

16 March 2021

Our ref: WD: NFP

Senior Advisor  
Not-For-Profit Unit, Not-for-profits and Tax Administration Branch  
Treasury Melbourne  
Level 16, 530 Collins Street  
Melbourne VIC 3000

By email: [REDACTED]

Dear Colleague

**Exposure draft consultation - Unlawful activity - changes to the governance standards for registered charities**

Thank you for the opportunity to comment on the exposure draft of the legislative instrument and explanatory materials for changes to governance standard three in the *Australian Charities and Not-for-profits Commission Regulation 2013* to expand the scope of impermissible activities that registered charities must not engage in or promote others to engage in.

The Queensland Law Society (QLS) is the peak professional body for the State's legal practitioners. We represent and promote over 13,000 legal professionals. This correspondence has been prepared with the assistance of the QLS Not for Profit Law Committee, whose members have substantial expertise in this area including representing charities.

QLS has had the opportunity to review the draft submission of the Law Council of Australia, which has been prepared by its Charities and Not for Profits Committee of the Law Council of Australia's Legal Practice Section. We understand a short extension was granted for their submission.

QLS supports and endorses the serious concerns and reservations raised by the Law Council for the reasons outlined in its submission.

If you have any queries regarding the contents of this letter, please do not hesitate to contact our Legal Policy team via [policy@qls.com.au](mailto:policy@qls.com.au) or by phone on (07) 3842 5930.

Yours faithfully

[REDACTED]  
Elizabeth Shearer  
President