



Legislative Compliance Register

Purpose

The purpose of this register is to assist Healthy Living NT to comply with its legal obligations, thus maximising the likelihood of the organisation's management, staff and contractors complying with the law.

This listing is not exhaustive and includes only the primary Acts that Healthy Living NT and/or its staff must comply with in the course of its business.

It lists the primary name of the Act but for ease of reference does not list each successive amendment or issue of regulations under the Act, unless they are substantive. Most current information can be sourced from the on-line legislative databases available for Commonwealth and NT legislation which can be found respectively at <https://www.legislation.gov.au/> and <https://legislation.nt.gov.au/>

This register may also list prospective Bills before Parliament which will impose additional compliance requirements on HLNT when passed. These Bills (**shown in BLUE**) are included to promote an awareness of probable forward compliance requirements. When passed / enacted, the Register is to be updated accordingly.

Name of Act	Relevance to Healthy Living NT	Reference to
Governance		
Associations Act of the NT 2003 (NT)	Prescribes the rules governing the incorporated associations in the NT. Is HLNT's source of legal incorporation.	Constitution
Australian Charities and Not-for-profits Commission Act 2012 (Cth)	Is the national registration body for charities in Australia; oversees compliance and reporting. Is HLNT's source of charity registration	Disclosure of Interests Policy Ethical Relationships and Practice Guidelines Improper Conduct Prevention and Management Policy Corporate Governance Statement

<i>Status</i>	<i>Approved</i>	Legislative Compliance Register	<i>Document ID</i>	<i>G0047</i>
<i>Consultation</i>	<i>Management and Board</i>		<i>Date of Issue</i>	<i>14/12/2024</i>
<i>Approval By</i>	<i>Board</i>		<i>Current Version Number</i>	<i>8.0</i>
<i>Circulation (on approval)</i>	<i>All Staff</i>		<i>Review Cycle</i>	<i>Annual</i>
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Name of Act	Relevance to Healthy Living NT	Reference to
Employment		
<i>Fair Work Act 2009 (Cth)</i>	HLNT must comply with the state and commonwealth laws and regulations in its employment of staff.	General Conditions of Salaried Employment
<i>Long Service Leave Act 1981 (NT)</i>	HLNT must comply with the state and commonwealth laws and regulations in its employment of staff.	General Conditions of Salaried Employment
<i>Fair Work Amendment (Paid Family and Domestic Violence Leave) Act 2022 (Cth)</i>	Amends the Fair Work Act 2009 to replace the current entitlement in the National Employment Standards to five days of unpaid family and domestic violence leave in a 12-month period with an entitlement to ten days of paid leave for full-time, part-time and casual employees; extend the definition of family and domestic violence to include conduct of a current or former intimate partner of an employee, or a member of an employee's household	General Conditions of Salaried Employment
<i>Fair Work Legislation Amendment (Secure Jobs, Better Pay) Act 2022 (Cth)</i>	<p>The amendments to the Fair Work Act have significant implications including:</p> <ul style="list-style-type: none"> • Changes to fixed term contracts, especially rolling fixed term contracts • new prohibitions on pay secrecy clauses • changes to multi-employer agreements that particularly affect those industries that may have difficulty bargaining at a single-enterprise level, such as aged care, disability care, early childhood education and care industries • new bargaining rules for single interest enterprise agreements, possibly broadening the use multi-employer agreements generally within the Australian economy. 	<p>General Conditions of Salaried Employment</p> <p>HLNT standard contract of Employment</p>
Health and Safety		
<i>Work Health and Safety Act 2011 (Cth) (WHS Act) and Work Health and Safety (National Uniform Legislation) Regulations</i> <i>Work Health Act 1986 (NT)</i>	<p>Persons Conducting a Business or Undertaking (PCBU) have a primary duty to manage risks to health and safety. This duty is placed on employers, the self-employed, principal contractors, persons with management or control of a workplace, and designers, manufacturers, importers and suppliers of plant, substances or structures that are used for work.</p>	Occupational and Office Health and Safety Policies and Procedures

Name of Act	Relevance to Healthy Living NT	Reference to
Workers Rehabilitation and Compensation Act 2008 (NT)	HLNT needs to maintain workers compensation insurance for its staff and needs to comply with requirements for injury management, return to work and employee rehabilitation.	Occupational and Office Health and Safety Policies and Procedures Insurance Policies
Public and Environmental Health Act (NT) 2011	HLNT is subject to the directions and regulations imposed by the Chief Health Officer under this Act, with particular regard to when a public health emergency declaration is in force.	Occupational and Office Health and Safety Policies and Procedures COVID-19 Approved Safety Plan COVID-19 Risk Mitigation Plan COVID-19 Cleaning Regimen COVID-19 Client Screening protocols HLNT Vaccination Register
Equal Opportunities		
Age Discrimination Act 2004 (Cth)	HLNT must not discriminate against older or younger employees on the basis of their age.	Discrimination Policy Ethical Relationships Guide Selection and Recruitment Policy Referral Policy Consumer Charter Cultural Safety Policy
Disability Discrimination Act 1992 (Cth)	HLNT must not discriminate against any person on the basis of any disability.	
Racial Discrimination Act 1975(Cth)	HLNT must not discriminate against any person on the basis of their race, colour, descent or nationality or ethnic origin.	
Sex Discrimination Act 1984 (Cth)	HLNT must not discriminate against any person on the basis of their gender.	
Anti-Discrimination Act 1992 (NT)	HLNT must not discriminate against any person on the basis of any disability, race or ethnic origin, disability, age or gender.	
Anti-Discrimination Amendment Act 2022 (NT)	Extends the range of protected attributes to include 'language, including signed language', 'gender identity', 'sex characteristics', accommodation status', 'employment status', 'employment in sexual services or engaging in sexual services, including past employment in sexual services or engagement in sexual services, 'carer responsibilities', 'subjected to domestic violence', and 'infectious disease status'; Broadens protections relating to the use of assistance animals;	

Name of Act	Relevance to Healthy Living NT	Reference to
	<p>Introduces a positive duty to prevent and eliminate discrimination, sexual harassment and victimisation and prohibits vilification because of a protected attribute;</p> <p>Broadens the prohibition of sexual harassment so that it applies in any context,</p> <p>Narrows or removes a number of exemptions for religious bodies in the areas of education, work, and accommodation;</p> <p>Ensures people who supply and receive goods, services and facilities are equally protected under the Act;</p> <p>Allows an organisation or body to make a 'representative complaint' of systemic discrimination;</p>	
<p><i>Sex Discrimination and Fair Work (Respect at Work) Amendment Act 2021 (Cth)</i></p>	<p>Amends the <i>Sex Discrimination Act</i>, <i>Fair Work Act</i> and <i>Australian Human Rights Discrimination Act</i> prohibiting sexual discrimination and sex-based discrimination</p>	
<p><i>Anti-Discrimination and Human Rights Legislation Amendment (Respect at Work) Act 2022 (Cth)</i></p>	<p>Amends the Sex Discrimination Act 1984 to: prohibit conduct that subjects another person to a workplace environment that is hostile on the ground of sex; introduce a positive duty on employers to take reasonable and proportionate measures to eliminate unlawful sex discrimination, including sexual harassment, as far as possible; state that an object of the Act is to achieve substantive equality between men and women</p>	
<p><i>Business Conduct</i></p>		
<p><i>Crimes Act 1914 (Cth), Criminal Code Act 1995 (Cth), Competition and Consumer Act 2010 (Cth)</i></p>	<p>HLNT is required to comply with all aspects of these Acts.</p>	<p>Ethical Relationships Guide Improper Conduct Prevention and Management Policy</p>
<p><i>Ombudsman Act 1976 (Cth); Auditor-General Act 1997 (Cth); Freedom of Information Act 1982 (Cth)</i></p>	<p>HLNT may be regarded as a Commonwealth Service Provider under a number of contracted arrangements and must comply with the terms of these Acts in the context of its Service Agreements</p>	<p>Ethical Relationships Guide; NDSS Agency Agreement; OHS Service Agreement</p>
<p><i>Business Names (National Uniform Legislation) Implementation Act 2012</i></p>	<p>HLNT maintains business name registration under this legislation</p>	<p>Business name registrations</p>
<p><i>A New Tax System (Goods and Services Tax) Act 1999 (Cth)</i></p>	<p>Prescribes the collection, payment and reporting of GST by HLNT</p>	<p>Accounting Package (Reckon) Monthly BAS</p>

Name of Act	Relevance to Healthy Living NT	Reference to
<i>Superannuation Guarantee (Administration) Act 1992 (Cth)</i>	Prescribes the level and frequency of superannuation payments to be made by HLNT to an employee	General Conditions of Salaried Employment – Section 3.3 Superannuation
<i>Fringe Benefits Tax Assessment Act 1986 (Cth)</i>	Prescribes the Fringe benefits tax (FBT) payable by HLNT on certain benefits provided to employees. The benefit may be in addition to, or part of, employees’ salary or wages package.	General Conditions of Salaried Employment – Section 3.2 Salary Packaging Salary Packing Agreement
<i>Banking Act 1959 (Cth)</i>	Specifies Government-guaranteed bank accounts / financial institutions in which funds held by the Association on behalf of an external funder must be maintained.	Investment Policy
<i>Independent Commissioner Against Corruption Act 2017 (NT)</i>	<p>The ICAC is a specialist investigator with a focus on government corruption. It investigates certain kinds of criminal offences that relate to government corruption, but also can investigate serious breaches of public trust. In addition to the kinds of powers Police have, the ICAC has powers to enter public body premises without warrants, and to compel any person to attend and give evidence. The ICAC also administers a whistleblower protection scheme, allowing it to protect important sources of information.</p> <p>The ICAC can investigate public officers and public bodies. As a recipient of public funding, Healthy Living NT is regarded as a public body under the Act. A member, officer, or employee of a public body is a public officer. Additionally, if a public body contracts a person or organisation to deliver services or makes a grant of public money, the ICAC will be able to look at corruption by the contractor or grant recipient in relation to delivering government services or spending government money.</p>	<p>Ethical Relationships Guide</p> <p>Improper Conduct Prevention and Management Policy</p> <p>Whistleblower Policy</p> <p>Disclosure of Interests Policy</p> <p>Compliance Authority Investigations Policy</p> <p>Workplace Investigations Policy</p> <p>Release of Information Policy</p>
<i>National Anti-Corruption Commission Act 2022 (Cth)</i>	<p>Under the <i>National Anti-Corruption Commission Act 2022</i>, as a provider of Commonwealth goods or services, Healthy Living NT is regarded as a contracted service provider. Board Members and employees are Public Officials under the NACC Act and are treated as a staff member of the Commonwealth agency that is responsible for the contract.</p> <p>There are 4 types of corrupt conduct under the NACC Act. A person engages in corrupt conduct if:</p>	<p>Ethical Relationships Guide</p> <p>Improper Conduct Prevention and Management Policy</p> <p>Whistleblower Policy</p> <p>Disclosure of Interests Policy</p> <p>Compliance Authority Investigations Policy</p> <p>Workplace Investigations Policy</p>

Name of Act	Relevance to Healthy Living NT	Reference to
	<ol style="list-style-type: none"> 1. they are a public official and they breach public trust 2. they are a public official and they abuse their office as a public official 3. they are a public official or former public official and they misuse information they have gained in their capacity as a public official 4. they do something that adversely affects a public official's honest or impartial exercise of powers or performance of official duties. 	Release of Information Policy
Corporations Act 2001 (Cth) Part 9.4AAA	NFP incorporated Associations fall under this Act for the purpose of whistleblower protection.	Whistleblower Policy
Service Provision		
Aboriginal Land Rights (Northern Territory) Act 1976 (Cth)	HLNT staff must hold current land permits from the relevant land council, prior to visiting most remote communities.	Occupational and Office Health and Safety Policies and Procedures Outreach Health Services Program Operational Guidelines June 2021
Health Practitioner Regulation (National Uniform Legislation) Act 2010	Requires national registration of and codes of conduct for designated health professional staff	General Conditions of Salaried Employment – Section 2.2.2 Practising Certificates - Health Professionals Job Descriptions and Selection Criteria Clinical Governance Policy
Health and Community Services Complaints Act 1998 (NT)	Prescribes the role and powers of the NT Health and Community Services Complaints Commission in investigating and resolving complaints between consumers and health service providers, including HLNT	Consumer Charter Consumer Complaints Mechanism
Privacy Act 1988 (Cth)	Regulates how personal information is handled. Personal information is defined as: <i>information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.</i> Common examples are an individual's name, signature, address, telephone number, date of birth, medical records, bank account details and commentary or opinion about a person.	Constitution Privacy Policy Privacy Statement Operational Privacy Guidelines Privacy Breach and Complaint Policy and Procedures

Name of Act	Relevance to Healthy Living NT	Reference to
	<p>The Privacy Act includes thirteen Australian Privacy Principles (APPs), which apply to HLNT. The Act also regulates the privacy component of the consumer credit reporting system, tax file numbers, and health and medical research.</p> <p>Health information is regarded as one of the most sensitive types of personal information. For this reason, the Privacy Act 1988 (Privacy Act) provides extra protections around its handling. For example, an organisation generally needs an individual's consent before they can collect their health information. In addition, all organisations that provide a health service and hold health information (other than in an employee record) are covered by the Privacy Act.</p>	Data Governance Policy
<i>SPAM Act 2003 (Cth)</i>	<p>Requires HLNT, when sending marketing messages or emails, to:</p> <ul style="list-style-type: none"> • first have permission from the person who will receive them. • identifies HLNT as the sender • contains HLNT contact details • makes it easy to unsubscribe 	<p>Privacy Policy</p> <p>Privacy Breach and Complaint Policy and Procedures</p>
<i>Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth)</i>	<p>Establishes a Notifiable Data Breaches (NDB) scheme in Australia effective from February 2018.</p> <p>The NDB scheme requires organisations covered by the Australian Privacy Act 1988 (Privacy Act) to notify any individuals likely to be at risk of serious harm by a data breach.</p> <p>This notice must include recommendations about the steps that individuals should take in response to the data breach. The Australian Information Commissioner (Commissioner) must also be notified.</p> <p>Organisations will need to conduct quick assessments of suspected data breaches to determine if they are likely to result in serious harm.</p>	Privacy Breach and Complaint Policy and Procedures
<i>Privacy Legislation Amendment (Enforcement and Other Measures) Act 2022 (Cth)</i>	<p>Increases penalties for data breach</p> <p>Increases Privacy Commissioner's enforcement powers</p> <p>Requires foreign entities operating in Australia to comply with the Privacy Act</p>	<p>Privacy Policy</p> <p>Privacy Breach and Complaint Policy and Procedures</p>

