

Australian Government

Department of Industry, Science, Energy and Resources

Department of Health





Grant Opportunity Guidelines

Medical Research Future Fund

Medical Research Future Fund – Preventive and Public Health Research Initiative

2020 Quality, Safety and Effectiveness of Medicine Use and Medicine Intervention by Pharmacists Grant Opportunity Guidelines

Opening date:	10 November 2020
Closing date and time:	5.00pm AEST on 23 February 2021
Commonwealth policy entity:	Australian Government Department of Health
Administering entity	Department of Industry, Science, Energy and Resources
Enquiries:	If you have any questions, contact us on 13 28 46 or <u>MRFF@industry.gov.au</u> .
Date guidelines released:	14 October 2020
Type of grant opportunity:	Open competitive

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Medical Research Future Fund (MRFF): Preventive and Public Health Initiative: Quality, Safety and Effectiveness of Medicine Use and Medicine Intervention by Pharmacists Grant Opportunity process

The Medical Research Future Fund is designed to achieve Australian Government objectives

This grant opportunity is part of the above grant program, which contributes to the Department of Health's Outcome 1. The Department of Health works with stakeholders to plan and design the grant program according to the *Commonwealth Grants Rules and Guidelines*.

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The grant opportunity opens		
We publish the grant guidelines on business.gov.au and GrantConnect.		
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You complete and submit a grant application		
You complete the application form, addressing all the eligibility and assessment criteria in order for your		
application to be considered.		
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We assess all grant applications

We review the applications against eligibility criteria and notify you if you are not eligible.

We assess eligible applications against the assessment criteria and compare it to other eligible

applications, if applicable.

We make grant recommendations

We provide advice to the decision maker on the merits of each application.

Grant decisions are made

The decision maker decides which applications are successful.

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We notify you of the outcome

We advise you of the outcome of your application. We may not notify unsuccessful applicants until grant agreements have been executed with successful applicants.

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We enter into a grant agreement

We will enter into a grant agreement with you if successful. The type of grant agreement is based on the nature of the grant and will be proportional to the risks involved.

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Delivery of grant

You undertake the grant activity as set out in your grant agreement. We manage the grant by working with you, monitoring your progress and making payments.

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Evaluation of the Grant Opportunity

We evaluate the specific grant activity as a whole. We base this on information you provide to us and that we collect from various sources.



1. About the Medical Research Future Fund

1.1. Medical Research Future Fund (MRFF)

The MRFF, established under the *Medical Research Future Fund Act 2015* (MRFF Act), provides grants of financial assistance to support health and medical research and innovation to improving the health and wellbeing of Australians. It operates as an endowment fund with the capital preserved in perpetuity. The MRFF reached maturity at \$20 billion in July 2020. The MRFF provides a long-term sustainable source of funding for endeavours that aim to improve health outcomes, quality of life and health system sustainability.

This MRFF investment is guided by the Australian Medical Research and Innovation Strategy 2016–2021 (the Strategy) and related set of Australian Medical Research and Innovation Priorities 2018–2020 (the Priorities), developed by the independent and expert Australian Medical Research Advisory Board following extensive national public consultation.

In the 2019-20 Budget, the Government announced its continued commitment to supporting lifesaving medical research with a \$5 billion 10-year investment plan for the MRFF. It will place Australia at the leading edge of research in areas like genomics and will support the search for cures and treatments, including for rare cancers. The plan is underpinned by four key themes – patients, researchers, translation and missions.

1.2. About the Preventive and Public Health Research Initiative

The Preventive and Public Health Research Initiative (the Initiative) forms part of the Fund. The Australian Government has announced a total of \$260.4 million over ten years from 2019-20 to 2027-28 for the Initiative.

This initiative aims to enable or support research to:

- test innovative public health approaches, to address the risk factors associated with the prevalence and persistence of chronic and complex diseases in Australia
- identify innovative approaches to treat and manage chronic and complex diseases
- generate evidence to support the translation of new preventive and public health measures into practice
- implement innovative approaches to improve the quality and cost-effectiveness of preventive healthcare interventions.

Further information on the rationale of the Initiative is available on the Department of Health website.

