 hours of volunteering from 2014 to 2015.⁸ At a cost of \$186,500 to operate the volunteering program, the work of the volunteers involved had a value of \$833,770 at the NDIS 1:1 support rate.⁹ In a recent study of disability service organisations in Victoria, 78 per cent of respondents reported that their organisation had run some type of volunteer-supported service within the past five years.¹⁰ These figures illustrate the significant economic value of volunteering in disability services.

While this research broadly illustrates the scale and nature of volunteer involvement in disability services, national data on volunteer contributions to NDIS services, and the kinds of roles undertaken by volunteers, is scarce. Where official data has been collected, for example by the National Disability Insurance Agency and the Australian Bureau of Statistics, data on volunteers in disability services is not included.¹¹ Further, it is currently unclear how many of the country's 11,600 active NDIS-registered providers engage volunteers, or what kind of support their volunteers provide.¹² This lack of data highlights the need for a review of the disability care and support workforce that includes volunteers. To effectively progress the 'Measuring outcomes and performance' priority area outlined in the 'What we have heard' report,¹³ a comprehensive understanding of volunteer roles and the issues surrounding the management of volunteers within the NDIS workforce is needed.

⁶ <https://www.interchange.org.au/wp-content/uploads/2020/06/Value-Added-Volunteer-Supported-Services-and-the-Challenge-of-the-NDIS.pdf>

⁷ *ibid*

⁸ <http://inclusionmelbourne.org.au/wp-content/uploads/2019/04/Volunteering-and-the-NDIS-Submission-Discussion-Paper-web.pdf>

⁹ *ibid*

¹⁰ <https://www.interchange.org.au/wp-content/uploads/2020/06/Value-Added-Volunteer-Supported-Services-and-the-Challenge-of-the-NDIS.pdf>

¹¹ https://www.dss.gov.au/sites/default/files/documents/06_2021/ndis-national-workforce-plan-2021-2025.pdf; <https://www.acnc.gov.au/node/6191086>

¹² https://www.dss.gov.au/sites/default/files/documents/06_2021/ndis-national-workforce-plan-2021-2025.pdf

¹³ <https://www.ndisreview.gov.au/sites/default/files/resource/download/what-we-have-heard-report.pdf>

Further, while volunteers are acknowledged as workers by the NDIS Commission,¹⁴ they are not included in key workforce planning initiatives for the sector, such as the NDIS National Workforce Plan: 2021-2025.¹⁵ Given the scale and importance of volunteering in the disability sector, the desired role of volunteer involvement in the NDIS workforce, and how this aligns with reform objectives, should be clearly articulated.

Barriers to volunteering for people with disability

Volunteering is greatly beneficial to wellbeing, inclusion, and social connection. Research consistently demonstrates that volunteering has a wide range of positive benefits for those who volunteer, including significant mental and physical health benefits and offering pathways to employment.¹⁶ Research has demonstrated that volunteering among people with disability can reduce feelings of alienation and loneliness and empower individuals with disability to shift from being recipients of welfare services to becoming active providers of support to others.¹⁷

Despite the recognition of the importance of volunteering and the desire of many people with disability to actively contribute to their communities, there are several barriers that hinder their participation in volunteering activities in Australia. Consultation with state and territory volunteering peak bodies has found that access to transport poses a major challenge for people with disability, as public transportation systems and infrastructure may not always be fully accessible or equipped to meet their specific needs. The two-hour minimum shift requirement for disability workers and inadequate funding for private transport options in NDIS packages also cause difficulties in this respect. The below example provided by Volunteering SA&NT illustrates this:

“One of our clients found the perfect volunteering role, but it would have cost him \$80 to get him there and back once a week via an access taxi – he had to reluctantly decline.”

The lack of accessible transport options can restrict the ability of individuals with disability to travel independently and participate in volunteering opportunities, further exacerbating the barriers they face in engaging in volunteering activities.

