

Senior Advisor
Not-For-Profit Unit, Not-for-profits and Tax Administration Branch
Treasury Melbourne
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Melbourne VIC 3000
By email: charitiesconsultation@treasury.gov.au

Submission on ACNC Governance Standards

To whom it may concern,

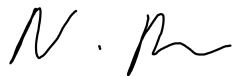
I am writing regarding the proposed changes to Governance Standard 3 of the *ACNC Regulation 2013*. I would like to raise my concern with these changes. I believe the proposed changes are draconian and represent regulatory overreach. I am concerned that charities will face the threat of being deregistered for incredibly minor infringements. I am also concerned that no justification has been given as to why currently existing penalties are inappropriate, and why the complete deregistration of the charity is preferable to other responses.

I believe that charities are a critical pillar of society and essential for the proper functioning of Australia's democracy. The proposed changes would unreasonably impact on the way that charities are able to carry out their work. I understand that a large number of charities are very concerned about these proposed changes.

By way of background, I am an actuary and non-executive director, mainly in the finance industry. Even though I am writing in my personal capacity, my business connection comes from my board roles with UniSuper, Zurich, Class Limited, CBHS Health and SuperEd. I am also on the board of Greenpeace.

Thank you for your consideration.

Yours sincerely



Nicolette Rubinsztein