

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

Stuart Ellis

Head of Finance

Stuart Ellis || Head of Finance || 01789 774215 || www.rlss.org.uk

The Drowning Prevention Charity



[Facebook.com/RLSSUK](https://www.facebook.com/RLSSUK)[@RLSSUK](https://twitter.com/RLSSUK)

This communication is intended for the above-named person(s) only and may be confidential and/or legally privileged. Any opinions expressed in this communication are not necessarily those of the company. If it has come to you in error please inform the sender immediately and delete/destroy the email and any attachments, you must take no action based on it, nor must you copy or show it to anyone. Although The Royal Life Saving Society UK takes all reasonable steps to ensure that its systems remain free from viruses, no responsibility is accepted for any damage caused by any viruses which may be associated with this message. Addressees are advised to rely on their own virus checking procedures.

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>
