



Australian Government



Australian  
Charities and  
Not-for-profits  
Commission

22 March 2024

SMS Sender ID Registry Consultation  
Communications Services and Consumer Division  
Department of Infrastructure, Transport, Regional Development, Communications and the Arts  
GPO Box 594  
Canberra ACT 2601

**Submitted Online:** [SMS Sender ID Registry - Fighting SMS Impersonation Scams | Department of Infrastructure, Transport, Regional Development, Communications and the Arts](#)

Our reference: ACNCSUB2024/6

1. The Australian Charities and Not-for-profits Commission (**ACNC**) welcomes the opportunity to comment on the design of a SMS Sender ID Registry.

#### About the ACNC and the charity sector

2. The ACNC is the national regulator of charities established by the *Australian Charities and Not-for-profits Commission Act 2012* (Cth) (**ACNC Act**). The objects of the ACNC Act are to:
  - a. maintain, protect and enhance public trust and confidence in the Australian not-for-profit sector; and
  - b. support and sustain a robust, vibrant, independent and innovative Australian not-for-profit sector; and
  - c. promote the reduction of unnecessary regulatory obligations on the Australian not-for-profit sector.
3. Currently, the ACNC has oversight of around 60,000 registered charities. The ACNC does not have oversight of the wider not-for-profit sector. These charities vary considerably in size, role, and function. Charities are a vital part of our community and economy. Registered charities employed over 1.42 million people<sup>1</sup> and reported revenue of \$190 billion in the 2021 reporting period.<sup>2</sup> While some charities are large and well-known entities, most charities are very small, volunteer-run organisations.<sup>3</sup>

#### Have you, your organisation, or clients been targeted by SMS impersonation scams that used your alphanumeric sender ID(s)?

4. We are not aware of SMS impersonation scams that have targeted our agency. We do not currently send SMS messages but may choose to do so in the future.
5. Scammers often impersonate charities in emails, on the internet, and via social media channels and request consumers click links, make a donation, or provide personal

<sup>1</sup> ACNC, *Australian Charities Report* – 9th edition, 2023, 19.

<sup>2</sup> Ibid, 24.

<sup>3</sup> Ibid, 19-21.



information. We regularly promote messages encouraging the public to be aware of this risk, including a recent media campaign during the Christmas and festive season charity appeal season<sup>4</sup> and campaigns during humanitarian crises.<sup>5</sup>

6. Statistics from the National Anti-Scam Centre show that, in 2023, there were 870 reports of fake charity scams, of which 7.5% had financial losses. The total reported amount lost was \$261,294.<sup>6</sup>
7. Charities deliver vital services throughout Australia. The existence of fake charity scams hampers the ability of these genuine charities to raise funds to deliver their charitable purposes.

### **Do you support the introduction of a voluntary or mandatory SMS Sender ID Registry for alphanumeric sender IDs? Why?**

8. We agree that a mandatory registry would provide a significantly higher level of protection to brands and consumers.
9. However, charities have limited financial and human resources. Our ninth Australian Charities Report found that total expenses for charities had increased by \$7.1 billion to \$174.8 billion in the 2021 reporting period.<sup>7</sup> Other expenses, which include operational costs, constitute 37.1% of all expenses for the charities sector.<sup>8</sup>
10. In such circumstances, we suggest that, regardless of the approach selected, discounted rates or fee exemptions for charities registering will support these organisations to participate in the scheme.

### **Next steps**

11. If you have queries about this submission please contact [REDACTED], Policy Manager, Legal and Policy, [REDACTED].

[REDACTED]  
[REDACTED]  
Acting Assistant Commissioner General Counsel  
Australian Charities and Not-for-profits Commission

<sup>4</sup> See, for example, our media release *Avoid Being Scammed: ACNC Advises Simple Check Before Donating* (6 December 2023) <<https://www.acnc.gov.au/media/news/avoid-being-scammed-acnc-advises-simple-check-donating>>.

<sup>5</sup> See, for example, our media release *Updated Advice on Donating Money for Humanitarian Relief to the Conflict in Gaza* (6 November 2023) <<https://www.acnc.gov.au/media/news/updated-advice-donating-money-for-humanitarian-relief-conflict-gaza>> and *After Türkiye and Syria Disaster Charity Regulator says Give Generously but Beware of Scams* (9 February 2023) <<https://www.acnc.gov.au/media/news/after-turkiye-and-syria-disaster-charity-regulator-says-give-generously-beware-scams>>.

<sup>6</sup> National Anti-Scam Centre, *Scam statistics*, filtered for “fake charities”, <<https://www.scamwatch.gov.au/research-and-resources/scam-statistics?scamid=14&date=2023>>.

<sup>7</sup> Above n 1, 26.

<sup>8</sup> *Ibid*, 36.