



7 August 2020

Michele Embling
Chief Executive
External Reporting Board
PO Box 11 250
Manners St Central
Wellington 6142

Dear Michele

NZASB Exposure Draft 2020-1 Proposed 2020 Amendments to PBE FRS 48

This submission is made on behalf of The Salvation Army New Zealand, a registered charity working in many areas of New Zealand society meeting people at their point of need.

The Salvation Army (The Army) is an international Christian and social services organisation that has worked in New Zealand for over one hundred and thirty years. The Army provides a wide-range of practical social, community and faith-based services, particularly for those who are suffering, facing injustice or those who have been forgotten and marginalised by mainstream society.

Each year we help over 120,000 families and individuals in need – with food and clothing assistance, addiction harm reduction, housing support, financial mentoring, life skills and social support. This is backed up by the 8,000 regular attenders of our 88 faith communities (churches). We are passionately committed to our communities as we aim to fulfil our mission of caring for people, transforming lives and reforming society by God's power.¹

¹ <http://www.salvationarmy.org.nz/about-us>

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Founders of The Salvation Army Catherine and William Booth. General Brian Peddle.

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Questions for Respondents

We provide the following responses to the specific questions in your exposure draft.

1. Yes, we agree with your proposal to defer the effective date of PBE 48 Service Performance Reporting by one year. The onset of COVID-19 and the huge spike in demand made it difficult for us to finalise our new data collection and reporting mechanisms. In turn, this means we will be struggling to have full comparative data so a delay of one year will certainly help.
2. Yes, we agree with the proposed clarification regarding explaining variances (see paragraphs 37 and 38A)
3. Yes, we agree with the proposed effective date of these amendments.
4. We have no other comments on this ED.

Should you have any queries about our submission, please contact me at peter.bain@salvationarmy.org.nz

Yours sincerely

Peter Bain
Chief Financial Officer
The Salvation Army