Finally, qualitative research indicates that expectations from society and from organisations often prevent people with disability from engaging in meaningful volunteering roles.¹⁸ Volunteers with disability are often underestimated by agencies and are assigned jobs well below their capability.¹⁹

¹⁴ <https://www.ndiscommission.gov.au/workers>

¹⁵ https://www.dss.gov.au/sites/default/files/documents/06_2021/ndis-national-workforce-plan-2021-2025.pdf

¹⁶ <https://www.volunteeringaustralia.org/wp-content/uploads/Evidence-Insights-Volunteering-and-mental-health-Final.pdf>; <https://www.seek.com.au/career-advice/article/3-reasons-volunteering-can-put-you-ahead-of-the-pack>

¹⁷ Yanay-Ventura, G. (2019). “Nothing About Us Without Us” in Volunteerism Too: Volunteering Among People with Disabilities. *VOLUNTAS: International Journal of Voluntary and Nonprofit Organizations*, 30(1), 147-163

¹⁸ Becky L. Choma and Joanna Ochocka, “Supported Volunteering: A Community Approach for People With Complex Needs,” *Journal on Developmental Disabilities* 12, no. 1 (2006): 1-18, doi:10.1.1.492.1063; Aneta Marková, “Volunteering of people with disability,” *Kontakt* 22, no. 3 (2020): 200-206, doi:10.32725/kont.2020.013

¹⁹ Choma and Ochocka 2006, 14

Consequently, volunteers with disability may find their roles unfulfilling, and may miss out on the personal and social benefits of community engagement. Similarly, young people with disability are less likely to be encouraged to volunteer by their school, as expectations of their abilities, or their commitment, are often lower than the expectations of their peers without disability.²⁰

Volunteers and worker screening

The administrative requirements of the NDIS can also create challenges for volunteer involvement. The introduction of national NDIS Worker Screening requirements is a prominent example and has caused complications for volunteers.

Although NDIS Worker Screening is a national requirement, the process is implemented by state and territory governments. Volunteering Australia has heard that the handling of the process in some states and territories has created issues for volunteer engagement with disability service providers. In Victoria, for example, the screening of volunteers in risk assessed roles with NDIS providers is a manual two-step process. Volunteers must first apply for a volunteer fee waiver and, once that is confirmed, apply for the NDIS screening check. Organisations have reported that this is often a disincentive for new volunteers to continue with the process. They have also expressed frustrations with this, as organisations are unable to manage the process or assist their volunteers, other than to direct them to apply.

These processes have also not appropriately considered the nature and scale of volunteer involvement in the disability sector. Insufficient understanding of the workforce and the role of volunteers in the disability sector caused significant issues with NDIS screening of volunteers in Victoria. When this process was first implemented, applications for the volunteer fee waiver were sent to a central help desk to be approved manually. This system did not account for the large number of volunteers who need the check, and there was no process to expedite clearances for volunteers in priority roles. Both decisions indicated a lack of understanding of the extent of volunteer involvement in the sector.

The following comments from volunteer involving organisations in South Australia indicate that similar difficulties exist in other jurisdictions.²¹

“[For] people without computer skills and an email it is very difficult to apply for NDIS. We bring them in and support them to apply.”

“We have the same issues here and although I try to do what I can to assist the volunteer, I unfortunately have to give the volunteer the Screening Unit number and explain that I can't help due to privacy & confidentiality.”

Volunteers are not able to volunteer without a check and, consequently, some volunteers applied for the paid check simply to try and expedite the process.

²⁰ Sally Lindsay, Emily Chan, Sara Cancelliere, and Monika Mistry, “Exploring how volunteer work shapes occupational potential among youths with and without disabilities: A qualitative comparison,” *Journal of Occupational Science* 25, no. 3 (2018): 322-336, doi: 10.1080/14427591.2018.1490339

²¹ Provided to Volunteering Australia by Volunteering SA&NT in June 2023

“To wait up to 1.5 – 2 months for a prospective volunteer to receive the outcome of their NDIS check is just not sustainable. [For comparison], the Disability Worker Exclusion Scheme and CrimCheck method used to take approximately 24 – 48 hours for checks to be lodged and resolved.”²²

Worker screening plays a critical role in protecting vulnerable communities, and Volunteering Australia supports the inclusion of volunteers in these processes. However, it is essential that the volunteering ecosystem is considered during the planning and implementation stages. Attention should be paid to the number of expected volunteer applicants, the waiver or reimbursement process for volunteers, and the accessibility of the process, particularly when an online application is required.

NDIS funding for volunteer-supported services

Although volunteers offer their time without financial gain, there is a cost associated with running volunteer-supported programs. It is therefore important for volunteering programs to be appropriately funded to ensure their viability.

