Grant Probity Policy

Purpose

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

Scope

This policy applies to all employees, contractors, advisers, board members, and other individuals or entities involved in FCIF grant processes. The probity principles also extend to grant applicants and grant recipients.

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 and without bias.*
- ***Integrity***: *Conducting grant processes honestly and ethically.*
- ***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 publishing its decision-making processes in the applicable Grant Guidelines, Grant Strategy and on its website. FCIF will provide consistent responses to applicant questions, whether received through webinars, email or other channels, and will publish and update relevant information and frequently asked questions online. Applicants are encouraged to submit questions about open application processes in writing.

Fair decision making

FCIF's grant decision making processes are guided by the principles in this policy. Individuals involved in the assessment and evaluation of applications must apply only the eligibility requirements, assessment criteria and processes set out in the applicable Grant Guidelines. All decisions must be made ethically, honestly, and consistently with FCIF's mission to support financially vulnerable people.

Conflicts of interest

FCIF recognises that actual, perceived or potential conflicts of interest are important probity considerations. FCIF 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 conflict of interest. FCIF will maintain a register of declared conflicts and actions taken to address them. A conflict of interest arises when personal interests could improperly interfere, or be perceived to influence, professional obligations. Conflicts of interest may include, but are not limited to:

- Holding a financial interest in an applicant or grant application.
- Having an immediate relative or close friend with a financial interest in an applicant or grant application.
- Having a personal bias that could affect a grant-related assessment or decision.
- Having a personal obligation, allegiance or loyalty that could affect a grant-related assessment or decision.

Action to manage a declared conflict may include:

- Recording the declaration and agreed management action in the Grant Program Probity Register.
- Restricting or recusing the person from advising on, assessing or deciding on a grant application or award funds.
- Assigning a different staff member to manage a grant.

In exceptional circumstances, where a conflict of interest is significant, it may be necessary for the individual to cease involvement in the relevant FCIF grant process or program.

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

Documentation and record keeping

FCIF ensures that all grant-related records, including applications, assessments, and decisions, are securely retained for at least five years or for any longer period required by law. Records will be stored within FCIF's grant making software platform and our secure operational systems. FCIF safeguards confidentiality by ensuring that applicant details and deliberations remain secure and only accessible to authorised individuals who require access for assessment, decision-making, administration or audit purposes, in line with our privacy policy. FCIF will maintain a Grant Program Probity Register to record 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.

Confidentiality and Intellectual Property

FCIF recognises that grant applicants may disclose ideas, methods and other material that may comprise their Intellectual Property. Where necessary, FCIF may disclose application information to other parties, including members of an Expert Advisory Panel, for assessment, decision-making, administration, or reporting. Recipients of the information must protect the information in accordance with applicable confidentiality obligations, including a non-disclosure agreement with FCIF.

Grant applicants and grant recipients

Applicants and recipient of grants must act with integrity and transparently throughout all grant-related processes and activities, consistent with the probity principles of this policy. They must provide accurate and complete information, appropriately acknowledge and lawfully use the work of others, protect confidential information, and promptly disclose any actual, perceived or potential conflicts of interest.

Applicants and recipients of grants must cooperate with reasonable requests for information and comply with applicable Grant Guidelines, grant agreements and FCIF policies.

FCIF may investigate suspected probity breaches and take appropriate action, including finding an application ineligible, withholding or recovering funding, terminating a grant agreement, or considering the breach in future funding considerations.

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.

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.

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 857 376. 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, transparency and safeguarding those who come forward.

Compliance and review

This policy will be reviewed regularly to ensure alignment with best practices and regulatory requirements. Non-compliance with this policy may result in disciplinary action, including termination of employment, agreements or contracts.

Version No	Date	Comments/changes
1.0	26 May 2025	Initial policy
2.0	26 October 2026	Review and 'Grant applicants and grant recipients' paragraph added