

Individuals and Indirect Tax Division
The Treasury
Langton Crescent
PARKES ACT 2600

Via email: ExternalConductStandards@treasury.gov.au

21 September 2018

[External conduct standards for charities registered with the Australian Charities and Not-for-profits Commission](#)

Justice Connect thanks Treasury for the opportunity to provide feedback on the draft regulations and explanatory statement for the proposed external conduct standards (**Standards**) for charities registered with the Australian Charities and Not-for-profits Commission operating outside Australia. We appreciate Treasury's commitment to consultation with the charity sector on the Standards.

Not-for-profit Law is a specialist service of Justice Connect, a registered charity and accredited community legal centre. Not-for-profit Law responds to more than 1,750 legal enquiries a year from a wide range of not-for-profits, with a particular focus on small-medium groups many of which are registered charities. Our advocacy focuses on an improved legal and regulatory framework for the not-for-profit sector, with an eye to the impact and cost of regulation for these smaller groups.

Endorsement

Justice Connect endorses the submission of the Law Council of Australia Not-for-profit Legal Practice and Charities Committee (LCA Committee) on the Standards.

In particular, we support the LCA Committee's comments about the need for this additional charity regulation and reporting requirements to be proportionate to the relevant, identified risk. Further consideration needs to be given to ensuring that the Standards are targeted to a specific risk and do not create an unreasonable reporting burden on charities operating outside Australia, many of which are small and operated by unpaid volunteers.



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Thank you once again for the opportunity to participate in Treasury's consultations on the Standards.

Yours sincerely

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