Name of Act	Relevance to Healthy Living NT	Reference to
<p><i>Privacy and Other Legislation Amendment Bill 2024 (Cth) (Bill)</i></p>	<p>This is the first-tranche of privacy reforms. If the Bill is enacted in its current form, the following key changes will be introduced, necessitating a review of HLNT privacy, data governance and cybersecurity policies:</p> <ul style="list-style-type: none"> • Transparency will be required when using personal information to make automated decisions (e.g. through the use of AI); • A new statutory tort will be available to individuals for serious invasions of privacy (including for physical intrusions and misuse of information); • Obligations relating to data security will be clarified, requiring organisations to take "technical and organisational measures" in respect of data protection; • A clearer framework for overseas disclosure of information will be introduced, allowing the Government to prescribe countries with similar privacy regimes to Australia for the purposes of easier data sharing; • A framework for information sharing in the case of eligible data breaches will be introduced in order to prevent or reduce the risk of harm to individuals; • A tiered penalty system and the ability for the OAIC to issue infringement notices for breaches which do not meet the "serious breach" threshold will be introduced, as well as stronger enforcement powers for the OAIC; and • A code to protect the online privacy of children with respect to social media and other internet services which are likely to be accessed by children and new criminal offences for "doxxing" (being the release of personal information using a carriage service in a way that would be menacing or harassing). 	<p>Privacy Policy Privacy Statement Privacy Breach Policy and Procedures Data Governance Policy Cybersecurity Policy</p>
<p><i>Cyber Security Legislative Package 2024 (Package):</i> 1. <i>Cyber Security Bill 2024 (Cyber Security Bill);</i> 2. <i>Intelligence Services and Other Legislation Amendment (Cyber Security) Bill 2024 (Intelligence Services Amendment Bill); and</i></p>	<p>The Package has been referred to the Parliamentary Joint Committee on Intelligence and Security for inquiry and report.</p> <p>The Australian Government seeks to increase proactive industry reporting and engagement following cyber incidents. The Government has perceived that businesses may be hesitant to voluntarily report information due to concerns that such information may be shared</p>	<p>Data Governance Policy Cybersecurity Policy Privacy Breach Policy and Procedures</p>

Name of Act	Relevance to Healthy Living NT	Reference to
<p><i>3. Security of Critical Infrastructure and Other Legislation Amendment (Enhanced Response and Prevention) Bill 2024 (SOI Amendment Bill).</i></p>	<p>between Government agencies and used against them in future proceedings.</p> <p>The Cyber Security Bill sets out a framework for the Government to gather information about emerging cyber threats and Australia's overall risk position, which in turn will inform future protections and policy. Among a range of things, the Bill provides for <i>Mandatory reporting of ransomware and cyber extortion payments</i>. An entity is a 'reporting entity', subject to the new reporting obligation, if it:</p> <ul style="list-style-type: none"> • carries on business in Australia, with an annual turnover above a yet-to-be specified threshold (which may align with the AUD \$3 million small business threshold in the <i>Privacy Act 1988</i> (Cth)); or • is a responsible entity for a critical infrastructure asset covered by the <i>Security of Critical Infrastructure Act 2018</i> (Cth) 	
<p><i>Liquor Act 1980 (NT)</i></p>	<p>Prescribes areas in the NT where the possession and/or consumption of alcohol is unlawful; particularly relevant to remote service provision</p>	<p>Occupational and Office Health and Safety Policies and Procedures</p> <p>Outreach Health Services Program Operational Guidelines</p> <p>Ethical Relationships Guide</p>
<p><i>Carers Recognition Act 2006 (NT)</i></p>	<p>Mandates requirements to comply with the Carer's Charter and other provisions requiring respectful and inclusive treatment of carers</p>	<p>Acknowledged in Annual Report</p> <p>Consumer Charter</p>
<p><i>Child Protection (Offender Reporting and Registration) Act 2004 (NT)</i></p> <p><i>Care and Protection of Children Act 2007 (NT)</i></p>	<p>Requires mandatory reporting of child abuse and management of all allegations of child abuse in a prompt, sensitive and confidential manner and investigation and mediation of any allegation of child abuse by the police or relevant other external party (not HLNT).</p>	<p>Child Protection Policy</p> <p>General Conditions of Salaried Employment – Section 2.2.1 Inherent Requirements – Criminal and Working with Children checks</p>
<p><i>Domestic and Family Violence Act 2007 (NT)</i></p>	<p>Domestic violence is defined as physical or emotional abuse, intimidation, stalking or economic abuse. All adults are required to report serious domestic and family violence to the police. The Act requires this if someone has caused or is likely to cause serious physical harm to someone else, and/or the life or safety of another person is under serious or imminent threat from domestic violence.</p>	<p>Occupational and Office Health and Safety Policies and Procedures</p> <p>NT Domestic Violence Mandatory Reporting Toolkit</p> <p>Clinical Governance Policy</p>

<i>Motor Vehicles Act 1978 (NT)</i>	Prescribes requirements for motor vehicles in the NT and traffic rules and regulations.	Occupational and Office Health and Safety Policies and Procedures
<i>Traffic Act 1987 and Regulations (NT)</i>		Motor Vehicle Policy
<i>Poisons and Dangerous Drugs Act 1983 (NT)</i>	Regulations cover the use, storage and transport of prescribed items such as insulin in the NT.	Health professional registration and codes of conduct Clinical Governance Policy



Remuneration Policy for health professional staff

Policy Statement

Healthy Living NT seeks to reward its health professional staff for additional effort and be innovative in remuneration packages.

Background

1. Healthy Living NT holds a number of primary core contracts with external funders for the delivery of a range of services. These include contracts with:
 - a) Diabetes Australia Ltd for the delivery of diabetes and related NDSS information under a funding agreement with the Department of Health (DoH) (held since 1987);
 - b) the NT Department of Health for the delivery of diabetes and cardiac education services from urban bases in Darwin and Alice Springs (held since 1989/2002);
 - c) the NT PHN (or appointed program administrator) to provide a range of health education services to remote communities throughout the NT, under the DoH Medical Outreach Indigenous Chronic Disease program (held since 2011)
 - d) Other minor funders and service contracts for the delivery of diabetes, dietetic and/or cardiac education services, which vary cyclically from year to year.
2. These core contracts enable Healthy Living NT to employ specialist health professional staff whose primary responsibility is the delivery of relevant services specified under the contracts.

Health professional employment agreements, job descriptions and remuneration packages with Healthy Living NT reflect that delivery of core contract services is the primary purpose of their employment, and that salaried remuneration is deemed to cover the provision of all services.

Individual job descriptions and remuneration are not linked to a specific funded program, and in the course of their duties, health professionals employed by HLNT provide services that meet a number of program/contract outcomes. Job descriptions also specify that:

- a) additional or special projects may also be undertaken.
- b) Maintenance of core underlying qualifications and credentials is required
- c) Travel within the NT is required including provision of services from HLNT office locations

3. Healthy Living NT recognises that:

- delivery of some core services requires greater employee effort than others (eg provision of cyclical remote services), and that
- there is opportunity to provide additional complementary services which may attract additional funding (such as Medicare benefits, private practice services or specialist services which require extraordinary CPD and certification, beyond that specified in job descriptions).

Healthy Living NT seeks to acknowledge this additional effort through income sharing and/or incentive arrangements.

4. Examples of additional projects or work outlined in point 3 above include:

- a) Eligibility of Credentialed Diabetes Educators and Accredited Practising Dietitians to claim Medicare rebates for specified client services (eg. eligible EPC / GPMP items) for direct client services delivered free by HLNT under the NT DoH contract specifically .
- b) Provision of health professional services on a private practice basis which may be conducted from HLNT premises or from external locations such as GP clinics, for fee paying clients.
- c) Provision of highly specialised clinical services requiring above-expectation qualifications and CPD, where Healthy Living NT has entered into Service Level agreements for remuneration of these services.
- d) Provision of cyclical remote services

5. This policy establishes a framework for the equitable remuneration of health professional effort either through provision of remote services or supplementary income derived from additional work or projects undertaken by Healthy Living NT.

Policy

6. Medicare/HIC Rebates applying to client services delivered under the NT DoH contract (referred to in 4a)

In the case of Medicare/HIC rebates, Healthy Living NT will pay the employee 15% of the **gross** income directly generated through HIC private practice provisions in addition to the remuneration and benefits in the Second Schedule of their contract, subject to:

- a) All income generated through private practice will be assigned to the employer; there will be no reduction in the employee's remuneration package as a result of additional income generated.
- b) Healthy Living NT will be responsible for all fixed costs associated with such practice, including extension to professional indemnity insurance where required.
- c) Any operational costs of Medicare/HIC rebatable activities must be agreed in advance with the CEO.
- d) The health professional making HIC claims through HLNT's client information system within 48 hours of service provision.

7. Private Practice services (referred to in 4b)

In the case of income generated through private practice (including fees and Medicare/HIC rebates), Healthy Living NT will pay the employee 15% of the **gross** income directly generated through private practice in addition to the remuneration and benefits in the Second Schedule of their contract, subject to:

- a) All income generated through private practice will be assigned to the employer; there will be no reduction in the employee's remuneration package as a result of additional income generated.

- b) Healthy Living NT will be responsible for all fixed costs associated with such practice, including extension to professional indemnity insurance where required.
- c) Any operational costs which must be agreed in advance with the CEO.
- d) The health professional making HIC claims through HLNT's client information system within 48 hours of service provision.

8. **Specialist Clinical Services (referred to in 4c)**

Where:

- Healthy Living NT has entered into a Service Level agreement for the provision of remunerated specialist clinical services and
- the health professional has attained and maintains extraordinary qualifications to deliver the services,

Healthy Living NT will pay the employee 10% of the **gross** income directly generated through the provision of specified services in addition to the remuneration and benefits in the Second Schedule of their contract, subject to:

- a) All income generated through specialist service delivery will be assigned to the employer; there will be no reduction in the employee's remuneration package as a result of additional income generated.
- b) Healthy Living NT will be responsible for all fixed costs associated with such practice, including extension to professional indemnity insurance where required.
- c) Any operational costs which must be agreed in advance with the CEO.
- d) The health professional ensuring that all necessary information for billable services provided are advised to the Finance and Administration Manager in a timely manner, not less than monthly.

9. **Remote Service Provision (referred to in 4d)**

Eligible remote service provision delivered outside of Darwin or Alice Springs locations includes:

- Face to face delivery of education services under the MOICD/ Outreach Health Services program
- Face to face delivery of education services under SLAs with Aboriginal Medical Services (or equivalent) based in remote locations
- Face to face delivery of education services under the NDSS ATSI Diabetes Yarning program

Health professional employees involved in the direct delivery of education services under these programs are entitled to receive additional remuneration as follows:

- For delivery of remote services (defined as involving travel away from an employee's town of residence and outside of Darwin or Alice Springs locations), a Remote Service Allowance (RSA) of \$100 per full day away is payable. This allowance is in addition to normal base salary and is referred to as a non-salary benefit.
- For the delivery of MOICD services that do not involve travel away from the employee's place of residence or are delivered within Darwin or Alice Springs locations, the remuneration package contained at Schedule 2 of the HLNT employment agreement applies.

Employees are required to ensure that all program requirements and reporting obligations have been met.

Payment Policy

10. Payments to employees made under this policy are referred to as a non-salary benefit and are inclusive of superannuation.
11. Health professional employees receiving additional non-salary benefit under this policy may receive the benefit as either a PAYG or exempt benefit. The method of additional remuneration will be determined by the taxable nature of the remuneration and where possible, the employee's preference. Such additional remuneration will be assessed and paid to the relevant employee on a monthly basis, where applicable. Superannuation is included in the gross amount of the non-salary remuneration.
12. Any additional non-salary remuneration will only become payable once Healthy Living NT has received payment for invoices or claims submitted:
 - MOICD invoices cannot be submitted until the relevant health professional has completed all necessary reports;
 - Medicare rebate claim submissions and private practice invoices are the responsibility of the relevant health professional.
 - NDSS ATSI program services must be registered in NDSS *Central* and managed according to NDSS requirements.

Exclusions from policy

13. Medicare/HIC rebates which are prima facie claimable, but are not payable to HLNT or the employee due to provisions of funding agreements e.g. MOICD program or where the rebatable income is assigned to the service funder.
14. Services provided from Darwin or Alice Springs locations are not eligible for the Remote Service Allowance.

Operation of Policy

15. This policy will be managed on the basis of implementation experience, with any variations needed as a result to be approved by the CEO. In appropriate cases the CEO may consult with the Board Executive or Governance Policy Committee for further guidance.
16. This policy will be appraised annually in the normal cycle of Healthy Living NT policy review as determined by Board.

Dispute Resolution

17. All parties subject to this policy are expected to apply all best endeavours and act in good faith to resolve issues and points of disagreement between the parties.
18. In the event that the parties cannot resolve a dispute arising in relation to the interpretation, operation or application of this policy, either party may refer the matter to the President of the Association or their nominee who will determine an appropriate course of action to achieve an equitable resolution.

Responsibility for Policy

The Board of Healthy Living NT is responsible for ensuring this policy is up to date and complied with.

Approval

Original Approval Date:	Board Meeting 3/08 of 28 June 2008
Revision 1 Date Approved:	Board Meeting 3/11 of 25 June 2011
Revision 2 Date Approved:	Board Meeting 6/13 of 14 December 2013
Revision 3 Date Approved:	Board Meeting 6/15 of 12 December 2015

Revision 4 Date Approved: Board Meeting 6/16 of 10 December 2016
Revision 5 Date Approved: Board Meeting 3/19 of 22 June 2019
Revision 6 Date Submitted: Board Meeting 6/24 of 14 December 2024
Revision 6 Date Approved: Board Meeting 6/24 of 14 December 2024

Circulation: All HLNT Board Members, CEO, health professional and finance staff

Sign off by: Association President



Signature: William De Decker
On behalf of Healthy Living NT Board

Related HLNT Documents/Policies:

Employment Agreement
General Terms and Conditions of Employment
Ethical Practice Guidelines
Time Off In Lieu
Travel Allowance



healthylivingNT

Corporate Governance Statement

Adopted Board Meeting 6/24 of 14 December 2024

Policy

Corporate Governance Statement

This statement reflects the corporate governance principles and policies adopted and followed by the Diabetes Association of the NT Inc., trading as Healthy Living NT.

The Board of Healthy Living NT believes the principles of good corporate governance underpin the values and behaviour of the organisation.⁽¹⁾

Lay solid foundations for management and oversight

The Board of Healthy Living NT has confirmed six major roles:

- Strategic thinking – to ensure that Board provides strategic leadership for the organisation and focusses at a strategic level in its considerations;
- Legal role – to ensure the Constitution is upheld, that good governance is practiced and that the organisation complies with relevant regulatory bodies and legislation;
- Planning and Policy – to approve and monitor the Strategic Plan and to approve and monitor relevant policy;
- Accountability – to ensure that the performance of the Board and the Chief Executive Officer is reviewed against key performance indicators, the Strategic Plan, budget and against best practice governance;
- Public Relations – to represent the mission and present the image of the organisation; and
- Risk Management – to identify major risks facing the organisation, to oversee the development of risk management techniques to deal with those risks and to monitor performance against risk management strategies.

