Electronic Funds Transfers
Guidelines for trust account operations

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Table of Contents

1. Legislative Requirements ................................................................................. 4
2. What are EFT payments used for? ...................................................................... 4
3. Prohibited Transfers ........................................................................................... 4
4. Speak to financial institution ............................................................................. 4
5. Making Application ............................................................................................ 5
6. Security measures ............................................................................................... 5
7. Authorising EFT payments ............................................................................... 6
8. What is an EFT instruction? ............................................................................... 6
9. Key Particulars .................................................................................................... 6
   9.1 EFT reference number .................................................................................. 6
   9.2 Bank Transaction ID .................................................................................... 7
   9.3 Details to appear on bank statement ............................................................ 9
   9.4 EFT Requisition Form ............................................................................... 9
   9.5 Screen Print / Bank Receipt / Payment Confirmation ...................................... 9
10. Trust Account Procedures .................................................................................. 10
    10.1 Processing an EFT instruction .................................................................... 10
    10.2 Recording EFT payments in trust accounting records .................................. 11
    10.3 Verification of EFT trust payments ............................................................. 11
11. Examples of EFT Trust Records ........................................................................ 12
12. Notification of first EFT trust payment ............................................................. 15
13. Retention of EFT records .................................................................................. 15
14. Certificate from External Examiner ................................................................. 15
15. Cancellation of approval to make EFT trust payments ..................................... 15
1. **Legislative Requirements**

A Queensland law practice may withdraw trust money from a law practice trust account or controlled money account, by way of a trust account cheque or, if the law practice is authorised by the Queensland Law Society, by way of Electronic Funds Transfer (EFT) in accordance with Section 250(1) of the *Legal Profession Act 2007*. The Council of the Queensland Law Society issued Guidelines in relation to EFT payments from a trust account or controlled money account which outlines the requirements for making payments and the particulars to be kept in the trust records for these payments.

Direct debit authority payments are also a form of electronic funds transfers, however, the Society has issued separate Guidelines in relation to direct debit payments from a trust account to the Office of State Revenue (OSR), to Property Exchange Australia (PEXA) and to Sympli Australia (Sympli).

2. **What are EFT payments used for?**

Most law practices seek EFT approval to enable them to pay professional fees by transferring funds from the trust account to the general office account. EFT trust payments can also be used to pay funds directly to a clients’ nominated bank account i.e. for reimbursement of funds or for payments for authorised expenses on the client’s behalf e.g. barrister fees and search agents fees.

**Note:** If the law practice is intending to make trust to office transfers, they must comply with all requirements of the EFT Guidelines. There is no exception from the Guidelines for trust to office transfers.

3. **Prohibited Transfers**

Section 250(2) of the *Legal Profession Act 2007* states that cash withdrawals, ATM withdrawals or transfers, telephone banking withdrawals or transfers, are prohibited.

BPAY Payments are **not** allowed to be made from a trust account as this means of payment is not capable of recording all the required information on the financial institution statement (as per Regulation 38(5) of the *Legal Profession Regulation 2017*).

4. **Speak to financial institution**

The Society recommends that law practices speak to their financial institution prior to applying for EFT approval.

Some financial institutions do not have the facility for trust accounts to disburse funds via EFT and other financial institutions do not comply with the EFT Guidelines.

The law practice will need to consult their financial institution in relation to the security requirements outlined in Section 6 of the EFT Guidelines.

**Things to ask:**

1. Does the bank allow for EFT payments to be made from a trust account to another bank account (including your office account)?
2. Does the online banking platform allow for a unique reference number to be recorded by the law practice (i.e. a description field)?
3. What information will appear on the trust account bank statement for EFT payments?
4. Which bank reference number (receipt, lodgement, confirmation) appears on the trust account bank statement?
5. What are the security measures for EFT payments?
5. Making Application

Law practices intending to make EFT payments must first make application to the Society to do so. “Appendix A” of the Guidelines is an example of the “Application Letter” that the law practice can amend for their purposes.