There will be other grant opportunities as part of this Initiative and we will publish the <u>opening and</u> <u>closing dates</u> and any other relevant information on business.gov.au and GrantConnect.

We administer the MRFF according to the Commonwealth Grants Rules and Guidelines (CGRGs)¹.

¹ <u>https://www.finance.gov.au/sites/default/files/commonwealth-grants-rules-and-guidelines.pdf</u>



1.3. About the Grant Opportunity

These guidelines contain information for the Quality, Safety and Effectiveness of Medicine Use and Medicine Intervention by Pharmacists Grant Opportunity. This grant opportunity was announced as part of the Medical Research Future Fund under the Preventive and Public Health Initiative.

Medicines are the most common intervention in health care and contribute to significant health gains. However, medicines can also be associated with harm. Half of all medication related harm is preventable² and a coordinated national approach that identifies and promotes best practice models and measures progress towards reducing medication related harm has the potential to improve the health of Australians and create savings across the health care system.

The Quality Use of Medicines and Medicines Safety was announced as the 10th National Health Priority Area in November 2019. The National Health Priority Area initiative is a collaboration between Commonwealth, state and territory governments aimed at focusing public attention and health policy on significant causes of the nation's burden of disease, and creating holistic strategies to address these areas to improve health outcomes.

Consistent with the *Medical Research Future Fund Act 2015*, the objective of this grant opportunity is to provide grants of financial assistance to support medical research and medical innovation projects that create or adapt technologies, mechanisms or approaches for improving the quality, safety and effectiveness of medicine use and medicine intervention by pharmacists in primary health and transitions of care. Projects should demonstrate alignment with relevant peak or representative bodies to facilitate national implementation.

The intended outcome of the research funded by this grant opportunity is to improve the health and wellbeing of Australians by:

- promoting the safe and effective use of medicines, particularly in high-risk groups and settings such as the elderly, people with complex chronic diseases, rural and remote communities, Aboriginal and Torres Strait Islander people, culturally and linguistically diverse people and communities, and aged care facilities
- reducing adverse drug events and medicine-related hospital admissions.

Outcomes of research may be used to inform the 8th Community Pharmacy Agreement in 2025.

To be competitive for funding, applicants must propose to conduct research that delivers against the above objective and intended outcomes. The research team must also include pharmacy professionals to ensure the effectiveness and impact of the proposed research.

This document sets out:

- the eligibility and assessment criteria
- how we consider and assess grant applications
- how we notify applicants and enter into grant agreements with grantees
- how we monitor and evaluate grantees' performance
- responsibilities and expectations in relation to the opportunity.

The Department of Industry, Science, Energy and Resources (the department/we) is responsible for administering this grant opportunity on behalf of the Department of Health.

² Roughhead, L Semple S, Rosenfeld E, Literature Review: Medication Safety in Australia (2013). Australian Commission on Safety and Quality in Health Care, Sydney.

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Impact of COVID-19

The MRFF acknowledges the potential impacts of COVID-19 on the health and medical research sector, including the ability of researchers to submit applications and undertake research. You will be asked to consider these impacts in your risk management plan. This information will be taken into account in the assessment of your application (refer section 5).

We have defined key terms used in these guidelines in the glossary at Section 13.

You should read this document carefully before you fill out an application.

1.4. Encouraging Partnerships

Applicants are encouraged to seek strategic partnerships with organisations whose decisions and actions affect Australians' health, health policy and health care delivery in ways that improve the health of Australians. Organisations that are capable of implementing policy and service delivery and would normally not be able to access funding through most MRFF funding mechanisms are highly valued as partners.

Partnerships and co-investment are encouraged in order to maximise impact of investment, provide opportunities for more mature sites/agencies to build the capacity of emerging sites/agencies, reduce duplication of activities, and reduce potential respondent administrative burden on participating communities.

They include organisations such as:

- those working in federal, state, territory or local government in the health portfolio or in other areas affecting health, such as economic policy, urban planning, education or transport
- those working in the private health sector such as employers, private health insurance providers or private hospitals
- non-government organisations and charities
- community organisations such as consumer groups
- healthcare providers, and/or
- professional groups.

