

## GRANT GIVING POLICY

Policy No.	C98	Adoption Date:	Council Meeting 19 March 2025
Directorate:	Future Communities	Department:	Community, Customer & Visitor
Revision Date:	March 2029		
<b>GOOD GOVERNANCE FRAMEWORK – OVERARCHING PRINCIPLES</b>			
Supporting Pillar:	Pillar 1. Direction & Leadership Pillar 3. Decision Making Pillar 4. Structure, Systems & Policies		
Link to Pillar:	Establish good processes and delegations to ensure decisions consider local community and broader municipal interests, are consistent		

### 1. PURPOSE

- 1.1. The purpose of the *Grant Giving Policy (C98)* (the Policy) is to provide a framework to guide the fair, transparent and effective administration of Council's Grant Giving Program(s).
- 1.2. This Policy has been developed to support the Council to comply with its Good Governance Framework.

### 2. SCOPE

- 2.1. The scope of this Policy applies to:
  - 2.1.1. The administration, management and review of Grant Giving Program(s) delivered by Council. These programs include but are not limited to, South Gippsland Community Grants Program.
  - 2.1.2. Any one-off or ongoing Grant Giving Program(s) that Council creates to respond to community need at the time.
- 2.2. The scope of this Policy does not apply to:
  - 2.2.1. Sponsorship, donation or funding allocation.
  - 2.2.2. Financial assistance requests made to Council that are of an emergent or extraordinary nature and that do not fall within any criteria set as part of any Council Grant Giving Program.

### **3. POLICY PRINCIPLES**

#### **Background**

- 3.1. This Policy outlines the requirements for distribution of grant funds through any and all South Gippsland Shire Council Grant Giving Programs in accordance with the *Local Government Act 2020*.
- 3.2. Council has a number of Grant Programs; i.e. South Gippsland Community Grants Program
- 3.3. The Policy is established to foster a culture of responsible and impactful grant giving and management.

#### **Guidelines for Grant Giving Programs**

- 3.4. All Council Grant Giving Programs will establish Grant Giving Guidelines prior to making a Grant Giving Program publicly available. Grant Giving Guidelines will provide prospective applicants with the information required to make an eligible application.
- 3.5. *Grant Giving Program Guidelines* will include as a minimum:
  - 3.5.1. Eligibility, application and assessment criteria.
  - 3.5.2. Funding agreement and acquittal requirements.

#### **Eligibility**

- 3.6. All Grant Giving Programs will establish specific eligibility criteria that clearly outline a prospective applicants eligibility to make application to a grant giving program.
- 3.7. The following groups or activities will not be considered eligible to make application to Grant Giving Program funding:
  - 3.7.1. Individual persons.
  - 3.7.2. Political parties or associated lobby groups.
  - 3.7.3. Fundraising activities.
  - 3.7.4. Activities that exclude community members based on faith, gender, sexuality, ability or political belief.

#### **Application**

- 3.8. All Grant Giving Programs will establish specific application processes that clearly outline how an application can be received and what information is required to complete an application.
- 3.9. Council utilises an online Grant Program (i.e SmartyGrants) to standardise how it receives Grant applications, and will provide alternative options for application if an applicant can demonstrate a barrier to access.
- 3.10. All application processes will include the following criteria:
  - 3.10.1. Complete responses must be provided to all questions on the application form.
  - 3.10.2. Applications not submitted by the closing date (if applicable) will not be considered.

- 3.10.3. Applications must include all supporting documentation, where required, as per the guidelines.

### **Assessment**

- 3.11. All Grant Giving Programs will establish specific criteria to be used to assess each application against, to determine suitability for funding.
- 3.12. All Grant Giving programs will establish an appropriate assessment panel to make recommendations on successful and unsuccessful applications.
- 3.13. The constitution of an Assessment Panel will be clearly outlined in the relevant Grant Giving Program guidelines.
- 3.14. Councillors are not eligible to act as assessors on assessment panels for Council Grant Giving Programs.
- 3.15. The appropriate person/panel, will individually score eligible applications received, based on established selection criteria for the specific Grant Giving Program.

### **Approval**

- 3.16. All Grant Giving Programs will establish approval designations prior to making a Grant Giving Program publicly available.
- 3.17. Applications will be ranked by the appropriately constituted assessment person/panel and presented as recommendations to Council or its delegated officer for decisions regarding the distribution of grants funding.
- 3.18. Decisions regarding the allocation or non-allocation of funding made by Council or its delegated officer are considered final.
- 3.19. Council reserves the right to part-fund an application.

### **Funding Agreements and Acquittal**

- 3.20. All Grant Giving Programs will establish funding agreement documentation and acquittal processes prior to making a Grant Giving Program publicly available.
- 3.21. Funding Agreements will include the following as a minimum:
- 3.21.1. Funding must be expended within twelve months of when the funds were granted (unless otherwise stated and agreed to in the Agreement) or the funds must be refunded to Council.
  - 3.21.2. An extension may be sought before the 12 months has expired, by writing to Council.
  - 3.21.3. Monies received must only be spent on the project as approved by Council. To vary the purpose for the allocated grant funds, written permission must be obtained in writing from Council prior to spending the funds. Any unspent funds must be returned to Council.
  - 3.21.4. Failure to abide by the grant conditions could impact an organisation's chances of receiving further funds from Council.
  - 3.21.5. At completion of the project, the grant recipient must submit a Grant Acquittal Report with all required accompanying documents.

### **Evaluating Outcomes**

3.22. All Council Grant Giving Programs will establish a process for evaluating the effectiveness of a grant giving program.

