



Sisters of the Good Samaritan Foundation
Financial Controls Policy & Procedures

Policy Governance

Approver	Board of Directors
Mandatory Reviewer	Finance, Risk and Audit Committee; Governance Committee
Owner	Executive Director
Review frequency	Every two years
This version approved	July 2024
Next review	August 2026

1. Introduction

Sound stewardship is a core element of the Good Samaritan Benedictine charism. In accordance with the Constitution of the Sisters of the Good Samaritan Foundation (GSF) and to protect SGFS against financial misconduct, it is necessary that all forms of financial transfers be secured through closely regulated decision making and approval processes.

2. Purpose

The purpose of this policy is to:

- Ensure that all expenditures made in the name of the organisation are authorised and independently reviewed.
- Guard against any potential abuse of payments procedures, while maintaining flexibility and avoiding unnecessary formality.

3. Policy

- 3.1 Financial transactions carried out in the name of GSF shall, as far as possible, be governed by the following principles.
- 3.2 No payments over the amount of \$1,000 shall be made in the name of GSF unless such payment has been authorised by the Board.
- 3.3 Payment authorisation can be made either through Board approval in the annual budget or by other avenues approved by the board (such as through a written delegation of the Board).
- 3.4 Complete records of payment authorisation should be kept on file.
- 3.5 The Board, through the financial management consultancy or other means, shall have continuous access on request to GSF's bank statements and accounts, books and records.
- 3.6 A Delegations Register shall be maintained. Any changes to the Delegations Register must be approved by a resolution of the Board.

3.7 No single person shall have the authority to carry through all processes (budgeting, authorisation, payment, approval) to do with any:

- payment
- approval of a supplier
- approval of an agreement or contract with an external party
- loan from SGSF funds
- contract of ongoing employment

3.8 Any person who has an actual or potential conflict of interest in respect of any:

- payment
- approval of a supplier
- approval of an agreement or contract with an external party
- loan from GSF's funds
- contract of employment,

must declare that conflict of interest to the board and either comply with any board direction or withdraw from involvement in the transaction.

3.9 All payments (except credit card and petty cash payments) shall require signatures (or equivalent validations) from two persons with properly delegated authority, as recorded in the Financial Delegations Register.

3.10 Financial transaction cards may only be issued to a person approved by the Board.

3.11 Cardholders and persons making a payment out of petty cash (Payor) must obtain a tax invoice or receipt for each transaction. If a tax receipt is lost or misplaced, the Payor must provide a written statement setting out the details of the transaction. Tax invoices or receipts and statements must be provided to the Executive Director (ED) with each monthly account statement.

4. Financial Controls Responsibilities

4.1 The Board is responsible for overseeing and monitoring the operational, financial, and overall performance of the organisation. In this capacity the Board will:

- Approve a budget for the GSF and authorise any departures from that budget.
- Maintain supervision of the financial progress of the organisation.
- Ensure the Financial Delegations Register is maintained.

4.2 It is the responsibility of the ED to ensure that:

- Procedures consistent with this policy are implemented.
- Reports on the implementation of these procedures are regularly submitted to the board.
- Staff and volunteers are aware of this policy and these procedures.
- Any breaches of this policy or procedures are dealt with appropriately.

4.3 It is the responsibility of all employees and volunteers to ensure that any payment made on behalf of the organisation conforms to this policy and those procedures.

5. Financial transaction cards - Issue and use

5.1 Any organisational financial transaction cards (credit or pre-paid debt cards) may only be issued to a Board member or staff member where their functions and duties would be enhanced by their use.

5.2 Financial transaction cards may be issued on a temporary basis and recovered afterwards.

5.3 Each financial transaction card will be issued to a specific person, who will remain personally accountable for the use of the card. Cardholders will sign a declaration to this effect.

5.4 There shall be an authorised approver for each financial transaction card as set out in the Delegations Register.

5.5 Cardholder's Responsibilities

5.5.1 The Cardholder shall:

- In all cases obtain and retain sufficient supporting documentation to validate the expense (e.g. tax invoice or receipt) or provide a written statement in lieu.
- Attach supporting documentation to the monthly statement from the bank.
- Review the monthly statement for inaccuracies and report these to the ED or their delegate (financial management consultancy) and/or the bank.
- Verify that that goods and services listed were received.
- Sign the monthly statement to verify that transactions have been made for official purposes.
- Forward the papers to the authorised approver in accordance with the SGSF Delegation of Authority Policy.
- Notify the bank and the ED (or authorised approver) immediately if:
 - The card is lost or stolen
 - Any unauthorised transaction is detected or suspected
 - A personal expense has inadvertently been charged to the card.
- Notify the bank and the ED (or authorised approver) of any change in name or contact details.
- Take adequate measures to ensure the security of the card.
- Cease using the card and promptly return or destroy the card if:
 - The cardholder resigns
 - The card has been cancelled by the bank.
- Be personally liable for any unauthorised transaction unless the card is lost, stolen or subject to fraud on some part of a third party.