Partnerships with an overseas partner organisation are acceptable, provided the objectives of the grant opportunity are fully met. However, you cannot use the grant to cover retrospective costs or to support research projects undertaken outside of Australia (although funding can be sought to support the Australian-based components of multinational clinical trials).

2. Grant amount and grant period

2.1. Grants available

The grant amount will be up to 100 per cent of eligible project costs (grant percentage). For this grant opportunity, \$13.0 million is available over two years.

- \$7.0 million in 2020-21
- \$6.0 million in 2021-22.

The maximum grant amount is \$2.5 million.

2.2. Project period

You must complete your project within four years of the date of execution.

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3. Eligibility criteria

We cannot consider your application if you do not satisfy all eligibility criteria.

3.1. Who is eligible?

To be eligible you must:

- have an Australian Business Number (ABN)
- be incorporated in Australia

and in accordance with s20 and s24 of the <u>MRFF Act 2015</u>³, be one of the following entities:

- a medical research institute
- a university
- a corporate Commonwealth entity
- a corporation (including businesses and not for profits)
- a state or territory government
- a state or territory government entity.

Joint applications are encouraged, provided you have a lead organisation who is the main driver of the project and is eligible to apply. For further information on joint applications, refer to section 6.2.

We cannot waive the eligibility criteria under any circumstances.

3.2. Chief Investigators

All members of the research team must be listed on the application form as Chief Investigators (CIs). Applicants must nominate a Chief Investigator A (CIA) who will take the lead role in conducting the project and report on the outcomes of the project as specified in the grant agreement.

A person must not be named as a Chief Investigator (CI) on more than one application submitted to this grant opportunity. See also section 6.2.

3.3. Additional eligibility requirements

We can only accept applications where you can provide:

- evidence from your board (or chief executive officer or equivalent if there is no board) that the project is supported, and that you can complete the project and meet the costs of the project not covered by grant funding.
- letters of support from each project partner, where applicable.

3.4. Who is not eligible?

You are not eligible to apply if you are:

- an individual
- partnership
- unincorporated association
- any organisation not included in section 3.1

³ <u>https://www.legislation.gov.au/Details/C2015A00116</u>



- trust (however, an incorporated trustee may apply on behalf of a trust)
- a non-corporate Commonwealth entity.

4. What the grant money can be used for

4.1. Eligible activities

To be eligible your project must:

- be aimed at the objectives in Section 1.3
- include one or more of the following eligible activities:
 - development/installation of research equipment
 - employment of personnel and/or
 - other direct research costs.

We may also approve other activities.

4.2. Eligible locations

We will consider activities based in any geographical location in Australia. You may request funding for a component of the research to be undertaken overseas if the equipment/resources required for that component are not available in Australia and the component is critical to the successful completion of the research project. However, the expectation is the majority of the research activities and funding expenditure will occur in Australia.

4.3. Eligible expenditure

You can only spend grant funds on eligible expenditure you have incurred on an agreed project as defined in your grant agreement.

- For guidance on eligible expenditure, see Appendix A.
- For guidance on ineligible expenditure, see Appendix B.

If your application is successful, we may ask you to verify project costs that you provided in your application. You may need to provide evidence such as quotes for major costs.

Not all expenditure on your project may be eligible for grant funding. The Program Delegate (who is an Australian Government official who has been authorised to make decisions) makes the final decision on what is eligible expenditure and may give additional guidance on eligible expenditure if required.

To be eligible, expenditure must:

- be a direct cost of the project
- be incurred by you for required project audit activities.

You must incur the project expenditure between the project start and end date for it to be eligible unless stated otherwise.

You must not commence your project until you execute a grant agreement with the Commonwealth.



5. The assessment criteria

You must address all assessment criteria in your application. We will assess your application based on the weighting given to each technical criterion and against the non-weighted (non-technical) assessment criterion.

The application form requests information that directly relates to the assessment criteria below. The amount of detail and supporting evidence you provide in your application should be relative to the project size, complexity and grant amount requested. You should provide evidence to support your responses. Size limits apply to all responses.

We will only award funding to applications that score satisfactorily against all criteria.

