FINANCIAL MANAGEMENT

SUB PLAN
Endorsement

This plan is recommended for distribution by the Townsville Local Disaster Management Group.

Wayne Preedy ESM
Local Disaster Coordinator
Townsville Local Disaster Management Group

Date: 10 / 04 / 2019

Cr Jenny Hill
Chair
Townsville Local Disaster Management Group

Date: 10 / 04 / 2019
# Consultation

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Name of consulted</th>
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<tr>
<td>Townsville City Council</td>
<td>Wayne Preedy</td>
<td>22/1/2019</td>
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<tr>
<td>Townsville City Council</td>
<td>Catherine Jordan</td>
<td>22/1/2019</td>
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<tr>
<td>Townsville City Council</td>
<td>Linda Horton</td>
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<tr>
<td>Townsville City Council</td>
<td>Jessica Lardi</td>
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<tr>
<td>QFES–EM</td>
<td>Margaret Lessells</td>
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Document Control

Amendment Control

The Financial Management Sub Plan is a controlled document. The controller of the document is the Townsville Local Disaster Coordinator (LDC). Any proposed amendments to this plan should be forwarded in writing to:

Local Disaster Coordinator
Townsville City Council
PO Box 1268
Townsville, QLD 4810

The LDC may approve inconsequential amendments to this document. The LDC will ensure that any changes to the content of the document will be submitted to the Townsville Local Disaster Management Group (TLDMG) for approval and be endorsed by the Townsville City Council.

Amendment Register

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<tr>
<th>Amendment</th>
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<th>Inserted by</th>
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<td>Allen Morris</td>
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<td>CDO</td>
<td>Counter Disaster Operations</td>
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<td>Disaster Recovery Funding Arrangements</td>
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<td>LDC</td>
<td>Local Disaster Coordinator</td>
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<td>QDRR</td>
<td>Queensland Disaster Relief and Recovery Arrangements</td>
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<td>Queensland Reconstruction Authority</td>
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<td>State Disaster Relief Arrangements</td>
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<td>TCC</td>
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<td>TLDMG</td>
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<tr>
<td>TLDMP</td>
<td>Townsville Local Disaster Management Plan</td>
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Plan Matrix

Townsville Local Disaster Management Plan Matrix

Please note: This matrix depicts plans and procedures, which have been grouped based on their relationship to one another rather than on hierarchy or trigger points for activation.

Operating Procedures (Internal Council Processes)

- Evacuation Centres SOP
- Places of Refuge SOP
- Public Cyclone Shelter SOP
- Animal Management SOP
- TCC Communications Operating Procedure for Disasters
- Bushfire Mitigation Operations Plan
- Impact Assessment Operating Procedure

Magnetic Island Disaster Management Group (MIDMG) SOP
Magnetic Island Evacuation Centre SOP
Rollingstone Disaster Management Group (RD MG) SOP
Townsville Local Disaster Coordination Centre (LO DCC) SOP
TCC Emergency Response Plan (ERP)
TCC Emergency Operations Coordination Centre (EO DCC) SOP
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**Part One – Overview**

1.1 **Purpose**

The purpose of the *Financial Management Sub Plan* is to manage the financial arrangements for a local event, in which the Townsville Local Disaster Management Group (TLDMG) and its plans and processes have been activated.

1.2 **Authority**

This plan forms a sub plan of the *Townsville Local Disaster Management Plan (TLDMP)* and is developed under the authority of the *Disaster Management Act 2003*. This sub plan will be managed in accordance with the administrative and governance processes outlined within the TLDMP including approval, document control, distribution and review and renew.

This plan will be reviewed annually by the Local Disaster Coordinator (LDC) of the TLDMG and reissued as necessary.

1.3 **Functional Responsibility**

The LDC is to ensure all agencies and members of the TLDMG are aware of these financial arrangements.

1.4 **Responsibilities of Other Agencies and Organisations**

Each support agency or organisation is responsible for providing its own financial services and support to its response operations in the field and maintaining compliance with its own financial policies and procedures.

1.5 **Relevant Issues**

Disaster related finances are not included in the budgetary processes of councils or other responding agencies. Disaster events may require the allocation of substantial funds as a consequence.

