



20 September, 2018

Ms. Marisa Purvis-Smith  
Division Head  
Individuals and Indirect Tax Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600  
[ExternalConductStandards@treasury.gov.au](mailto:ExternalConductStandards@treasury.gov.au)

### **Proposed Regulations on Charities' External Conduct Standards**

Dear Ms. Purvis-Smith:

I am writing to you in relation to the draft regulations to the external conduct standards and the University of Sydney and University of New South Wales (UNSW) submissions on the issue. I want to express our support for UNSW's position as, without modification, the draft *Australian Charities and Not-for-Profits Commission Amendment Regulations (No.2) 2018 (Cth)* regulations will place a significant burden on Australian universities.

By way of introduction, the Council for Advancement and Support of Education (CASE) is the global membership association for professionals and leaders working to advance education. CASE has worked closely with universities in Australia over the past two decades to support their growth and advocate for policies that will aid institutions in the fulfilment of their missions.

As both institutions have noted, the draft regulations and annual reporting requirements for charities regarding their international activities will be an encumbrance for educational institutions. International engagement is a critical aspect of university work and it is embedded in their core missions. Therefore, activities that support this are extensive and already captured under current regulatory internal and external requirements. The existing regulatory scheme for universities is administered by Tertiary Education Quality and Standards Agency (TEQSA) and Australian Charities and Not-for-profits Commission (ACNC) and their requirements are quite comprehensive. Given the robust nature of the requirements and longstanding efforts to minimise the burden and create efficiency, we support Sydney and UNSW's recommendations.

Policies and regulations that needlessly increase the cost of doing business hurt the ability of higher education providers to direct their resources to the advancement of their missions. We are appreciative of the Treasury's interest thus far in discussing this matter and encourage the Treasury to explore the proposed recommendations. We believe that the offered alternatives to the draft regulations would satisfy the intended needs of the proposed regulations.

I send thanks for your attention to this matter.

Sincerely,

Sue Cunningham  
President and CEO