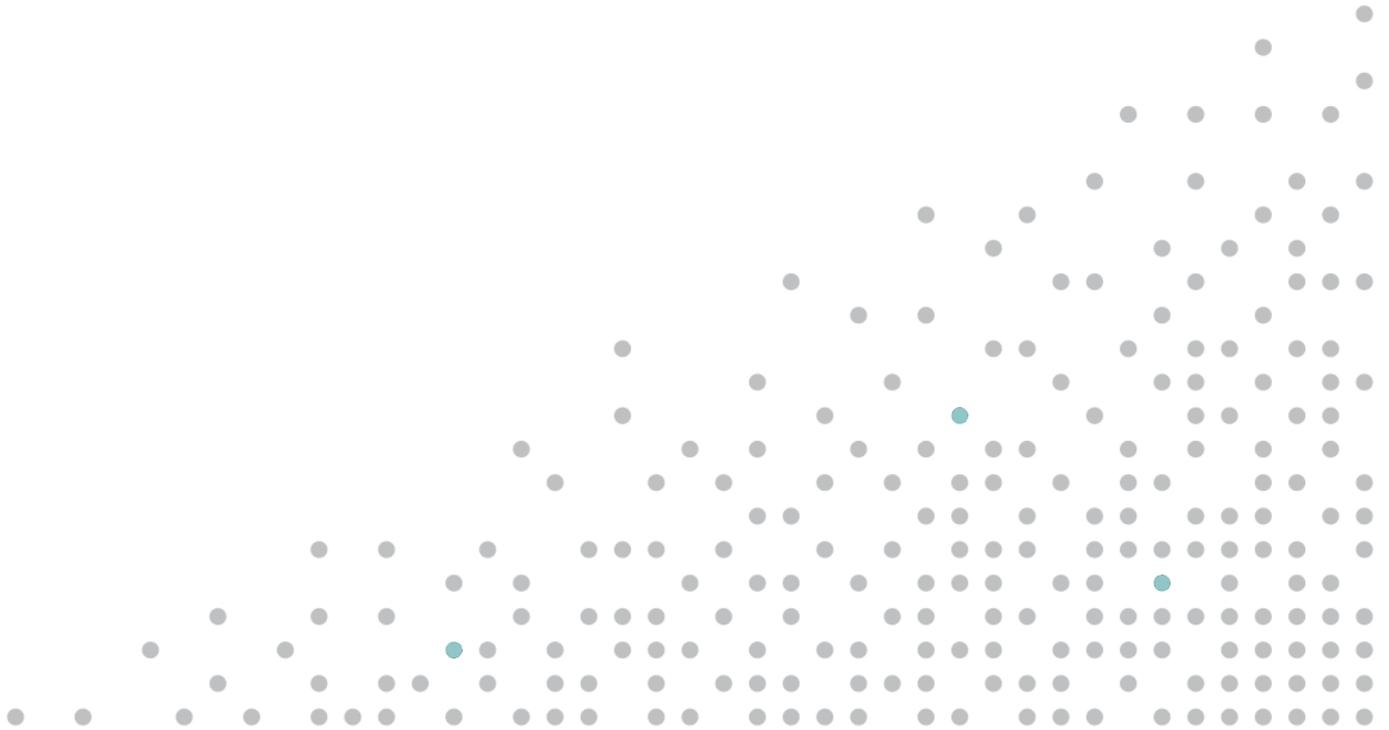




Australian Government
Department of Finance



Publishing and reporting Grants and GrantConnect

Resource Management Guide No. 421

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The words '**must**', '**required**', '**requires**' and '**requiring**' denote mandatory compliance by accountable authorities/officials. The use of the words 'could', 'may', 'encouraged' or 'consider' convey non-mandatory guidance. The guidance to which these words relate may or may not be applied by accountable authorities/officials in their approach to resource management, depending on the operating circumstances of the entity and its appetite for risk.

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Audience

This guide is relevant to:

- accountable authorities and officials involved in grants administration in all non-corporate Commonwealth entities (NCEs).
- accountable authorities in corporate Commonwealth entities (CCEs) where a Minister is involved in making “CCE grants”¹.

Key points

This guide sets out the requirements for the publication of grants on GrantConnect and outlines arrangements in relation to additional publication of grants information in other ways.

