



20th July 2012

Committee Secretariat
House of Representatives Standing Committee on Economics
Parliament House
CANBERRA ACT 2600

Dear Ms Owens

Re: Review of Australian Charities and Not For Profits Commission exposure draft legislation

Surf Life Saving NSW welcomes the establishment of the new national regulator for the charity and not-for-profit (NFP) sector if it is able to achieve its aims of reducing red-tape by reducing duplication of reporting requirements and assisting the efficiencies of the sector, however this will not occur without the involvement of the states and territories to align reporting requirements with the ACNC reporting framework.

For example, according to the ACNC's 3 tier income provision for those charities and NFPs with Deductible Gift Recipient Status, it states that those entities with revenue of under \$1 million are not required to have a full audit of financial statements, yet Surf Life Saving Clubs in NSW are still required to be audited under the *Charitable Fundraising Act 2009* regardless of their income; so until such time as agreement is reached with the State Governments, there will be very little reduction in red tape for our Surf Life Saving Clubs.

As previously stated in our response to Treasury on the 'Charitable Fundraising Regulation reform' Discussion Paper in April 2012, ideally there should be one national legislation, which adopts the best requirements of existing State legislation without adding any further requirements. In addition, as stated in the Surf Life Saving Australia response to the ACNC Taskforce in February 2012 when providing feedback on the implementation design of the ACNC, it is fundamental that all State and Territory Governments have enacted transitional legislation to recognise a specific time when the ACNC becomes the one-stop regulator.

The ACNC Exposure Draft Bill states that the ACNC will minimise procedural requirements and duplication and we would like to see this occur through specific measures, particularly in terms of improving arrangements for Government funding through the grants process. This could be achieved through specific provisions such as NFPs being able to submit their end of financial year statements once to the ACNC, which would remove the burden of having to resubmit financials for every Government grant and having to separately acquit on grants.

Surf Life Saving NSW supports the longer transition period with no financial reporting required until 31 December 2014, as it will give charities and NFP entities time to respond to proposed changes in reporting requirements by the ACNC and enable the NFP Reform Working Group of the Council of Australian Governments (COAG) to negotiate aligning the ACNC reporting framework with existing state and territory requirements. Furthermore, we believe it should be a requirement that all charities adopt the Standard Chart of Accounts (SCOA) as recommended by COAG to promote uniformity of fundraising classification and reporting.



The ACNC Exposure Draft Bill will see an improvement for Surf Life Saving NSW as a state entity in terms of its ability to undertake collective reporting, however we would like to see financial reporting made easier for our affiliated Surf Life Saving Clubs who are often under resourced and don't have the money, paid staff or financial expertise to follow complex and costly reporting and compliancy requirements.

Surf Life Saving NSW welcomes the Federal Government's efforts to reduce the overlapping requirements imposed by Commonwealth, State, Territory and Local Governments and we look forward to seeing the details of the Government's proposed governance standards and external conduct standards, which will be set out in the regulations shortly.

We look forward to working with the Government to achieve the best outcomes for the NFP sector and to reduce the duplication of reporting for our Surf Life Saving Clubs so they can be freed up to do what they do best, which is to save lives.

Yours sincerely

Phillip Vanny AM
Chief Executive Officer
Surf Life Saving New South Wales