The Board has an established set of delegations of authority in place formalising the functions reserved to the Board and those delegated to management.

Structure the Board to add value

The Board is elected from and by its membership for two year terms, with 50% of the Board retiring annually. All Board Members are required to act in the best interests of the Association and, as honoraries, receive no remuneration.

The Board ensures that it is composed of a broad cross-section of members, including an appropriate mix of qualifications, skills and experience and representation from Central Australia and other distinct groups. The Association's Constitution provides the Board with authority to appoint additional Board Members who, by virtue of their special qualities or otherwise, could assist in achieving the objects of the organisation.

Promote ethical and responsible decision-making

The Board has implemented and actively monitors adherence to an Ethical Practice and Relationships Guidelines Policy applying to all people representing Healthy Living NT including Board Members, staff and volunteers. The policy also outlines the organisation's expectations in doing business with external suppliers and stakeholders.

This code of conduct encompasses areas such as active compliance with statutory requirements, fair and equitable dealing, conflict of interest, efficient use of resources and assets, confidentiality and privacy, commercial relationships and reporting mechanisms for unlawful or unethical behaviour.

Safeguard integrity in financial reporting

Financial statements, comprising Profit and Loss and Balance Sheet reports are:

- Circulated to Board Members monthly via email, and
- Presented bi-monthly to Board meetings for review and consideration.

A clear division of responsibility and authority exists between purchase and payment authorisation, the integrity testing of payment claims and the preparation of payments. A formal set of financial delegations are in place.

The Board cyclically reviews the basis for financial reporting and the relevance of the Australian Equivalents to International Financial Reporting Standards (AEIFRS) to the Association's financial reporting integrity.

The Board is responsible for recommending to the members the appointment of the external auditor at the Annual General Meeting.

Make timely and balanced disclosure

The Constitution of the Association prescribes the documents and information that are freely available to members. Access is enhanced by the publication of key documents and information in an exclusive member area on the Association's website

The Board is committed to accuracy, openness and timeliness in reporting, including statutory reporting and balanced, detailed reporting of performance under Service Agreements with external stakeholders. The collection of a relevant range of raw data and synthesis of this data in a meaningful and accurate manner within reports provides reviewers with the opportunity to assess transparency.

Respect the rights of members

The Board is committed to upholding the rights of members which are clearly defined in the Constitution of the Association.

The Board facilitates members' effective exercise of their rights through quarterly and annual communications, the provision of balanced and understandable information and the use of technology to allow remote members to participate in general meetings.

The ability of members to exercise their rights is further enhanced through a formal communication plan and through the website.

Recognise and manage risk

The Board has a formal Risk Management policy and a comprehensive risk management framework which is reviewed regularly.

The framework provides a systematic application of policies to identify, rank and treat risks and for Board and management to monitor those risks. The framework includes action plans to ameliorate the identified gaps in current risk management practice and facilitate an ongoing review and reporting mechanism to the Board.

Encourage enhanced performance

The Board is committed to the fair review and active encouragement of Board and management effectiveness, and assesses individual and collective performance against key performance indicators and the achievement of goals in the Strategic Plan.

A formal Board Performance Evaluation policy and a formal Board induction program are in place and operational.

Recognise the legitimate interests of stakeholders

As a charitable organisation dedicated to providing benefit and service to people with diabetes and the community, and as the provider of significant externally funded services, Healthy Living NT recognises and values its relationships with all stakeholders, including the community, clients, staff, Government, honoraries and volunteers.

The Board values the integrity of the Association and its dealing with stakeholders. As such, the Board has endorsed and is constantly reviewing Healthy Living NT's policies and procedures that uphold the reputation of the organisation. Internal and external guidelines, policies and procedures include:

- Corporate Guiding Values statement
- Ethical Practice and Relationships Policy
- Privacy and Confidentiality Policy
- Privacy Breach Policy and Procedure
- Occupational and Office Health and Safety Policy
- Complaints Resolution Policy
- Discrimination and Sexual Harassment Policy
- Spokesperson Policy
- Data Governance Policy
- Consumer Charter
- Disclosure of Interests Policy
- Workplace Behaviour Policy
- Member Approval Policy
- Improper Conduct Prevention and Management Policy
- Whistleblower Policy
- Related Parties Policy
- Cybersecurity Policy
- Data Retention and Destruction Policy

The Board retains the ability to obtain specialist advice and mechanisms for external stakeholders to promote their legitimate interests.

(1) The ASX Principles of Good Corporate Governance and Best Practice Recommendations were used as guidelines.

GUIDING VALUES

To pursue excellence in all facets of Healthy Living NT's operations, through:

- Professionalism and ethical practice
- Fairness, honesty, confidentiality and compassion
- Mutual respect for all individuals, their roles and the organisation
- Continuous improvement in all activities
- Involvement with, and responsiveness to, community diversity
- Working collaboratively



Ethical practice and ethical relationships guide

Healthy Living NT (HLNT) has an obligation to treat all clients and business relationships objectively and fairly.

Healthy Living NT has legislative responsibility for proper resource management insofar as a chief executive and the Board must manage the affairs of the organisation in a way that promotes proper use of resources for which the chief executive and the Board are responsible. In this section, proper use refers to the efficient, effective and ethical use.

Legislative Framework

Associations Act NT

Under the Associations Act 2003, “officers”, including Board Members and employees (both current and former), of an incorporated association have a number of duties and responsibilities. In particular, officers must not, in the exercise of powers or the discharge of the duties of the office:

- commit an act with intent to deceive or defraud the association, members or creditors of the association or creditors of another person or for any fraudulent purpose;
- make improper use of information acquired by virtue of his or her position in the association so as to gain, directly or indirectly, a pecuniary benefit or material advantage for himself or herself or a related person (other than the class of people represented by the Association) or to cause detriment to the Association;
- make improper use of their position so as to gain, directly or indirectly, a pecuniary benefit or material advantage for themselves or a related person (other than the class of people represented by the Association) or to cause detriment to the Association.

ACNC Act

Under amendments to the Australian Charities and Not-for-Profits Commission (ACNC) Regulation 2013 Schedule 1, effective from 1 July 2013, Governance Standards for charitable organisations operating in Australia are prescribed. Specifically, Governance Standard 5 prescribes duties of responsible persons (defined as Board Members) which are:

- to act with reasonable care and diligence;
- to act honestly in the best interests of the charity and for its charitable purposes;
- not to misuse their position as a responsible person;
- not to misuse information they gain in their role as a responsible person;
- to disclose conflicts of interest;
- to ensure that the financial affairs of the charity are managed responsibly; and
- not to allow the charity to operate while it is insolvent.

ICAC Act NT

Under the Independent Commissioner Against Corruption Act 2017 (NT), as a recipient of public funding, Healthy Living NT is regarded as a Public Body under the Act, and its officers are regarded as Public Officers. All Board Members, employees, volunteers and contractors of HLNT are Public Officers.

In the implementation of this Act:

1. Healthy Living NT as a Public Body has responsibility to ensure:

- the proper and effective use of public funds under its administration;
- mandatory reporting of suspected serious Improper Conduct including Corrupt Conduct, Misconduct and Unsatisfactory Conduct or conduct that breaches public trust as defined by the Act; and
- the protection of the rights and responsibilities of whistle-blowers

2. As Public Officers, all HLNT Board Members, employees, volunteers and contractors of HLNT have a responsibility for mandatory reporting of suspected serious Improper Conduct including Corrupt Conduct, Misconduct and Unsatisfactory Conduct or conduct that breaches public trust as defined by the Act.

National Anti-Corruption Commission Act

Under the [National Anti-Corruption Commission Act 2022](#), as a provider of Commonwealth goods or services, Healthy Living NT is regarded as a contracted service provider. Board Members and employees are Public Officials under the NACC Act and are treated as a staff member of the Commonwealth agency that is responsible for the contract.

There are 4 types of corrupt conduct under the NACC Act. A person engages in corrupt conduct if:

1. they are a public official and they [breach public trust](#)
2. they are a public official and they [abuse their office](#) as a public official
3. they are a public official or former public official and they [misuse information](#) they have gained in their capacity as a public official
4. they do something that [adversely affects a public official's](#) honest or impartial exercise of powers or performance of official duties.

As a part of achieving these ideals, HLNT and its Board Members, employees and volunteers must act ethically in all activities. Efficient, effective and ethical relationships between HLNT and its customers, suppliers of goods and services, business and service partners, sponsors, etc are essential. This guide is not intended to create legal obligations between the parties, although it describes some legal obligations imposed by legislation.

The guide provides Board Members, employees, volunteers, suppliers, and business and service partners with basic information on HLNT's expectations when doing business. It is designed to enhance awareness of the issues involved and aims to encourage the highest level of ethical standards in client/supplier and business/service partner relationships.

All HLNT Board Members, employees and volunteers must act in accordance with the code of conduct set out by HLNT and underpinned by the *Associations Act NT 2003*, *ACNC Act*, *the ICAC Act NT 2017* and *the NACC 2022*.

HLNT believes the code of conduct is consistent with similar ideals practised within Australian businesses and is consistent with expectations of the wider community. In addition to this code of conduct, Healthy Living NT has an established Disclosure of Interests Policy which sets out processes for reporting and managing the conflicts of interest.

Complaints or concerns about Healthy Living NT or its staff

HLNT Members, employees, suppliers or business/service partners, who are concerned that a breach of the law or unethical behaviour by HLNT, its staff or Board Members has taken place and wish to have the circumstances examined, have a number of options available to them.

- Complaints or concerns about:
 - staff can be directed to the CEO or to the President;
 - the CEO can be directed to the President;
 - the President can be directed to the Treasurer;
 - the Association can be directed to the Board.
- Complaints or concerns can also be directed to:
 - the Attorney-General's Department or Licensing NT in respect of the Association's administration;

- the Independent Commissioner Against Corruption in respect of suspected serious Improper Conduct as defined by the ICAC Act NT;
- the National Anti-Corruption Commission in respect of corrupt conduct relating to administration of a Commonwealth program or funding or to the
- Health Complaints Commission.

Complaints about suppliers or business partners

HLNT expects that suppliers and business/service partners will provide a means of problem resolution should circumstance arise. In the first instance, complaints about suppliers should be directed to the Finance and Administration Manager, and if unresolved, to the CEO.

The code of conduct

The code of conduct set out below provides a framework for relationships between HLNT and its clients, suppliers, business and service partners.

All HLNT Board Members, employees and volunteers, when acting in the course of HLNT service, are obliged to:

- behave honestly and with integrity;
- act with care and diligence;
- treat everyone with respect, courtesy and compassion, with deference to cultural and religious diversity and without harassment;
- comply with all applicable Australian and Northern Territory laws;
- comply with all HLNT policies and values;
- comply with any lawful and reasonable direction given by someone in the Association who has authority to give direction;
- maintain appropriate confidentiality about dealings with any client of HLNT;
- disclose, and take reasonable steps to avoid, any conflict of interest (real or apparent) in connection with HLNT service;
- use HLNT resources in a proper manner;
- ensure that false or misleading information is not provided in response to a request for information that is made for official purposes in connection with the employee's HLNT employment;
- not make improper use of:
 - inside confidential information, or
 - the Member's or employee's duties, status, power or authority;
- neither order to gain, nor seek to gain, a benefit or advantage for themselves or for any other person, other than the class of people represented by the Association;
- behave in a way that upholds HLNT values and the integrity and good reputation of HLNT at all times;
- not give or disclose, directly or indirectly, any information about HLNT business or official knowledge except in the course of service with HLNT or with the CEO's or Board's express authority; and
- report suspected serious Improper Conduct to HLNT's nominated recipients or to the Independent Commissioner Against Corruption.

Healthy Living NT requires its Board Members, employees and volunteers to, within the scope of their specific delegations and roles:

- ensure HLNT's requirements for services and goods are met;
- obtain value for money;
- be open and fair in business dealings, subject to commercial-in-confidence, security and privacy considerations;
- observe HLNT's obligations under the terms and conditions of tender and of contract;

- regularly communicate with suppliers, including keeping them abreast of relevant developments;
- respond promptly to reasonable requests for advice and information;
- be fair and equitable in their treatment of all tenderers and suppliers;
- deal honestly with suppliers and be timely in paying accounts;
- avoid and declare situations where personal interests conflict, or may conflict, with public duty;
- neither solicit nor accept personal remuneration or other benefit from organisations seeking or having an official relationship with HLNT; and
- protect the interests of HLNT and its members and clients at all times.

Healthy Living NT expects that its suppliers and business/service partners will

- adequately protect commercial, confidential and security classified information
- deliver services and/or goods in accordance with accepted HLNT standards and requirements
- deliver value for money
- be open in business dealings, subject to commercial-in-confidence, security and privacy considerations
- observe supplier obligations under the terms and conditions of tender and of contract and, where appropriate, conduct their business in accordance with the Medicines Australia Code of Conduct.
- regularly communicate with HLNT representatives, including keeping them abreast of relevant developments and best practice
- avoid collusive practices
- disclose beneficial interests in contracts wherever appropriate
- avoid and declare situations where personal or business interests conflict, or may conflict, with HLNT interests
- comply with the requirements of the Privacy Act in the performance of any services for HLNT which require the collection and handling of personal information
- prevent the unauthorised release of privileged information including security classified information
- respond promptly to reasonable requests for advice and information
- not accept solicitations from or make offers to HLNT employees of financial or other benefits.

HLNT policies and strategies

The following information is intended to outline the general ideals of HLNT policy. For more specific information, refer to your direct supervisor or the CEO.

1. Gifts

Board Members and staff must not use their position to obtain a benefit for themselves or anyone else, other than the class of people represented by the Association. It is inappropriate to accept more than trivial gifts or mementos from clients, suppliers or contractors. If a supplier wishes to provide a personal gift, it should be of nominal value only (such as a calendar). Any gift with an estimated value above \$50 should be politely declined and if that is not possible, declared to the CEO or the Association President for direction on appropriate management.

2. Sponsorships and trade displays

Suppliers regularly sponsor trade displays and meetings of professional bodies. Attendance by HLNT employees at sponsored meetings is acceptable and has become normal practice. Employees attending such meetings should ensure that the sponsorship does not interfere with or influence their normal decision-making responsibilities.

Such sponsorship must be declared at the time and reported in the Annual and Performance Reports.

3. Commercial-in-confidence

Information supplied by suppliers and HLNT is frequently classified 'in confidence' and on the strict understanding that it will not be disclosed to other than those with authority and a genuine need to know.

Under no circumstances are HLNT employees and suppliers or partners to allow commercial-in-confidence information to be made known to unauthorised persons.

4. Hospitality and entertainment

It is not appropriate for Board Members or employees to accept any offer of free entertainment or hospitality from a supplier where it could be regarded as substantial or could give rise to either an actual or perceived conflict of interest.