For NCEs this guide applies to grants defined under paragraph 2.3 of the *Commonwealth Grants Rules and Guidelines 2017* (CGRGs). It does not apply to grants that are excluded from the definition of a grant under paragraph 2.6 of the CGRGs.

For CCEs this guide applies to CCE grants where a Minister is involved in making the grants in accordance with Division 6A of the *Public Governance, Performance and Accountability Rule 2014* (PGPA Rule).

Resources

This guide is available on the Department of Finance website at <https://www.finance.gov.au>.

Other relevant publications include:

- CGRGs
- PGPA Rule
- Administration User Guides, available in GrantConnect
- RMG No. 411: *Grants, Procurements and Other Financial Arrangements*
- RMG No. 412: *Australian Government Grants – Briefing, Reporting, Evaluating and Election Commitments*.

Should you have any questions regarding this guide, please contact:
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¹ “CCE grant” as defined under section 4 of the PGPA Rule.

Introduction

1. Appropriate disclosure and reporting in grants administration are essential to ensure transparency and accountability. Reliable and timely information on grant opportunities and grants awarded helps to provide both the public and Parliament with confidence in the quality and integrity of grants administration.
2. GrantConnect is the Australian Government's whole-of-government grants information system, which centralises the publication and reporting of Commonwealth grants in accordance with the CGRGs and the PGPA Rule. It is available at www.grants.gov.au.
3. In accordance with the CGRGs and the PGPA Rule, this guide sets out the requirements for accountable authorities and officials involved in grants administration.
4. NCEs **must** publish on GrantConnect to meet the grant publishing requirements under the CGRGs.
5. CCEs **must** publish on GrantConnect to meet the grant publishing requirements under the PGPA Rule where the Minister is involved in the making of CCE grants.
6. GrantConnect is the authoritative source of information in relation to all forecast opportunities, grant opportunities, grant opportunity guidelines² and grants awarded.

Part 1 – Policy

1.1 Grant Opportunity Guidelines

7. Officials of NCEs must develop grant opportunity guidelines for all new grant opportunities and revised guidelines where significant changes have been made to grant opportunities. The CGRGs contain a number of requirements with regard to the development and publication of grant opportunity guidelines (see CGRGs paragraphs 4.4 and 5.2).
 - Where grant opportunity guidelines have been in place for a considerable time, officials should review the content and structure of the guidelines to ensure they are consistent with the relevant legislation and the CGRGs.
 - Officials should identify opportunities to appropriately accommodate one-off or ad hoc grants within the structure of a grant program. This will also assist with the requirement to have legal authority for these payments.
 - Finance should be consulted when planning for a significant one-off or ad hoc grant, or when officials are considering approving a number of one-off or ad hoc grants for similar purposes, whether in the same round or over a period of time. Whilst not a requirement, publishing the grant opportunity guidelines for one off or ad hoc grants on GrantConnect may improve transparency and accountability.
8. Officials of CCEs **must** develop written guidelines for CCE grants where the Minister is involved in the making of the grant. The PGPA Rule contains a number of requirements with regard to the development and publication of the grant guidelines (see subparagraphs 25B(2) and (4)).

² For this RMG, the terms “grant opportunity guidelines” (CGRGs) and “guidelines” (PGPA Rule) are interchangeable, unless otherwise specified. For further information, see Glossary of Terms

9. Officials may consider developing forecast opportunities prior to publishing grant opportunity guidelines. Forecast opportunities inform the public and grant applicants of possible future grant opportunities.
10. Finance has developed a whole-of-government grant opportunity guidelines template suite to assist officials. These templates are available from Finance at grants@finance.gov.au. There are three grant opportunity guidelines templates, targeting:
 - open competitive, open and closed and targeted processes
 - demand driven grants processes, and
 - one-off ad-hoc grants.
11. Officials of NCEs should ensure that grant opportunity guidelines align with the CGRGs principles, are simple, clear and effectively communicate key information to stakeholders. At a minimum, grant opportunity guidelines should provide potential grant applicants with adequate information to submit a grant application.
 - officials may consider testing the clarity of grant opportunity guidelines with government and non-government stakeholders prior to their release.
 - before grant opportunity guidelines are published, entities must ensure they have complied with any Australian Government processes for the approval of new or revised program guidelines.
12. Officials of CCEs should ensure that grant guidelines align with the PGPA Rule requirements. At a minimum, grant guidelines must include an explanation of the purposes, expected outcomes and objectives of the CCE grant; an outline of the application and assessment processes; and the entity's operation and governance arrangements in relation to the CCE grant.
13. The checklists at [Attachment A](#) and B contain further information and better practice guidance on information to include in guidelines to satisfy the CGRGs and PGPA Rule requirements.
14. Accountable authorities and officials **must** use GrantConnect to publish:
 - all Forecast Opportunities where these have been developed by NCEs.
 - for CGRGs grants:
 - all grant opportunities and grant opportunity guidelines (except where there is a specific policy reason not to publicise the grant opportunity guidelines; or grants are provided on a one-off or ad hoc basis).
 - any alterations and addenda to Grant Opportunities and grant opportunity guidelines³.
 - for CCE grants:
 - grant guidelines where the Minister is to be the decision maker (except where there is a specific policy reason not to publicise the grant guidelines; or grants are provided on a one-off or ad hoc basis).
 - any alterations and addenda to published grant guidelines.