Due to the nature of many disaster situations, finance operations will often be carried out within compressed time frames and other pressures, possibly necessitating the use of non–routine procedures; this in no way lessens the requirement for sound financial management and accountability. Townsville City Council’s financial management policy and procedures will govern all financial delegations and authorisations to expend funds, recording of expenditure, etc.
Part Two – Expenditure Procedures

2.1 Authorised Expenditure

All costs incurred by Townsville City Council as a result of a disaster event will be captured and recorded to meet the requirements of the Queensland Disaster Relief and Recovery Arrangements – see Part Three below. Clarification can be obtained from the LDC, if required.

2.2 Expenditure Records

Prior to each wet season, project/works orders will be created and activated by the relevant Council Departments to capture costs for deployment of resources and response and recovery activities. Expenses should be recorded in the following three (3) categories;

- Labour;
- Plant hire; and
- Materials and services.

When an incident occurs, council and each participating department or agency should immediately begin accounting for personnel, equipment and other costs relating to the disaster response.

Separate recording of disaster-related expenditure shall be in accordance with the council’s or relevant agency’s financial procedures and supported by logs, formal records and file copies of expenditures to provide clear and reasonable accountability to ensure justification for reimbursement is maintained.

While innovative and expeditious means of procurement are called for during times of disaster events, it is still mandatory that good accounting principles and practices be employed in order to safeguard the use of public funds from the potential of fraud, waste or abuse.
Part Three – Queensland Disaster Funding Assistance (QDFA)

3.1 General

Following severe disaster events, Local, State and Commonwealth Governments respond through a coordinated range of disaster management arrangements to address both the physical and financial needs of affected communities.

The Queensland Disaster Relief and Recovery (QDRR) Guidelines outline financial assistance available to communities, small businesses, primary producers, non-profit organisations and local and state governments affected by disasters. The arrangements are designed to provide a ‘safety net’ to those in immediate need or who are unable to affect their own recovery. Refer to Annexure A for a comparison of funding schemes and sources.

The Queensland Disaster Relief and Recovery (QDRR) Guidelines are reviewed annually and can be found on the Queensland Reconstruction Authority (QldRA) website (https://www.qra.qld.gov.au/). All claims must be prepared in accordance with these guidelines.

Two (2) types of funding arrangements are available, which can be activated depending upon the type and scale of the disaster. These include:

1. Disaster Recovery Funding Arrangements (DRFA)
2. State Disaster Relief Arrangements (SDRA).
3.2 DRFA vs. SDRA

Details for these funding types are outlined below. Refer to Annexure B for additional information.

<table>
<thead>
<tr>
<th>Funding Type</th>
<th>Description</th>
<th>Activation</th>
<th>$ Trigger Point (2018–19)</th>
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<tr>
<td>Disaster Recovery Funding Arrangements (DRFA)</td>
<td>A joint funding initiative of the Australian and state governments to provide disaster relief and recovery payments and infrastructure restoration to help communities recover from the effects of natural disasters and terrorist acts. In Queensland, this program is managed on a whole-of-government basis by the Queensland Reconstruction Authority (QRA).</td>
<td>The Queensland Minister for Fire and Emergency Services is responsible for activating the DRFA. This activation relies on the damage, loss and personal hardship information provided by state and local governments. Activation of the DRFA allows for eligible expenditure to be reimbursed by QRA to activated state and local governments loans to be disbursed to eligible individuals, not-for-profit organisations, primary producers and small businesses, in compliance with the: • Disaster Recovery Funding Arrangements (DRFA) 2018 and • Queensland Disaster Relief and Recovery (QDRR) Guidelines. The DRFA can be activated when the event meets the definition of an <strong>eligible disaster</strong>: A <em>natural disaster</em> or <em>terrorist act</em> for which: • a coordinated multi-agency response was required and • state expenditure exceeds (Commonwealth-set) small disaster criterion (2018–19 is $240,000). If an event does not meet this criteria, the SDRA may be activated.</td>
<td>$1,079,250.00</td>
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Funding Type | Description | Activation | $ Trigger Point (2018–19)
--- | --- | --- | ---
| Included in DRFA arrangements are Counter Disaster Operations (CDO), which are activities undertaken by Local and State Government agencies to provide direct assistance to and in the protection of the general public before, during and after a disaster event.

DRFA allows for the reimbursement of extraordinary costs associated with eligible CDO activities to alleviate personal hardship and distress.