Examples of 'free entertainment' include but are not limited to dinners, corporate boxes, tickets to sporting or cultural events.

HLNT employees should ensure that in all dealings with suppliers, their actions are able to withstand public scrutiny.

Acceptance of offers of hospitality is only acceptable where it is provided on-site at the Association's offices for a number of staff and in conjunction with a substantial educational component. The hospitality must be secondary to the education component.

Attendance at external CPD activities where there is a broad range of other health professionals attending does not fall under this guideline.

5. Conflict of interest

A conflict of interest generally covers matters that give, or have the potential to give, rise to a direct or indirect financial interest or personal advantage to a particular Board Member or staff member. Types of interests that may be considered in determining whether or not they might conflict with official duties can include, but not be limited to:

- shareholdings or other interest in a company or business whether held by the employee as an individual or as a member of another company or partnership, or through a trust;
- interest in land or property;
- significant liabilities to organisations or individuals excluding indebtedness for home mortgages or for current and ordinary household and living expenses;
- outside employment, appointments or directorships, whether remunerated or not; and
- an association with another organisation (whether remunerated or not) that impinges upon, or has the potential to impinge upon, the operations and/or the best interests of HLNT.

HLNT officers must disclose, and take reasonable steps to avoid, any conflict of interest (real or apparent) in connection with HLNT service.

In accordance with the Associations Act 2003, ACNC regulations and HLNT's Disclosure of Interests Policy:

- 1) HLNT Board Members and senior officers must:
 - fully disclose any interests that have a potential to conflict with HLNT's interests on commencement, and
 - on becoming aware of an interest which has potential to become a conflict of interest, to disclose the nature and extent of the interest to the Board. The declaration must be minuted and the member must disclose the nature and extent of the interest at the next Annual General Meeting of the Association.

Once a Board Member or officer has declared an interest, they may participate in Board discussion at the discretion of the Board, but they may not participate in voting or decision making on the matter.

- 2) HLNT employees must, on becoming aware of an interest which has potential to become a conflict of interest, to formally disclose the nature and extent of the interest to the CEO.

Interests that are common to the class of people represented by the Association are not considered a conflict of interest under the Associations Act.

In order to avoid real or perceived conflict of interest:

- staff employed directly by Healthy Living NT are not eligible to apply for assistance or sponsor applications under the Bill Raby Diabetes Fellowship;
- Healthy Living NT is unable to act as an auspicing organisation for unincorporated associations seeking funding through the Bill Raby Diabetes Fellowship.

6. Product Selection, Demonstration and Promotion

HLNT sells products for people with diabetes for their diabetes needs but does not endorse specific products.

Within their scope of practice, HLNT staff should have the knowledge to sell products and ability to provide assistance and instruction to people purchasing products. The primary determinant guiding assistance with product selection is the suitability of the product for the client, including considerations such as client preference, budget, technical ability, literacy and education level, support services, visual acuity and manual dexterity.

Staff may suggest products that best meet the client's specified needs, but the decision of the client is final and will be respected and supported by HLNT.

Staff should ensure that when demonstrating equivalent products that they provide a fair and unbiased explanation of the advantages and disadvantages of each product, and do not allow personal or other preferences to become a factor in promotion or selection.

Prohibition on Financial Remuneration: No health professional staff of HLNT shall accept financial remuneration, directly or indirectly, from pharmaceutical or medical device companies or any other related industry entity for the purpose of commencing clients on branded diabetes management technology devices or for any other related endorsements. This policy is set in place to ensure that our professionals act solely based on the best interest of the client, without any financial influence.

HLNT will, on request or as required, assess specified products with a view to stocking them for sale to clients. Such assessments will include: need and likely demand, supplier bona fides and customer service support, demonstrated sustainability/appropriateness of the product in the NT environment, likely customer requirements, availability of equivalent products and commercial factors such as terms of trading, pricing structures, HLNT stock management and administration considerations etc.

Food or nutrition products will not be scientifically assessed by HLNT.

HLNT's decision on the stocking of a product will be communicated to the supplier. The reasons for the decision will not be made available and HLNT's decision is final.

Where products such as home blood glucose monitors are stocked, suppliers will be required to supply free of charge a minimum number of units for education and demonstration purposes.

Suppliers may provide HLNT with free consumables for clinical and demonstration use, however this is not mandatory. Staff will ensure that the provision of free consumables does not influence their practise in assisting with the selection of the most appropriate/suitable product for the individual client.

Suppliers may provide HLNT with visual and teaching aids, education material and minor ancillary items such as client product samples, pens, notepads etc. Staff should ensure that when using these items in public or education areas that there is no overt bias to a particular supplier. Additionally, education staff will minimise their use of items with overt company signage in consultation areas, particularly where the item does not have a significant educational value.

7. Client Referrals

Health professional staff employed by Healthy Living NT may refer or suggest external health professionals to clients based on an assessment of a client's personal preferences and clinical needs, and with full reference to the broader range of practitioners available. Healthy Living NT will not favour one practitioner or practice over others.

Healthy Living NT will not formally or informally refer any clients to services or practitioners hiring our facilities as a result of their use of HLNT facilities unless it is in accordance with the above paragraph.

8. References

HLNT will not provide false or misleading information in response to a request for information that is made for official purposes in connection with a person's HLNT employment.

Professional references for employees may only be provided by direct supervisors or the CEO, who have been explicitly authorised by the employee to provide such a reference.

Written references may only be provided with the explicit approval of the CEO.

9. Terms and conditions of tender and of contract

HLNT is responsible for ensuring that all procurement processes and contract management are transparent and accountable and are able to withstand full public scrutiny.

Tenderers, contractors and suppliers should ensure that they are aware of the terms and conditions of tender and of contract. During the tender process, social contact should be avoided. During contract negotiations, hospitality shall not be accepted.

Failure to adhere to these guidelines may have adverse consequences, including termination of contract. Alleged breaches will be examined on a case-by-case basis.

10. Privacy

HLNT Board Members, employees and volunteers are bound by HLNT's Privacy Policy, based on the Privacy Act as amended.

Amendments to the *Privacy Act 1988* include the:

- *Privacy Amendment (Private Sector) Act 2000*, which commenced on 21 December 2001, containing provisions that apply to agencies and their contractors in relation to personal information.
- The *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Privacy Amendment Act) which commenced on 12 March 2014 containing many significant changes to the Privacy Act.
- *Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth)* requiring organisations covered by the Australian Privacy Act 1988 (Privacy Act) to notify any individuals likely to be at risk of serious harm by a data breach.

Contractors should ensure that they are aware of and comply with the requirements of the Privacy Act in the performance of any services for HLNT which require the collection and handling of personal information.

Suppliers, contractors, substantive operational volunteers and advisory committee members may be required to sign a non-disclosure agreement if they are not already bound by Codes of Ethics or company policies.

Responsibility for Policy

The Board of Healthy Living NT is responsible for ensuring this policy is up to date and complied with.

Approval

Original Approval Date:	Meeting 5/05 of 22 October 2005
Revision 1 Approval Date:	Meeting 6/08 of 13 December 2008
Revision 2 Approval Date:	Meeting 6/11 of 10 December 2011
Revision 3 Approval Date:	Meeting 6/13 of 14 December 2013
Revision 4 Approval Date:	Meeting 6/14of 13 December 2014
Revision 5 Approval Date:	Meeting 6/16 of 10 December 2016
Revision 6 Approval Date:	Meeting 6/17 of 9 December 2017
Revision 7 Approval Date:	Meeting 6/18 of 8 December 2018
Revision 8 Approval Date:	Meeting 4/19 of 24 August 2019
Revision 9 Approval Date:	Meeting 6/22 of 9 December 2023
Revision 10 Submission Date:	Meeting 6/24 of 14 December 2024
Revision 10 Approval Date:	Meeting 6/24 of 14 December 2024

Circulation: All HLNT Board Members, staff and volunteers;
HLNT Website (public).

Sign off by: Association President, William De Decker

Signature:



On behalf of Healthy Living NT Board

Disclosure of Interests Policy

All Healthy Living NT Board and staff members are required to conduct themselves in accordance with the standards and values identified in Healthy Living NT's *Ethical Practice and Ethical Relationships Guide*.

Scope

This policy applies to all officers of Healthy Living NT (HLNT) including Board Members, employees and operational volunteers, to:

- provide guidelines for application of an essential element of the *Ethical Practice and Ethical Relationships Guide*;
- confirm the necessity to disclose in writing any private financial or other interests that conflict, or have the potential to conflict, with a person's official duties.

This policy does not apply to the Bill Raby Diabetes Fellowship Board of Governors which operates under specific provisions relating to conflict of interest.

Definitions

For the purpose of this policy, the following terms are defined:

Officer	Refers to all Board Members, staff and operational volunteers employed by HLNT
Immediate Family	Includes an officer's spouse, including de facto spouse and dependent children.
Conflict of Interest	Means a conflict between private financial or other interests and official duties or responsibilities of HLNT, whether actual, potential or perceived.
Actual Conflict of Interest	Involves a direct conflict between an officer's current duties and responsibilities and their existing private interests.
Potential Conflict of Interest	Arises where an officer has private interests that could interfere with their official duties in the future.
Perceived Conflict of Interest	Is when it could be perceived or appears that an officer's interest could improperly influence the performance of their formal HLNT duties – whether or not this is in fact the case.
Other Relevant Persons	Means any other person with whom an officer has a close personal relationship including persons who are substantially or wholly reliant on the officer for support, financial or otherwise.
Private Interests	Are those interests that can bring benefits or disadvantages to us as individuals, or to others whom we may wish to benefit or disadvantage.
Senior Management	The HLNT positions of CEO, Manager Education Services and Manager Finance and Administration
General Interests	Are the backgrounds, professional skills and extended community linkages of Board Members and senior management staff. These general interests are not regarded, prima facie, as conflicts of interest and are not required to be disclosed or reported on due to any legislative requirement.

<i>Status</i>	<i>Approved</i>	Disclosure of Interests Policy	<i>Document ID</i>	G0012
<i>Consultation</i>	<i>Board</i>		<i>Date of Issue</i>	24/08/2019
<i>Approval By</i>	<i>Board</i>		<i>Current Version Number</i>	3.0
<i>Circulation (on approval)</i>	<i>All Staff and Board</i>		<i>Review Cycle</i>	<i>Annual</i>
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Policy Statement

Any conflict of interest, whether actual, potential or perceived, erodes confidence in the integrity of HLNT.

The purpose of declaring private and other interests is to formally demonstrate that officers have identified interests which might result in a conflict of interest, and after due consideration, that appropriate action has been taken to resolve such conflict or prevent it from arising.

Completed declarations are held as evidence of disclosure and, as such, provide some protection from unfounded allegations of improper or unprofessional conduct concerning HLNT, its officers or employees.

The purpose of this policy is to provide a formal framework through which:

1. Healthy Living NT (HLNT) Board members and senior management staff can:
 - a) Declare any interests that may constitute a conflict of interest, for which declaration and management in accordance with statutory requirements is necessary, or
 - b) Advise any interests of a general information nature, shared with the Board on a voluntary basis in order to enhance the Board's overall appreciation of its community and other linkages.
2. HLNT staff are aware of the need to declare any interests that may constitute a conflict of interest, for which declaration and management in accordance with statutory requirements is necessary.

A conflict of interest occurs when a person's personal interests conflict with their responsibility to act in the best interests of the charity. A conflict of interest may be actual, potential or perceived and may be financial or non-financial.

Conflicts of interest are common and do not have to be a serious problem. However, if a conflict of interest isn't managed properly, it may damage a charity's reputation and, in serious cases, even breach the law.

Legislative requirements

The rules relating to the declaration and management of conflicts of interest (actual and potential) are prescribed under two pieces of legislation/regulation:

- a) Amendments to the Australian Charities and Not-for –Profits Commission (ACNC) Regulation 2013 Schedule 1, prescribe Governance Standards for charitable organisations operating in Australia; Governance Standard 5 is relevant to conflicts of interest.
- b) Sections 31-33 of the Associations Act 2003 (NT) prescribe rules relating to disclosure and management of conflicts of interests for NT incorporated associations.

Healthy Living NT must comply with both Acts with respect to the duties of its responsible persons specified in those Acts.

Additionally, as Healthy Living NT is a receiver of public monies, the conduct of the organisation and its officers also fall within the scope of the NT Independent Commissioner Against Corruption Act 2017 including failure to manage adequately an actual or perceived conflict of interest.

ACNC Requirements

Specifically, Governance Standard 5 prescribes duties of Responsible Persons (defined as Board Members) and Authorised Persons (defined as senior management) which are:

- to act with reasonable care and diligence
- to act honestly in the best interests of the charity and for its charitable purposes
- not to misuse their position as a responsible person
- not to misuse information they gain in their role as a responsible person
- to disclose conflicts of interest
- to ensure that the financial affairs of the charity are managed responsibly
- not to allow the charity to operate while it is insolvent.

Compliance with this standard (as it relates to conflict of interest) is generally achieved by:

- having a charter that sets out how responsible persons are expected to behave or a code of conduct
- having a policy, procedure or other process (such as in governing documents) to require a responsible person not to vote on matters where the person has a conflict of interest
- having processes in place to manage conflicts of interests

Association Act Requirements

Under the Associations Act 2003, “officers”, including Board Members and employees (both current and former), of an incorporated association have a number of duties and responsibilities. In particular, officers must not:

- in the exercise of powers or the discharge of the duties of the office, commit an act with intent to deceive or defraud the association, members or creditors of the association or creditors of another person or for any fraudulent purpose.
- make improper use of information acquired by virtue of his or her position in the association so as to gain, directly or indirectly, a pecuniary benefit or material advantage for himself or herself or a related person (other than the class of people represented by the Association) or to cause detriment to the Association.
- make improper use of their position so as to gain, directly or indirectly, a pecuniary benefit or material advantage for themselves or a related person (other than the class of people represented by the Association) or to cause detriment to the Association.

Conflicts of interest (potential or actual) must be declared at the Board Meeting and minuted, assessed and managed by Board in an agreed manner and/or, when confirmed, managed as prescribed by the Associations Act i.e. member not to vote and reported to the Association’s AGM. An extract of Sections 31-33 of the Associations Act 2003 is appended to this policy.

Independent Commissioner Against Corruption Act Requirements

Under the Independent Commissioner Against Corruption Act 2017 (NT), as a recipient of public funding, Healthy Living NT is regarded as a Public Body under the Act, and its officers are regarded as Public Officers. All Board Members, employees, volunteers and contractors of HLNT are Public Officers under the ICAC Act.

