



Financial Policy Framework 2024

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1. Financial Reporting

1. Procurement

Purposes

- 1) The purpose of this policy is:
 - a) to ensure that all purchases of the association are made in an accountable manner and appropriately authorised manner.
 - b) to ensure that ethical behaviours such as honesty, integrity, diligence, fairness, trust, respect and consistency are adhered to. This protects the integrity of each procurement process being undertaken by the association, promotes members' confidence and manages potential risks, perceived or otherwise, to the association.

Principles

- 2) Association purchasing activities shall seek value for money.
 - a) Association purchasing shall be conducted in a manner that encourages competition amongst suppliers, generating opportunities to achieve the best outcome for the student body.
 - b) Association funds must be used solely for the purposes of the association in an efficient, effective and ethical manner.
 - c) Association purchasing activities shall be undertaken in accordance with the principles of accountability and transparency.
 - d) Procurement activities should be done in line with the ethics that the student body expects of its student union. Procurement activities should encourage positive environmental outcomes through the promotion of environmental standards, energy efficiency, re-use, recycling, disposal practices and natural resource conservation.
 - e) Association procurement shall be conducted in accordance with the principles outlined in the below procedure, with particular attention paid to the requirements associated with various procurement thresholds.
 - f) For the avoidance of doubt, employment decisions are not subject to this policy.
 - g) Procurements should provide long-term value to the Association wherever possible.
 - i) This section applies exclusively to procurements on behalf of the Association as a whole, and not procurements on behalf of departments, committees, or other sub-units of the Association.
 - ii) Merchandise purchasers should procure designs that will not rapidly date wherever possible. All merchandise purchases made on behalf of ANUSA must promote the Association and items should be identifiable as being produced by ANUSA, unless doing so would defeat the purpose of the procurement.

Procurement Thresholds

- 3) All procurements must be conducted according to the requirements in the threshold table appended to this policy.
- 4) Association procurement requirements are dependent on the value of the goods and services being sought.
 - a) Thresholds apply to the value of individual goods and services, not to the value of single transactions. A contract shall be treated as a procurement at the threshold of the total cost over its full term.
 - b) A procurement must not be divided or split into separate parts to avoid a procurement threshold.
- 5) All thresholds in this policy are subject to the Purchases Policy
- 6) A purchaser may conduct a procurement according to the requirements of a higher value procurement threshold.
- 7) A procurement exercise is valid for the term of the contract (including extensions entered into in contract variations).
 - a) Any further procurement undertaken following expiration of a term of a contract must be conducted with reference to the Procurement Policy.
- 8) All procurements that require approval by a decision of the Executive must be disclosed at the next General meeting of the Association by the ANUSA Treasurer.

Conflicts of Interest

- 9) Procurements must be done with a view towards minimising conflicts of interest.
 - a) Staff, representatives and volunteers involved in association purchasing activities must disclose any actual or perceived conflict of interest arising from the purchasing activity.
 - b) Particular caution should be exercised if the Association is considering purchasing goods and/or services from suppliers who:
 - i) are current employees or office bearers of the association;
 - ii) are past employees or office bearers of the association;
 - iii) have a personal relationship with any of the employees, volunteers or representatives involved in the procurement process.
 - c) Where an actual or perceived conflict of interest has been identified, such a conflict shall be actively managed by the board or involvement prohibited.
 - d) The Association and its staff, representatives and volunteers must not seek to benefit from supplier practices that may be dishonest, unethical or unsafe.
 - e) Staff, representatives and volunteers must avoid all situations that could give rise to a conflict of interest, either real or perceived.

