QLD LEGAL FINANCE

QUICK ANSWER · TRUST ACCOUNTING

BPAY, PayID and PayTo from trust — *what records are different?*

These payment methods do not carry a BSB and account number. What has to go into the record instead, and what QLS requires before you use them.

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Modern payment methods change the evidence — not the need for control.

Queensland Law Society's current EFT Guidelines allow a law practice, where the relevant exemption has been granted, to use payment methods such as BPAY, PayID and PayTo when the ordinary BSB and account-number particulars are not available.

The trust accounting record must then capture the particulars specific to the payment method used.

> **QLF PERSPECTIVE**
> The question is not 'Can the bank make this payment?' It is 'Can the trust records still show exactly where the money went and why?'

1. First confirm the practice has the relevant QLS exemption

QLS explains that the usual EFT record requires the destination account name, account number and BSB.

Where a payment method does not disclose those particulars, the practice may apply to QLS for an exemption from that part of the record requirement.

That exemption is what allows payment methods such as BPAY, PayID and PayTo to be used with alternative identifying particulars.

> **RED FLAG**
> The bank platform offers PayID or BPAY, so the practice assumes the payment method is automatically available for trust.

2. BPAY — record the biller details

For a BPAY payment, QLS says the trust accounting records should include:

- the Biller Code;
- the Customer Reference Number.

Those details may appear in the field normally used for the BSB/account number or in the payment-reason field, but they must appear in both the trust account payments cash book and the individual trust ledger.

The practice must also retain a copy of the invoice or notice showing the Biller Code and Customer Reference Number.

> **GOOD CONTROL**
> The trust record should allow a reviewer to match the BPAY entry directly to the underlying invoice or notice.

3. PayID — record the identifier and verify it

For a PayID payment, QLS says the trust records should capture the PayID used, such as:

- mobile phone number;
- email address;
- ABN or ACN.

The details must appear in the payments cash book and the individual trust ledger.

QLS also requires the practice to confirm that it has verified the authenticity of the PayID destination.

> **RED FLAG**
> The PayID name displays on screen and the practice treats that alone as sufficient verification.

> **QLF PERSPECTIVE**
> PayID changes the destination identifier. It does not remove the need to verify who is receiving the trust money.

4. PayTo — record the payment agreement number

For a PayTo payment, QLS says the trust accounting record should include the payment agreement number.

The practice must also retain either:

- the notification of request finalisation; or
- a screen capture of the confirmation of the payment agreement.

QLS also says the practice should carefully consider any PayTo payment-agreement request before providing authorisation.

> **DIRECTOR QUESTION**
> Who reviewed the payment agreement before the practice authorised it, and where is that evidence retained?

5. The rest of the trust EFT controls still apply

Using BPAY, PayID or PayTo does not remove the core payment controls.

Before release, the practice should still confirm:

- the correct client and matter;
- sufficient available trust-ledger funds;
- the authority for the payment;
- the purpose for which the funds may be used;
- the person effecting the payment is appropriately authorised;
- the payment record is complete and retained.

QLF PERSPECTIVE

The payment method changes one part of the evidentiary trail. It does not change the need for the entire transaction to remain reconstructable.

The method-specific record

PAYMENT METHOD	RECORD IN TRUST SYSTEM	ADDITIONAL EVIDENCE
Ordinary EFT	Account name, BSB and account number	Normal EFT written record
BPAY	Biller Code + Customer Reference Number	Invoice/notice showing BPAY details
PayID	Mobile, email or ABN/ACN used	Evidence the PayID destination was verified
PayTo	Payment agreement number	Request-finalisation notice or agreement confirmation

A practical release check

- [ ] The practice holds the relevant QLS authority/exemption.
- [ ] The payment method is supported by the trust accounting system.
- [ ] The method-specific identifier has been entered correctly.
- [ ] The required supporting evidence has been retained.
- [ ] The payee/destination has been verified where required.
- [ ] The client ledger, purpose and authority support the payment.
- [ ] The transaction will be recorded promptly in the trust records.

Where QLD Legal Finance fits

QLD Legal Finance can support the preparation and recording of BPAY, PayID and PayTo trust payments, including method-specific evidence, ledger checks and the payment record provided to the authorised releaser.

The law practice remains responsible for its QLS authorisations and exemptions and for the approval and release of trust money.

The objective is that newer payment methods remain just as traceable as a traditional bank-account EFT.

Important information

This guide is general information only and is not legal advice.

Law practices should refer to the Legal Profession Act 2007 (Qld), the Legal Profession Regulation 2017 (Qld), their own QLS EFT authorisation or exemption, and the current Queensland Law Society Electronic Funds Transfers — Guidelines for trust account operations.

The use of BPAY, PayID and PayTo described in this guide depends on the relevant QLS exemption applying to the law practice.

The practical release check in this guide is a QLD Legal Finance operational control framework. It is not a separate statutory checklist issued by Queensland Law Society.

QLD Legal Finance supports Queensland law practices with trust accounting, financial control and advisory services. It is not affiliated with or endorsed by Queensland Law Society.

Source: Queensland Law Society, Electronic Funds Transfers — Guidelines for trust account operations, Version 8, July 2025.

WHERE THIS CAME FROM

This guide is part of the QLD Legal Finance resource library — practical material written for the people who run Queensland law practices, not for other accountants. If something here raises a question about your own firm, write to **enquiries@qldlf.com.au** or call **07 3261 2833**. A director will answer personally.

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