*Note: Local governments do not have a trigger point for CDO.*

| State Disaster Relief Arrangements (SDRA) | A wholly State funded program that may be activated for all hazards to provide assistance to alleviate personal hardship and distress. | The SDRA is able to be activated when the Department of Communities, Disability Services and Seniors (DCDSS) identifies that local service providers have reached their capacity to provide a service to people identified as experiencing personal hardship as a direct result of a disaster event, or that there are no local service providers to assist in the event of a disaster.

The Director-General of the Department of the Premier and Cabinet (supported by QRA) is responsible for activating the SDRA. QRA will coordinate the delivery of the SDRA assistance measures. |  |


### 3.3 Recouping of Expenditure

Each agency is responsible for claiming their own reimbursement of funds relating to disaster operational expenses.

Claims within council will be coordinated by the Infrastructure & Operations Division.
Part Four – Activation of Funding vs. Disaster Declaration

4.1 Activation of Disaster Funding

The “activation of the disaster funding” (see Section 3.2 above) provides jointly funded State / Australian Government financial assistance to communities affected by eligible disaster events.

4.2 Declaration of Disaster Situation

The “declaration of a disaster situation” and the area covered by the declaration is not related to the activation of disaster funding and the area defined for the receipt of financial assistance.

The ‘declaration of a disaster situation’ is a formal declaration invoked under the Disaster Management Act 2003. It is a short term declaration, which provides additional operational powers to the Queensland Police Service and emergency services prior to, during and in the immediate wake of a disaster event.
Related Documents

Townsville City Council’s Financial Policy and Procedures

*Townsville Local Disaster Management Plan*

*Queensland Disaster Management Act 2003*

*Disaster Recovery Funding Arrangements (DRFA) 2018*

*Queensland Disaster Relief and Recovery (QDRR) Guidelines*


Annexure A – Funding Sources

Queensland Disaster Funding Assistance

Non-DRFA assistance schemes

Donors
- Individuals
- Companies
- Other States
- Nations

Australian Government
- Funding assistance for impacted communities

Queensland Government
- Funding assistance for impacted communities

Disaster Recovery Funding Arrangements (DRFA) assistance schemes

Category A
- Personal Assisting Disaster Scheme (PADS)
- Essential services (water, power, communication, etc.)
- Safety, security, and essential services
- Rebuilding and recovery programs
- Clear up and recovery
- Transport of goods and services
- Special activities (e.g., temporary shelters)

Category B
- Disaster assistance for impacted communities
- Rebuilding and recovery programs
- Clear up and recovery
- Transport of goods and services
- Special activities (e.g., temporary shelters)

Category C
- Community recovery package

Category D
- Extraordinary special assistance

Australian Government
- 75% funding assistance

Queensland Government
- 25% funding assistance
Annexure B – DRFA & SDRA Fact Sheet

DRFA & SDRA
Disaster Recovery Funding Arrangements State Disaster Relief Arrangements

Information sheet 2018-19

What is the DRFA?
The DRFA is a joint funding initiative of the Australian and state governments to provide disaster relief and recovery payments and infrastructure restoration to help communities recover from the effects of natural disasters and terrorist acts. In Queensland, this program is managed on a whole-of-government basis by the Queensland Reconstruction Authority (QRA).

Definition of an eligible disaster
A natural disaster or terrorist act for which:
- a coordinated multi-agency response was required and
- state expenditure (Commonwealth set) small disaster criterion (2018-19 is $240,000).

Activation
In Queensland, the Minister for Fire and Emergency Services is responsible for activating the DRFA. The DRFA activation relies on the damage, loss and personal hardship information provided by state and local governments.

Activation of the DRFA allows for eligible expenditure to be reimbursed by QRA to activated state and local governments loans to be disbursed to eligible individuals, not-for-profit organisations, primary producers and small businesses, in compliance with the:
- Disaster Recovery Funding Arrangements (DRFA) 2018 and
- Queensland Disaster Relief and Recovery Guidelines (QDRR).

The DRFA can be activated when the event meets the definition of an eligible disaster (refer to definition).

If an event does not meet this criteria, the State Disaster Relief Arrangements (SDRA) may be activated.

Note: The activation of the DRFA is not dependent upon the declaration of a disaster situation. A declaration of a disaster situation is a separate action and provides extraordinary powers for the protection of the public during a disaster situation under the Disaster Management Act 2003.