³ Alterations and addenda include but are not limited to: corrections to currently published documents, changes to close times for applications, Questions and Answers (Q&A) documents and Frequently Asked Questions (FAQ) documents.

15. Accountable authorities and officials are encouraged to provide a link to GrantConnect on their website to indicate the transfer of grant advertisements to GrantConnect.
16. Accountable authorities and officials may use GrantConnect to publish:
 - one-off or ad hoc grant opportunity guidelines, and
 - a URL to an external online application web page relating to a relevant grant opportunity on GrantConnect.
17. Where accountable authorities and officials have used other mechanisms to notify potential applicants about grant opportunities, such as printed media, the content of the notification **must** be the same, or be a subset of the information published on GrantConnect. Where there are inconsistencies, GrantConnect is the authoritative source.

1.2 Web-based reporting on grants

18. The CGRGs and PGPA Rule contain a number of reporting requirements for grants (see section 5 of the CGRGs and 25F of the PGPA Rule).
19. An NCE **must** report, on GrantConnect, information on individual grants no later than 21 calendar days after the grant agreement for the grant takes effect (date of effect).
20. A CCE **must** report, on GrantConnect, information on individual grants no later than 21 calendar days after the CCE grant commenced where a Minister was involved in the making of the grant.
21. The approval date for reporting purposes is taken to be the date that the decision-maker (as listed in the Grant Opportunities Guidelines or guidelines) makes a decision to award a grant. For example, the relevant Minister may receive advice pursuant to paragraph 4.6 of the CGRGs, and then advise the entity of his/her decision of which grantees to approve, with a 'funding up to \$XX' amount.
22. Where there is a grant agreement, the start date for reporting purposes is generally taken to be the date the grant agreement is executed. However, if the grant agreement contains a specified date which occurs post-execution, in those instances, the start date for reporting purposes is taken to be the specified post-execution date.
23. Where there is no grant agreement, officials may decide and document why they have chosen a specific date of effect or start date. The date of effect can be the date of the first payment, the announcement of successful grantees or there may be a planned delayed start for grant projects to coincide with the commencement of the financial year. Whichever date of effect is decided and documented, this should be deemed as the start date for reporting and publishing purposes.
 - Officials should adopt a consistent approach for grants awarded in the same grant opportunity.
 - Where the nature of the grant means that a grant agreement is not required, then the 21 calendar days would apply from the relevant date of effect, for example, the date of the first invoice or payment.
24. In order to provide line of sight transparency for grants awarded, the grant opportunity identification number (GO ID) is required to be published as part of the grant award report. The exception to publishing a GO ID is where:
 - for a specific policy reason the Finance Minister has provided an exemption for the publication of the grant opportunity guidelines (NCEs);

- the CCE or Minister makes a decision not to publish the guidelines (PGPA Rule); or
 - grants are provided on a one-off or ad hoc basis.
25. Reporting on individual grants awarded includes reporting grant variations, where those variations involve additional payments of relevant money or significant extensions. Reportable variations include:
- material increases to the dollar value of a grant
 - extension of the grant activity into another financial year, or
 - change in organisation details.
26. When updating a Grant Award notification for variations it is better practice to link the GO ID where not previously reported.