Appendix 1: Threshold Table

Threshold	Requirement 1	Requirement 2	Requirement 3	Requirement 4
<\$2000	Purchaser must source the best option, with a view to value for money and quality. Purchases must comply with the constitutional requirement that formal approval be	--	--	--
\$2000 – 4999		Purchaser must source at least two quotes for the procurement.	--	--
\$5000 – 100,000			The procurement must be approved by a decision of the Executive.	The Executive must consider competitor quotes or other evidence to satisfy themselves that the procurement is the best value option available.
>\$100,000	given by two of either the President, Vice President, or Treasurer beforehand.	--	The procurement must be approved by the SRC.	The SRC must consider competitor quotes or other evidence to satisfy themselves that the procurement is the best value option available.
Notes:		<i>Requirements in this column may be waived or reduced by a decision of the trustees, recorded alongside a usual approval decision. The trustees will notify the Executive of any such approvals at the next Executive meeting. The trustees may only waive or reduce these requirements if compliance would be unreasonably difficult or would be commercially unviable.</i>	<i>Requirements in this column for decisions by the SRC or Executive may be fulfilled by votes conducted over email or other non-synchronous means. Meeting notice requirements do not apply, however for non-synchronous votes, the SRC must be given at least two days to vote.</i>	

2. Accounts Receivable

Purpose

To ensure that all accounts receivables are received in a timely manner and deposited, recorded, and reconciled.

Principles

To manage its resources effectively and efficiently the associations must ensure that all monies owed are paid within a reasonable timeframe. Standard association payment terms are 14 days. Any variation must be approved by a decision of the Executive.

Effective debt management requires early and sustained action on debts at risk of becoming non-recoverable.

Policy

Debt management shall be undertaken by the Finance Officer in conjunction with the Treasurer, subject to advice and information provided by the representative(s)/staff responsible for the debt.

If payment is not received within the approved timeframe, the following procedure shall apply:

1. Issue reminder notices at 14-day intervals to supplier
2. After 2 notices, follow up with phone call.
3. After further 7 days, ask Legal Officer to prepare a letter of demand.

4. If payment still not received, send to Executive to add as an agenda item to next meeting. Executive to decide whether to take legal action or write off, any decision must be publicly recorded.

Only by a decision of the Executive may the non-recovery of a debt be approved and then only under any of the following conditions:

- a) the Executive is satisfied that the debt is not legally recoverable, or
- b) the Executive considers that it is not economical to pursue recovery of the debt, or
- c) recovery of the debt would cause undue financial hardship to the debtor.

3. Cash Management

Purpose

This policy is to be followed when handling cash for ticketed events, selling merchandise, selling products or any other time an Association will be counting and banking cash.

Principle

This process must be followed every time, if the process is not followed and cash is handled/managed differently then the Association could be exposed to theft or fraud. It is the duty of the representative responsible for the event as which cash is handled to ensure adherence to this policy.

Policy

The process for managing cash is:

- 1) Any cash collected must be counted at the end of the day or after the event is over.
- 2) One person must count and record the cash, and another person must observe this process.
- 3) The person counting the cash must fill in a bank deposit slip and sign/date the slip
- 4) A third person, who is always a bank signatory, must take the bank deposit slip to the nearest bank depository.

4. Financial Hanover

Purpose

This policy sets out the requirements and process, which must be followed when an outgoing Treasurer is handing over to their replacement.

Principles

This process aims to ensure the incoming officer are aware of their responsibilities, are compliant with the relevant accounting standards/laws and there is less confusion around the Associations finances.

Policy

The incoming Treasurer must be briefed on;

- a) Shown and helped through completing Commbiz access forms and changing bank signatory forms
- b) Access to financial management software used by the Association such as Xero

- c) The ANU EBA and any other relevant employment contracts
- d) SSAF agreement between the Association and the University
- e) The current financial year budget and how the budget was prepared
- f) Ensure all financial review committee policies are read

Remuneration for the outgoing officers can be docked or withheld if the new officers are not properly briefed in the financial handover policies set out in this policy.