The Queensland Disaster Management Arrangements are based upon partnership arrangements between state and local governments.

The declaration of a disaster situation and/or the activation of the Queensland Disaster Management Arrangements and/or the activation of the DRFA are independent and are not interlinked or conditional, although they may occur for the same event.

Australian Government – State funding of DRFA
For simplicity, the publicly acknowledged DRFA funding split is:
- Categories A and B – 75% Commonwealth and 25% State
- Category C – 50% Commonwealth and 50% State funding
- Category D – funding split is agreed to when the measure is approved.

Should there be any (unintended) inconsistencies between this information sheet and the Australian Government DRFA 2018, the Queensland Disaster Relief and Recovery Arrangements Guidelines than those documents will take precedence.

Level 15, 460 George Street Brisbane PO Box 5548 City QLD 4001 Australia
T 07 3004 7204 F 07 3004 7299 E info@qra.qld.gov.au W www.qra.qld.gov.au
Relief and recovery assistance measures under the DRFA

Category A

Counter Disaster Operations – reimbursement of extraordinary costs associated with eligible activities aimed at protecting the general public and ensuring public health and safety in public areas (e.g. the community as a whole benefit from the activity being undertaken). Note: local governments do not have a trigger point for this relief measure.

DRFA activation can be requested by any state or local government by submitting an Activation Request form to QRA via email to DRA@qra.qld.gov.au detailing the disaster situation and requesting activation of this relief measure.

Administrating Authority: Once activated, please contact QRA. Ph: 1800 110 861 Email: Submissions@qra.qld.gov.au

Personal Hardship Assistance Scheme – to alleviate personal hardship and distress:

- Emergency Hardship Assistance – a grant to address the immediate needs (e.g. food, clothing, emergency accommodation or medical supplies) of individuals and families who are unable to support/fund their own relief and recovery.
- Essential Services Hardship Assistance – a grant to individuals or families who are suffering hardship by loss of essential services for more than five days, and are unable to provide for their own recovery from their own resources.
- Essential Household Contents Grant – a financial contribution towards the repair or replacement of uninsured essential household contents.
- Structural Assistance Grant – a financial contribution towards the repair of damage to an uninsured dwelling (including caravans and residential vessels) to return it to a safe, habitable and secure condition.

The Essential Household Contents and Structural Assistance Grants are income tested.

DRFA activation requested and administered by: Department of Communities, Disability Services and Seniors (DCDSS). Ph: 13 QGOV (13 74 68).

If DCDSS identifies that local service providers have reached their capacity to provide a service to people identified as experiencing personal hardship as a direct result of a disaster, or that there are no local service providers to assist in the event of a disaster, DCDSS will contact QRA to request activation. If local government identifies a need for activation, they are to contact DCDSS directly.

Category B

Counter Disaster Operations – reimbursement of extraordinary costs associated with eligible activities aimed at protecting the general public and ensuring public health and safety in public areas (e.g. the community as a whole benefit from the activity being undertaken). Note: local governments do not have a trigger point for this relief measure.

DRFA activation can be requested by any state or local government by submitting an Activation Request form to QRA via email to DRA@qra.qld.gov.au detailing the disaster situation and requesting activation of this relief measure.

Administrating Authority: Once activated, please contact QRA. Ph: 1800 110 861 Email: Submissions@qra.qld.gov.au

Essential Services Safety and Reconnection Scheme – to assist homeowners with grants up to $5000 to inspect and/or repair damaged essential services (electricity, gas, water, sewage/septic systems) that are uninsured. Income tested.

DRFA activation requested and administered by: DCDSS. Ph: 13 QGOV (13 74 68).
IF ACF identifies a need for the activation of this relief measure, ACF will contact QRA to request activation. If local government identifies a need for activation, they are to contact ACF directly.

**Administrating Authority:** Once activated, please contact QRDA.
**Ph:** 1800 623 946

**Disaster Assistance (Essential Working Capital) Loans Scheme for Not-for-profit organisations**—concessional loans up to $100,000 to profit organisations that have suffered a significant loss of income by providing a loan for essential working capital required to continue operations.

**DRA activation requested by:** DC OSS. Ph: 13 60 G0V (13 76 68)

DC OSS regional officers source information from state government agencies and local governments, Industry bodies, non-government organisations and “on the ground” observation from staff visiting affected areas to determine a need for this relief measure.

