

# Grant Probity Policy

## Purpose

This policy outlines Financial Counselling Industry Fund (FCIF)'s commitment to probity in all aspects of the grant cycle, including application, assessment and ongoing grant management. It establishes guidelines for ethical behaviour in grant-related activities.

## Scope

This policy applies to all employees, contractors, advisers, board members, and any individuals or entities involved in FCIF grant processes. The conflicts of interest obligations also extend to applicants and grantees.

## Principles of probity

FCIF adheres to and recognises the importance of the following principles to uphold probity:

- **Transparency:** Ensuring open and clear decision-making processes.
- **Accountability:** Holding individuals responsible for their actions and decisions.
- **Fairness:** Treating all applicants equitably based on established criteria & without bias.
- **Integrity:** Conducting grant processes with honesty and ethical behaviour.
- **Confidentiality:** Protecting sensitive and personal information.

## Equal access to information

To ensure transparency and fairness, it is essential that all applicants have access to the same information.

FCIF ensures equal access to information by maintaining publicly available decision-making processes in our Grant Guidelines, Grant Strategy and on our website. We also undertake to ensure applicants have equal access to grant round information by providing consistent answers to any applicant queries (whether via webinars, email, or other means) and publishing and updating those consistent answers online via information pages and FAQs. FCIF encourages applicants to submit questions about any open application processes in writing, as far as practical.

## Fair decision making

Our grant decision making processes are guided by our probity principles. Accountability is upheld by requiring individuals involved in the assessment and evaluation of applications to be guided solely by the established criteria and processes set out in the respective Grant Guidelines.

Integrity is at the core of our grant decision-making process, with all decisions made ethically, honestly, and in the fulfilment of our mission to support financially vulnerable people.

## Conflicts of interest

FCIF recognises that conflicts of interest - including actual, perceived or potential conflicts - are important and relevant considerations. We take all conflicts of interest seriously and are committed to identifying, declaring, and managing them appropriately.

All individuals covered by this policy must promptly declare any actual, perceived or potential conflicts of interest. FCIF will maintain a register of declared conflicts and actions taken to address them.

A conflict of interest arises when personal interests interfere with professional obligations. Conflicts of interest include, but are not limited to:

- Holding a financial interest in the grant applications.
- Having immediate relatives or close friends with a financial interest in the grant applications.
- Possessing personal bias that could affect decisions regarding the grant applications.
- Having a personal obligation, allegiance or loyalty that could in any way affect decisions regarding the grant applications.

Action taken to address a declared conflict may include:

- Transparently recording the declaration in the conflicts register.
- Recusing the person from providing advice on a grant application or participating in a decision to award funds.
- Assigning a different staff member to manage a grant.

In exceptional circumstances, where a conflict of interest is very significant, it may be necessary for the individual to cease engagement with the FCIF grant program.

The FCIF Board must be advised of all declared conflicts declared under this policy and the actions taken to address the declared conflict.

## Documentation and record keeping

FCIF ensures that all grant-related records, including applications, assessments, and decisions, are securely maintained for a minimum of five years. These records will be stored within FCIF's grant making software platform and our secure operational software.

FCIF safeguards confidentiality by ensuring that applicant details and deliberations remain secure and only accessible to individuals involved in the decision-making process in line with our privacy policy.

FCIF has also established a Grant Program Probity Register to records actions taken, in addition to those stated in this policy, to meet its commitment to maintaining high probity standards.

All documentation will be readily accessible for internal and external audits, supporting compliance with governance and probity requirements.

## Reporting and investigation

Employees and stakeholders are encouraged to report any suspected probity breaches to the Probity Officer via email at [raymonda.dijkwel@fcif.org.au](mailto:raymonda.dijkwel@fcif.org.au).

All concerns will be handled with fairness and discretion. If a report is not resolved satisfactorily, it will be escalated to the FCIF Board for further review. Investigations will be conducted impartially, and appropriate action will be taken if a breach is confirmed.

## Confidentiality and Intellectual Property

We recognise that grant applicants may share new ideas, particularly during an Innovation grants round, that may comprise their Intellectual Property. FCIF may disclose information about applications to other parties, including our Expert Advisory Panel, for assessment and reporting purposes in line with our probity commitment. Our Panellists views any such information subject to a non-disclosure agreement with FCIF.

## Whistleblower hotline

FCIF offers a Whistleblower hotline to provide a safe and confidential process for reporting concerns about unethical behaviour, illegal activities, or breaches of our policies. FCIF encourages employees, contractors, and stakeholders to report any issues without fear of retaliation.

Run by Dual Australia, this service is completely anonymous and confidential: employees, contractors, and stakeholders can report suspected or actual fraudulent behaviour, 24 hours a day, 365 days a year by calling 1800 857 876. All reports will be investigated promptly and thoroughly, with appropriate actions taken to address any misconduct.

We are committed to maintaining the highest standards of integrity and transparency, and safeguarding those who come forward.