The NDIS funding model creates some difficulties in this respect, which must be re-examined in future strategic planning for the disability services workforce. Volunteering Australia and the State and Territory volunteering peak bodies have heard from disability service providers that involve volunteers that the individual NDIS funding model has created challenges for volunteer engagement. These include concerns that the requirement to charge for services delivered by volunteers is antithetical to the volunteering premise, that the model excludes participants whose plans do not cover their services, and that the accompanying administrative requirements are onerous and increase volunteer turnover. The experience of HorsePower Australia, a community-based disability service provider in Western Australia, highlights these challenges:²³

Our experience with the NDIS to date has been one of frustration. We struggled in the first place to be registered, and then with getting funding for our programs in participants’ plans. It is a constant struggle to manage the day-to-day administrative and reporting requirements for the scheme, let alone to keep up to date with the ever-changing landscape.

This new individualised funding model has seen session fees for participants increase from \$20 per session to that currently provided under the NDIS price guide (\$58.80 per session). Parents and individuals over the years have seen this increase as rather steep and questioned why they should pay such a fee for a program provided by volunteers. The NDIS have also asked this question, with planners stating that it should be a free service if provided by volunteers. We would love to provide services free to all who need them. However, we still have overheads to cover, which with horses to care for are rather substantial.

²² Statement provided by Tess Lynch, Manager, Community Support, Inclusion Melbourne

²³ This case study was provided by HorsePower Australia to Volunteering WA on 27 May 2020, and included in Volunteering Australia’s submission to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability in September 2021

It is now often the case that individuals who are not eligible for NDIS funding or who have not been successful in securing enough funding in their plans for our programs are missing out, as they can no longer afford the services. We feel that the NDIS and the Government do not value and recognise the contribution of volunteers in our community.

Research on volunteer-supported disability services has found that the outcomes reported of most programs align with those outlined in the Information Linkages and Capacity Building (ILC) framework.²⁴ This framework aims to ensure that the NDIS supports capacity building activities for people with disability and their families and carers which are not tied to individually funded packages.²⁵ Despite this, a study of NDIS-funded volunteer programs in Victoria found that only a small minority—8 of the 152 programs detailed by organisations in the study—received any funding through ILC.²⁶ Most NDIS-funded programs are funded through individual NDIS packages. A recent report from Per Capita and National Disability Services (NDS) found that annual expenditure on activities under the ILC program was insufficient to meet the intended goals of the scheme.²⁷ The report also revealed considerable variation in funding from year to year. For example, funding in 2018 and 2021 equated to less than 6.5 per cent of 2020 funding allocations.²⁸ This funding also appears to be lower than aggregate funding from state and territory governments that predates the NDIS, which has declined significantly since 2015-16.²⁹

While individual package funding may be an appropriate model for some volunteer involving organisations, the block funding model employed within the ILC program offers volunteer involving organisations a more stable funding arrangement, which is crucial for their sustainability and effectiveness in supporting individuals with disability. Based on the experiences of volunteer involving organisations, it could also greatly improve the accessibility of volunteer-supported services. The ‘What we have heard’ report highlights that: “The Information, Linkages and Capacity Building program is a short-term grants program and has not provided sufficient investment to match its ambition of delivering projects that benefit all Australians with disability, their families and carers.”³⁰ Expanding the ILC program would create more appropriate funding opportunities for volunteer involving organisations and support the aim of a ‘complete and joined up ecosystem of support.’

²⁴ <https://www.interchange.org.au/wp-content/uploads/2020/06/Value-Added-Volunteer-Supported-Services-and-the-Challenge-of-the-NDIS.pdf>

²⁵ https://www.dss.gov.au/sites/default/files/documents/10_2020/ndia-website-ilc-policy-framework.pdf

²⁶ <https://www.interchange.org.au/wp-content/uploads/2020/06/Value-Added-Volunteer-Supported-Services-and-the-Challenge-of-the-NDIS.pdf>

²⁷ https://www.nds.org.au/images/per_capita_report_march_2023/Not_a_One_Stop_Shop_-_Summary.pdf, 19

²⁸ https://www.nds.org.au/images/per_capita_report_march_2023/Not_a_One_Stop_Shop_-_Summary.pdf, 20

²⁹ https://www.nds.org.au/images/per_capita_report_march_2023/Not_a_One_Stop_Shop_-_Summary.pdf, 21-22

³⁰ <https://www.ndisreview.gov.au/sites/default/files/resource/download/what-we-have-heard-report.pdf>, 8

The National Strategy for Volunteering (2023-2033)