5.1. Assessment Criterion 1 - Project Impact (40% weighting)

You should demonstrate this by identifying:

- a. how your project will improve patient outcomes by creating or adapting technologies, mechanisms or approaches to improve the quality, safety and effectiveness of medicine use and medicine intervention by pharmacists in primary health and transitions of care, reflected by measurable project targets including, but not limited to:
 - promoting the safe and effective use of medicines, particularly in high-risk groups and settings such as the elderly, people with complex chronic diseases, rural and remote communities, Aboriginal and Torres Strait Islander people, culturally and linguistically diverse people and communities, and aged care facilities
 - reducing adverse drug events and medicine-related hospital admissions.
- the extent to which your project will deliver outcomes that are a priority for the Australian public, including details of community engagement and involvement during conceptualisation, development and planned implementation of you project
- c. partnerships with relevant peak or representative bodies that will support implementation of study findings into practice, as quickly as possible
- d. how the research will provide outcomes within 12 months of the grant period ending
- e. how your project includes new and innovative approaches, that can be scaled nationally
- f. how your project builds on and supports other initiatives, if applicable.

5.2. Assessment Criterion 2 - Project methodology (30% weighting)

You should demonstrate your proposed approach to delivering the project by providing:

- a. your project plan, including
 - an outline of the activities you will undertake
 - appropriate milestones, performance indicators and timeframes for delivery
 - the governance structures in place for the project
- b. a project feasibility analysis.

5.3. Assessment Criterion 3 - Capacity, capability and resources to deliver the project (30% weighting)

You should demonstrate this by providing details of:

a. your access to, and/or a feasible plan to recruit, an appropriate multi-disciplinary team, with proposed key project personnel, including pharmacy professionals, their skills and experience

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clearly articulated, along with explanations of how their skills and experiences are important to the success of your project

- b. your track record in managing similar projects
- c. your access, or future access, to any required infrastructure, land, capital equipment, technology, and regulatory or other approvals
- d. how any infrastructure funded through this project will be maintained beyond the life of the grant opportunity.

5.4. Assessment Criterion 4. Overall Value and Risk of the Project (nonweighted)

Your application should demonstrate the overall value and risk of the project, including that you have robust risk identification and management processes.

You should provide:

- your proposed budget and justification
- a risk management plan.

Our assessment will also take into consideration:

- the suitability of your proposed budget to complete all project activities
- how well the requested budget has been detailed and justified
- how soundly your risk management approach is demonstrated
- any risks identified as part of the assessment of your application
- the appropriateness of the submitted risk management plan in documenting key risks to the completion of the research proposal, including your plan to manage those identified risks, and
- how you propose to monitor and report risks (both those identified in your submitted risk management plan and those which may arise during your project) and issues.

6. How to apply

Before applying, you should read and understand these guidelines, the sample <u>application form</u> and the sample <u>grant agreement</u> published on business.gov.au and GrantConnect.

To apply, you must:

- complete the online program application form via business.gov.au
- provide all the information requested
- address all eligibility and assessment criteria
- include all necessary attachments

You will receive confirmation when you submit your application. You should retain a copy of your application for your own records.

You are responsible for making sure your application is complete and accurate. Giving false or misleading information is a serious offence under the *Criminal Code Act 1995* (Cth). If we consider that you have provided false or misleading information we may not progress your application. If you find an error in your application after submitting it, you should call us immediately on 13 28 46.

If we find an error or information that is missing, we may ask for clarification or additional information from you that will not change the nature of your application. However, we can refuse to



accept any additional information from you that would change your submission after the application closing time.

If you need further guidance around the application process, or if you are unable to submit an application online, <u>contact us</u> at business.gov.au or by calling 13 28 46.

6.1. Attachments to the application

Provide the following documents with your application:

- a detailed project plan (maximum 12 pages excluding appendices)
- a detailed and itemised project budget, including but not limited to disaggregation by project component and Financial Year (FY), and your related fee card
- a detailed risk management plan, and any supporting documentation, describing how you
 propose to monitor, manage and report identified risks including risks that may arise during
 your project
- a project feasibility analysis
- details of intellectual property (IP) arrangements as an attachment if this is not included within the written content of the application
- a plain English summary that can be used to describe your project to the general public (maximum 200 words)
- evidence of support from the board, CEO or equivalent
- trust deed (where applicable)
- letters of support (where applicable).