3.23. Evaluation will require both qualitative and quantitative data responses.

### **Conflict of Interest**

3.24. All Responsible Officers involved in any Council Grant Giving Program are required to declare any interest prior to administering or assessing any applications.

3.25. All Councillors involved in a grant giving program are required to declare their interests prior any discussion of or voting process on any grant giving program recommendations.

3.26. Any external to Council participants in an assessment panel must declare their interests prior to assessing any applications.

3.27. In the event of a conflict of interest being declared the relevant person must decline to participate in any discussion or decision-making process and have the declaration noted as part of Council's conflict of interest process. This ensures and direct, indirect or a perceived conflict is promptly identified and managed appropriately.

### **Documentation and Communication**

3.28. Establish clear and effective communication channels between stakeholders and Council to facilitate better understanding and collaboration on Grant Giving Programs.

3.29. Foster a culture of continuous improvement and encourage learnings.

3.30. Grant programs will be widely advertised as per Council's *Community Engagement Policy (C06)*.

3.31. Applicants will be able to see the status of their application through Council's online grants portal (SmartyGrants).

3.32. Implement measures to ensure personal and sensitive data associated with grant application are securely stored and only used for the primary or secondary purpose.

3.33. All Council employees are responsible for creating, managing and maintaining complete and accurate records as per the *Corporate Information Management Policy (C49)*

### **Training (Staff and Councillors - Fraud Training)**

3.34. Ensure Council Staff and Councillors who administer, assess and approve financial distribution of funds under this Policy have completed Fraud Training.

#### 4. RISK ASSESSMENT

**This Policy mitigates Council's risks as described below.**

##### **People**

- 4.1. This Policy aims to provide fair, transparent and effective administration of Council Grant Giving Program/s.

##### **Reputational**

- 4.2. This Policy provides Council with a framework to manage Grant Giving Program/s through an open, transparent and consistent approach to decision making.

##### **Financial**

- 4.3. This Policy mitigates the risk of inconsistent financial allocation of Council Grant Giving Program funding.
- 4.4. This Policy mitigates the risk associated with Council grant giving activities to minimise potential negative impacts and fraudulent activities.

#### 5. IMPLEMENTATION STATEMENT

##### **Human Rights Charter**

- 5.1. This Policy has considered the Charter of Human Rights and Responsibilities Act 2006.

##### **Gender Equality**

- 5.2. This Policy has considered the *Gender Equality Act 2020* in its development.

#### 6. MONITORING, EVALUATION AND REVIEW

- 6.1. This Policy will be reviewed and adopted by Council on a four-year cycle.

#### 7. REFERENCE DOCUMENTS

Legislative Provisions	Charter of Human Rights and Responsibility Act 2006 Freedom of Information Act 1982 Gender Equity Act 2020 Local Government Act 2020 Privacy and Data Protection Act 2014
Council Supporting Documents	Community Vision 2040 Community Engagement Policy (C06) Complaint Handling Policy (CE73) Council Plan 2022-2026 Councillor Code of Conduct Policy (C14) Employee Code of Conduct (CE20) Fraud and Corrupt Conduct Policy (C19) Procurement Policy (C32) Risk Management Framework (C35) Risk Management Policy (C35) South Gippsland Community Grants Program Guidelines
Related External Documents	VAGO Report – Fraud Control over Local Government Grants – May 2022

#### 8. DEFINITIONS

Acquittal	Information provided by a grant recipient that ensures that funds have been administered responsibly and in line with conditions of the grant program.
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Applicant	Individual or organisation submitting a grant application.
Community Group(s)	A legal entity who provide services, support or activities to the South Gippsland Shire community.
Delegated Authority:	This is the Officer (usually Director or CEO) who has been delegated the responsibility to approve grants by Council resolution.
Delegate	Means a Council officer(s) designated by the CEO to administer a grant process.
Donation	A voluntary financial contribution made by Council without the expectation of receiving compensation or benefits in return with no reporting requirements.
Funding agreement	An agreement between the grant recipient and Council that documents the agreed objectives of the funded project/activity and the reporting and accountability requirements of the grant.
Grant	Any assistance by way of a sum of money provided to Council by a funding organisation on the condition that the assistance is used for a specified purpose as outlined in a successfully submitted grant application and/or committed to through a funding agreement to achieve agreed objectives through milestone reporting.
Grant-giving (and Grant Making):	The process by which Council distributes grants.
Letter of agreement:	A legal document setting out the terms and conditions, milestones acquittal requirements and consequences of non-compliance that govern the administration of funds by Council, determined by the funding organisation. Sometimes referred to as Funding Agreement.
Material change / exception	Any decision or action that would change the purpose, scope or delivery of a grant or grant program. For example, an action, amendment or exception to existing rules that would be likely to change an assessor's view of an application.
Non-material change / exception	Minor administrative alterations, improvements to program process, or corrections, actions, amendments, or exception to existing rules that would not be likely to change an assessor's view of an application.
Organisation	A group, business or other legally structured body that consists of a group of individuals acting as one applicant.
Program	The set of categories and guidelines developed by any Council department tasked with grant-giving for a specific purpose.
Recipient	Applicant who has been approved for a grant by Council.
Sponsorship	A form of partnership where Council provides financial support to an individual, event or business in exchange for promotions benefits or other agreed purposes.
SmartyGrants	Web based Grant Application and Administration Program
Variation	The process to change the deliverables/scope of a project, service or program funded by a grant that must be agreed by both parties.

## 9. REVISION HISTORY

Approved By	Approval Date	Sections Modified	CM9 Ref#
Council Meeting	19 March 2025	New Policy	D2581724