To whom it may concern,

I am writing to respond to the research exercise on charities SORP (FRS 102).

I believe that it is important for the charities SORP making-bodies to take into account the views of charity sector preparers. I know that having an effective reporting framework is in the interests of not only the public, but the charity sector itself.

So I would urge the charities SORP making-bodies to listen to organisations such as the Charity Finance Group, which have undertaken an extensive consultation with finance professionals via roundtables and an online survey.

In particular, I would urge the SORP making-bodies to:

1. Reject the proposal for a Key Facts Summary

There is no rationale for why this summary would improve understanding of charities, and I do not believe that there is financial information which would universally demonstrate the effectiveness of a charity. It is only likely to encourage readers not to engage with the full annual report and accounts.

2. Reject the proposal for material donors and funders to be declared

I am concerned that this will impact of the donor's right to privacy and could lead to fewer charities receiving charitable donations. I also do not believe that declaring funders, such as local councils, would improve the public's understanding of the effectiveness of a charity.

3. Abolish the separate accounting of support costs

These add a burden on charities and do not add any value for the reader of the accounts. Support costs are necessary for all operations and separating out support costs feeds an incorrect impression that support costs are a 'bad' piece of expenditure. The SORP making-bodies need to take action.

4. Reject calls further details on administration and fundraising costs

Financial disclosures are not the way to improve understanding of charities operations, encouraging and supporting charities to talk about their operations and approach to fundraising through narrative reporting would be better.

5. Reject calls for charities to break down their spending by jurisdictions

This will not add value as most charities that work overseas will already be explaining their operations through the narrative reporting. This will add significant bureaucracy, however, and further lengthen the SORP.

Thank you for considering my response to the research exercise.

Kind regards,

Huw

Huw Davies BSc. FCCA.

Director of Finance & Resources

Direct line: 01993 825550

Mobile: 07768 132276

www.bluecross.org.uk Shilton Road, Burford, Oxon OX18 4PF





Blue Cross is a company limited by guarantee (registered in England No. 363197) and has its registered office at Blue Cross, Shilton Road, Burford, Oxfordshire OX18 4PF. Blue Cross is registered as a charity in England and Wales (224392) and in Scotland (SC040154)

NOTE: Information in this e-mail is for the exclusive use of the intended recipient(s) and any opinions expressed are not necessarily those of Blue Cross. If you have received this communication in error, please return to sender and note that distribution, copying or use of this information is strictly prohibited. This e-mail and any attachments are believed to be free of any virus, or any defect which might affect any computer system into which they are received and opened. No responsibility is accepted by Blue Cross for any loss or damage arising in any way from receipt or use thereof.

Please consider the environment before printing this email

This e-mail has been scanned for all viruses by Star. The service is powered by MessageLabs. For more information on a proactive anti-virus service working around the clock, around the globe, visit: http://www.star.net.uk