The approval is granted for the specific law practice’s trust account/s held at the time the approval is granted. If a law practice has been given approval to make EFT payments from a specific trust account/s and then changes trust account banker or opens a new trust account, the law practice will need to reapply for approval in respect to the new law practice trust account.

6. Security measures

An EFT payment is made by sending an EFT instruction to the financial institution with which the law practice trust account is kept. It is necessary for the financial institution to verify that the instruction has been sent by a person who has the authority to do so. This is usually done by entering the appropriate user identification information and a password.

It is absolutely imperative that the user identification information and password is kept secure. They are not to be shared with any other person, including staff members, under any circumstances. Nor are they to be stored in a way that another person may easily gain access to them.

Staff members i.e. bookkeepers, administration staff and finance officers, can be given ‘read only’ access to a trust account for the purpose of checking transactions recorded against the trust account and printing online bank statements. It is essential that all users have their own password and that their user account is setup correctly, according to the authorisation status i.e. user versus authoriser.

Third Means of Security

Law practices are required to enter into arrangements with their financial institution that a third means of identification is to be satisfied before the financial institution will transfer funds from the law practice’s trust account pursuant to an EFT instruction.

The third means of identification is generally in the form of a security token (like a USB stick). It generates a unique code that must be entered before the payment can be authorised. Another third means of security is receiving a SMS message with a unique code, that must be entered before the payment can be authorised. A security token can only be held by an authorised associate (trust account signatory).

Example – USB security token

![Example – USB security token](image)

Example – SMS unique code

The Society is aware that some financial institutions are moving towards Adaptive Authentication Technology. This is a real time authentication and fraud detection platform which allows a law practice to make payments to an existing payee without the need for a Security token or SMS code authentication. A Security token or SMS code will be required for each new payee transfer, however the security device will not be required for any payments made thereafter.

The Society permits this new form of security technology.
It is important to remember that, without some other form of identification requirement/security code, a person who knows the user identification information and password is in the same position as a person who has possession of a blank trust account cheque, pre-signed by a trust account cheque signatory – they can withdraw the entire balance of the trust account and apply it to their own benefit, if proper security measures do not exist.

Further, the password should consist of at least seven (7) characters, including letters of the alphabet and numbers and not be capable of being easily determined by a third party.

7. Authorising EFT payments

An EFT instruction can only be approved by an authorised trust account signatory. Section 38(2) of the Legal Profession Regulation 2017 outlines the person/s who are authorised to effect an electronic funds transfer from the trust account.

The person/s who authorises the EFT requisition must also be the same person/s who authorises the payment online.

Notification of appointment or termination of signatories on the trust account must be provided to the Society (Section 46 of the Legal Profession Regulation 2017).

8. What is an EFT instruction?

An example of an EFT instruction is when the law practice makes an EFT payment through their own online internet banking portal i.e. a funds transfer. Another example of an EFT instruction is to send the instruction, in a bank form, requesting the bank to make the EFT payment i.e. Real Time Gross Settlement request form.

Note: If the law practice is using a bank form, an EFT reference number must still be allocated, by the law practice, for that payment. The law practice must discuss with their financial institution regarding the EFT reference number (allocated by the law practice) appearing on the trust account bank statement. If the EFT reference number is unable to appear on the bank statement, the bank statement must then record a unique identifier (bank reference number). It is not acceptable for the payment to show as ‘withdrawal’ on the bank statement. The law practice, in this instance, will then be required to record the bank reference number on the EFT requisition form, trust ledger and cashbook – See Section 9.2 for more information about Bank Transaction ID numbers.

A direct credit request is not considered an electronic funds transfer. If the law practice wants to ensure that funds are banked they should continue to draw trust account cheques and directly deposit the cheque to the payee’s bank account.

9. Key Particulars

9.1 EFT reference number

All EFT instructions are to be sequentially assigned, by the law practice, a reference number.

