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## Policy No. 24

# Organisational Submissions, Representations, Delegations and Consultations

### DOCUMENT CONTROL

<b>Version:</b>	V1 10 <sup>th</sup> March 2017 Jack Wegman CEO
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<b>On behalf of Board:</b>	Denis Moroney President
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## **TITLE**

Organisational Submissions, Representations, Delegations and Consultations

## **PURPOSE**

It is SSAA Victoria policy that the Association (State Office) is the sole representative of the organisation in respect of submissions, representations, delegations and consultations with external agencies, including parliamentary inquiries, in respect of policy, regulatory and strategic matters.

## **SCOPE**

This policy applies to all SSAA Victoria branches, sub-clubs and members.

## **OBJECTIVE**

To ensure reputational integrity and that the Association speaks with one *official* voice.

## **POLICY DETAILS**

Currently, there is no defined policy on submissions, representations, delegations and consultations (*submissions etc*) with government, parliamentary inquiries or external agencies on behalf of SSAA Victoria. For example in the past, where government, quasi-government or other external agencies have called for submissions on various legislative, regulatory or policy matters, it has been open to branches, sub-clubs and individuals to lodge submissions in parallel with any from SSAA Victoria. Typically, branches and sub-clubs have lodged their submissions on their own letterhead, identifying them as being SSAA.

While the SSAA Victoria is unlikely to be able to or want to prevent individual members, as *individuals*, from making submissions, allowing branches and sub-clubs to make submissions on SSAA-associated letterhead potentially gives rise to a number of difficulties for the Association. For example, on occasion, these submissions may have either been at odds with SSAA Victoria's adopted or informal position or may have been of sufficiently low quality as to reflect poorly on the Association. Importantly, the impression may also have been created that these submissions purport to represent the views of the SSAA Victoria. This situation exists not only with respect to hunting-related issues but more broadly, where significant potential for reputational compromise exists.

Overall:

- it is imperative that SSAA Victoria speaks with one voice, especially to government and external agencies;
- more than one submission from the same organisation potentially makes the organisation appear divided and unprofessional;
- more than one submission detracts from the impact and reduces credibility if there are any differences or errors;

- branches and sub-clubs can still raise issues that can be included in the SSAA Victoria submission (if applicable and appropriate); and
- State Office is aware of the bigger picture and has the professional staff, and responsibility, to put together well-constructed and technically correct submissions which will enhance the credibility of SSAA and represent official SSAA policy.

Therefore, the Board has adopted a policy which has as its objective the SSAA Victoria (State Office or delegate) becoming the sole representative of the organisation in respect of submissions, representations, delegations and consultations with external agencies, including parliamentary inquiries, in respect of policy, regulatory and strategic matters.

Importantly, it would not be the intent of the policy to preclude submissions *etc* from individuals or groups so long as they did not purport to represent the Association. Written submissions are to include a disclaimer as follows: “This submission is not made on behalf of the SSAA Victoria.”

In addition, consultation would form part of SSAA Victoria submission development. Branches, sub-clubs and members will be given the opportunity to provide input for consideration.

Consequently, it is policy that:

- i) branches, sub-clubs and members are not to make submissions *etc* where such submissions can be construed as representing the Association, ie using letterhead displaying the SSAA Victoria logo or any other logo which can reasonably be construed to represent the SSAA Victoria;
- ii) branches, sub-clubs and members are not to appear before external agencies, including parliamentary inquiries, where such appearance may be construed as representing the Association;
- iii) given that the Association is the only body charged with the responsibility of making submissions *etc*, input is to be sought from branches, sub-clubs and members prior to the finalisation of drafting; and
- iv) there may be occasions when it is appropriate for branches, sub clubs or individuals to make submissions. Where, in identified circumstances, the SSAA Victoria delegates to a branch, sub club or individual the responsibility for making a submission, the delegation must be in writing. A suggested template can be made available.

## **ASSOCIATED DOCUMENTS / REFERENCES**

None