5. Fraud Management

Purpose

The purpose of this policy is

1. To ensure that all parties are aware of their responsibilities for identifying exposures to fraudulent activities and for establishing controls and procedures for preventing such fraudulent activity and/or detecting such fraudulent activity when it occurs.
2. To provide guidance to staff/volunteers/contractors as to action which should be taken where they suspect any fraudulent activity.
3. To provide a clear statement to staff/volunteers/contractors forbidding any illegal activity, including fraud for the benefit of the organisation.
4. To provide assurance that any and all suspected fraudulent activity will be fully investigated.

Policy

ANUSA will not tolerate fraud in any aspect of its operations. ANUSA will investigate any suspected acts of fraud, misappropriation, or other similar irregularity. An objective and impartial investigation, as deemed necessary, will be conducted regardless of the position, title, length of service or relationship with the organisation of any party who might be the subject of such investigation. Any fraud shall constitute grounds for dismissal. Any serious case of fraud, whether suspected or proven, shall be reported to the police. Any person reporting a fraud, or a suspected fraud, shall suffer no penalty in their employment from the disclosure.

Procedure

The ANUSA Executive has ultimate responsibility for the prevention and detection of fraud and is responsible for ensuring that appropriate and effective internal control systems are in place. All directors are responsible for investigating instances of fraud reported to them.

All employees, representatives and volunteers must ensure that there are mechanisms in place within their area of control to:

- Assess the risk of fraud;
- Educate employees about fraud prevention and detection and;

- Facilitate the reporting of suspected fraudulent activities.

Representatives should be familiar with the types of improprieties that might occur within their area of responsibility and be alert for any indications of such conduct.

All staff/representatives/volunteers share in the responsibility for the prevention and detection of fraud in their areas of responsibility. All staff/representatives/volunteers have the responsibility to report suspected fraud. Any staff member, representative or volunteer who suspects fraudulent activity must immediately notify their supervisor or those responsible for investigations. In situations where the supervisor is suspected of involvement in the fraudulent activity, the matter should be notified to the next highest level of supervision or to the Operations Manager.

Processes

- Fraud prevention accounting procedures shall be incorporated in the organisation's Purchases and Financial Reporting policies.
- Fraud prevention procedures shall be incorporated into the induction of staff members, representatives and volunteers.
- All complaints of suspected fraudulent behaviour must be reported to the Executive. Upon notification or discovery of a suspected fraud, the Executive must promptly arrange to investigate the fraud. Every effort shall be made to keep the investigation confidential, subject to constitutional and legal requirements. In addition, from time to time other staff members/representatives/volunteers will need to be consulted in conjunction with the investigation. After an initial review and a determination that the suspected fraud warrants additional investigation, the Executive shall coordinate the investigation with the appropriate law enforcement officials. In addition, any allegations will be reported immediately to the Pro-Vice Chancellor (Student Experience). Internal or external legal representatives will be involved in the process, as deemed appropriate. Once a suspected fraud is reported, immediate action will be taken to prevent the theft, alteration, or destruction of relevant records needs to occur. Such actions include, but are not necessarily limited to, removing the records, and placing them in a secure location, limiting access to the location where the records currently exist, and preventing the individual suspected of committing the fraud from having access to the records.

Where a prima facie case of fraud has been established the matter shall be referred to police. Any action taken by police shall be pursued independent of any employment-related investigation by the organisation. If a suspicion of fraud is substantiated by the investigation, disciplinary action, up to and including dismissal, shall be taken.

The organisation will also pursue every reasonable effort, including court ordered restitution, to obtain recovery of the losses from the offender. No employee, volunteer

or representative of the organisation, or person acting on behalf of the organisation in attempting to comply with this policy shall be:

- dismissed or threatened to be dismissed.
- disciplined or suspended or threatened to be disciplined or suspended.
- penalised or any other retribution imposed.
- be intimidated or coerced; based to any extent upon the fact that the employee has reported an incident or participated in an investigation in accordance with the requirements of this Policy.