Under this Act:

1. Healthy Living NT as a Public Body has responsibility to ensure:
 - the proper and effective use of public funds under its administration
 - mandatory reporting of suspected serious Improper Conduct including Corrupt Conduct, Misconduct and Unsatisfactory Conduct or conduct that breaches public trust as defined by the Act and
 - the protection of the rights and responsibilities of whistle-blowers
2. As Public Officers, all HLNT Board Members, employees, volunteers and contractors of HLNT have a responsibility for mandatory reporting of suspected serious Improper Conduct including Corrupt Conduct, Misconduct and Unsatisfactory Conduct or conduct that breaches public trust as defined by the Act.

Failure to manage adequately an actual or perceived conflict of interest is regarded as Corrupt Conduct under this Act, and is therefore subject to mandatory reporting requirements.

Conflict of Interest

A conflict of interest generally covers matters that give, or have the potential to give, rise to a direct or indirect financial interest or personal advantage to a particular Board Member or staff member. Types of interests that may be considered in determining whether or not they might conflict with official duties can include, but not be limited to:

- shareholdings or other interest in a company or business whether held by the employee as an individual or as a member of another company or partnership, or through a trust;
- interest in land or property;
- significant liabilities to organisations or individuals excluding indebtedness for home mortgages or for current and ordinary household and living expenses;
- outside employment, appointments or directorships, whether remunerated or not; and
- an association with another organisation (whether remunerated or not) that impinges upon, or has the potential to impinge upon, the operations and/or the best interests of HLNT.

The provision of a written disclosure does not absolve the individual of the responsibility to manage conflicts, or potential conflicts, between their financial and other interests, and their official duties.

General Interests

Healthy Living NT officers (Board Members and senior management staff) are drawn from a diverse range of community, professional and demographic backgrounds. These varying backgrounds and professional skills, together with the extended community linkages (such as clubs or other associations or boards) are collectively important to Healthy Living NT's linkages to the wider community and bona fides as a community-based organisation.

These general interests are not regarded, prima facie, as conflicts of interest and are not required to be disclosed or reported on due to any legislative requirement. These interests are, by and large, those that would be included on a person's curriculum vitae or, in other terms, an application for Board membership.

Healthy Living NT encourages Board members and relevant officers to share any interests that are of a general information nature, on a voluntary basis in order to enhance the Board's overall appreciation and awareness of its community and other linkages.

Reporting and Management Framework

The primary responsibility for declaring and managing a conflict of interest rests with the individual officer. It is expected officers will take all reasonable steps to prevent such conflicts.

Failure or refusal to provide a declaration may be considered a breach.

The framework for reporting and managing both conflicts of interest and general interest matters is detailed below.

1. Board Members and Senior Management

All Board Members and senior management must fully disclose any interests that have potential to conflict with HLNT's interests via a Declaration Form (Attachment A) on commencement and upon becoming aware of a potential conflict of interest, or following changes to interests. Completed forms should be submitted to the CEO and/or President.

Additionally, the Board agenda will provide for the following standing items:

- Disclosure of Interests
 - Conflicts of Interest
 - General Interest (General interest advisories to the Board by officers will be documented in the minutes)

Where a Conflict of Interest:

- Is not confirmed, the declaration and Board consideration/decision will be minuted.
- Is confirmed:
 - The nature and extent of the conflict and Board consideration of the matter will be minuted;
 - The officer, at the discretion of Board, may be required to absent themselves from discussion on the agenda item;
 - The officer will not take part in any decision making or voting on the matter; and

- The nature and extent of the conflict of interest and Board management of the issue will be reported to the next Association AGM.

2. HLNT Employees (below Senior Management)

When an employee becomes aware of a potential conflict of interest, a Declaration Form (Attachment A) must be completed and submitted to their Supervisor and the CEO.

Where a Conflict of Interest:

- Is not confirmed, this declaration will be signed by the immediate supervisor and the CEO and placed in the employee's personnel file.
- Is confirmed:
 - The nature and extent of the conflict will be assessed, and this assessment (together with further action) will be placed in the employee's personnel file.
 - The officer, at the discretion of CEO, may be required to absent themselves from discussions, meetings or correspondence relating to the subject of the conflict of interest;
 - The officer will not take part in any decision making relating to the subject of the conflict of interest; and
 - The nature and extent of the conflict of interest and management of the issue will be reported to the next meeting of the Association's Board which may implement additional action.

In the case of both Board Members and staff, it is potentially possible that the nature and/or extent of the conflict are such that the officer may need to divest themselves of interests and/or associations in order to continue a formal relationship with HLNT.

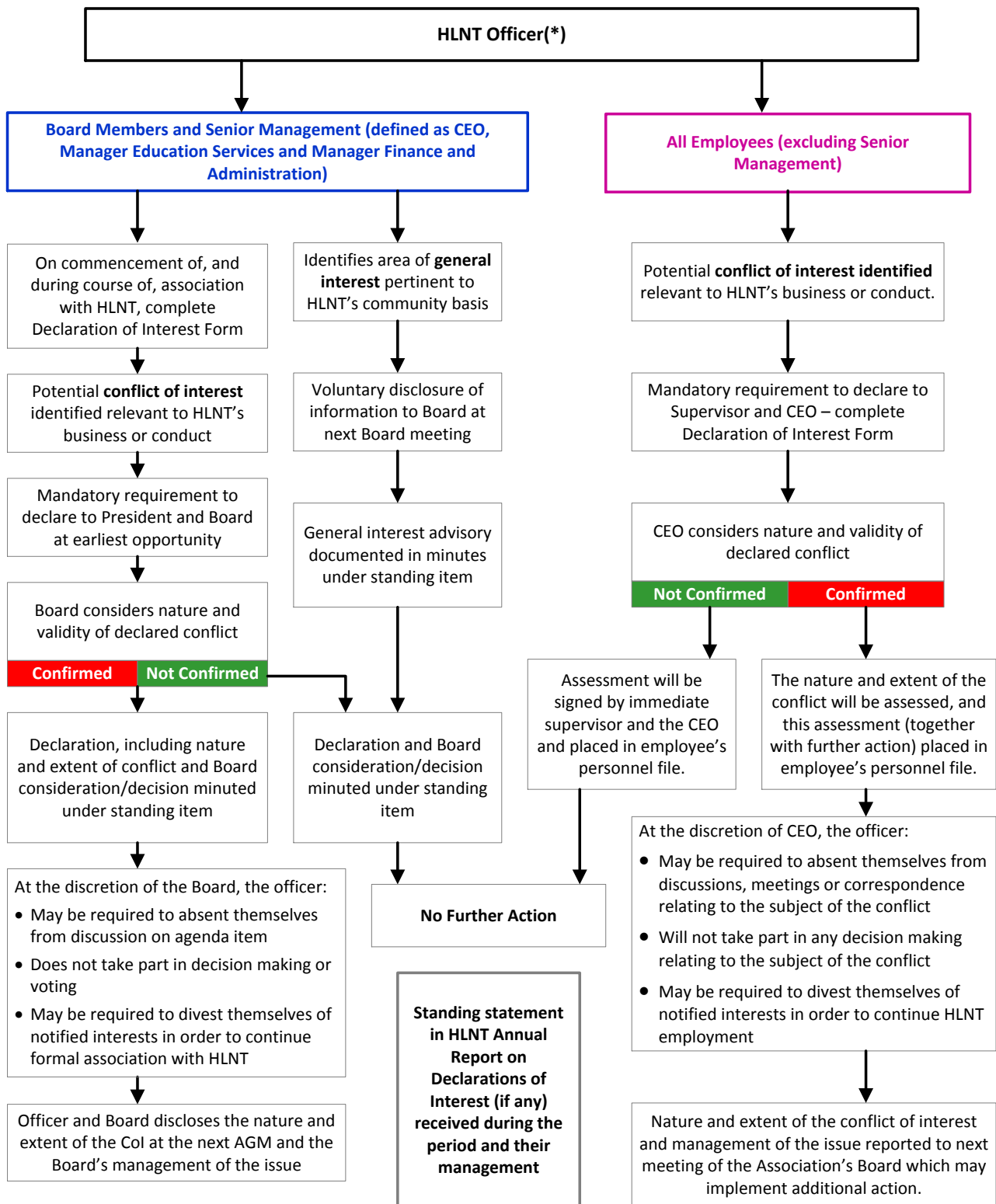
3. Public Reporting

HLNT's Annual Reports should contain standing statement related to Declarations of Interest (if any) received during the period and their management.

Privacy

All disclosures will be held in confidence by the CEO and/or Manager Finance and Administration. An officer is able to access his or her information.

Healthy Living NT
Declaration and Management of Interests Framework



(*) The term "officer" is defined as:

1. **Associations Act:** Board Members and employees
2. **ACNC Act:** Board Members and senior staff members ("responsible persons" and "authorised persons")
3. **ICAC Act:** All Board members, employees, contractors and volunteers are Public Officers and have responsibility for mandatory reporting of suspected serious Improper Conduct, including failure to manage adequately an actual or perceived conflict of interest.

Responsibility for Policy

The Board of Healthy Living NT is responsible for ensuring this policy is up to date and complied with.

Approval

Original Approval Date:	Board Meeting 5/13 of 26 October 2013
Revision 1 Approval Date:	Board Meeting 6/18 of 8 December 2018
Revision 2 Submission Date:	Board Meeting 4/19 of 24 August 2019
Revision 2 Approval Date:	Board Meeting 4/19 of 24 August 2019

Circulation: Board and Staff

Sign off by: Chair of the Board



Signature: Ron O'Brien
On behalf of Healthy Living NT Board

Related Documents

- HLNT Corporate Governance Statement
- HLNT Ethical Relationships Guide
- HLNT Improper Conduct Prevention and Management Policy

Extract: Sections 31-33 of the Associations Act 2003 (NT)**31. Disclosure of interest**

(1) A member of the committee of an incorporated association who has a direct or indirect pecuniary interest in a contract, or proposed contract, with the association –

(a) must, as soon as the member becomes aware of the interest, disclose the nature and extent of the interest to the committee; and

(b) must disclose the nature and extent of the interest at the next annual general meeting of the association required to be held by the association.

Penalty: 200 penalty units.

(2) Subsection (1) does not apply in relation to a pecuniary interest that exists only because –

(a) the member of the committee is an employee of the association;

(b) the member of the committee is a member of a class of persons for whose benefit the association is established; or

(c) the member of the committee has the pecuniary interest in common with all or a substantial proportion of the members of the association.

(3) If a member of the committee of an incorporated association discloses a pecuniary interest in a contract, or proposed contract, in accordance with this section, or his or her interest is not required under this section to be disclosed –

(a) the contract is not liable to be avoided by the association on a ground arising from the fiduciary relationship between the member and the association; and

(b) the member is not liable to account for profits derived from the contract.

32. Voting on contract in which committee member has interest

(1) A member of the committee of an incorporated association who has a direct or indirect pecuniary interest in a contract, or proposed contract, with the association must not take part in a decision of the committee with respect to that contract but may, subject to this Division, take part in deliberations with respect to the contract.

Penalty: 200 penalty units.

(2) Subsection (1) does not apply in relation to a pecuniary interest –

(a) that exists only because the member of the committee is a member of a class of persons for whose benefit the association is established; or

(b) that the member of the committee has in common with all or a substantial proportion of the members of the association.

33. Duties of officers etc.

(1) An officer of an incorporated association must not, in the exercise of his or her powers or the discharge of the duties of his or her office, commit an act with intent to deceive or defraud the association, members or creditors of the association or creditors of another person or for any fraudulent purpose.

Penalty: 200 penalty units or imprisonment for 12 months.

(2) An officer or employee of an incorporated association, or former officer or employee of an incorporated association, must not make improper use of information acquired by virtue of his or her position in the association so as to gain, directly or indirectly, a pecuniary benefit or material advantage for himself or herself or another person or so as to cause a detriment to the association.

Penalty: 200 penalty units or imprisonment for 12 months.

(3) An officer or employee of an incorporated association must not make improper use of his or her position as an officer or employee of the association so as to gain, directly or indirectly, a pecuniary benefit or material advantage for himself or herself or another person or so as to cause a detriment to the association.

Penalty: 200 penalty units or imprisonment for 12 months.

(4) A person who contravenes a provision of this section is liable to the association for all profit made by him or her and for all damage suffered by the association as a result of the contravention.

Attachment A - Declaration of Interest Form

Section 1 – Officer details

Name: _____

Position Title: _____

Section 2 – Declaration

I DECLARE that I have considered my private interests and associations, and those of my immediate family (or other relevant persons), and (please tick):

- I have **no** private interests or associations that I consider may, at some time, give rise to a potential, perceived or actual conflict of interest with my official duties (Proceed to Section 4).
- I have **private interests or associations** which I consider may have the **potential** to give rise to a conflict of interest with my official duties (Proceed to Section 3).
- I have an **actual or perceived** conflict of interest (Proceed to Section 3).

Section 3 – Disclosure of Potential, Perceived or Actual Conflicts of Interest

Provide details of private interests or associations which you consider form a **potential, perceived, or actual** conflict of interest with your official duties. All interests can be included on one statement.

Describe how the situation might affect, or be seen to potentially affect, you or HLNT.

Explain how you propose to manage the private interest or association should it give rise to a conflict of interest; and/or manage the actual or perceived conflict/s of interest.

Agreed action plan (with Board or CEO) you are to undertake to manage or eliminate the conflict of interest.

Section 4 - Endorsement

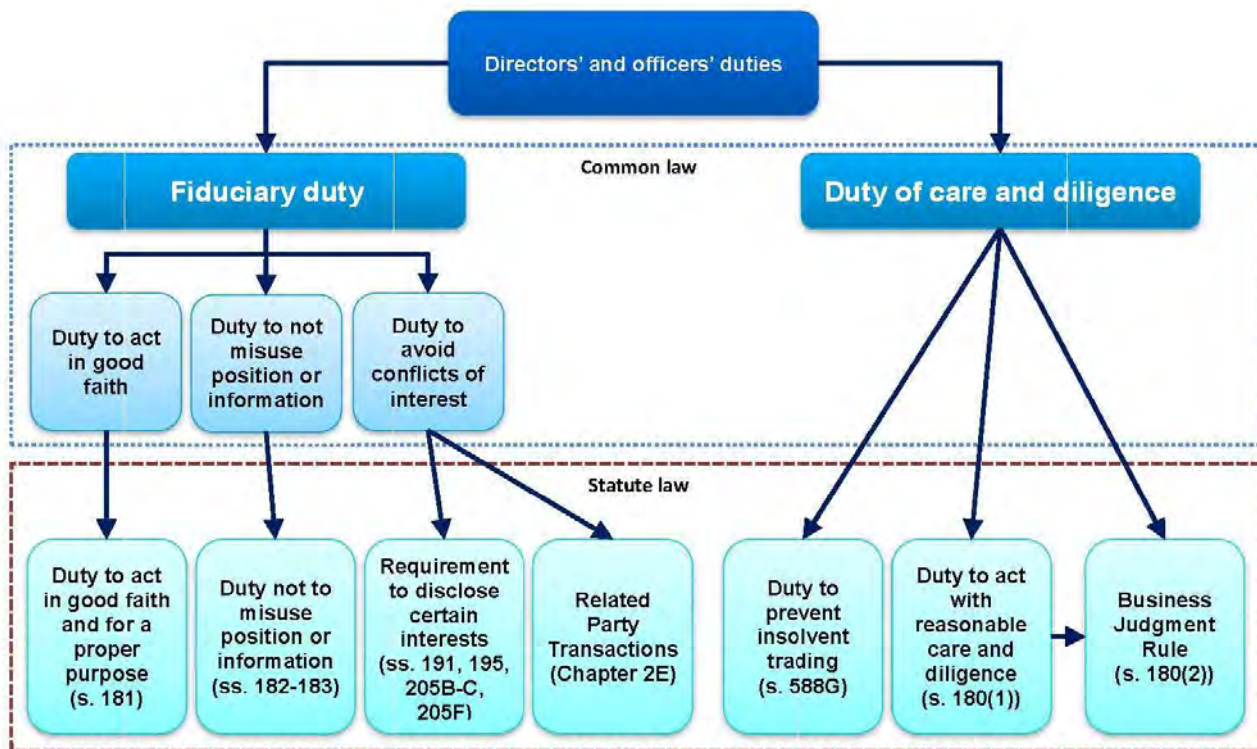
The above management proposal for the potential, perceived or actual conflict of interest is to be forwarded to the Chief Executive.