You must attach supporting documentation to the application form in line with the instructions provided within the form. You should only attach requested documents. We will not consider information in attachments that we do not request.

6.2. Joint applications

We encourage organisations to join together as a group to deliver a project. In these circumstances, you must appoint a lead organisation. Only the lead organisation can submit the application form and enter into the grant agreement with the Commonwealth. The application should identify all other members of the proposed group and include a letter of support from each of the project partners. Each letter of support should include:

- details of the project partner
- an overview of how the project partner will work with the lead organisation and any other project partners in the group to successfully complete the project
- an outline of the relevant experience and/or expertise the project partner will bring to the group
- the roles/responsibilities the project partner will undertake, and the resources it will contribute (if any)
- details of a nominated management level contact officer.

You must have a formal arrangement in place with all parties.



6.2.1. Lead Organisation and Chief Investigator A

Applicants must nominate a lead organisation who meets the eligibility criteria and will submit the application. The lead organisation must enter into the grant agreement, and nominate a project lead (Chief Investigator A) who will conduct the project and report on the outcomes of the project as specified in the grant agreement.

6.3. Timing of the grant opportunity process

You can only submit an application between the published opening and closing dates. We cannot accept late applications.

Table 1: Expected timing for this grant opportunity

Activity	Timeframe
Assessment of applications	14 weeks
Approval of outcomes of selection process	8 weeks
Negotiations and award of grant agreements	4 weeks
Notification to unsuccessful applicants	2 weeks
Earliest start date of project	Date of execution of your grant agreement
End date of grant commitment	Four years after grant execution date

7. The grant selection process

We first review your application against the eligibility criteria. If eligible, we will then assess it against the assessment criteria. Only eligible applications will proceed to the assessment stage.

We refer your application to an independent committee of experts (the Committee). For the Quality, Safety and Effectiveness of Medicine Use and Medicine Intervention by Pharmacists Grant Opportunity, the Committee will comprise national and international experts.

The Committee will undertake the assessment in accordance with the CGRG's and consider your application on its merits, based on:

- how well it meets the criteria
- whether it provides value with relevant money.

When assessing the merits of your application against the technical assessment criteria, the Committee will use the rating scale at Appendix C. Rating of the non-technical (Overall Value and Risk of your project) assessment criterion will be done in accordance with the Rating Scale at Appendix D.

To be awarded MRFF funding, applications must receive a rating of 5 or higher against each of the weighted technical assessment criteria (criteria 1, 2 and 3), and a rating of 'Good' or 'Excellent' for the non-weighted assessment criterion (criterion 4).

When assessing whether the application represents value with relevant money, the Committee will have regard to:

- the overall objective/s to be achieved
- the value of the grant sought



- extent to which the application matches identified MRFF priorities
- the extent to which the application demonstrates that funding will assist to meeting the proposal outcomes/ objectives.

The Committee will provide the Program Delegate with a report of the assessment outcomes.

If the selection process identifies unintentional errors in your application, we may contact you to correct or clarify the errors, but you cannot make any material alteration or addition.

7.1. Who will approve grants?

The Program Delegate decides which grants to approve taking into account the committee report, the availability of grant funds and the geographical spread of projects across Australia.

The Program Delegate's decision is final in all matters, including:

- the grant approval
- the grant funding to be awarded
- any conditions attached to the offer of funding.

We cannot review decisions about the merits of your application.

The Program Delegate will not approve funding if there is insufficient program funds available across relevant financial years for the grant opportunity.

8. Notification of application outcomes

We will advise you of the outcome of your application in writing. If you are successful, we will advise you of any specific conditions attached to the grant, including the timing of any public communications you make regarding being awarded a grant. If you are unsuccessful, we will give you an opportunity to discuss the outcome with us.

9. Successful grant applications

9.1. The grant agreement

You must enter into a legally binding grant agreement with the Commonwealth. A sample grant agreement is available on business.gov.au and GrantConnect.

We must execute a grant agreement with you before we can make any payments. Execute means both you and the Program Delegate have signed the agreement. We are not responsible for any expenditure you incur until a grant agreement is executed. You must not start any project activities until a grant agreement is executed.