Violation of this section of the Policy will result in disciplinary action, up to and including dismissal. If an allegation is made in good faith, but it is not confirmed by the investigation, no action will be taken against the originator.

6. Gifts

Purpose

The purpose of this policy is to provide guidelines to all student representatives and staff members when receiving gifts. It is also used to specify when the provision of entertainment and hospitality is appropriate, and the level of accountability for these activities. This policy applies to all elected representatives and paid staff.

Principles

In the interest of professional integrity, employees and representatives should discourage the receipt of any gift or benefit in connection with the performance of their duties. If an individual is presented with a gift or benefit in connection with the performance of their duties in an official capacity, such gifts belong to ANUSA.

Procedure

- These gifts or benefits must be declared to their supervisor, or where the recipient is a member of the executive committee, another executive member. If the value of the gift is equal to or less than \$50 AUD and the gift has no obvious inscription/indication that it is a presentation to the organisation, the supervisor/fellow executive may re-gift the gift to the recipient, but the maximum allowable annual value of such re-gifting must not exceed \$200.
- A written record, in the form of a gift register, must be kept of the declaration and whether the gift was re-gifted to the recipient. Gifts and gratuities include any of the following:
 - i. Money in cash or kind.
 - ii. Merchandise.
 - iii. Special personal discounts.
 - iv. Any item or benefit providing personal gain or gratification or which could be seen to compromise either the employee, a representative or the organisation.

This policy does not prevent an employee or representative accepting an invitation to an artistic, social, sporting, or cultural function provided it does not include paid travel

and/or accommodation. Such invitations include tickets or press passes issued to representatives for the purpose of publishing reviews. Invitations must also be recorded in the gift register.

The provision of entertainment, hospitality and gifts to/for employees and representatives to further organisational objectives is a legitimate professional activity. As a student funded body, however, standards of accountability must be maintained. Expenditure on entertainment and hospitality must be:

- i. in the furtherance of the organisation's interests.
- ii. properly documented.
- iii. available for scrutiny by both internal and external audit.

For any expenditure on entertainment, hospitality, and gifts outside of general meeting catering (defined as catering for any staff meeting, CRC, SRC, AGM, OGM or SGM) or catering otherwise exempted by this policy, formal approval must be obtained in writing prior to the event from the President of the association. Expenditure of this nature must also be of a reasonable nature.

7. Debit Card Purchases

Purpose

A Debit Card of the associations nominated bank may be issued to one or more of the President, Vice President, or Treasurer ('cardholders') as trustees of the association, to be used for the payment of association expenses or purchases allowed under the conditions of this policy. Before making any purchases, the cardholders should refer to the procurement policy.

Procedure

All purchases must have formal written approval by two of either the President, Vice President or Treasurer beforehand.

- i. If the approval is via emails, the email trail must be attached to the expense form (see table below)
- ii. A completed Expense Form with tax invoices and email trail attached must be sent to the Financial Controller within 3 business days of the transaction.
- iii. The Financial Controller is responsible for entering the payment in Xero (accounting software)
- iv. At least two electronic account authorities review the transaction and sign the expense form, if there are any inconsistency the payment will not be approved/processed until all issues are addressed.

Excluded Expenditure

The debit card cannot be used for the following under any circumstances:

- a) the purchase of firearms, fireworks, pornography or tobacco products;
- b) cash withdrawals or the purchase of bank cheques, traveller's cheques or foreign currency;
- c) personal expenditure.
- d) the payment of fines, payroll, reimbursement, or grants

Account Balance

The account linked to the debit card should not exceed a balance of \$1,000 unless there is an immanent payment to be made, in these cases:

- i. the account balance should be regularly monitored.
- ii. the account balance should be restored to below \$1,000 within 2 business days.