The EFT reference number assigned to the EFT instruction is to be included in the instructions sent to the financial institution. This means that the EFT reference number is to be recorded in the description/lodgement field and must appear on the trust account bank statement, similar to how a trust account cheque number would appear.

The EFT reference number is generally the link between the trust records and allows for the various trust records to be cross referenced.
Note: Some accounting systems will automatically generate a reference number, so long as this number is sequential, the law practice may use this as their EFT reference number. This auto generated number must then be included in the instructions sent to the financial institution and must appear on the trust account bank statement. If the auto generated number is not sequential, the law practice must override the generated number with their own number sequence.

Numbering Examples

The most common form of numbering for EFT payments is EFT1, EFT2, EFT3, etc.

Some law practice will incorporate the year into the reference i.e. EFT17/01, EFT17/02, etc. Other law practices will include the matter reference in the number as well i.e. EFT01-1732, EFT02-2654, etc.

It is suggested that separate sequences of numbers be kept for each financial institution trust account (if more than one trust account is kept). For example, CBA17/01 or NAB17/01.

It should be remembered that controlled money account payments will not be recorded in the law practice’s trust account cashbook, but in the controlled money account movement record. There will therefore need to be a separate sequence of numbers, for EFT payments, that are also different to controlled money cheque payments.

Multiple EFT payments may also be a method that the law practice utilises. These types of EFT payments should also have their own separate sequences. For example EFT17/01-MULT.

Note: Using a numbering system of 1, 2, 3, etc. is not sufficient.

![Table Example]

**9.2 Bank Transaction ID**

The requirement to record the bank transaction ID/receipt number (Bank ID) was introduced when it became apparent that some financial institutions do not allow for a law practice to record their own reference number. This created an issue in that EFT payments were unable to be clearly verified and reconciled as there was a lack of information on the trust account bank statement.

Note: When the EFT reference number assigned by the law practice does not appear on the trust account bank statement – the bank transaction ID becomes the linkage between the trust records i.e. bank statement and trust ledger and cashbook.

In these cases, the Bank ID must appear in the transaction description on the trust account bank statement. It is essential that the Bank ID be included when the payment is recorded to the trust ledger and cashbook, generally in the reason for payment field.

The law practice is encouraged to make enquiries with their financial institution as to which bank reference number appears on the trust account bank statement. In some instances, a receipt number and lodgement/confirmation number will be generated, and only one will appear on the trust bank statement. Whichever number appears on the bank statement is the number that is required to be recorded on the EFT requisition form and in the trust records.
BOQ – Receipt Number appears on bank statement

ANZ – Receipt Number appears on bank statement

NAB – Payment ID appears on bank statement
9.3 Details to appear on bank statement

The below information must be recorded on the trust account bank statement in respect of each EFT payment:

- the date the EFT payment was made;
- the EFT reference number – assigned by the law practice to the payment OR if this is unable to be produced, the bank transaction ID;
- the amount of the EFT payment.

9.4 EFT Requisition Form

An EFT requisition form must be completed for each EFT instruction. The requisition form must have a bank screen print of the EFT instruction attached to it. This is required for all EFT payments made.

“Appendix B” of the EFT Guidelines is a sample requisition called “QLS EFT Requisition Form”. The law practice can choose to adopt the QLS EFT Requisition Form or utilise their own requisition form. Regardless, the requisition form must include the following details:

- the date of payment;
- the EFT reference number, generated by the law practice;
- the bank transaction identification number (if applicable – see Item 9.2 for Bank ID requirements);
- the amount to be transferred/paid;
- payee details i.e. the name of the account, account BSB and account number;
- trust ledger account details/controlled money account details i.e. client name, matter number and matter description;
- the reason/purpose for the payment;
- the name and signature of the person/s who authorised the EFT instruction (authorised associate/s/principal).

Note: EFT requisition forms must be prepared in paper form for all EFT payments. The law practice may choose to then scan the completed requisition form and retain the completed requisition form electronically.