1.3 Reporting on confidentiality provisions

27. There are generally two broad types of confidentiality related clauses used in grant agreements:
- general clauses referencing confidentiality requirements in legislation, such as under the *Privacy Act 1988*, or
 - special confidentiality provisions, which protect the confidentiality of: all or part of the grant agreement; or information obtained or generated in relation to the grant project.
28. The CGRGs and PGPA Rule provide that officials **must** identify whether a grant agreement contains confidentiality provisions. When entities publish information on individual grants awarded, as part of web-based reporting, they **must** include information identifying whether a grant agreement contains any confidentiality provisions and if so, provide the reasons why they are included. References to requirements in other legislation do not need to be reported. There is no threshold for reporting on confidentiality provisions contained in grant agreements.
29. For additional information on reporting on confidentiality provisions, officials can draw from information provided for procurement contracts at <http://www.finance.gov.au/procurement>.

1.4 Web-based reporting exemptions

30. Paragraphs 5.6 and 5.7 of the CGRGs and sub paragraph 25F (3) of the PGPA Rule outline exemptions to reporting grants information on GrantConnect.
31. Where officials assess that publishing grant information, in accordance with the CGRGs could adversely affect the achievement of government policy outcomes, the responsible Minister can seek an exemption from the Finance Minister. The responsible Minister **must** write to the Finance Minister detailing the rationale for the exemption. Officials should consult the Grants Policy Team (grants@finance.gov.au) prior to commencing this process.
32. For any decision to not publish grants information, a record of the reasons for that decision **must** be in writing for CCEs.

Part 2 – Roles and Responsibilities

33. Accountable authorities and officials are responsible for:
 - complying with the CGRGs and PGPA Rules where applicable
 - ensuring that the information they publish on GrantConnect is accurate at the time of reporting, and
 - complying with the Conditions of Use of the GrantConnect Memorandum of Arrangement.
34. The Department of Finance is responsible for:
 - the grants policy framework
 - the development and maintenance of the GrantConnect system, and
 - operational and technical support for the GrantConnect system.

Attachment A – Grant guidelines- Better practice checklist for grants for the purposes of the CGRGs

Grant opportunity guidelines should be a single reference point for all potential applicants. They should be clear, consistent and fit for purpose. To assist officials, the list below identifies the type of information that should generally be included in grant guidelines.

This checklist may assist officials to complete the grant opportunity guidelines templates.

Heading	Information guidelines should contain	✓ x
Objective	<ul style="list-style-type: none"> Are the purpose, outcomes and objectives of the grant opportunity clearly defined? 	
	<ul style="list-style-type: none"> Do the objectives link to government policy outcomes? 	
Eligibility	<ul style="list-style-type: none"> Do the guidelines clearly identify the key priorities – e.g. targeted regions? 	
	<ul style="list-style-type: none"> Do the guidelines clearly identify who is eligible to apply – e.g. individuals, specific business structures, other governments, certain groups or industry? 	
	<ul style="list-style-type: none"> Is there anyone who cannot apply for funding? 	
	<ul style="list-style-type: none"> Are there specific eligibility criteria that must be met – e.g. must have an ABN/ACN? 	
	<ul style="list-style-type: none"> Are there cases where the eligibility criteria can be waived? 	
Application process	<ul style="list-style-type: none"> Do the guidelines list the opening and closing dates for applications? Is it clear if late applications will be accepted, and if so, under what circumstances? 	
	<ul style="list-style-type: none"> Are the methods of applying and lodgement clearly outlined – e.g. email, online, post? 	
	<ul style="list-style-type: none"> Are all relevant forms, templates and other documents included or are there web links to where materials can be found? 	
	<ul style="list-style-type: none"> Do the guidelines identify processes, should a state or territory entity apply? How will these applications be considered? 	
	<ul style="list-style-type: none"> Will applicants need to submit a detailed budget as part of their proposal? 	
	<ul style="list-style-type: none"> Are all the necessary contact details provided to allow applicants to apply? 	
	<ul style="list-style-type: none"> Do the guidelines specify any other attachments that must be included – e.g. letters of support, detailed technical specifications etc? 	
Funding	<ul style="list-style-type: none"> Do the guidelines outline the total funding that is available and over what period of time? 	
	<ul style="list-style-type: none"> Do the guidelines specify how much funding is available per grant or whether there are limitations on the amount that can be applied for? Are there any exemptions? 	
	<ul style="list-style-type: none"> Are the guidelines clear about what items are eligible for funding? Are there items ineligible for funding? 	
	<ul style="list-style-type: none"> Do the guidelines specify timeframes – e.g. are multi-year grants available? 	
	<ul style="list-style-type: none"> Do the guidelines discuss any relevant tax implications – e.g. whether goods and services tax applies? 	