Other provisions

- I. Cardholders must ensure that their debit card is maintained in a secure manner to prevent loss, theft or misuse and that they do not store their full debit card number and expiry date anywhere.
- II. The Cardholder must immediately inform the Office Manager and the Finance Officer if the card is lost or stolen, or the Cardholder becomes aware of any unauthorised transaction on the card.
- III. The Cardholder must return the card to the Office Manager or the Finance Officer no later than ceasing to hold office for which the card was issued.
- IV. In the event of non-compliance with provisions related to the use of debit cards, a majority of the Executive may require the cardholder to surrender their debit card to the Office Administrator until such time as all missing receipts have been provided, or until a resolution is passed by the majority of the Executive to return the card to the cardholder.
- V. The Finance Officer may immediately take steps to suspend operation of the card and refer the matter to the Student Representative Council in any situation where the Finance Officer has concerns that the card has been misused.

8. Reserves & Investments

Purpose

The Association holds substantial reserves of funds. These funds are not SSAF funds and are derived from revenue pre-dating the advent of SSAF and grown through non-SSAF income since the introduction of SSAF.

Principles

1. ANUSA endeavours to use and invest its reserves in such a way that promotes the financial stability and sustainability of the Association, and thereby benefits members of the Association.
2. ANUSA shall structure investments to ensure that the Association at all times retains enough liquidity to meet financial obligations. The Association has a low appetite for a risk of insufficient liquidity.
3. ANUSA's risk appetite for investment of reserves is set out in the table below:

Investment type	Risk appetite
Financial products.	Low appetite for risk.
Investments in commercial activity by the Association or controlled entities likely to produce revenue and/or deliver direct benefit to students.	Medium appetite for risk.

4. ANUSA strives to make ethically conscious choices when choosing investments, including social and environmental considerations.
5. Investments should be reviewed regularly throughout the year to ensure they uphold the principles of this policy.

Procedure

The investment decisions of the Association are considered and approved by the Executive of the Association, subject to the policies, regulations, and constitution of the Association.

For the Executive to first consider an investment decision, the Treasurer shall prepare an Investment Decision Analysis (“IDA”) which shall contain the following.

- i. Summary of financial position of the Association at time of consideration
- ii. A market summary of the investment vehicle
- iii. Potential risk factors
- iv. An ethical investment statement, assessing the social and environmental impact of the decision.
- v. Other information necessary to satisfy the Executive.
- vi. A recommendation

Other provisions

- Investment decisions shall be publicly recorded in the minutes of the Executive, this includes reviews of currently held investments.
- An investment shall not be subject to the Procurement Policy but shall comply with all other applicable financial policies and procedures.
- The Treasurer shall provide an update on the status of all Investments at the AGM.

Appendix.

1. Financial Reporting

This serves as a summary of the different financial reporting obligations of the Association, there may be additional administrative reporting not captured.

External

Organisation	Name	Description
Australian Taxation Office	Buisness Activity Statement (BAS)	Record of GST paid/collected and PAYG withheld during period
	Instalment Activity Statement (IAS)	Record of PAYG withheld during period
	PAYG Summary Statement	Record of total wages and PAYG withheld during the financial year
ACT Office of Regulatory Services (ORS)	Annual Return	Lodgement of financial statements
Australian Charities and Not-for-profits Commission (ACNC)	Annual Information Statement (AIS)	Statement on operations and finances
Australian National University	Annual Student Services and Amenities Fee (SSAF) Report	Information on SSAF category spending, usage of services.
	Financial Statements	
	Quarterly SSAF Reports	

Constitutional Reporting Requirements

- Budget to be passed at the first general meeting of each year (s17(2))
- Financial statements to be presented at the Annual General Meeting (AGM)
- Report of SRC/CRC income and expenditure to be presented at each general meeting (s(8)(4)(i))
- Report of Grants and Affiliations Committee expenditure to be presented at each Student Representative Council (SRC) meeting (Grants and Affiliations Regulations 2.3.2) ● Provisional budget to be passed at the final general meeting of each year (s17(3)) ● Income and expenditure reports to be submitted by each ANUSA department by 30 November (s26(6))

