

From: John Church [<mailto:jchurch@bigpond.net.au>]
Sent: Saturday, August 20, 2011 04:25 PM
To: Robert Keys
Subject: Friday 19/10/2011

Dear Robert,

Thank you again for the presentations you and your team provided and the way you all handed the more vocal members of the audience it was very creditable and reflected well on you all.

As I said my prime interest is the charitable sector and I would be most disappointed if you proceed to cover them.

There are many reasons some of which are:

1. The history of Charities.
2. Their structures are very diverse in nature and many would not be caught by your determination.
3. There is no common legal definition of charities worldwide. Some are statutory, others are common law and some a mixture of both.
4. There are some 600,000 entities in Australia, many of which have large range of obligations under Commonwealth Law and State/Territory Laws.
5. As a member of The Charities Definition Inquiry, it was clear that the multitude of regulations and the lack of interest by most State Governments. There was little real will to reform by them. Many of them were extremely small.
6. At last the Commonwealth Government is actually doing some things on this front, it would be a tragedy if the Board the acted unilaterally on this issue. I believe the actual running of this issue should be done by the Not-for-profit Regulator. I would have no doubt they would talk with your Board.
7. The users of Charities reports are principally the donors and in many cases the recipients. I really believe they need a simple clear means of providing this information and a real issue is to express such things accurately in a clear and simple manner, something I believe is getting lost because of your obligations to the International Board.
8. On the general issue of not-for-profits I really believe that you will have to divide into categories. I realise this is against your concept of principles, but I think you will find on examination, the auditors of these bodies will require the maximum convoluted disclosure. I think you often do not consider who the users are. At times, I feel the individual recipient who does not have the skills of an accounting expert just puts them in the bin as being useless. This is a challenge for you.

Thank you once again.

John Church