Heading	Information guidelines should contain	✓ x
Grant agreement	<ul style="list-style-type: none"> What are the terms and conditions that recipients would need to comply with – e.g. is there an example grant agreement? Will the terms and conditions be varied for different types of organisations, such as state government entities? 	
	<ul style="list-style-type: none"> What are the record keeping, reporting and acquittal requirements that recipients would need to comply with? 	
	<ul style="list-style-type: none"> How will the grant be monitored? Are there any performance reporting requirements recipients would need to comply with? Will there be milestone payments? 	
	<ul style="list-style-type: none"> What is the process where recipients fail to meet obligations? 	
Selection process	<ul style="list-style-type: none"> Do the guidelines clearly outline the selection process – e.g. open competitive, targeted, open or closed non-competitive, demand-driven selection (See CGRGs para 13.11)? 	
	<ul style="list-style-type: none"> Do the guidelines detail the selection criteria against which eligible applications will be assessed? 	
	<ul style="list-style-type: none"> Do the guidelines specify what applicants need to address for each of the selection criteria? Do word limits apply? 	
	<ul style="list-style-type: none"> Do the guidelines detail the weighting attached to each assessment criterion? Do applicants have to successfully address all assessment criteria? 	
	<ul style="list-style-type: none"> Do the guidelines state how value with relevant money considerations will be taken into account in the awarding of grants? 	
	<ul style="list-style-type: none"> Is an external advisory panel used to provide input? If so, which and what type of bodies or industries are on it? 	
Decision making	<ul style="list-style-type: none"> Are the roles and responsibilities of all parties clearly defined? What roles do the entity and minister have? What role do external experts have? 	
	<ul style="list-style-type: none"> Is the assessment made by a panel? If so, who comprises the panel? 	
	<ul style="list-style-type: none"> Do the guidelines discuss conflict of interest, bias and associated obligations on officials and applicants, and how these will be managed? 	
	<ul style="list-style-type: none"> Do the guidelines identify who will make recommendations – e.g. officials, independent subject matter experts? 	
	<ul style="list-style-type: none"> Who will be the ultimate decision maker – e.g. the minister, accountable authority or a delegate? 	
Other	<ul style="list-style-type: none"> How will the successful and unsuccessful applicants be advised? 	
	<ul style="list-style-type: none"> What are the feedback and complaint handling mechanisms? Do the guidelines set out the avenues of appeal? 	
	<ul style="list-style-type: none"> Do the guidelines discuss how the grant activity or grant program will be evaluated? 	
	<ul style="list-style-type: none"> Do the guidelines discuss the <i>Privacy Act 1988</i> and associated obligations on officials and applicants? 	
	<ul style="list-style-type: none"> Are program specific issues, such as the provision of equipment or premises by the Commonwealth clearly explained? 	
	<ul style="list-style-type: none"> Do the guidelines set out any additional requirements, such as relevant qualifications for grant recipient staff or applicable legislation? 	

Attachment B – Guidelines requirements for CCE Grants where the Minister is involved in the making of grants.

To assist officials, the list below identifies the type of information that should be included in grant guidelines.

Information to include in grant guidelines	✓ x
<ul style="list-style-type: none"> • Are the purpose, expected outcomes and objectives of the grant clearly explained? 	
<ul style="list-style-type: none"> • Do the guidelines explain the process for applying for the grant? 	
<ul style="list-style-type: none"> • Do the guidelines clearly outline the assessment process and the criteria used to select potential recipients? <ul style="list-style-type: none"> ○ Do the guidelines enable an assessment of whether the CCE grant will achieve value with relevant money? 	
<ul style="list-style-type: none"> • Do the guidelines explain the governance arrangements of the entity in relation to the grants? 	
<ul style="list-style-type: none"> • Do the guidelines explain the operation of the grants? 	
<ul style="list-style-type: none"> • Is the role or involvement of the Minister in the process clear? 	

Appendix 1 – Glossary of terms

accountable authority see subsection 12(2) of the PGPA Act.

application process refers to the steps that must be by followed potential grantees to be considered for a grant. It includes the forms, and written documentation, which contain eligibility and any assessment criteria to be satisfied.

assessment criteria are the specified principles or standards, against which applications will be judged. These criteria are also used to assess the merits of proposals and, in the case of a competitive grant opportunity, to determine application rankings.