5.5.2 The Cardholder shall not:

- Exceed any maximum limits set for the card.
- Obtain cash advances through the card.
- Use the card for any illegal purchases.
- Authorise their own expenditure.



- Claim double allowances (i.e. request reimbursement for an expense already paid by the card).

5.6 Card Expenditure

- 5.6.2 The card will only be used for purchases that are directly associated with the cardholders' function within the organisation.
- 5.6.3 Where doubt exists as to whether an item is function-related, prior authorisation should be obtained from the authorised approver.
- 5.6.4 Where private expenditure occurs on the same transaction as a corporate expenditure (e.g. a person incurs a debt for personal telephone calls during a hotel stay) the cardholder must settle the private expense prior to charging the balance on the organisational card.
- 5.6.5 The use of a corporate card for services of a dubious nature is expressly prohibited. "Services of a dubious nature" are defined as any goods or services that could bring the name of the organisation into disrepute.

5.7 Card Expenditure Review

- 5.7.2 Records of all expenditures made on the card must be reviewed by the Cardholder's supervisor, with a view to establishing both the need for the expenditure and the authorisation of the expenditure.

5.8 Card Misconduct

- 5.8.2 Wherever a breach in this policy occurs, the ED or Chair will assess the nature of the breach and may institute an appropriate disciplinary process, including:
 - counselling and/or verbal warning
 - a diary or file note created and retained on employee's personnel file
 - a written warning.
- 5.8.2 Where the breach is such that serious sanction is appropriate, GSF's right to summarily dismiss an employee for serious misconduct may be exercised and report a breach of the policy to the police for criminal investigation.
- 5.8.3 Following report of a breach, at the next Finance Risk and Audit committee meeting, the Executive Director or Chair shall report:
 - the investigation of the circumstances of the breach
 - any police reports and action
 - any disciplinary action taken.

6. Bank Accounts

- 6.1 Bank accounts may only be opened in GSF's name, or to hold GSF's funds, when authorised by a person with the appropriate authority as recorded in the Financial Delegations Register.
- 6.2 Any variations to banking arrangements can only be made by a person with the appropriate authority as recorded in the Financial Delegations Register.



6.4 Any bank transfer above the level approved for the person in the Financial Delegations Register (or any series of payments within the period of fourteen days amounting to 150% of the level approved for the person in the Financial Delegations Register) must be approved prior to the payment by two persons authorised to make such approvals by the Financial Delegations Register.

6.5 Each payment must be supported by an invoice, receipt, or other appropriate documentation. Authorisations must be attached to this documentation prior to payment.

6.6 Bank transfers above \$5,000 to suppliers must be made only to suppliers who have been approved for the organisation's Approved Supplier Register. Where it appears necessary to make transfers to persons or bodies not on the Approved Supplier Register, prior approval must be sought from the ED.

6.7 Cheque use

6.7.1 All cheques must contain two eligible signatures. Eligible signatories are persons approved by the board and recorded in SGSF's Financial Delegations Register.

6.7.2 Signatories cannot sign a cheque made payable to themselves, or a blank cheque. All details on the cheque form must be filled in before signature.

6.7.3 A list of all cheques issued each month, featuring amount, recipient, signatories, and explanation, will be provided to the financial management consultant.

6.7.4 All cheques received will be deposited in SGSF's bank accounts within three days.

6.8 Petty Cash

6.8.1 The amount of the petty cash float in general should not exceed \$250. Any amount in the petty cash float over \$250 shall be returned to general funds.

6.8.2 Each Petty Cash Officer shall ensure that petty cash is used only to cover expenses for which it is not feasible or is unreasonably inconvenient to use normal purchasing methods. Any expense that is predictable, regular, and significant should be dealt with through normal accounting procedures.

6.8.3 A tax invoice must be obtained for all petty cash purchases exceeding \$55 (GST inclusive). (check with accountant.)

6.8.4 Each ED/Petty Cash Officer shall require all petty cash expenses incurred are supported by acceptable documentation (receipts, tax invoices, copies of staff travel diaries, etc.) and that the documentation relating to each payment shall be sufficient to establish the nature of the expenditure.

6.8.5 Each ED/Petty Cash Officer shall retain acceptable supporting documentation of payments from the Petty Cash float and shall submit these with their accounts to the Finance Officer each month.

6.8.6 Each ED/Petty Cash Officer shall report the loss of any Petty Cash funds to their supervisor as soon as the loss is discovered.