Officer signature		Date:
CEO signature		
CEO name		Date:
President signature		
President name		Date:

Related Party Transaction Policy

All Healthy Living NT (HLNT) Board and staff members are required to conduct themselves in accordance with the standards and values identified in Healthy Living NT's *Ethical Practice and Ethical Relationships Guide* and requirements of HLNT policies.

This policy must be read and interpreted in conjunction with HLNT's *Disclosure of Interests Policy* and is fundamental to the tenets of good governance as shown in the diagram below.



Scope

This policy applies to:

- all HLNT Board Members, and
- all HLNT key management personnel (KMP) defined as the CEO, Finance and Administration Manager and the Manager Education Services.

This policy does not apply to the Bill Raby Diabetes Fellowship Board of Governors which operates under specific provisions relating to conflict of interest.

Context

A related party is a person or organisation (for example, suppliers, contractors and their owners and staff, or a beneficiary) that is related (or has connections) to the NFP organisation. The term can refer to a diverse range of people and organisations and may include pre-existing relations with directors (or responsible persons in the case of charities), key management personnel, employees, volunteers, their families, and friends.

HLNT, like many NFP organisations, gains special terms from suppliers or contractors because of commitments of the supplier/contractor to directors or employees or volunteers of HLNT. These connections with HLNT can work to benefit of HLNT. However, there is also the possibility that such connections may lead to inadequate scrutiny of any transactions arising from them, which may be detrimental to HLNT.

Status	Approved	Related Party Transaction Policy	Document ID	G0066
Consultation	Board		Date of Issue	17/04/2021
Approval By	Board		Current Version Number	1.0
Circulation (on approval)	Board and Management		Review Cycle	Annual
		Page 1 of 4		

A significant issue for charities is that of private benefit – where the resources of the charity are used for the benefit of those close to or related to the charity, rather than for the charity’s beneficiaries, and for its charitable purpose.

It is important for charities to:

- carefully manage these transactions to ensure that they are transparent
- ensure the details of transactions are recorded appropriately and to
- ensure that related party transactions do not take place without approval of the charity’s Responsible Persons.

Purpose

The purpose of this policy is to provide a framework to manage related party transactions to ensure compliance with ACNC [Governance Standard 5](#) which requires a charity to take reasonable steps to make sure its Responsible Persons meet certain duties, including:

- to act honestly and fairly in the best interests of the charity and for its charitable purposes
- not to misuse their position
- to disclose any actual or perceived conflict of interest, and
- ensure that the charity’s financial affairs are managed responsibly.

Who are related parties?

Related parties are not defined in the ACNC legislation. The term *related party* is defined by the Australian Accounting Standards Board (AASB) in AASB 124 *Related Party Disclosures*. The definition in AASB 124 refers to the following as related parties for a registered charity:

- a person that is connected to the charity, such as a Responsible Person (or a close member of their family) that has control or joint control of the charity
- an organisation that is connected to the charity and has control or significant influence over the charity, such as a parent entity of the charity
- an organisation that the charity has control or significant influence over, such as a subsidiary entity
- any organisation and the charity that are members of the same group (for example, fellow subsidiaries)
- a member, or a close member of their family, of the key management personnel of the charity (the people with authority and responsibility for planning, directing and controlling the activities of the charity directly or indirectly)
- an associate (an entity over which the charity has significant influence) or joint venture (a joint arrangement whereby the charity with another entity or other entities have joint control of the arrangements and have rights to the net assets of the arrangement)

What are related party transactions?

Related party transactions are also not defined in the ACNC legislation. A related party transaction is defined in AASB 124 as a transfer of resources, services or obligations between a charity and a related party regardless of whether a price is charged.

Related party transactions can include:

- purchases, sales, donations
- receipt of goods, services or property
- leases

- transfers of property including intellectual property
- loans
- guarantees
- provision of employees on a paid or complementary basis
- other transactions that occur on terms and conditions that are different to those offered to the general public

Exclusions from Related Party Transactions

Ordinary Transactions are not considered related party transactions. Ordinary transactions are transactions that an ordinary community member or Association member would undertake with HLNT. For example, paying membership fees and the purchase of diabetes-related products on normal terms and conditions.

Policy

All related party transactions are to be reported to Board in accordance with the following framework

Related Party Transaction	Report to Board
Purchases, sales, donations	Board approval required for amounts valued at >\$5,000
Receipt of goods, services or property	Board approval required for amounts valued at >\$5,000
Leases	Board approval required
Transfers of property including intellectual property	Board approval required
Loans	Board approval required
Guarantees	Board approval required
Provision of employees on a paid or complementary basis	Board approval required
Transactions (other) that occur on terms and conditions that are different to those offered to the general public	Board approval required

All related party transactions must be:

- Recorded in the Board Minutes under the standing item (Disclosure of Interests and Related Party Transactions) on Board agenda together with any Board consideration/decision, and
- Declared to HLNT’s Auditor during quarterly and/or annual financial audit reviews.

Responsibility for Policy

The Board of Healthy Living NT is responsible for ensuring this policy is up to date and complied with.

Approval

Original Submission Date: Board Meeting 2/21 of 17 April 2021

Original Approval Date: Board Meeting 2/21 of 17 April 2021

Circulation: Board and Management

Sign off by: Chair of the Board

A handwritten signature in black ink, appearing to read 'Ron O'Brien', with a large loop at the end.

Signature: Ron O'Brien
On behalf of Healthy Living NT Board

Related Documents

- HLNT Disclosure of Interests Policy
- HLNT Corporate Governance Statement
- HLNT Ethical Relationships Guide
- HLNT Improper Conduct Prevention and Management Policy

Risk Management Policy

Policy Statement

The Healthy Living NT Board is committed to the embedding of risk management into the organisation and its corporate governance through:

- The development of a risk management framework and profile for the organisation;
- The implementation of a planned and systematic process aimed at achieving an appropriate balance between realising opportunities for gain while minimising losses or harm;
- The development of an organisational culture that optimises our ability to achieve strategic objectives while ensuring appropriate management of risks.

Aim

The aims of our risk management policy are to:

- Promote employee, stakeholder and public safety in accordance with relevant standards and legislation;
- Protect personnel, tangible and intangible assets and intellectual property;
- Encourage better quality service delivery;
- Minimise loss and insurance costs; and
- Improve contingency planning for dealing with risks and their impact; and
- Identify and implement new initiatives to address the organisation's purpose.

Principles

Healthy Living NT will actively implement the following operating principles that support this risk management policy:

- Identify and rank all risks,
- Ensure risk management becomes part of day-to-day management,
- Provide staff with policies and procedures necessary to manage risks,
- Ensure staff and Board are aware of risks and agreed risk minimisation measures, and
- Monitor our strategic risk profile and implement a continuous improvement approach to risk management.

Responsibility for Policy

The Board of Healthy Living NT is responsible for ensuring this policy is up to date and complied with.

Approval

Original Approval Date:	Meeting 3/06 of 6 May 2006
Revision 1 Approval Date:	Meeting 6/09 of 12 December 2009
Revision 2 Approval Date:	Meeting 6/12 of 8 December 2012
Circulation:	All HLNT Board Members and staff
Sign off by:	Association President



Signature:

On behalf of Healthy Living NT Board

Workplace Health & Safety Policy

Healthy Living NT is a charitable, independent, member based organisation managed by a voluntary board that provides services for people with diabetes, cardiac disease and related conditions and preventative health programs for the general community. It is our aim to maintain a safe, healthy and secure work environment for all employees, volunteers, contractors, clients and visitors. Achieving this aim is the responsibility of all of us.

Healthy Living NT's Board and management are committed to developing and maintaining the highest practicable standards of workplace health and safety management. Through teamwork, and in partnership with employees, clients and volunteers, Healthy Living NT will work to meet legislative and other requirements. Continual improvement will be achieved with our commitment to establish measurable objectives and targets aimed at the elimination of work related injury and illness.

Through continuous improvement our goal is to create an environment and culture where all employees, and non-employees who work with us, can reasonably expect to be free from injury and illness. Through consultation, the sharing of ideas and mutual respect and understanding we will continue to build on our culture of safe working practices.

This commitment will be documented, implemented, maintained and communicated to all employees, volunteers, contractors, clients and visitors with the reasonable expectation of compliance attached.

Healthy Living NT's Board and management are committed to ensuring we, as an organisation, have sound health, safety and security practices in place. These practices are supported by local workplace health and safety policies and procedures that provide governance and guidance for us to ensure we support this commitment.

Workplace health and safety are a shared responsibility and require constant awareness and input from all levels of Healthy Living NT employees. We all have the opportunity on a daily basis to ensure we support this commitment.

We ask that you support this goal by ensuring you take reasonable care to avoid workplace incidents to yourself and others by following our policies and procedures.

Responsibility for Policy

The Board of Healthy Living NT is responsible for ensuring this policy is up to date and complied with. The policy will be reviewed regularly within HLNT's annual policy review process.

Approval

Original Date Approved:	Meeting 1/12 of 18 February 2012
Revision 1 Date Approved:	Meeting 6/17 of 9 December 2017
Revision 2 Date Proposed:	Meeting 6/19 of 14 December 2019
Revision 2 Date Approved:	Meeting 6/19 of 14 December 2019

Circulation: All HLNT staff and volunteers.

Sign off by: Chair of the Board



Signature: On behalf of Board

Succession Planning

Background

Healthy Living NT has enjoyed an extended period of stability in its Board, Board Executive and senior management staff. As a result, the organisation has obtained significant benefits from this period of stability resulting in substantial organisation growth and development.

Healthy Living NT recognises that change in both Board Executive and senior management staff is inevitable and seeks to mitigate disruption and loss of business momentum as a result of personnel changes and transition.

Active succession planning will assist in minimising the risks associated with significant changes in personnel. Similarly a managed transition process will assist the organisation endure periods of change.

Board

Board Members are elected for two year terms from and by the Association membership, with 50% of the Board retiring annually. Board members may serve consecutive terms. This is designed to promote greater stability and surety in Board membership and reduce the possibility of a number of key Board members retiring at the same time. All Board Members are required to act in the best interests of the Association and, as honoraries, receive no remuneration.

The Board is comprised of five (4) Executive members (Office bearers including the President; two (2) Vice-Presidents; the Secretary/Treasurer, (one of whom is also the Public Officer) and a maximum of 4 general Board Members.

The Board proactively seeks to maintain representation from Central Australia at a governance level to ensure inclusiveness and a jurisdiction-wide perspective in its operations.

The Board also ensures that it is composed of a broad cross-section of members, including an appropriate mix of qualifications, skills and experience. The Association's Constitution provides the Board with authority to appoint additional Board Members who, by virtue of their special qualities or otherwise, could assist in achieving the objects of the organisation.

Through annual review following each AGM, the Board has also adopted a more systematic approach to ensure it is also broadly balanced in terms of:

- Gender
- Age
- Ethnicity
- Member demographics
- Type of diabetes
- Special needs groups

It is the Board's preference that a number of new members join the Board each year to ensure a constant injection of new ideas and views as well as replace Board Members retiring through natural attrition. It is established Board practice to elect/appoint a higher number of general Board members than the Constitutional maximum to ensure that there is ample opportunity for new people or people with special attributes to join the Board.

By having a constant renewal process operating at a Board level, it enables more experienced members to operate at the Board Executive level whilst allowing newer members to gain experience and knowledge in the operations of the Association prior to taking on more senior governance roles.

Senior Management

The key senior management positions are the Chief Executive Officer, Manager – Education Services and Finance and Administration Manager. These positions are critical to the ongoing success of the organisation.

Due to the small size of the organisation, it is not possible to effectively ensure that 'under-studies' exists for all senior management positions. However a number of strategies are

currently employed by Board and senior management to minimize disruption caused by change in senior management personnel. These include:

- An embedded cycle of strategic, business and quality improvement planning that will assist the organisation in attaining levels of sustainability in its performance of major services and service contracts.
- Thorough and cyclical assessment of risks and implementation of risk minimization strategies, and
- Professional development opportunities for staff that encourage personal and professional development in line with the growth of the organisation.

Transition Processes

Personnel change will occur, and the effectiveness of succession planning will always be limited by unknown or uncontrollable factors.

However, managed transition processes can assist the organisation endure periods of change. Recommended transition arrangements include:

- In the case of significant or major changes, the establishment of a Board-led Transition Committee to:
 - advise the Board on the management of the succession and transition process
 - oversee the development and dissemination of a communication plan to keep all major stakeholders (internal and external) advised of changes.
 - act as a mechanism to identify, communicate and manage any transition issues that may arise.
- The implementation of extended transitioning arrangements for existing senior management staff. This would entail negotiation of incentive based contractual arrangements with existing senior staff to provide an extended minimum hand-over period to successors (eg 3 months).

The Board considers that the additional human and financial resources incurred in extended transition arrangements to be a sound investment in the future of the Association.

Responsibility for Policy

The Board of Management of the Diabetes Association of the NT Inc. is responsible for ensuring this policy is up to date and complied with.

Approval

Original Date Approved:	Board Meeting 6/06 of 21 October 2006
Revision 1 Approved:	Board Meeting 6/10 of 11 December 2010
Revision 2 Submission Date:	Board Meeting 6/15 of 12 December 2015
Revision 2 Approval Date:	Board Meeting 6/15 of 12 December 2015
Revision 3 Submission Date:	Board Meeting 6/17 of 9 December 2017
Revision 3 Approval Date:	Board Meeting 6/17 of 9 December 2017

Circulation: All Board Members, staff and volunteers

Sign off by: Chair of the Board



Signature:

On behalf of Diabetes Association of the NT Inc. Board

Financial Roles & Delegations

Overview

Every day people working for Healthy Living NT make financial decisions and commitments. This may include approval of a request to travel, the purchase of supply and services using supplier credit, the engagement of staff as permanent employees and the purchase of ancillary office supplies. All are financial commitments and each has a short or long term impact on Healthy Living NT's resources.