9.5 Screen Print / Bank Receipt / Payment Confirmation

The EFT requisition form must have the bank screen print attached. The screen print should capture the date, EFT reference number or the bank transaction ID, amount & payee details (BSB and account number).

A screen print of the EFT instruction is required to be retained with the relevant requisition form to verify the date of payment, the payee account details and the amount.

Most financial institutions will generate a bank receipt/lodgement receipt after the EFT instruction has been sent. This is known as a lodgement receipt, bank acknowledgement or payment confirmation statement.

A screen print of the bank lodgement receipt or payment confirmation statement is to be produced immediately after the EFT instruction has been sent to the financial institution. If the system is not capable of producing a screen print after the instruction has been sent, a screen shot is to be produced immediately before the instruction is sent showing the relevant information outlined above.
10. Trust Account Procedures

10.1 Processing an EFT instruction

Not all law practices record EFT payments in the same way, although the same principles apply. Below are two examples of how to prepare and process an EFT instruction.

**Note:** A non-signatory can be granted read only access with the ability to prepare an EFT instruction. An authorised signatory would then login, enter their security code and authorise the EFT payment.

**Example 1**

This example must be followed if the EFT reference number does not appear on the bank statement – Bank ID must be captured on requisition form and trust records.

1. Prepare the EFT requisition form – Assign the payment a sequential EFT reference number and record this on the requisition form – PRINT
2. Check ledger balance to ensure there are enough funds on the ledger for the payment
3. Give the requisition form to principal or authorised associate for approval
4. Once approval is given – login to online banking system
   a. Check bank statement balance to ensure there are sufficient clear funds
   b. Prepare the transfer including the EFT reference number in the description field
   c. Send the transfer instruction, entering any required security code
   d. Print/Save a copy of the screen print/lodgement receipt and attach to requisition form
   e. Check the transaction on the trust account bank statement – if the EFT reference number does not appear – record the relevant bank ID on the EFT requisition form.
5. Record the payment to the relevant trust ledger account by including the EFT reference number as the payment/cheque number, The bank ID is only required to be recorded in the reason for payment field, if the EFT reference number is not on the bank statement (refer to Point 4. e.).

**Example 2**

This example works only when the EFT reference number appears on the bank statement.

1. Prepare the EFT requisition form – Assign the payment a sequential EFT reference number and record this on the requisition form – PRINT
2. Give the requisition form to principal or authorised associate for approval
3. Record the payment to the trust ledger account by including the EFT reference number as the payment/cheque number
4. Once approval is given – Login to online banking system
   a. Check bank statement balance to ensure there are sufficient clear funds
   b. Prepare the transfer including EFT reference number in the description field
   c. Send the transfer instruction, entering any required security code
   d. Print/Save a copy of the screen print/lodgement receipt and attach the requisition form
   e. Check the transaction on the trust account bank statement – if the EFT reference number does not appear – record the relevant bank ID on the EFT requisition form. You will also need to go back into trust ledger and amend the records to include the Bank ID in the ledger and cashbook. Example 1 should then be followed in future.

Refer to Section 11 for examples of a completed EFT requisition form, bank screen print, trust ledger and bank statement.
10.2 Recording EFT payments in trust accounting records

Details of an EFT payment from a trust account are to be recorded in the trust account cash payment book and the relevant trust ledger account.

When the EFT payment is recorded, the EFT reference number assigned to the payment is recorded as the payment number in the trust ledger and the payments cashbook. Remember that if the EFT reference number does not appear on the trust account bank statement, the Bank ID number must be recorded in the reason for payment on the trust ledger and payments cashbook.

The payment is to be recorded in a similar manner to a trust account cheque but with the added BSB and account number details. Details of an EFT payment are to be recorded in the relevant trust records within two days of the payment. Details of an EFT payment from a controlled money account are to be recorded in the relevant controlled money account movement record.

