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28 August 2003

The Chair, Charities Definition Working Group,  
The Board of Taxation  
C/- the Treasury  
Langton Crescent  
PARKES ACT 2600

Facsimile: (02) 6263 4471

Dear Madam,

Thank you for the opportunity to comment on the exposure draft of the Charities Bill 2003. My comments follow the sequence requested in the guidance notes provided.

1. My name is Barry Arthur (Bill) Willcox and I am now retired from the position of National Executive Director of a charity dedicated to responding to a particular disease group and the support of those with one of the conditions within that group. My contact details are above.

3. My reasons for contributing to this discussion are:

- During my eight years in that position, I had considerable difficulty in concisely relating our varied activities into the current legislation;
- Not only was I engaged in the objects of my own organisation, I was much involved in industry groupings in Australia (e.g. ACROD; Consumers' Health Forum) and in the international group related to the particular disease group which I personally established;
- **On the basis of these experiences, I am not now able to contribute to charitable appeals in Australia as, with few exceptions, I found organisations with hugely excessive overheads, providing services on the assumptions of supplier opinion rather than community need, and with a total concentration on process rather than outcomes as being normal in Australian charitable organisations.**

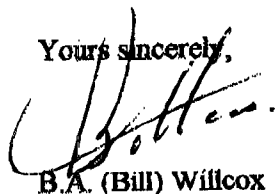
6. In the case of the organisation in which I was employed, this draft Bill will greatly clarify its entitlement to a charitable definition.

7. And this flexible range of definitions should greatly assist changing responses to changing circumstances.

8. Accordingly, I would support the inclusion of the word "altruistic" even in terms of the limited definition you provide. I would be more interested in seeing a form of words which gave rise to tests of usefulness, effectiveness and efficiency and perhaps future enhancements of this Bill might find common ground for these requirements to attach to the requirement of altruism.

I trust that these comments at least provoke some thought about these last concerns of mine.

Yours sincerely,



B.A. (Bill) Willcox