

Research, Education and Programs (REP) Probity Plan

Probity principles

The LSA (Lifetime Support Authority) will observe the highest standards of probity for their REP (Research, Education and Programs), with all applications assessed in a manner that is fair, transparent, consistent, confidential, and of the highest professional standard. We observe a number of key probity principles:

Impartiality and fairness	All applicants to be treated equally with the same access to information and advice.
Consistency and a transparent process	All applicants will be subjected to evaluation through a systematic process which assesses them against explicit, predetermine criteria.
Confidentiality	All applicants will have information provided in any application processed securely and confidentially ensuring the protection of their intellectual property and proprietary information.
Conflict of Interest	All persons involved in the application process will declare and address any actual or perceived conflict of interest prior to providing advice or assessing an application.

The above requirements are intended to achieve an equitable, consistent, accountable and sound process according equal opportunity for all applicants. This process will be applied with common sense and flexibility, so the task of assessing proposals is fair and equitable while still achieving the LSA's strategic objectives.

Information must be provided to applicants in a fair, equitable and consistent manner. No applicant should receive or be perceived to have received an undue advantage in respect to the assessment process.

Probity related to the application and assessment process is the responsibility of all LSA staff involved in informing applicants or assessing applications and it is their duty to ensure the process is open and fair.

Per the **LSA Code of Conduct** and **Code of Ethics for the South Australian Public Sector**, LSA staff must:

- At all times treat other persons with respect and courtesy;
- Act with professionalism, honesty, integrity and fairness;
- Not access or attempt to access official information other than in connection with the performance by them of their duties and/or as authorised;
- Not disclose official information acquired through the course of their employment other than is required by law or where appropriately authorised in the agency concerned;
- Not misuse information gained in their official capacity; and
- Maintain the integrity and security of official information for which they are responsible

Independent probity advice

If deemed necessary, the LSA will make use of an impartial probity advisor.

Confidentiality

We protect the confidentiality of personal information collected for the purposes of administering the LSS. Unless authorised or permitted by law, we will not disclose any confidential information and will ensure it is stored in a form that cannot be accessed by unauthorised persons. We protect all LSA records and information in accordance with our policies and procedures and ensure that we comply with the Information Privacy Principles Instruction and our obligations under the State Records Act 1997. Access to information will occur in compliance with the Freedom of Information Act 1991 (SA).

The REP application and assessment process will result in the generation of a significant quantity of confidential information. The LSA will respect the confidentiality of these documents and information, including:

- Application contents, unless an applicant agrees to waive confidentiality;
- Any questions clarifying or responses that may be considered commercial in confidence;
- Information produced as part of the assessment process – including minutes, assessment reports and any communications,

Any person involved in the assessment process will treat applications and assessment documents as confidential. In order to maintain ethical standards, information can only be used for the purpose for which it was provided to the LSA.

The LSA values and protects the privacy and confidentiality of its participants. As part of this, the LSA does not grant direct access to participants and recognises that it needs to be mindful of the amount of studies and programs that participants are provided with details of

The LSA also respects the confidentiality and privacy of service provider's and other stakeholder's information and will not provide details it deems confidential to applicants.

Conflicts of interest

The LSA recognises the importance of people who are involved in the application and assessment process not having any conflicts of interest which adversely affect, or appear to adversely affect, the impartiality and fairness of the process. This included members of the REP Review Committee (RCM), Executive Management Team (EMT) and LSA Board. Any person involved in the assessment of an application will be required to confirm that they do not have a conflict of interest and will only be asked to participate in the process once this has occurred.

These will be dealt with using the below measures:

1. Conflict of interest register

The LSA acknowledges that there may from time to time there may be a shortage of potential assessors with the relevant experience who have no potential conflicts of interest.

The LSA will maintain a register of all actual, perceived and potential conflicts of interest reported during the application and assessment processes. Persons participating in the assessment process will be required to sign (or agree to, for online reviewers) a conflict of interest form before assessing and offering comments or views.

2. Assessor procedures

When undertaking assessment of applications, the Senior Project Coordinator (REP) will remind assessors of their responsibilities to avoid potential conflicts of interest. When assessment takes place in a meeting, this will be a formal agenda item. It is the responsibility of individuals to bring any potential conflicts of interest to the attention of the LSA.

Generally, a declaration of a conflict of interest will result in that person withdrawing from discussion or assessment of the application. However, if the LSA deems that the conflict of interest can be resolved in a different way, declaration of the conflict and the actions taken to resolve them must be recorded in the conflict of interest register and/or in the minutes of the appropriate meeting.

All persons undertaking application assessment for the LSA REP process must:

- observe the LSA Code of Conduct
- observe the Code of Ethics for the South Australian Public Sector
- act with integrity, objectivity, openness and honesty
- be accountable for their decisions and actions
- be subject to an appropriate level of scrutiny
- abide by LSA confidentiality requirements
- disclose any conflicts of interest related to their official duties.

Communication with applicants

Categories of personnel communicating with applicants are:

- REP Project Staff
- LSA staff involved in discussing proposals with applicants
- External assessors involved in assessment
- LSA Board members involved in assessment

Who can communicate with prospective applicants on applications?

All applicant enquiries with regard to the application form and grant process will be dealt with by the REP project staff. If other LSA staff are to communicate with applicants, this must occur within the parameters of the probity plan. Generally, staff involved in the formal assessment processes should avoid or minimise assisting applicants with applications.

