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56a Pirrama Road
PYRMONT NSW 2009

The Manager
Consumer Policy Unit
Infrastructure Competition and Consumer Division
The Treasury
Langton Crescent
Parkes ACT 2600

Dear Sir/Madam,

Submission regarding ACNC Charitable fundraising regulation reform

In general ,the proposals are sensible and would help improve the necessary trust and confidence in accountability to the public and reduce the compliance burden off smaller charities without changing the risk. The key aims will not be successfully achieved unless the elephants in the room are addressed:

- Fundraising for small charities is more difficult and done by volunteers whilst large groups do contracted / commission based fundraising;
- Some charities are very inefficient in their delivery of services; and,
- Criticism of some charities and how this is addressed is not an open process

I suggest the proposed procedures be augmented by the following additions:

- \$50,000p.a. is a very small charity indeed (less than one staff unit)
- \$100,000 p.a. is still a minor charity.
- Greater than \$300,000 in retail fundraising is large.

I suggest a scaling of regulatory requirements as follows:

- Below \$100,000p.a. - basic accreditation, limited reporting
- Above \$100,000 p.a. yet below \$300,000 p.a. - simplified accreditation, condensed reporting
- Above \$300,000 p.a. - full accreditation and compliance reporting.

The key trust element is ignored in your paper and it sits in three areas

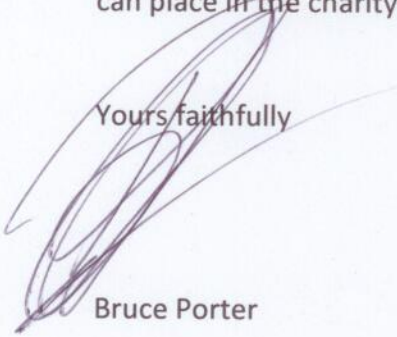
1. The Commission paid to contractors and commission agents needs full and clear disclosure;
2. Efficiency of donations i.e. what percentage of donation is actually used for the prescribed purpose, needs to be identified: and,
3. Is there underlying conflict in the charity (minor religious faiths, use of funds for other say political purposes).

In this regard it should be mandatory that each charity with a fundraising license at each level should have a clear website, which must detail.

- a) The key activities and purpose of the charity and any fundraising
- b) The ACNC Fundraising Authority Number
- c) A statement of compliance for funds raised claiming last years fundraising efficiency levels:
 - a. The percentage of commission paid on fund raising;
 - b. Funds raised last year;
 - c. Efficiency of \$1 raised in delivering direct services to the charitable purpose from those funds;
- d) A statement of compliance with the charities aims; and,
- e) Detail of any adverse claim against the charity with a right of reply by the charity.

This way the public can determine the value of the charity and the level of trust it can place in the charity delivering on its purpose.

Yours faithfully



Bruce Porter