

---

**From:** Pam Duncan <pduncan@walkawhile.org.au>  
**Sent:** Saturday, 11 February 2023 8:12 PM  
**To:** Charities Consultation  
**Subject:** Submission on DGR Registers Reform

To Whom it May Concern

I am writing today in response to an email I received from the Register of Cultural Organisation (ROCO) in relation to Deductible Gift Recipient (DGR) Registers Reform. I understand that the intention is to centralise administration of the various DGR categories with the ATO for the purposes of consistency, simplification and reduction of red tape. However, ROCO is a very specific category that is relied upon by certain charities to operate in the best interest of various cultural groups, including our Indigenous Australians.

I do not believe the ROCO reporting requirements are onerous, nor that they require simplification, and therefore I do not believe any changes to the current structure are necessary.

A charity which has the promotion of culture as one of its primary objects, should be handled, monitored and managed differently from a charity that has other objectives. Walk a While Foundation is primarily concerned with the promotion of Indigenous arts and culture and I do not believe the ATO in general would be the best place for concerns to be raised or queries to be answered. It is quite a specific subset of the larger DGR Category.

It seems to me the ATO could be equally well supplied with information through auditors' reports, AIS submissions, etc, without needing to take over the administration of charities registered under ROCO. The ATO could easily stipulate that ROCO reports from charities are copied to a branch of the ATO for monitoring and checking.

Therefore, I submit that ROCO should be left in place, to continue to administer cultural organisations, regardless of what determinations are made in relation to other DGR categories.

Should you require any further information, please feel free to contact me.

Yours sincerely,

*Pam Duncan*

**Pamela Duncan**

DIRECTOR

**Walk a While Foundation Limited**

Email: [pduncan@walkawhile.org.au](mailto:pduncan@walkawhile.org.au)

Office: 02 4367 6701

Direct: 02 4307 8401

Mobile: 0408 438 025



[www.walkawhile.org.au](http://www.walkawhile.org.au)

[www.facebook.com/walkawhile](https://www.facebook.com/walkawhile)