

22 January 2013

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Manager
Philanthropy and Exemptions Unit
Indirect, Philanthropy and Resource Tax Division
The Treasury
Langton Crescent
PARKES ACT 2600

Dear Sir/Madam

Consultation re the governance standards for the not-for-profit sector under the ACNC

Thank you for the opportunity to respond to this aspect of the development of the ACNC.
On behalf of Arthritis Queensland, I have the following comments:

- Standard 4 – Responsible management of financial affairs. This section is lacking in content and it is a very important standard. Other standards within the document have a 'Notes' section. It would seem appropriate that some relevant information in a 'Notes' section would assist understanding and provide information which is sorely lacking.
- Standard 5 – Suitability of responsible entities. I would be concerned about the Disqualified Responsible Entities Register being available in the public domain. Although the administrative cost would be higher, I would recommend a process whereby the NFP could make a private enquiry of the ACNC about whether proposed responsible entities are on the list.

Yours faithfully



HELENE FRAYNE
General Manager