If DC OSS identifies a need for the activation of this relief measure, DC OSS will contact QRA to request activation. If local government identifies a need for activation, they are to contact DC OSS directly.

**Administrating Authority:** Once activated, please contact QRDA.
**Ph:** 1800 623 946

**Disaster Assistance (Essential Working Capital) Loans Scheme for Small Business**—concessional loans up to $100,000 to small businesses that have suffered a significant loss of income by providing a loan for essential working required to continue business operations.

**DRA activation requested by:** DES BT. Ph: 13 60 G0V (13 76 68)

DC OPS in conjunction with DESBT will provide regional support to source information from state government agencies and local governments, Industry bodies, small businesses and “on the ground” observation from staff visiting affected areas to determine the need for this relief measure. If DESBT identifies a need for the activation of this relief measure, DESBT will contact QRA to request activation. If local government identifies a need for activation, they are to contact DESBT directly.

**Administrating Authority:** Once activated, please contact QRDA.
**Ph:** 1800 623 946

**Disaster Assistance (Essential Working Capital) Loans Scheme for Primary Producers**—concessional loans up to $100,000 to primary producers that have suffered a significant loss of income by providing a loan for essential working required to continue operations.

**DRA activation requested by:** DAF. Ph: 13 60 G0V (13 76 68)

DAF regional officers source information from state government agencies and local governments, Industry bodies, primary producers and “on the ground” observation from staff visiting affected areas to determine a need for this relief measure. If DAF identifies a need for the activation of this relief measure, DAF will contact QRA to request activation. If local government identifies a need for activation, they are to contact DAF directly.

**Administrating Authority:** Once activated, please contact QRDA.
**Ph:** 1800 623 946

**Funds Subsidies to Primary Producers**—assistance up to $5,000 for movement of stock, feed, machinery, fuel, water and building/fencing materials.

**DRA activation requested by:** DAF

DAF regional officers source information from state government agencies and local governments, Industry bodies, primary producers and “on the ground” observation from staff visiting affected areas to determine a need for this relief measure. If DAF identifies a need for the activation of this relief measure, DAF will contact QRA to request activation. If local government identifies a need for activation, they are to contact DAF directly.

**Administrating Authority:** Once activated, please contact DAF.
**Ph:** 3224 0832

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**Category C**

Category C relief measures may be made available where the community is severely affected by an eligible disaster and existing standard DRA relief measures are insufficient to support community recovery. Category C is only available in exceptional circumstances. Approval is by the Prime Minister and the Premier.

**Community Recovery Fund**—aimed at community recovery, community development and community capacity building for the future.

**DRA activation requested by:** DC OSS. Ph: 13 60 G0V (13 76 68)

DC OSS will collate and review impact data, and if required, a business case will be drafted and forwarded to QRA for review, then on-forwarded to the Department of the Premier and Cabinet. If endorsed by the Premier, it will be forwarded to the Commonwealth for approval by the Prime Minister.

**Administrating Authority:** Once activated, please contact DC OSS.
**Ph:** 13 60 G0V (13 76 68)

Special Disaster Assistance Recovery Grants of up to $25,000 may be made available for communities that have suffered direct impact from the eligible disaster. Grants can be used for clean-up and reinstatement but not for providing compensation for losses (i.e. loss of income/trade).

**Not-for-profit organisations—DRA activation requested by:** DC OSS

Primary producers—**DRA activation requested by:** DAF

The requesting agency will source information from state government agencies and local governments, Industry bodies, Chambers of Commerce, primary producers, small businesses and “on the ground” observation from staff visiting the affected areas for each sector. The requesting agency will then review the information collated and if it meets the requirements set by the Commonwealth (e.g. more than 33 percent of small business are directly affected), a business case will be forwarded to QRA for review, then on-forwarded to the Department of the Premier and Cabinet. If endorsed by the Premier, it will be forwarded to the Commonwealth for approval by the Prime Minister.

Further information on the requirements for Category C activation is located in the Commonwealth Determination, Guideline 3.

**Administrating Authority:** Once activated, please contact QRDA.
**Ph:** 1800 623 946

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**Category D**

Approval is by the Prime Minister and the Premier.

