



Australia's Charities and Not-for-profits

Written Submission

The Options Paper, Australia's Charities and Not-for-profits sets out proposed replacement arrangements for charities in Australia. The paper outlines policy directions proposed by the Government to introduce effective replacement arrangements that reduce the burden of regulation on the civil society sector.

The paper is being released to seek feedback from charities and interested parties on the proposed replacement options. Comments and feedback will inform development of the replacement arrangements. A summary of written submissions will be provided on the Department's website in September 2014.

Please use this submission template to provide your feedback on the proposed replacement arrangements for charities in Australia.

Completed submissions are to be sent by 20 August 2014 to:

consultationwithcharities@dss.gov.au (preferred method) OR

Civil Society and Programme Delivery Policy Branch
Department of Social Services PO BOX 7576
Canberra Business Centre, ACT 2610

Submissions received after 20 August may not be considered.

Unless otherwise stated, the information and feedback you provide may be used for publishing purposes. Please state if you do not wish for your comments to be published.

Instructions for completing the Submission Template

- Download and save a copy of the template to your computer.
- Refer to the *Options Paper, Australia's Charities and Not-for-profits* for context and discussion questions.
- You do not need to respond to all of the questions.
- Please keep your answers relevant to the topic being addressed, we ask that submissions be limited to two pages.

Name (first and surname): Canio Fierravanti

If submitting on behalf of a company or organisation

Name of organisation: University of Wollongong

Stakeholder category (e.g. service provider, client, peak body, academic): Academic

State/Territory: NSW

Contact email address: caniof@uow.edu.au

Response to Options Paper:

The University of Wollongong (UOW) values the opportunity to provide feedback into the consultative process surrounding the proposed abolition of the ACNC. UOW is an income tax exempt charitable entity and endorsed by the Australian Taxation Office (ATO) as a deductible gift recipient. Fundraising is an important aspect of the long term funding strategy of the University. Our donors support ground breaking research, scholarships for hardworking or disadvantaged students, prizes to reward academic achievement, initiatives to support our community and activities to conserve our environment.

The proposed abolition of the Australian Charities and Not-for-profits Commission (ACNC) addresses the duplication of regulatory and reporting burdens currently imposed on universities. UOW wishes to comment on some general aspects of the replacement arrangements following the abolition of the ACNC.

The Public University sector is already closely regulated by Commonwealth, State and Territory governments and the ACNC has been unnecessary as a regulatory measure for the University sector. We welcome the proposed approach to monitoring and compliance as the governance, quality, efficiency and transparency of university services is already closely regulated. It is our view that no additional transparency measures are required for a sector that already reports to an array of regulators (for example the Tertiary Education Quality and Standards Agency) and is subject to State and Federal scrutiny through the application of the laws, regulations and by-laws.

Australian universities are required to lodge audited financial reports with State and Federal statutory bodies, and detailed annual financial statements are submitted to the Department of Education as a condition of receipt of financial assistance from the Australian Government. The Australian Higher Education Providers (Guidelines) prescribe the form of the financial statements including the necessary auditing and verification that is required approved by the Australian Government under the relevant Acts. It is our opinion any reports lodged with under existing reporting requirements should be sufficient as under the new arrangements. Requiring universities to undertake additional financial reporting impacts our ability to focus on our core objectives and burdening our processes with bureaucracy instead of encouraging innovation.

On this basis UOW supports the proposed replacement arrangements following the abolition of the ACNC, and the Government's commitment to reducing reporting obligations where strong accountability measures are already in place.