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Local Government Victoria
c/- [REDACTED]
MAV – [REDACTED]
GPO Box 4326
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Dear [REDACTED]

LGV - Councils and Emergencies Directions Paper

Councillors and Council Officers of the City of Yarra have had an opportunity to review Local Government Victoria's (LGV) 'Councils and Emergency Directions Paper', released in January, 2017. This response provides feedback on that paper for your consideration.

General comments

Yarra City Council agrees that council's emergency management responsibilities should reflect the organisation's strengths and capabilities. These strengths and capabilities have not, however, been measured. On that basis, we believe it is premature to accept the 154 management responsibilities and actions given that it is unlikely Yarra City Council could or would be able to engage in some of these actions while effectively balancing business continuity of essential council services. This issue is especially relevant in the case of man-made disasters, where Natural Disaster Financial Assistance and insurance coverage does not apply (e.g. influenza pandemic or acts of terrorism). LGV should consider this list of emergency management responsibilities and actions in the context of and after gauging each councils' capacity, to ensure that the responsibilities are consistent with local government's capability and capacity. Capacity and capability will vary amongst Councils; as will risk factors and context, such as the presence of service providers and the level of community capacity.

It is important that LGV clearly acknowledges that levels of capability and capacity are not uniform across the 79 councils. Therefore, actions that are not a responsibility under legislation, regulations, policy or plans, must be at the discretion of each Council to undertake. Additionally, LGV needs to maintain a strong and clear distinction between responsibilities and discretionary actions.

Just as capabilities and capacities are not uniform, neither are expectations or responsibilities of councils – particularly with regards to fire management and suppression. In Table 1 of the Directions Paper, LGV describes Council as involved in providing "firefighting capabilities to manage and suppress fires of all types...".

For inner city metropolitan councils, this is neither a core capability nor is it a goal to become a core capability.

.../2

Principles

Yarra City Council recommends that LGV amend the wording of the principle, “be applicable to emergencies of different scales and complexity [p35]” to, “be flexible in its application to emergencies of different scales and complexity”. This proposed wording allows for the fact that some of the listed actions will not be required or may need to increase in scope, depending on the affected community, Council’s business continuity requirements and the needs of control authorities.

Responsibilities (listed in blue in the directions paper)

We wish to point out that responsibilities listed in blue font have conflated legislative requirements with activities outline in non-legislation (such as manuals). It is misleading to conflate what Councils ‘must’ to, with what they ‘should’ do. Statutory requirements need to be listed separately in order to not create an additional burden on Councils who, for reasons of capacity or capability, are unable to carry out recommended standards of practice.

1. Lead an all-agencies approach to community-based risk assessment and planning including compliance with relevant legislation and policy at the municipal level.

Councils do not currently ‘lead’, instead they facilitate (or support) an all-agency approach that is led by the Victoria State Emergency Service. This responsibility should be reworded from ‘lead’ to ‘facilitate’ or ‘support’.

2. Prepare and maintain municipal emergency management plans and sub plans.

Although the wording of this responsibility is technically accurate as it comes directly from legislation, Yarra City Council believes that this responsibility should not sit solely with Council and that the legislative amendments will eventually reflect this, so that it becomes a responsibility shared by all members of the Municipal Emergency Management Planning Committee.

5. Lead implementation and coordination of specific risk treatments on private and council land in partnership with emergency management agencies, including flood/fire management, maintaining a register of at-risk groups.

Yarra City Council is not currently maintaining a register of at-risk groups, nor have we not been asked to do so by any agency. Council is not leading or coordinating specific risk treatments on private land with regards to flood or fire risk management. It is not feasible for Council to lead implementation or coordinate risk treatments, for example, on Melbourne Water assets or on Parks Victoria Land, nor on some ‘private land’.

21. [...] Developing accurate, timely risk information tailored to community needs.

This responsibility should be reworded to read, “tailor risk information to community needs, ensuring accurate and timely dissemination”. Information about an emergency event needs to come from a control agency, not from the Council. Council only produces information on Council operations and associated risks.

27. Provide and staff a recovery centre

Like all the other responsibilities listed in the Emergency Management Manual of Victoria, community needs, control agency requests and State government department directions will determine whether councils will actually undertake these activities. Yarra

City Council has never, for example, provided and staffed a municipal emergency recovery centre following a municipal emergency event in the City of Yarra. We suggest rewording this point to, "Assess and plan requirements for planning to establish municipal emergency relief and/or recovery centres and if necessary provide and manage these centres". Additionally, point 27 is almost identical to point 52, "Establish a recovery centre, coordinating across agencies to ensure sufficient staff, resources and equipment".

59. Clear blocked drains and local roads including by removing trees on council land and on roads.

Councils clear blocked Council-owned drains, but does not have authority or capacity to clear blocked private drains or drains belonging to other authorities (e.g. Vic Roads, Melbourne Water).