The new National Strategy for Volunteering (2023–2033) is a ten-year blueprint for a reimagined future for volunteering in Australia. It is the first National Strategy for Volunteering in a decade, providing a strategic framework for enabling safe, supported, and sustainable volunteering. The National Strategy for Volunteering was developed through a 12-month co-design process with members of the volunteering ecosystem.³¹

Ensuring alignment with the National Strategy for Volunteering can maximize the potential of volunteering in the disability sector, fostering a stronger and more inclusive society and supporting the aims of the NDIS. This section highlights the key strategic objectives of the National Strategy for Volunteering and outlines how our recommendations to the NDIS Review can support these goals. In particular:

1. *Develop a national disability services volunteering framework which clearly articulates the desired role of volunteer involvement in the NDIS workforce and how this aligns with reform objectives* aligns with:
 - **Strategic Objective 3.1**, to ensure that governments are consistently considering the needs of volunteers and supporting volunteering through comprehensive policy and investment.
2. *Develop a Disability Sector Workforce Census that collects data on volunteer involvement in disability services, including those delivered under the NDIS* aligns with:
 - **Strategic Objective 3.3**, to ensure that volunteering is supported across Australia by common infrastructure and continuous strategic investment. This includes investment in research and data collection to support effective policymaking and program design for volunteering.
3. *Introduce a streamlined, nationally-consistent worker screening process for volunteers* aligns with:
 - **Strategic Objective 1.2**, to make volunteering more inclusive and accessible. Processes such as background checks are not easy or inclusive for those without the requisite identification documents or access to private transport.
 - **Strategic Objective 3.1**, to ensure that governments are consistently considering the needs of volunteers and supporting volunteering through comprehensive policy and investment. This includes fast and accessible screening processes.
4. *Increase funding for the Information, Linkages and Capacity Building (ILC) Program, and extend this funding to resource volunteer involving organisations that deliver services under the NDIS* aligns with:
 - **Strategic Objective 3.3**, to ensure that volunteering is supported across Australia by common infrastructure and continuous strategic investment. For volunteering in Australia to thrive, investment priorities need to be broadened to understand and account for the true costs of enabling volunteering and facilitating volunteer involvement. This includes ensuring that volunteering is resourced appropriately and sustainably in all sectors.

³¹ <https://volunteeringstrategy.org.au/the-strategy/>

5. *Recommend the formation of a small unit within the Department of Social Services which focuses on volunteer engagement in disability services and the way volunteering intersects with general policies, reforms, and regulations related to the NDIS* aligns with:
 - **Strategic Objective 3.1**, to ensure that governments are consistently considering the needs of volunteers and supporting volunteering through comprehensive policy and investment.

Recommendations

Volunteering Australia makes the following recommendations to the NDIS Review:

1. Develop a national disability services volunteering framework which clearly articulates the desired role of volunteer involvement in the NDIS workforce and how this aligns with reform objectives.
2. Develop a Disability Sector Workforce Census that collects data on volunteer involvement in disability services, including those delivered under the NDIS.
 - Like the Aged Care Workforce Census, this census should include the number of volunteers and information on the kinds of voluntary work undertaken. In addition, information should be collected on volunteer-supported programs, including which organisations provide them, how they are funded, and what human resources are contributed to them.
3. Introduce a streamlined, nationally-consistent worker screening process for volunteers.
 - An updated process should consider the number of volunteer applicants, aim to make screening checks portable between jurisdictions, and be made available to volunteers across Australia free of charge.
4. Increase funding for the Information, Linkages and Capacity Building (ILC) Program, and extend this funding to resource volunteer involving organisations that deliver services under the NDIS.
5. Recommend the formation of a small unit within the Department of Social Services which focuses on volunteer engagement in disability services and the way volunteering intersects with general policies, reforms, and regulations related to the NDIS.

Authorisation

This submission has been authorised by the Chief Executive Officer of Volunteering Australia.



Mr Mark Pearce

Chief Executive Officer

Endorsements

This position statement has been endorsed by the seven State and Territory volunteering peak bodies.



About Volunteering Australia

Volunteering Australia is the national peak body for volunteering, working to advance volunteering in the Australian community. The seven State and Territory volunteering peak bodies work to advance and promote volunteering in their respective jurisdictions and are Foundation Members of Volunteering Australia.

Volunteering Australia's vision is to promote a strong, connected, and resilient Australian community through volunteering. Our mission is to lead, strengthen, and celebrate volunteering in Australia.

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