6.8.7 Petty cash should be kept in a secure (locked) location and the key held securely.

6.9 Cash

Except when classified as Petty Cash, all cash receipts shall be:

- Kept in a supervised or secure (locked) environment, and
- Deposited in the organisation's bank accounts within three working days.

7. Payments to Suppliers & Purchases

New Suppliers

- 7.1 Any new suppliers must be approved by an authorised person on the Financial Delegations Register.
- 7.2 Any such approval must be made based on objective criteria, including ethical criteria relating to environmental sustainability and modern anti-slavery laws, and must be recorded in a standard format
- 7.3 Any changes to supplier masterfile details need to be verified with the supplier via the phone **only** to avoid any payments to unauthorised suppliers.

Purchases

- 7.4 For items or services over the value of \$5,000 a minimum of two quotes must be provided.
- 7.4 Where there is a relationship with a known supplier with demonstrated experience, the need to get two quotes may be waived. The purchaser should document the reasons why more than one quote was not sought and have it approved as per the Financial Delegations Register.
- 7.5 All items received are to be checked against purchase quote and specifications

8.0 Asset Management

- 8.1 All purchases of equipment above the value of \$100 must be entered in the organisation's Asset Register in a standard format. (check amount with accountant as there may be a threshold for audit etc)
- 8.2 The Asset Register shall be reviewed at least yearly.



Sisters of the Good Samaritan Foundation
 Financial Delegations Register
 Approved July 2024

This Register is governed by the Constitution, Financial Controls Policy & Procedures and any other relevant policies of the Sisters of the Good Samaritan Foundation.

1. Authorised Approvers and Delegations

Who	What	Amount
By resolution of the Board	Open bank account Change Investment Policy Appoint Investment Advisor Approve Annual Budget	
Executive Director	Approve Payments Approve staff timesheets and payroll Approve the transfer of funds between the CBA transaction account and the Macquarie Accelerator account or other investment account held by the Company.	Within annual budget Within annual budget Up to \$50,000.
Board Chair Or Board Member	Approve payments Approve staff timesheets and payroll Approve the opening of a transaction card Approve changes to limit of a transaction card Approve payment of a monthly transaction card statement Approve the transfer of funds between the CBA transaction account and the Macquarie Accelerator account or other investment account held by the Company where this exceeds the threshold limit for the Executive Director	Within annual budget and / or as per the Financial Controls Policy & Procedures
A Finance Sub-Committee Member appointed by the Board as an authorised approver	Approve payment of a monthly transaction card statement Approve changes to limit of a transaction card Approve the transfer of funds from the CBA transaction account to the Macquarie Accelerator account or other investment account held by the Company where this exceeds the threshold limit for the Executive Director	
Financial Manager of the Company		
Financial Manager of the Congregation	Approve payments Approve Transfers Approve Payroll	As per annual budget As per annual budget As per annual budget

	Approve one-off changes to the limit of a transaction card to meet an expense that is contained in the approved annual budget Approve the transfer of funds from the CBA transaction account to the Macquarie Accelerator account or other investment account held by the Company where this exceeds the threshold limit for the Executive Director	
Investment Manager (Allegra Wealth)		

2. Authorised signatories

The following persons may be appointed by resolution of the Board as signatories to the Macquarie Wrap account:

- Superior of the Congregation of the Sisters of the Good Samaritan
- Chair of Members of the Company
- Member of the Company
- Board Director of the Company
- Board Chair of the Company
- Executive Director of the Company
- Finance Manager of the Congregation of the Sisters of the Good Samaritan

The following persons may be appointed by resolution of the Board as signatories to any other account held in the name of the Company:

- Superior of the Congregation of the Sisters of the Good Samaritan
- Chair of Members of the Company
- Member of the Company
- Board Director of the Company
- Board Chair of the Company
- Executive Director of the Company
- Finance Manager of the Congregation of the Sisters of the Good Samaritan
- Financial Accountant of the Company

3. Approval of payments and transfers

All cheques, promissory notes, bankers drafts, bills of exchange and other negotiable instruments shall be signed, drawn, accepted, endorsed or otherwise executed, as the case may be, by:

- (i) two (2) signatories from List A (see table below); or
- (ii) one (1) signatory from List A plus one(1) signatory from List B (see table below):

List A	List B
Directors of the Company	Finance Manager of the Congregation



Members of the Company	Financial Accountant of the Company
Executive Director of the Company	

Electronic Funds Transfers, bank account transfers, priority payments, direct debits or changes to credit card authorities executed via the Commonwealth Bank Commbiz Portal (or equivalent banking portal) to be authorised by:

(iii) two (2) signatories from List A (see table below); or

(iv) one (1) signatory from List A plus one (1) signatory from List B (see table below):

List A	List B
Directors of the Company	Finance Manager of the Congregation
Members of the Company	Financial Accountant of the Company
Executive Director of the Company	