10.3 Verification of EFT trust payments

The law practice must ensure that all EFT payments made from the trust account are verified within a reasonable timeframe. The Society suggests the day after the EFT payment is made is best practice.

Verifying EFT payments is achieved by logging into the online banking system and viewing the online bank statement/transaction history. The EFT payment on the online statement/transaction history of the trust account should agree to the EFT payment recorded in the trust account cashbook and trust account ledger.

Checking the online payments will ensure that there have been no unauthorised debits on the trust account and that the information recorded on the bank statement is the same as the information recorded on the relevant EFT requisition form.
## 11. Examples of EFT Trust Records

<table>
<thead>
<tr>
<th>Date</th>
<th>2 December 2019</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>EFT reference number (Note 1)</strong></td>
<td>EFT19-251</td>
</tr>
<tr>
<td><strong>Bank transaction identification number (Note 2)</strong></td>
<td>ABC123654789</td>
</tr>
<tr>
<td><strong>Amount</strong></td>
<td>$53.35</td>
</tr>
<tr>
<td><strong>Payee details</strong></td>
<td>Account Name: Benjamin Potts</td>
</tr>
<tr>
<td></td>
<td>BSB: 789321</td>
</tr>
<tr>
<td></td>
<td>Account Number: 987123</td>
</tr>
<tr>
<td><strong>Debit trust ledger account or controlled money account (client, matter name and number, if there is a number)</strong></td>
<td>Client: Benjamin Potts</td>
</tr>
<tr>
<td></td>
<td>Matter Name: Estate of Harry Potts</td>
</tr>
<tr>
<td></td>
<td>Matter Number: 8792</td>
</tr>
<tr>
<td><strong>Reason/Purpose for payment</strong></td>
<td>Balance held in trust</td>
</tr>
<tr>
<td><strong>Name and position of person who authorised payment (Note 3)</strong></td>
<td>Penny White, Principal</td>
</tr>
<tr>
<td><strong>Signature of person who authorised payment</strong></td>
<td></td>
</tr>
</tbody>
</table>
Screen Print / Lodgement Receipt
Trust Matter Ledger

For Period: All
Trust Account: Best Legal Practice, Commonwealth Bank of Australia 064000 12345678
Matter no. 0800000975
8792 - Estate of Harry Potts

Client Details: Benjamin Potts
179 ANN ST
BRISBANE QLD 4000

Solicitor Acting: 
Responsible Partner: Glenn Forster

<table>
<thead>
<tr>
<th>Date</th>
<th>Reference</th>
<th>Paid To / Received From Journaled To/From Reason</th>
<th>Withdrawal Amount</th>
<th>Deposit Amount</th>
<th>Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>12/08/2019</td>
<td>Rec 3421</td>
<td>Received From: Benjamin Potts Reason: Professional Fees</td>
<td></td>
<td>$106.51</td>
<td>$106.51</td>
</tr>
<tr>
<td>18/10/2019</td>
<td>Jn000010</td>
<td>Journaled To: Matter 13247 Reason: Transfer of professional costs to pay Invoice 563 (as per client instructions)</td>
<td></td>
<td>$53.35</td>
<td>$53.35</td>
</tr>
<tr>
<td>02/12/2019</td>
<td>Pay EFT19-251</td>
<td>Paid by EFT to: Acc Name: Benjamin F Potts BBB: 789-321 Acc Number: 987-123 Reason: Balance held in trust</td>
<td></td>
<td>$53.35</td>
<td>$0.00</td>
</tr>
</tbody>
</table>