CCE means a corporate Commonwealth entity (see section 8 of the PGPA Act).

CCE grant is defined under PGPA Rule (Section 4) and means an arrangement for the provision of financial assistance by or on behalf of a corporate Commonwealth entity under which relevant money is to be paid to a person, or body, that is not a Commonwealth entity. There are some arrangements that are not considered to be CCE grants, such as procurement, an investment or loan, payments of compensation, benefit or entitlements under law.

Commonwealth Grants Rules and Guidelines 2017 (CGRGs) establish the overarching Commonwealth grants policy framework, articulate the expectations for all non-corporate Commonwealth entities in relation to grants administration. Under this overarching framework, NCEs undertake grants administration based on the mandatory requirements and key principles of grants administration.

eligibility criteria refer to the mandatory criteria which must be met to qualify for a grant. Assessment criteria may apply in addition to eligibility criteria.

entity means a Commonwealth entity and includes a Department of State, a Parliamentary Department, a listed entity or a body corporate established by a law of the Commonwealth (see section 8 of the PGPA Act).

forecast opportunity refers to a notice published on GrantConnect that provides an indication to the public that there is a planned grant opportunity that may become available in the near future. All forecast opportunities are subject to revision, withdrawal or cancellation. Information about forecast opportunities is provided to alert potential grant applicants of upcoming opportunities and to assist in their application planning.

grant is defined by CGRGs paragraph 2.3 as: an arrangement for the provision of financial assistance by the Commonwealth or on behalf of the Commonwealth:

- a) under which relevant money or other CRF money is to be paid to a grantee other than the Commonwealth; and
- b) which is intended to help address one or more of the Australian Government's policy outcomes while assisting the grantee achieve its objectives

grant activity(ies) refers to the project/tasks/services that the grantee is required to undertake.

grants administration is the processes that an entity undertakes to achieve Government policy outcomes through grants. It includes: planning and design; selection and decision-making; the making of a grant; the management of grant agreements; the ongoing relationship with grantees; reporting; and review and evaluation.

Grant Award (GA) is a grant reported on GrantConnect as the result of a grant being awarded by an Australian Government entity. A GA must be published on GrantConnect within 21 days of a grant agreement taking effect.

- The mandatory reporting of Grant Awards for CGRGs grants took effect from 31 December 2017.
- The mandatory reporting of Grant Awards for CCE grants approved by a Minister took effect 1 December 2020.

GrantConnect is the Australian Government's whole-of-government grants information system, which centralises the publication and reporting of Commonwealth grants in accordance with the CGRGs and the PGPA Rule.

grant guidelines refers to a document(s) containing the relevant information required for potential CCE Grantees to understand: the purposes, expected outcomes and objectives of the CCE grant; an outline of the application and assessment processes; and operation and governance arrangements of the entity in relation to the CCE grant.

grant opportunity refers to the specific grant round or process where a Commonwealth grant is made available to potential grantees. Grant opportunities may be open or targeted, and will reflect the relevant grant selection process.

grant opportunity ID (GO ID) refers to the unique identifier on GrantConnect related to the grant opportunity. For each grant opportunity there will be grant opportunity guidelines for CGRGs grants or grant guidelines for CCE grants where a Minister is the decision maker.

grant opportunity guidelines refers to a document(s) containing the relevant information required for potential CGRGs grantees to understand: the purpose, outcomes and objectives of a grant; the application and assessment process; the governance arrangements (including roles and responsibilities); and the operation of the grant. Grant opportunity guidelines include related documents, such as the application guidelines and forms, invitations to apply, supporting documentation, frequently asked questions, draft grant agreements, and any templates for reporting or acquittals.

NCE means a non-corporate Commonwealth entity (see section 8 of the PGPA Act).

officials means officials of a Commonwealth entity. An official of a Commonwealth entity is an individual who is in, or forms part of the entity (see section 8 of the PGPA Act).

one-off or ad hoc grants – generally do not involve planned selection processes, but are instead designed to meet a specific need, often due to urgency or other circumstances. These grants are generally not available to a range of grantees or on an ongoing basis.

selection criteria comprise eligibility criteria and assessment criteria.

selection process is the method used to select potential grantees. This process may involve comparative assessment of applications or the assessment of applications against the eligibility criteria and/or the assessment criteria.