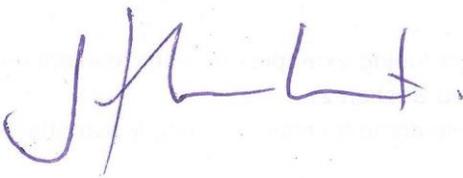




**SENSITIVE EXPENDITURE POLICY 2021**

<b>Signed By:</b>	James Herbert  _____ Waikato Waldorf School Board, Presiding Member
<b>Date Ratified:</b>	Term 1 8 April 2021
<b>Next Review Date:</b>	Term 1 8 April 2024
<b>Review Cycle:</b>	Every three years (maximum)

**Rationale**

The School Board (the Board) of Waikato Waldorf School (the School) has affirmed the rationale and guidelines of this policy and made this policy available for our community on our school website.

The School Board is a Crown Entity under the Crown Entities Act 2004. The following is guidance to such entities from the OAG on what is termed “sensitive expenditure”. This relates to: donations, koha, personal use of communications technology and gifts (such as gifts to retiring principals). (Refer also to the Sixth Schedule, Part 3, Clause 33 of the Education Act 1989.)

The Board agrees that it has a responsibility to ensure that all expenditure of Board funds is clearly linked to the business of the School and does not at any time provide unreasonable and personal benefit from those funds to any individual or group of individuals (staff or students).

The Board acknowledges that at times there are expenses which may be considered to be beneficial only to individuals or small groups of individuals. These may include expenses in relation to travel (especially international travel), or to koha, gifts and other payments to individuals.

The Board has determined that any expenditure which may be considered to be beneficial to individuals or groups of individuals will be carefully scrutinised before approval and will be supported by appropriate fundraising specific to that expenditure.

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This policy is also linked to the Board's travel policy in considering expenditure which may benefit individuals or groups of individuals.

The Board has agreed on the fundamental principles of this Policy and has delegated responsibility for the implementation and monitoring of this Policy to the Principal (as the chief executive and the Board's most senior employee).

## **Guidelines**

### **General**

The Board requires the Principal, where expenditure may be beneficial to an individual or group of individuals, to take account of the following prior to authorising this expenditure:

- Does the expenditure benefit student outcomes?
- Does the expenditure represent the best value for money?
- Is it in the budget?
- Could the board justify this expenditure to a taxpayer, parent or other interested party?
- How would the public react if this expenditure was reported by the media?
- Would there be, or be perceived to be, any personal gain from this expenditure?
- Does this expenditure occur frequently?

Any proposed expenditure which may benefit individuals or groups of individuals will be backed by funds which have been raised for the purpose. The funds will be raised with a full understanding of their purpose known to those contributing the funds – such as parents or other funding sources (e.g. charities). The funds raised will cover all costs (including travel and accommodation costs for teachers who may be involved).

All expenditure which is incurred on behalf of individuals or groups of individuals will be fully accounted for and a separate income statement for management reporting purposes showing all funds raised and expenditure incurred will be provided to the Board.

No variations of this Policy or amendments to it can be made except with the approval of the board.

As part of its approval, the Board recognises that this policy is available to the community and staff as it will be on our school website and included in the School Policy Folder.

The Board will sign off the Proposed Trip Checklist (see attached) prior to any travel being committed to. The purpose of the checklist is to ensure that the proposed trip supports the curriculum and that the trip is paid for either through using crown funds (which would meet the purposes of supporting the curriculum) OR using locally raised funds which would be identified in the budget.

### **Donations**

A donation is a payment (in money or by way of goods or services) made voluntarily and without expectation of receiving goods or services in return. Issues and principles

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We ensure that:

- donations are for purposes that are consistent with the business of the entity making the donation; and
- the size of the donation is appropriate in the circumstances.

The principles of preserving impartiality and integrity, and moderate and conservative expenditure, are particularly relevant. Making a donation should not result in any counterpart obligation on individuals or entities, other than to apply the donation to the purposes of the recipient.

We expect donations to be:

- lawful in all respects, including complying with Parliamentary appropriations;
- disclosed in aggregate (where required);
- made to a recognised organisation by normal commercial means – not to an individual and not in cash; and
- non-political.

## **Communications Technology**

Communications technology such as cell phones, telephones, and e-mail and other access to the Internet – is widely used in the workplace. While some level of personal use of this technology may be unavoidable (such as for dealing with a family emergency during work hours), excessive use incurs costs that are a diversion of public money from the business purposes of the entity. Such costs include lost productivity (including from incoming personal e-mails and phone calls) and the direct cost of the technology.

The risk associated with personal use of an entity's communications technology is the cost to the entity of it being used excessively. An entity should not install communications technology exclusively or predominantly for personal use by staff.

A further risk includes the technology being used for purposes that are not consistent with the entity's goals. An example would be use of Internet access for downloading or e-mailing unacceptable material.

The principles of a clear business purpose, and moderate and conservative expenditure, are particularly relevant. Any personal use of communications technology must be well managed through adequate controls and regular monitoring and reporting.

We expect entities to:

- have policies on personal use of communications technology and ensure that staff are well informed of them; and

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- where it is administratively possible and cost-effective for them to do so, require reimbursement of personal use of communications technology.

## Gifts

A gift is usually given as a token of recognition of something provided by the recipient.

Gifts may be given by a public entity – such as to an employee for long or outstanding service, or in international relations when the giving of gifts is customary – or may be given by another organisation to a public entity or an entity staff member.

Gifts usually take the form of some tangible object, but might also be in the form of, for example, free use of a corporate box at a sporting event or privileged access to goods or services. Issues and principles

The major risks with gifts include that:

- the value or nature of a gift is inappropriate or excessive to the occasion or the reason for it being given;
- the gift is given in explicit or implicit expectation of favour in return; and
- the gift is given in substitution for legitimate payment or remuneration.

The principles of a justified business purpose, moderate and conservative expenditure, and acting with integrity and preserving impartiality are particularly relevant.

## Guidance

We expect entities to have a policy on giving gifts, including specifying the purposes for which and occasions on which it is acceptable, and the nature and value of gifts that are appropriate to particular occasions.

We recognise that receiving a gift is not strictly an issue of sensitive expenditure. This is because it does not involve expenditure on the part of the organisation or individual receiving a gift. Receiving a gift is nevertheless a sensitive issue, and one that entities need to manage carefully. It is especially important that receiving a gift does not alter an entity's or individual's decision-making, as this could be perceived as acting without impartiality or integrity.

We expect entities to:

- require receipt of gifts, except for inexpensive gifts that are openly distributed by suppliers and clients, to be disclosed, to be recorded in a gifts register, and to remain the property of the entity;
- allow staff to personally acquire only infrequent and inexpensive gifts that are openly distributed by suppliers and clients (for example, pens, badges, and calendars); and
- have policies defining "infrequent" and "inexpensive" in relation to receiving gifts.