Account Totals: $56.51 $56.51 $0.00

Trust Matter Ledger – recording payment

Bank Statement

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
<th>Debit</th>
<th>Credit</th>
<th>Balance</th>
<th>Currency</th>
<th>Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/12/2019</td>
<td>Opening</td>
<td></td>
<td></td>
<td>9,816.22</td>
<td>AUD</td>
<td></td>
</tr>
<tr>
<td>01/12/2019</td>
<td>$5.00 DR Account Fee REDIRECTED TO 064 -000 00244257</td>
<td></td>
<td></td>
<td></td>
<td>AUD</td>
<td></td>
</tr>
<tr>
<td>01/12/2019</td>
<td>$11.60 DR Transaction Fee REDIRECTED TO 064-000 00244257</td>
<td></td>
<td></td>
<td></td>
<td>AUD</td>
<td></td>
</tr>
<tr>
<td>02/12/2019</td>
<td>Direct Credit 301500 EFT19-251</td>
<td></td>
<td>53.35</td>
<td></td>
<td>AUD</td>
<td></td>
</tr>
<tr>
<td>02/12/2019</td>
<td>Direct Credit 301500 QLS Trust Accoun Co EFT19-252</td>
<td></td>
<td>652.61</td>
<td></td>
<td>AUD</td>
<td></td>
</tr>
<tr>
<td>02/12/2019</td>
<td>Direct Credit 301500 QLS Trust Accoun Co EFT19-253</td>
<td></td>
<td>157.48</td>
<td></td>
<td>AUD</td>
<td></td>
</tr>
<tr>
<td>02/12/2019</td>
<td>Direct Credit 301500 QLS Trust Accoun Co EFT19-254</td>
<td></td>
<td>287.02</td>
<td></td>
<td>AUD</td>
<td></td>
</tr>
<tr>
<td>12/12/2019</td>
<td>Direct Credit 301500 QLS Trust Accoun Co EFT19-255</td>
<td></td>
<td>1,257.97</td>
<td></td>
<td>AUD</td>
<td></td>
</tr>
<tr>
<td>12/12/2019</td>
<td>Closing Balance</td>
<td></td>
<td></td>
<td>7,407.79</td>
<td>AUD</td>
<td></td>
</tr>
</tbody>
</table>

Totals: 7 (Transactions) 5 Debits 0

Credits

Bank Statement
12. Notification of first EFT trust payment

Law practices are required, within seven (7) days of making their first electronic funds transfer (EFT) payment from a trust account, or controlled money account, to give notification to the Society to that effect.

The law practice must provide the following documentation for the 1st payment only, in order for the Society to thoroughly review the first EFT payment and ensure that the law practice has complied with the EFT Guidelines:

- EFT requisition form
- Bank screen print
- Copy of bank statement showing transaction
- Copy of the trust matter ledger recording the payment

The above material should be sent to the Manager, Trust Account Investigations by either:

Post: GPO Box 1785, Brisbane QLD 4001; or

Email: managertai@qls.com.au

Note: If the law practice received approval, at the same time, for two or more accounts, they are only required to provide notification for the first transfer under that approval.

13. Retention of EFT records

The material to be retained for EFT payments is the EFT requisition form and the bank screen print (payment confirmation). These records can either be printed in paper form or be kept in a printable format (i.e. PDF).

EFT requisition forms and bank screen print are to be kept in sequential number order as a trust accounting record for a period of not less than seven (7) years. In addition, copies of EFT requisition forms can be, but need not be, kept on the relevant client files.

14. Certificate from External Examiner

The External Examiner of a law practice is required to complete an “External Examiner Certificate” (refer to attached Appendix C) which must accompany the External Examiner’s audit report as at 31 March of each year, or upon the closure of a trust account, if applicable. The ‘External Examiner Certificate’ has been incorporated into the External Examiner’s Report QLS Form 5 as Schedule 3.

15. Cancellation of approval to make EFT trust payments

A law practice that fails to comply with the EFT Guidelines may have their approval cancelled by the General Manager, Regulation of the Queensland Law Society.