86. [...] develop and maintaining a municipal fire prevention plan

This is not a requirement for councils in MFB areas. Yarra City Council does not have a municipal fire prevention plan.

94. Initially assess impacts on essential infrastructure and services.

This active verb should be amended to "support". Council supports owners of essential infrastructure and services to determine initial impacts, however Council is not best placed or resourced to do these impact assessments on behalf of asset owners, such as CitiPower, TransUrban, Melbourne Water etc.

140. Coordinate the rebuilding and redevelopment of council and private assets.

Council's remit to coordinate rebuilding and redevelopment is limited to council assets.

Actions (in black)

6. Lead the maintenance and administration of the Vulnerable Persons Register (VPR).

This should be amended to clarify in CFA districts only.

7. Support the profiling of the community to identify and record what makes people vulnerable in emergencies and work with Red Cross, DHHS and other agencies to establish a plan to support vulnerable people in the community.

While Yarra City Council produces community profiles, it does not currently establish individualised plans for identified vulnerable people in the municipality, and we note that the definition of 'vulnerable' is not applied consistently across agencies. Municipal Emergency Management Plans are developed to ensure that arrangements are in place to meet the needs of vulnerable people in the community following an emergency. Consequently, we suggest that this action is reworded to the following: "Develop community profiles that use local information to identify areas and types of vulnerabilities within the municipality and ensure local arrangements are designed to support people or assets identified as vulnerable". This wording is broad enough to include infrastructure and asset vulnerabilities as well as at-risk groups.

8. Develop council business continuity plans detailing procedures and systems to maintain core business and emergency management activities.

We agree that an effective council business continuity plan is one that considers its implementation during MEMP activation. However, we do not believe that councils are currently developing their business continuity plans to detail procedures and systems to maintain core business *and* emergency management activities. We believe this one

needs to be removed until councils are provided with models and resources to do this.

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9. Improve recovery plans and procedures by exercising and reviewing them.

Municipal Emergency Management Plans (MEMP) account for risk reduction, response, relief, recovery etc. It would be onerous and illogical to separate or distinguish the action of improving and exercising one part of the MEMP (recovery) over another. We suggest this action is changed to, "Improve emergency management plans and procedures by exercising and reviewing them".

15. Plan, together with neighbouring councils and regionally, community information.

Emergency Management Regions in Victoria have been established in such a way that two of Yarra City Council's five bordering municipalities belong to different emergency management regions. As such, there is negligible formalised emergency management collaboration across these borders. While collaborative planning does occur with some neighbouring Councils, it is not currently occurring systematically with all neighbouring Councils with regards to the development or planning of community information due to the regional configuration.

42. Support response agencies to access affected areas.

This wording is unclear. Can LGV provide more clarity around what is intended and this support might look like?

49. Support agencies to analyse community needs for the planning of service provision.

This point is very similar to point 24, "Assess community needs, to inform recovery information". We recommend amalgamating these points to cover the broader task that councils have to conduct municipal impact and needs assessments in order to inform emergency management planning and preparation, and relief and recovery service provision.

60. Lead the management of environmental health issues (such as food and sanitation safety, vector control and animal disposal) with relevant agencies.

The action verb 'lead' should be amended to 'support', given that the management of environmental health issues sits with State authorities.

65. Implement standardised systems and processes to facilitate surge arrangements and exchange staff between neighbouring (partner) councils to maintain capability and capacity during and after emergencies ...

All points referring to 'neighbouring' councils should be amended to read simply "partner" councils, to allow for the fact that many regions have different emergency management practices, meaning that some neighbouring councils may have different emergency management systems and processes. LGV needs to articulate which systems and processes are or should be standardised.

We also request clarification on who has responsibility for coordinating inter-council resource exchanges and who ensures it occurs.

71. Capture, process and manage large volumes of data from multiple sources to share with the community and stakeholders.

This action requires more description and clarification. Once again, undertaking this type of activity will depend on community, control agency and emergency management stakeholder needs. This task is also potentially resource intensive, beyond the current capacity of councils.

72. Capture and analyse lessons, share the findings with other councils and agencies, and work cooperatively to identify and implement solutions.

While we agree that this is an action that should be undertaken by local government, there is currently no standardised or accepted mechanism set up to facilitate capturing, analysing and sharing lessons learnt. In order for isomorphic learning to be effective and widespread, we believe this action would require centralised coordination at a regional or state level of authority.

78. Encourage and assist the community to participate in emergency management education and training programs provided by council and agencies.

Education and training provided by councils are tailored to council emergency management staff roles. The wording of this action should be amended to reflect the fact that Council can encourage and facilitate community participation in emergency management education and training more broadly.

82. Monitor and evaluate the community's engagement with emergency management and its capacity to prepare for, act during and recover from emergencies.

This action is highly resource intensive and not part of Yarra City Council's current activity. Gauging community capacity would require significant funding.