Category D relief measures may be made available when the community is severely affected by an eligible disaster that additional funding is required to meet particular circumstances of the event and where a gap or need for special assistance above and beyond the standard suite (Category A and B) of the DRA assistance exists.

Ifoal government identifies a need for a Category D Extraordinary Special Assistance relief measure, they are encouraged to contact the relevant state government agency. The state government agency will collate and review the information and, if necessary, prepare a business case for QRA to review and on-forward to the Department of the Premier and Cabinet. If endorsed by the Premier, it will be forwarded to the Commonwealth for approval by the Prime Minister.

**Administrating Authority:** Dependent upon the type of assistance made available.
State Disaster Relief Arrangements (SDRA)

The SDRA is an all-hazards relief program that is 100% State funded and covers natural and non-natural disasters. The purpose of the SDRA is to address personal hardship and community response needs for disaster events where the DRFA is unable to be activated. SDRA relief measures for Personal Hardship Assistance and Counter Disaster Operations are the same relief measures that are activated under the DRFA, as detailed above.

The SDRA is able to be activated when the Department of Communities, Disability Services and Seniors identifies that local service providers have reached their capacity to provide a service to people identified as experiencing personal hardship as a direct result of a disaster event, or that there are no local service providers to assist in the event of a disaster.

The Director-General of the Department of the Premier and Cabinet (supported by QRA) is responsible for activating the SDRA. QRA will coordinate the delivery of the SDRA assistance measures.

Key contacts quick guide

Category A

- **Counter Disaster Operations**
  - Queensland Reconstruction Authority
  - Ph: 1800 110 841

- **Personal Hardship Assistance Scheme**
  - Community Recovery Helpline Ph: 1800 173 349
  - DCCS Ph: 13 QGOV (13 74 68)

Category B

- **Counter Disaster Operations**
  - Queensland Reconstruction Authority
  - Ph: 1800 110 841

- **Essential Services Safety and Reconnection Scheme**
  - Community Recovery Helpline Ph: 1800 173 349
  - DCCSS Ph: 13 QGOV (13 74 68)

- **Reconstruction of Essential Public Assets (including Immediate Reconstruction Works and Emergency Works)**
  - Queensland Reconstruction Authority
  - Ph: 1800 110 841

- **Disaster Assistance (Not-for-profit organisations) Loans**
  - DCCS Ph: 13 QGOV (13 74 68)

- **Disaster Assistance (Essential Working Capital) Loans Scheme for Not-for-profit Organisations**
  - QRIDA Ph: 1800 623 946

- **Disaster Assistance (Small Business) Loans**
  - DESB Ph: 13 QGOV (13 74 68)

- **Disaster Assistance (Essential Working Capital) Loans Scheme for Small Businesses**
  - QRIDA Ph: 1800 623 946

- **Disaster Assistance (Primary Producers) Loans**
  - DAFF Ph: 13 QGOV (13 74 68)
  - QRIDA Ph: 1800 623 946

- **Freight Subsidies to Primary Producers**
  - DAFF Ph: 3224 8632

Category C

- **Community Recovery Fund**
  - DCCS Ph: 13 QGOV (13 74 68)

- **Special Disaster Assistance Recovery Grants**
  - QRIDA Ph: 1800 623 946

Category D

- **Extraordinary Special Assistance**
  - The Administering Authority is dependent upon the type of assistance made available.

- **DRFA/SDRA Activation**
  - Queensland Reconstruction Authority
  - Email: DRFA@qra.qld.gov.au
  - Ph: 0417 644 593

Additional funding outside the DRFA & SDRA could be made available by the Commonwealth to assist communities to recover, such as the Australian Government Disaster Recovery Payment (AGDRP) and the Australian Government Disaster Recovery Allowance (AGDRA). Information on funding available by the Commonwealth is located on:

www.disasterassist.gov.au

Further Information:

Commonwealth DRFA 2018
www.disasterassist.gov.au
Queensland Disaster Relief and Recovery Arrangements Guidelines
www.qra.qld.gov.au

For information concerning the DRFA/SDRA program please contact:

Resilience and Recovery Branch
Queensland Reconstruction Authority
Ph: 1800 110 841
Email: info@qra.qld.gov.au
www.qra.qld.gov.au

Where there are (unintended) inconsistencies between this tip sheet, the Australian Government DRFA and the QDAR Guidelines, the DRFA will prevail.