If the Society cancels a law practice’s approval, the Society will advise the relevant financial institution, to that effect and will request the law practice to provide confirmation that the trust account has been set to a “read only” basis.
Appendix A

Application Letter

General Manager
Regulation
Queensland Law Society
GPO Box 1785
BRISBANE QLD 4001

Dear Colleague

APPLICATION FOR APPROVAL TO MAKE EFT TRUST PAYMENTS

XYZ Law Practice hereby applies to the Queensland Law Society for approval to make EFT payments from controlled money accounts held now and in the future, as well as, the following trust accounts:

<table>
<thead>
<tr>
<th>Name of Trust Account</th>
<th>BSB Number</th>
<th>Account Number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>

I certify that:

1. The EFT Guidelines issued by the Society have been read by all authorised trust account signatories, all staff involved in the management of the trust account and all staff involved in the making of EFT payments;

2. Suitable practices and procedures have been implemented and will be observed by the law practice in order to comply with the Guidelines;

3. The Society has been previously notified of the trust account signatories as required by Section 46(2)(a) of the Legal Profession Regulation 2017.

Yours faithfully

Name of main principal/law practice director

XYZ Law Practice
## Appendix B

### QLS EFT Requisition Form

<table>
<thead>
<tr>
<th>Field</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td></td>
</tr>
<tr>
<td>EFT reference number (Note 1)</td>
<td></td>
</tr>
<tr>
<td>Bank transaction identification number (Note 2)</td>
<td></td>
</tr>
<tr>
<td>Amount</td>
<td></td>
</tr>
<tr>
<td>Payee details</td>
<td>Account Name:</td>
</tr>
<tr>
<td></td>
<td>BSB:</td>
</tr>
<tr>
<td></td>
<td>Account Number:</td>
</tr>
<tr>
<td>Debit trust ledger account or controlled money account (client, matter name and number, if there is a number)</td>
<td>Client:</td>
</tr>
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<td></td>
<td>Matter Name:</td>
</tr>
<tr>
<td></td>
<td>Matter Number:</td>
</tr>
<tr>
<td>Reason/Purpose for payment</td>
<td></td>
</tr>
<tr>
<td>Name and position of person who authorised payment (Note 3)</td>
<td></td>
</tr>
<tr>
<td>Signature of person who authorised payment</td>
<td></td>
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</tbody>
</table>

(Screen print of Bank EFT instruction/confirmation attached)

**Note 1:** The EFT reference number allocated to the EFT Payment is a unique and sequential number, generated by the law practice to be recorded on the bank statement, trust ledger and cashbook.

**Note 2:** The bank transaction ID is only required to be recorded if the EFT reference number assigned by the law practice does not appear on the trust account bank statement. The Bank ID must then also be recorded in the trust ledger and cashbook as it is the linkage between the bank statement and trust records.

**Note 3:** The person(s) who authorise the EFT payment from the trust account must be the same person(s) who authorise the payment online.
Appendix C

External Examiner Certificate

Certificate from External Examiner as to whether law practice has complied with Queensland Law Society's Electronic Funds Transfers Guidelines for trust account operations ("the Guidelines").

I, __________________________, the External Examiner of the law practice, __________________________, certify that:

1. The law practice appears to have complied with the Guidelines in respect of all EFT trust payments noted during the external examination; OR (strike out whichever of 1 or 2 is not applicable).

2. The law practice appears to have complied with the Guidelines in respect of all EFT trust payments noted during the external examination other than the following:

<table>
<thead>
<tr>
<th>Name of trust account payment made from</th>
<th>Date of payment</th>
<th>EFT payment ref no</th>
<th>Amount</th>
<th>Details of non-compliance</th>
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3. The following EFT trust payments were noted during the external examination and appear to have been made in accordance with the Guidelines (list no more than 5 EFT trust payments; if less than 5 were noted, list all that were noted):

<table>
<thead>
<tr>
<th>Name of trust account payment made from</th>
<th>Date of payment</th>
<th>EFT payment ref no</th>
<th>Amount</th>
<th>Payee</th>
</tr>
</thead>
<tbody>
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______________________________ Signature

______________________________ Name of External Examiner

______________________________ Date