All applicant enquiries should be referred to REP project staff in the first instance. If any staff engage in discussions directly with applicants on their project applications, they should keep a record of the nature of the discussion.

The LSA does not formally partner with or support any application until the assessment process is complete.

General rules for LSA staff communicating with REP applicants

If an application is yet to be assessed, LSA staff should not provide comment, judgement or opinion on an application that may give an applicant an expectation of success.

LSA staff may provide feedback to potential applicants if when discussing a particular proposal, it is clear that the proposal is ineligible. LSA staff may do this by pointing out ways that the proposal does not meet eligibility or other requirements.

As all discussions with applicants are confidential, LSA staff must take care not to disclose details of other applications to competing applicants. Staff must exercise caution if they have contact with applications in other business or social settings, to not discuss application assessments or contents. If questioned, LSA staff should indicate that it is not appropriate to discuss this. If the incident is considered significant, it should be reported to the REP team who can make a note of the conversation and any appropriate action required.

Providing additional information to applicants

LSA staff should not provide to applicants copies of documents that are not publicly available. All applicants will have access to the same documentation and guidelines in relation to application and process made available to them.

Additional information disclosed to applicants during discussions, which staff consider needs to be disclosed to all applicants, will be approved by the REP team and communicated publically through the LSA website.

Should a staff member believe that the information provided in discussions with an applicant is relevant to all applicants and could be perceived as providing an unfair advantage they should advise the REP staff immediately.

Encouraging collaboration with other parties

The LSA encourages effective working relationships with stakeholders which can help identify, overcome and even avoid fragmentation and unnecessary overlaps in granting activity.

Applicants generally encouraged to, where appropriate, form partnerships in the development of their proposals. It is permissible for the LSA staff to make suggestions as to the kind of other groups or organisations that may be worth talking to in developing their proposal. It should be noted that a priority of the LSA is to encourage collaboration but care should be taken not to favour one organisation over other similar organisations.

Guidelines for other staff discussions with prospective applicants

Once the application and assessment process has commenced, LSA staff must follow the probity principles as outlined in this document. Staff who are unfamiliar or unsure of the expectations contained in the probity plan should refer all applicant enquiries to REP project officers.

If potential applicants request information the LSA's research needs that may be related to them preparing a REP application, staff should ascertain why they are making this enquiry. If it is related to the REP and if the staff member is not familiar with the requirements of the probity plan, they should refer them to REP staff.

Routine business meetings and social activities continue as usual, but LSA staff must adhere to the probity plan in discussing issues that may be relevant to the REP.

LSA representatives involved in assessment processes

The terms of reference of assessors will reflect the requirements of the probity plan. Communication related to REP between applicants and members of this panel will be minimised wherever possible, and where it does occur, it will be dealt with during the assessment process using the conflict of interest provisions of the probity plan.

Record keeping

Documentation of discussions with applicant

A record of all contact with applicants making enquiries regarding REP will be maintained by REP staff throughout the process. This will include summaries of all discussions with applicants and monitoring records from departmental contacts. REP staff having discussions with potential applicants need to record the substantive issues of the discussion.

Ethics Approval

Applicants are responsible for ensuring that they obtain relevant ethics approval as part of the application process.

Minutes of expert assessment panel meetings

All major issues discussed at meetings will be recorded, including:

- meeting details;
- attendance;
- record of any potential conflicts of interest;
- decisions of assessments of applications against the defined documented criteria;
- recommendations made;
- actions agreed;
- responsibility and time frame.

Grant Progress/Acquittal

To ensure that Individual projects achieve intended outcomes within agreed timeframes, they may be required to provide progress records to the LSA. These will be decided on an individual basis with applicants.

Records of the assessment process and grant or program acquittal will be maintained to allow for independent audit and review. The maintenance of appropriate records increases the accountability and transparency of the assessment process.

Appeals procedure

Appeals will be considered **only** against process issues. They will not be considered against EMC or EMT panel decisions or assessor ratings and comments. Appeals must be lodged through the Senior Project Coordinator (REP) and be received within 28 days of the date on the letter notifying the outcomes of applications. The signed appeal should be sent to:

Senior Project Coordinator
PO Box 1218
Adelaide, SA, 5000

The LSA is continually looking to review and improve processes, incorporating stakeholder feedback. This approach enables us to refine the REP over time and may inform changes we make.

The LSA values open communication and feedback and applicants are encouraged to provide feedback by via the [LSA website](#).

The LSA is committed to consistent, fair and confidential complaint handling and to resolving complaints as quickly as possible. Feedback and complaints will be handled impartially and in a confidential manner.

If you are dissatisfied or have concerns about our day to-day services, please raise this with the staff member concerned or their supervisor, then Director, Corporate Services. We will try to resolve the problem immediately.

Disclosure of information

The process of assessing applications for REP requires the collection of information. Some or all of this information may be provided to:

- members of RMC, EMT , the LSA Board and independent peer reviewers and assessment panel members who are responsible for assessing applications
- operational members of the LSA for planning and support purposes
- members of parliament and the media who may help in publicising successful projects and the program as a whole.

The name of the applicant, public summary, and the amount of funding may be disclosed in documentation such as media releases and will be made publicly available on the LSA website and annual report.

Information contained in annual or final reports may be used for reporting and or administrative purposes by the LSA. Only the sections clearly defined as 'public' will be released publicly.

All information submitted to the LSA is subject to the requirements of the *Freedom of Information Act 1982* and the *Privacy Act 1988*.