87. Develop emergency management resource-sharing protocols between councils.

We propose broadening this action to include other municipal emergency management stakeholders. Resource-sharing protocols are not limited to between councils. The MAV has already developed the main resource-sharing protocol for councils in Victoria. While some councils such as Yarra City Council, have progressed to additional resource-sharing protocols across councils within emergency management regions, our Council has also developed MoUs and protocols with other stakeholders (such as Schools and Community Health Centres) for emergency management resource sharing purposes.

88. Maintain and store essential equipment and materials to support emergency management activities and meet the needs of affected communities (such as sandbags).

Councils such as Yarra City Councils, who have limited geographical footprints and minimal in-house plant equipment, do not maintain and store essential equipment to support emergency management activities. For example, Yarra City Council does not maintain and store sandbags. Councils – especially inner-city ones – are not best-placed to maintain and store essential equipment and materials. Some councils are better placed to resource emergency management activities by drawing on local providers. This activity should be removed from the list or amended to read, "maintain a

list of providers of essential equipment and materials to support emergency management activities and meet the needs of affected communities”.

90. Manage, coordinate, supply and deliver resources promptly and efficiently using best-practice methods locally.

This should be amended to read, “deliver *available* resources”. Council’s role in undertaking this action is entirely dependent on the availability of resources. Council does not manage, coordinate, supply or deliver resources outside its municipality. This is the role of the Victoria Police or Department of Health and Human Services.

100. Include emergency management in council plans including in the municipal public health and wellbeing plan and the council plan.

There is already a legislative requirement to have a MEMP; we disagree that Council Plans automatically include emergency management. The content of a Council Plan is determined through community consultation and will not necessarily include emergency management. Indeed, not all priorities – especially all legislative requirements – are captured within the Council Plan. The wording of this action also requires further clarification; what does “emergency management” mean in this case?

101. Establish programs to detect and identify risks to public health locally (such as through heatwave planning).

Programs are not established to detect and identify community emergency health risks. Broader health risk identification research may occur as part of the development and improvement of the Municipal Public Health Plan, however point 101 is not an action undertaken in the City of Yarra as part of its municipal emergency management arrangements. This action requires clarification if it is to be included as a responsibility of Local Government.

105. Develop protocols and procedures that are agreed with relief agencies.

This point can be covered under point 87.

107. Work with other councils to develop a collaborative approach to relief.

This point is also covered under point 87. Additionally, if keeping point 107, then ‘relief’ should be amended to ‘relief service planning and delivery’.

108. Contribute to regional relief planning.

This point should be broadened as Councils contribute to regional emergency management planning, which includes mitigation, response, relief, recovery and resilience-building.

119. Manage enquiries about donations of goods and offers to volunteer.

Councils do not and should not ‘manage’ enquiries relating to volunteering and donations. They can support agencies with a responsibility to manage volunteer goods and services in responding to enquiries, however council emergency management arrangements are not established to act as call centres for this purpose.

123. Support the community to work with insurers.

This point requires further clarification as Council is not an insurance adviser, nor does it act on behalf of community members in matters relating to private insurance (home and contents). Council facilitates community access to legal and insurance advice by inviting legal aid agencies to be present in Municipal Emergency Relief Centres.

126. As part of emergency planning, identify at-risk cultural heritage sites.

Council does not perform this role currently. This action requires further clarification around its intent and scope.

128. Restore local cultural heritage sites.

This action is only possible if funding is available and community need requires Council to do this. Under Natural Disaster Financial Assistance arrangements, funding will not necessarily be provided to Councils to restore sites of significant cultural heritage. Restoration will depend on the type of site, its previous and current condition, cost and need to restore the site and funding availability.

130. Coordinate remediation and stabilisation works on private and public land.

Remediation and stabilisation on private land may not be able to be coordinated by Council, especially if private landholders engage insurance companies and their own contractors to undertake works.

134. Identify standards for clean-up and recovery

This is not currently done in Yarra City Council and we believe that the individual Councils' insurers, the Department of Treasury and Finance or subject matter experts such as the Environmental Protection Authority are better placed to identify standards under Victoria's Natural Disaster Financial Assistance (NDFA) scheme.

148. Assess and deliver services for the medium- to long-term psychosocial needs of the community.

This point should be reworded to "Assess and coordinate the delivery of services..." as councils are unlikely to deliver psychosocial support services themselves.

150. Assess and deliver financial re-establishment assistance.

Councils can assist the Department of Health and Human Services, or Emergency Management Victoria in identifying needs for community members to access financial re-establishment assistance but we do not believe that we would deliver this assistance directly. If we deliver financial assistance, it would be on behalf of another agency.

151. Support community services to provide shelter, food, counselling and other assistance to people at socioeconomic disadvantage.

This point is too restrictive as it limits recipients of services to people who are socioeconomically disadvantaged only. We suggest that the wording of this point should be broadened to, "coordinate the provision of shelter, food counselling and other immediate emergency recovery assistance to people affected by the emergency and identified as disadvantaged or at-risk".

Should you require further information on this feedback, please feel free to contact

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Yours sincerely

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