Healthy Living NT also has legislative responsibility for proper resource management insofar as a chief executive must manage the affairs of the organisation in a way that promotes proper use of resources for which the chief executive is responsible. The authority to spend monies provided to Healthy Living NT is in the first instance vested to the Chief Executive Officer of Healthy Living NT, and by instruments of delegation.

The purpose of this policy is to provide guidance on the financial management process with regard to the roles that various positions have in the financial chain.

Funds are provided to Healthy Living NT primarily from Health Services Contracts, the NDSS, Membership and Retail Sales.

Healthy Living NT as a legal entity

Healthy Living NT operates as an entity under its Constitution, and ultimately, the Associations Act, and is registered with the Australian Charities and Not for Profit Commission (ACNC). Under the Constitution, and subject to the Associations Act:

The Association may do all things necessary or convenient for carrying out its objects or purposes, and in particular, may:

- 1.1. *acquire, hold and dispose of real or personal property;*
- 1.2. *open and operate accounts with Financial Institutions;*
- 1.3. *invest its money in any security in which trust monies may lawfully be invested;*
- 1.4. *raise and borrow money on the terms and in the manner it considers appropriate;*
- 1.5. *secure the repayment of money raised or borrowed, or the payment of a debt or liability;*
- 1.6. *appoint agents to transact business on its behalf;*
- 1.7. *enter into any other contract it considers necessary or desirable;*
- 1.8. *establish any business entities or structures it considers necessary or desirable; and*
- 1.9. *enter into any arrangement for union of interests, co-operation or reciprocal concessions with other organisations with a view to furthering the objectives of The Association. "*

The Healthy Living NT Board

The purpose of the Board as defined in the Constitution is to decide the objectives, strategies and governance policies to be followed by Healthy Living NT, and to ensure that Healthy Living NT performs its functions in a proper, efficient and effective manner.

The Board operates as a collective at a high policy and strategic review level and approves overall budgets and financial commitments. However, the Board is not involved in day to day running matters of the Organisation and, as such, does not have a delegation to physically expend money.

The Chief Executive Officer

The Chief Executive Officer has, within funds available to Healthy Living NT (as defined by the Board), the delegation to enter into expenditure contracts on Healthy Living NT's behalf. The Board may impose conditions on the exercise of that delegation on the Chief Executive Officer, duty to disclose contracts or commitments over a nominated dollar value before or after approval.

Role of Delegations

In view of the many day to day approvals required within the organisation, it is impractical and inefficient for the CEO to retain total authority to commit Healthy Living NT to expenditures throughout the organisation. The basis of the delegation to expend Healthy Living NT funds is done by a separate instrument of delegation which is approved by the Board. It forms an attachment to this policy.

These delegations also contain levels of financial authority granted to the Executive Board by the Board of Healthy Living NT.

The Board may, by resolution, change or amend these delegations at any time.

Such delegations are vital to ensure:

- ◆ Financial accountability
- ◆ Positive audit scrutiny
- ◆ Staff accountability
- ◆ Good management practices & efficient operations
- ◆ Clear reporting and responsibility lines.

Responsibility for Policy

The Board of Management of the Diabetes Association of the NT Inc. is responsible for ensuring this policy is up to date and complied with.

Approval

Prior Approval Date(s):	Board Meeting 4/06 of 24 June 2006 Board Board Meeting 7/06 of 9 December 2006 Board Meeting 5/07 of 20 October 2007 Board Meeting 6/08 of 13 December 2009 Board Meeting 3/10 of 26 June 2010 Board Meeting 6/10 of 11 December 2010 Board Meeting 2/11 of 16 April 2011 Board Meeting 4/12 of 25 August 2012 Board Meeting 6/13 of 14 December 2013 Board Meeting 6/14 of 14 December 2014 Board Meeting 6/15 of 12 December 2015 Board Meeting 6/16 of 10 December 2016
Date Approved:	Board Meeting 4/22 of 20 August 2022
Date Submitted:	Board Meeting 6/23 of 9 December 2023
Date Approved:	Board Meeting 6/23 of 9 December 2023
Circulation:	All Board Members & staff
Sign off by:	Chair of the Board

Signature:



Healthy Living NT Financial and Personnel Delegations

(Attachment to Financial Roles and Delegations Policy: Approved Board Meeting 6/23 of 9 December 2023)

ITEM	LIMIT/SCOPE	AUTHORISED OFFICERS	ALTERNATE OFFICERS
Commit Extraordinary Unbudgeted Expenditure	Up to \$200 Up to \$5,000	All Staff CEO	President/Executive
Authorise Petty Cash	Up to \$500 Up to \$200	CEO, MES, FAM, DNE Alice Springs staff	President/Executive
Issue Purchase Orders & Approve Expenditure within approved budget	Stock & office supplies - up to \$5,000 Education & print items – up to \$1,500 All budget areas – up to \$1,000 All budget areas – no limit	CEO, MES, FAM MES, DNE MES, FO CEO	CEO/Executive
Counter-sign Payments for Authorised Expenditure	Within Approved Budget	Primary: CEO, MES Secondary: Treasurer, DNE	President/Executive Members
Authorise Bad Debt write-off	Up to \$500 \$501-\$2,000 >\$2,000	CEO Executive Board	Executive Board
Internal Bank Account transfers	No Limit	CEO, MES, FAM Executive	DNE Board
Authorise EFT Salaries & Benefits	As per contract	CEO, MES	DNE, Treasurer, President
Approve statutory leave	As per entitlement	MES/FAM + CEO	President/Executive
Approve Extraordinary Leave	All Staff	CEO	President/Executive
Employ Staff	Within approved budget	CEO	President/Executive
Terminate Employment Contracts	Casual / Part-Time / Permanent CEO	CEO Board	MES+ FAM/President

Legend: CEO= Chief Executive Officer; MES = Manager Education Services; FAM = Finance & Administration Manager (Shani Williams); DNE = Diabetes Nurse Educator (Leanne Kuchel); FAM = Finance and Administration Manager

Healthy Living NT Financial and Personnel Delegations

(Attachment to Financial Roles and Delegations Policy: Approved Board Meeting 6/23 of 9 December 2023)

	LIMIT/SCOPE	AUTHORISED OFFICERS	ALTERNATE OFFICERS
Approve Travel	All Staff Board Members	CEO CEO/President/Executive	MES, FAM Board
Approve Insurance Claims against HLNT	Up to \$5,000 \$5,000 - \$10,000 > \$10,000	CEO Executive Board	Executive Board
Enter into Service Agreements	Up to \$200,000 pa \$200,000 - \$1,000,000 pa > \$1,000,000 pa	CEO Executive & CEO (jointly, in consultation) Board	Executive/Board Board
Disposal of Assets	Casi House Properties Units 4 & 5	Board	
	Motor Vehicles	Executive, based on recommendation from CEO	Board
	Other Assets <ul style="list-style-type: none"> ● Up to \$5,000 ● \$5,000-\$20,000 ● Over \$20,000 	CEO Executive Board	Executive Board

Legend: CEO= Chief Executive Officer; MES = Manager Education Services; FAO = Finance & Administration Officer (Shani Williams); DNE = Diabetes Nurse Educator (Leanne Kuchel); FAM = Finance and Administration Manager

Asset Acquisition and Management Policy & Procedure

Purpose

The purpose of Healthy Living NT's asset policy and procedures are to:

- maintain control over assets purchased and owned by Healthy Living NT;
- ensure optimum and responsible use of assets purchased and owned by Healthy Living NT, or assets in which HLNT has a liability or obligation;
- provide accurate asset information for the annual financial statements which is required for accrual reporting purposes;
- assist in the calculation of insurance values for assets and provide substantiation of losses for insurance claims;
- allow audit verification of additions to and deletions from the Asset Register;

Definitions and Acronyms

"Asset Register"

The database which contains information about Healthy Living NT assets. The Asset Register is housed in the M Drive under the Finance and Administration Manager's control in an Excel Spreadsheet. Historical Depreciation Schedules are held in the M Drive under each year's Audit Folder.

"Assets"

Assets are defined as items that have service potential or future economic benefits controlled by the entity as a result of past transactions or other past events. In determining whether items are identified as assets, three essential characteristics must be present, namely:

- control/asset ownership;
- service potential or future economic benefits;
- occurrence of past transactions or other past events.

"Property Assets"

Land and buildings including property leases, licences and other agreements

"Leased Assets"

Assets that are not owned by Healthy Living NT but we are responsible for their maintenance and retention.

Links to Related Forms, Records and Electronic Databases

Financial Roles & Delegations; Depreciation Schedule.xls; Insurance

Detailed Steps, Procedures and Actions

PROCEDURES FOR RECORDING ASSETS

Identification and recording of assets in the Asset Register

Asset Purchases.

In order to ensure the Association has an unencumbered title to assets, no assets are to be purchased using Government funding except where there is a specific agreement to do so.

All assets are to be depreciated in accordance with the depreciation rates shown overleaf and expensed at rates across all cost centres in accordance with the prevailing HLNT Cost Allocation Policy.

Any assets purchased with Government funding are to be entered into the Asset Register with the Government's interest noted.

Assets valued at greater than \$1,000

Assets must be recorded in the Asset Register.

Assets valued at less than \$2,500

Assets with a value of less than \$2,500 are also recorded in the Asset Register but depreciated fully in the month of acquisition.

Confirmation of Asset Details

Once an asset is added to the Asset Register, giving serial number, location and relationship to Major Projects, a corresponding entry at the same date is entered into the accounting system. The attached forms may be attached to receipts to enable clarification of serial numbers etc.

Depreciation Rates

Assets are given the following rates based on their type. Any asset valued at less than \$2,500 is also recorded on the Asset Register but are depreciated at 100% in the month of purchase.

Type of Asset	Rate in prime cost method
Land and Buildings	2.5%
Renovations & Office Fitouts	10%
Intangibles – Web/Strategic Plans	33.33%
Computer & IT Equipment	33.33%
Laptops	50%
Furniture & Fittings	20%
Motor Vehicles	25% P 16.66% D

Property Valuations

Land and Building Assets are re-valued in the accounts every five years on notice received from the Valuer-General’s Office. In the case of Healthy Living NT the only asset this applies to is Casi House.

Leased Assets

Although leased assets do not appear on the Asset register they are noted for insurance and audit purposes. They are also a liability over which the Association needs to maintain control and be accountable for, for the duration of the lease. This includes leased items that may incur damage during the lease term that will need to be returned at the end of the lease. Where leased items are purchased at the end of the lease term they are then added to the Asset Register and if under \$2,500 value, they are depreciated at 100% in the month of purchase.

Insurance

As Assets of value are added/deleted to the Asset Register, the Insurance Company is notified by email by the Finance and Administration Manager and any additional premium advised back by the Insurance Company. Every year the Finance and Administration Manager reviews the insurance renewals and revise the values insured.

Motor Vehicles

Motor Vehicles are traded in every four to six years depending on the fuel type. Petrol (P) vehicles have a life of four years while a Diesel (D) vehicle has a life of six years. Healthy Living NT is a PBI and consequently exempt from Stamp Duty (renewable 12 March 2015). Where trade-in value is less than 50%

of the original cost, the trade-in is also GST Free. The CEO is required to provide the supplier a copy of the Stamp Duty Exemption Certificate and the ATO Fact sheet relating to GST and Motor vehicle trade-ins for charities; along with the Certificate of Incorporation when negotiating trade-in of vehicles. As Healthy Living NT receives substantial NT Government funding, we are entitled to purchase vehicles as per the NT Government Fleet rate. In some cases, confirmation of government funding needs to be obtained from DHF and given to the supplier of the replacement vehicle.

PROCEDURES TO NOTIFY CHANGES TO ASSETS

Written advice of any changes to existing assets is to be forwarded to the Finance and Administration Manager with a copy to the CEO. The CEO to confirm change to existing asset in writing (email) to the Finance and Administration Manager. The attached disposal form may be useful in giving reason for disposal and how disposed of.

All disposal of assets must comply with the Delegations approved by the Board.

STOCKTAKE PROCEDURES

Proper stocktake procedures ensure the accuracy of the Asset Register information by allowing the data on the Asset Register to be verified and any discrepancies to be adjusted. Stocktakes will occur on an annual rolling basis. All deletions and changes must be verified by the CEO.

ASSET SECURITY PROCEDURES

Staff are required to take reasonable care in preventing damage or loss to property. If care is not taken, there may be no insurance coverage.

ASSET CONTROL MEASURES

To ensure the accuracy of the Asset Register information, auditors annually review HLNT's asset policies and procedures and conduct random audits of asset data.

FINANCIAL IMPLICATIONS

It is important that asset transactions (additions, transfers, deletions, disposals) are reflected in the Asset Register in a timely manner, as asset transactions have a direct impact on Healthy Living NT financial position. All assets over \$2,500 are depreciated, and assets which are disposed of will generate a profit or loss on disposal, based on the written down value of the asset as recorded in the Asset Register.

Effectiveness of this Procedure

Measured by:

- All appropriate assets recorded in the Asset Register in a timely manner
- The provision of accurate asset information from the Asset Register
- Ease in the calculation of insurance values for Healthy Living assets and allows for substantiation of losses for insurance claims
- Ease in audit verification of additions to and deletions from the Asset Register

Approval

Original Approval Date:	Board Meeting 5/07 of 20 October 2007
Revision 1 Approval Date:	Board Meeting 6/08 of 13 December 2008
Revision 2 Approval Date:	Board Meeting 6/10 of 11 December 2010
Revision 3 Approval Date:	Board Meeting 6/13 of 14 December 2013
Revision 4 Submission Date:	Board Meeting 6/18 of 8 December 2018
Revision 4 Approval Date:	Board Meeting 6/18 of 8 December 2018
Circulation:	All Board Members & staff
Sign off by:	Chair of the Board
Signature:	On behalf of Diabetes Association of the NT Inc. Board

Investment Policy

Healthy Living NT, a charitable, member-based Association with Public Benevolent Institution status, is committed to prudent and accountable management of its funds and investments.

Endorsed funds management strategies include optimum utilisation of cash on hand through maximising interest rates, minimising bank charges and reducing loan interest, and streamlining of bank accounts. The use of the Westpac Community Benefit Fund with less bank charges and the use of the Westpac Maxi Accounts for high interest have given Healthy Living NT additional funds. By keeping with Westpac, it is relatively easy to change signatories (as required) and open new accounts (as required). Consolidation of banking through one institution also provides access via internet banking to view and transfer between accounts with ease. The Board has considered the consolidation of banking through one institution and noted that any resultant risks are outweighed by the benefits.

Funds held by the Association on behalf of an external funder must, without exception, be maintained in a Government-guaranteed bank account in a financial institution specified as an authorised deposit-taking institution within the meaning of Section 5 of the Banking Act 1959 of the Commonwealth.

Any use of independent Association funds in investments outside a Government-guaranteed bank account requires the decision of the full Board of the Association.

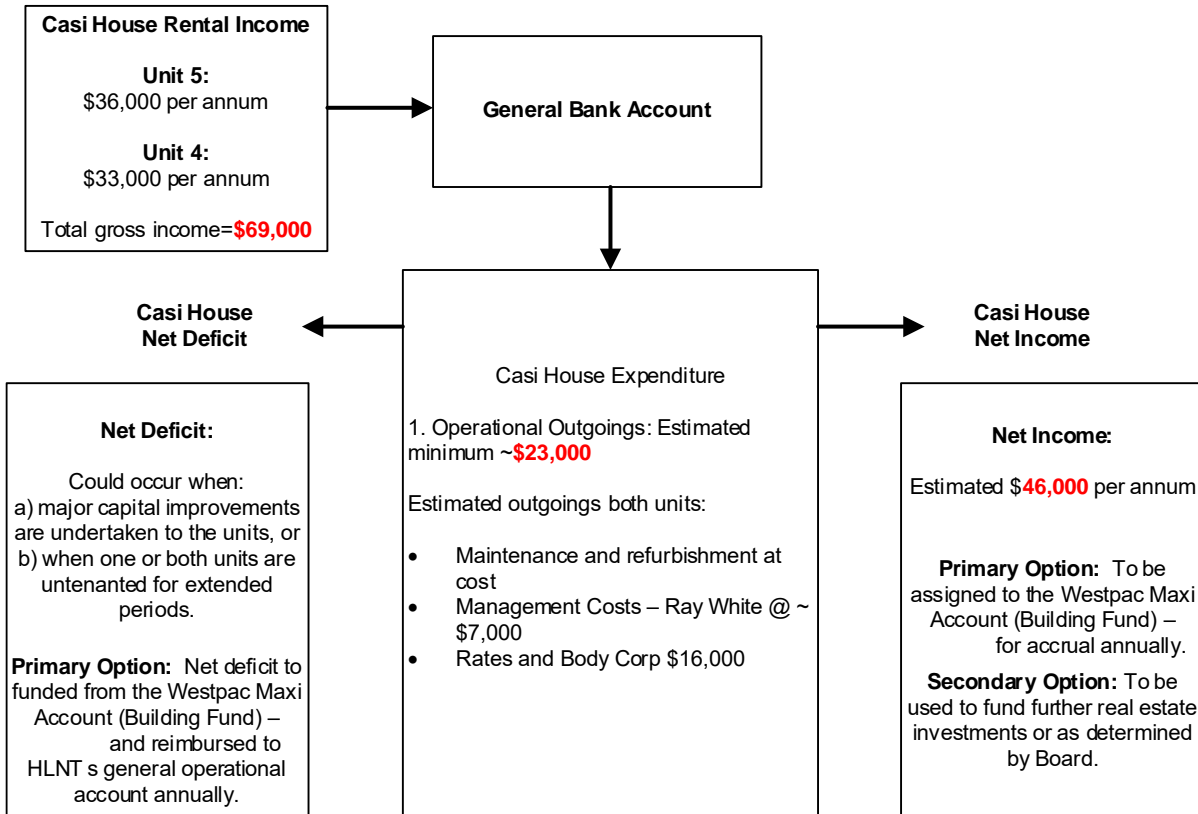
Investments should be balanced, but tending towards risk-averse rather than risk-seeking and comply with the framework outlined below:

Type of Account/Asset	Purpose	Investment Strategy
Trading Accounts ("at call" funds used in the day-to-day commercial operations of HLNT)	(1) Westpac Business Account - 322088 This is the primary operational/trading account for HLNT and is used for receipt and expenditure of all funds, including funding received under various service agreements. The account is reimbursed from other accounts where specific expenditure has been incurred eg purchase of IT assets.	Primary objective = at call access to trading funds Secondary objective = none These funds should be deposited in trading account/s that provide the ease of access (eg chequebooks, EFT etc) required for the day-to-day operations of HLNT. These accounts will yield minimal interest, if any. No Account Keeping Fee, only charged for merchant fees, token fees and periodical payment fees.
Cash Management ("at call" funds used to fulfil contractual project obligations)	(1) Westpac Maxi Account (Investment) - 176789 HLNT holds a high interest bearing account for surplus operational funds that are not required on a day to day basis. Funding received in advance is sometimes transferred to this account from the trading account until required for operational purposes.	Primary objective = at call access Secondary objective = funds readily available for transfer to operational day-to-day account
Cash Management (additional funds that, whilst not required for day-to-day commercial operations, are available at call)	(1) Westpac Maxi Account (Building Fund) - 324024 This is a high interest bearing account for funds not required for operational use. The purpose of the fund is to contribute towards future income-producing asset acquisition requirements as determined by the Board. Net income from Casi House units is transferred to this fund annually. Operational deficits from Casi House are debited from this fund.	Primary objective = medium term growth Secondary objective = funds readily available for transfer to other accounts if required These funds should be deposited in a form of cash management account that gives a reasonable rate of return and that allows sufficient ease of access so that funds can be transferred to operational or investment accounts.

Type of Account/Asset	Purpose	Investment Strategy
<p>Investments (Independent Association funds that are not required in the short term and that are invested for the medium to long term)</p>	<p>(1) Westpac Maxi Account (Board Designated Reserves)- 317756</p> <p>The level of the fund is determined by the Board. The type of deposit generally relates to one-off extraordinary income eg large bequests, which need to be quarantined from general operational uses.</p> <p>These funds originated from DAL repayment of the 2006-2011 NDSS deficit \$75,914.00.</p> <p>From 2015/16-2019, funds in this account were minimal (<\$1,000) following contribution to equity funds for the purchase of Unit 4 Casi House in 2014.</p> <p>In 2019/20, an amount equivalent to funding reimbursed from the JobKeeper program was transferred to this fund. . This amount is to be quarantined until the Board determines a use.</p>	<p>Primary objective = medium to long term growth</p> <p>Secondary objective = modest income stream</p> <p>These funds are not required for immediate operational purposes but are required to be readily accessible for purposes determined by the Board eg investment in real estate</p>
<p>Investments (funds that are not required in the short term and that are invested for the medium to long term)</p>	<p>(1) IT Westpac Maxi Account – (IT Fund) - 176797</p> <p>These funds are not required for immediate operational purposes but are required to be readily accessible to support future Information Technology investment.</p> <p>Funds (cost savings from pay-out of IT lease contracts) are transferred monthly from the P&L.</p> <p>Expenditure on ICT items is drawn from the trading account, which is subsequently reimbursed from the IT Fund annually.</p>	<p>Primary objective = medium to long term growth</p> <p>Secondary objective = modest income stream</p>
<p>Investments (funds that are not required in the short term and that are invested for the medium to long term)</p>	<p>(1) IT Westpac Maxi Account – (Employee Provisions Fund) -176818</p> <p>New fund established in 2015 to recognise employee provisions and quarantine a portion of funds towards this purpose.</p> <p>Initial capitalisation of \$100,000 with monthly deposits as possible until the Fund reaches not less than 75% of long term ARL and LSL liabilities identified at the end of every financial year.</p> <p>The maximum capitalisation of this fund should not exceed 100% of identified employee liabilities based on the annual Audited Financial Statement.</p>	<p>Primary objective = medium to long term growth</p> <p>Secondary objective = modest income stream</p> <p>These funds are not required for immediate operational purposes but are required to be readily accessible to support future payouts related to employee provisions including long term ARL and LSL and any redundancy payments.</p> <p>Funds may be used for operational working capital when required (at last resort) but the fund must be replenished to its original level at the first opportunity. Instances of such use are to be noted in the monthly financial report.</p>

Type of Account/Asset	Purpose	Investment Strategy
<p>Long Term Investments (Independent Association funds that are not required in the short term and that are invested for the medium to long term)</p>	<p>See Casi House investments below</p>	<p>Investments should be balanced, but tending towards risk-averse rather than risk-seeking. They should be deposited in investments that provide medium to long-term growth. Investment opportunities could include:</p> <ul style="list-style-type: none"> ● Real property; ● Cash; ● Fixed-interest securities; ● Shares and stocks; ● Managed investment funds; and ● Equity stakes in an ongoing business.
<p>Long Term Investments (Independent Association funds that are not required in the short term and that are invested for the medium to long term)</p>	<p>Unit 5 Casi House – Business Development Loan (closed) As at October 2013, this loan had been fully paid out and the Board determined that the loan account be closed, with Westpac to retain the first mortgage over the property. Net income from the lease of Unit 5 is applied directly to the Building Fund</p>	<p>Unit 5 Casi House is an investment to support the Association's long term viability and income generation. In the event that major funding contracts are lost and the Association downsizes, it also offers alternative office accommodation</p>
<p>Long Term Investments (Independent Association funds that are not required in the short term and that are invested for the medium to long term)</p>	<p>Unit 4 Casi House – Business Development Loan –(Closed) This loan commenced in Q1 2014 to support the purchase of Unit 4 Casi House (adjoining existing Unit 5) with equity contributions drawn from Board Designated reserves. The loan balance was fully paid out at the end of April 2018. The loan account was closed in 2023/24 Primary Option: Net income from Units 4 and 5 are applied directly to the Building Fund. Secondary Option: Nil . Refer below explanatory diagram.</p>	<p>Unit 4 Casi House is an investment to support the Association's long term viability and income generation. In the event that major funding contracts are lost and the Association downsizes, or the Association requires expanded premises, it also offers alternative office accommodation</p>

Casi House Unit 4 and 5 Income Management
2024/25



Approval

Original Approval Date:	Board Meeting 6/03 of 13 December 2003
Revision 1 Approval Date:	Board Meeting 5/07 of 20 October 2007
Revision 2 Approval Date:	Board Meeting 6/08 of 13 December 2008
Revision 3 Approval Date:	Board Meeting 6/09 of 12 December 2009
Revision 4 Approval Date:	Board Meeting 6/10 of 11 December 2010
Revision 5 Review Date	Board Meeting 6/12 of 8 December 2012
Revision 6 Approval Date	Board Meeting 6/13 of 14 December 2013
Revision 7 Approval Date	Board Meeting 1/14 of 15 February 2014
Revision 8 Approval Date	Board Meeting 6/14 of 13 December 2014
Revision 9 Approval Date	Board Meeting 5/15 of 24 October 2015
Revision 10 Approval Date	Board Meeting 3/18 of 23 June 2018
Revision 11 Approval Date:	Board Meeting 6/19 of 14 December 2019
Revision 12 Approval Date:	Board Meeting 6/20 of 12 December 2020
Revision 13 Date Proposed:	Board Meeting 6/24 of 14 December 2024
Revision 13 Approval Date:	Board Meeting 6/24 of 14 December 2024

Circulation: All Board Members, CEO and Finance Manager

Sign off by:

Chair of the Board

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line extending to the right.

Signature:

William De Decker
On behalf of Diabetes Association of the NT Inc. Board

Reserves Management

Purpose

To enable the management and Board of Healthy Living NT to assess on a monthly basis the ability of the Association to meet its liability and provision payments in the event of funding or trading cessation.

Monthly Assessment

The Finance and Administration Manager will calculate the percentage of funds available to the Association after all current Liabilities and Provisions have been identified and maintain a record of this calculation with the Financial Monthly Reports.

Liabilities taken into account are:

- Funds held by the Association on behalf of other parties i.e. GHANT and the CDN Seed Funding
- Trade Creditors
- BRDF Committed Funds
- Payroll Liabilities and Provisions (ARL & LSL)
- ATO Liabilities
- Casi House Bond

It excludes long term lease/service contract commitments which generally have provision for early exit. It also excludes quarterly grant funding from DoH as any cessation of business would involve use of the funds paid in advance for exit liabilities (particularly staff) and a transitioning of the service to another provider.

Cash Assets have been defined as funds held in the following accounts:

- Maxi Direct Investment
- Future IT Development
- Building Fund

It excludes cash in the Operating bank account, pre-payments, accounts receivable and any non-cash assets such as Casi House office unit, loan redraw facility, stock or equipment etc.

A Traffic Light assessment process will be reflected on the Balance Sheet indicating the current status of cash assets to liabilities according to the below legend:

Traffic Light	Reserve Threshold Definitions
●	Cash assets (reserves) exceed the cash value of current liabilities by greater than or equal to 20% (≥ 20%); no action required.
●	Cash assets (reserves) exceed the cash value of current liabilities by greater than or equal to 10% but less than 20% (≥10% - <20%); careful administration and monitoring by management required.
●	Cash assets (reserves) exceed the cash value of current liabilities by less than 10% (<10%); immediate management review and action required.

An example of this calculation as at 30 September 2011 is shown below, indicating that HLNT cash assets exceeded current liabilities by 34%. This would be shown as a ● traffic light in the Balance Sheet report to Board.

Reserves Review - 30 September 2011

Bank Accounts		Liability and Provisions		Reserves Traffic Light		
Investment	\$255,186.87	Annual Leave	\$59,786.72	Bank	\$354,791.51	
IT Fund	\$71,739.07	LS Leave	\$48,955.22	Liability	\$235,307.40	66%
Building	\$27,865.57	PEOM	\$7,758.91	Available Reserves	\$119,484.11	34%
Total	\$354,791.51	Super	\$8,482.21	Assessment		
		PAYG Liability	\$11,790.31	Green	●	≥20%
		Trade Creditors	\$41,077.27	Orange	●	≥10%<20%
		GST	\$1,114.39	Red	●	<10%
		BRDF Committed	\$1,838.90			
		GHANT	\$12,100.32			
		CDN Seed	\$18,051.69			
		ATSI	\$11,017.34			
		CDN DoHA	\$5,635.35			
		Casi Loan	\$95.00			
		Casi Bond	\$7,603.77			
		Total	\$235,307.40			

Balance Sheet		
DoH Grant Status	End of 3 month cycle	\$0.00

Note:

Over a quarterly cycle, funds in the Maxi Direct Investment Account will decrease due to draw down of funding for DoH services. The grant from DoH is paid quarterly in advance, moved to the Maxi Direct Investment Account and transferred into the General Account as funds are required. From a Balance Sheet perspective the DoH grant is drawn down to the Profit and Loss Report in three equal amounts over the quarter.

Approval

Original Approval Date: Board Meeting 6/11 of 10 December 2011
 Revision 1 Approval Date: Board Meeting 6/12 of 12 December 2015
 Revision 2 Approval Date: Board Meeting 6/18 of 8 December 2018

Circulation: All Board Members, CEO and Finance Manager

Sign off by: Chair of the Board



Signature: On behalf of Diabetes Association of the NT Inc. Board