The approval of your grant may have specific conditions determined by the assessment process or other considerations made by the Program Delegate. We will identify these in the offer of grant funding.

If you enter an agreement under this grant opportunity, you cannot receive other grants for the same activities from other Commonwealth, State or Territory granting programs.

The Commonwealth may recover grant funds if there is a breach of the grant agreement.

We will use a standard grant agreement.

You will have 30 days from the date of a written offer to execute this grant agreement with the Commonwealth. During this time, we will work with you to finalise details.

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The offer may lapse if both parties do not sign the grant agreement within this time. Under certain circumstances, we may extend this period. We base the approval of your grant on the information you provide in your application. We will review any required changes to these details to ensure they do not impact the project as approved by the Program Delegate.

9.2. Grant agreement variations

We recognise that unexpected events may affect project progress. In these circumstances, you can request a variation to your grant agreement, including:

- changing project milestones
- extending the timeframe for completing the project but within the maximum year period as specified in section 2.2.
- changing project activities

The program does not allow for:

an increase of grant funds.

If you want to propose changes to the grant agreement, you must put them in writing before the project end date. We can provide you with a variation request template.

If a delay in the project causes milestone achievement and payment dates to move to a different financial year, you will need a variation to the grant agreement. We can only move funds between financial years if there is enough program funding in the relevant year to allow for the revised payment schedule. If we cannot move the funds, you may lose some grant funding.

You should not assume that a variation request will be successful. We will consider your request based on factors such as:

- how it affects the project outcome
- consistency with the program policy objective, grant opportunity guidelines and any relevant policies of the department
- changes to the timing of grant payments
- availability of program funds.

9.3. Project specific legislation, policies and industry standards

You must comply with all relevant laws and regulations in undertaking your project. You must also comply with the specific legislation/policies/industry standards that follow. It is a condition of the grant funding that you meet these requirements. We will include these requirements in your grant agreement.

Wherever the government funds research activities, the following special regulatory requirements may apply:

- MRFF Act 2015⁴
- Working with Vulnerable People registration
- State/Territory legislation in relation to working with children
- Ethics and research practices

⁴ https://www.legislation.gov.au/Details/C2015A00116



- the <u>NHMRC/ARC/UA Australian Code for the Responsible Conduct of Research</u> (2018) and successor documents
- the <u>NHMRC/ARC/UA National Statement on Ethical Conduct in Human Research</u> (2007, updated 2018)
- the <u>Australian Code for the care and use of animals for scientific purposes</u> (2013) endorsed by the NHMRC, the ARC, the Commonwealth Scientific and Industrial Research Organisation and UA.

If there is any conflict or inconsistency between a successor document and its predecessor, then the successor document prevails.

9.3.1. Child safety requirements

You must comply with all relevant legislation relating to the employment or engagement of anyone working on the project that may interact with children, including all necessary working with children checks.

You must implement the National Principles for Child Safe Organisations endorsed by the Commonwealth and available at: <u>https://www.humanrights.gov.au/national-principles-child-safe-organisations.</u>

You will need to complete a risk assessment to identify the level of responsibility for children and the level of risk of harm or abuse, and put appropriate strategies in place to manage those risks. You must update this risk assessment at least annually.

You will also need to establish a training and compliance regime to ensure personnel are aware of, and comply with, the risk assessment requirements, relevant legislation including mandatory reporting requirements and the National Principles for Child Safe Organisations.

You will be required to provide an annual statement of compliance with these requirements in relation to working with children.

9.4. Intellectual property rights

Applicants must provide details of intellectual property (IP) arrangements in their applications. This includes both the use of IP in the project and the proposed ownership rights to IP generated by the project as well as strategies for protecting Australia's interests. Where IP is likely to be generated by the project, successful applicants are required to conclude protocols or contracts with their collaborating partners on the management of IP issues. These agreements should be in accordance with laws and regulations in Australia.

9.5. Dissemination of research outcomes

You must ensure appropriate safeguards are in place to protect patient privacy, intellectual property and commercially confidential information.

Except where publication may compromise your obligations with respect to patient privacy, intellectual property and/or commercially confidential information, grantees are required to:

- if a clinical trial, submit the clinical trial protocol to an open access repository within six months of Human Research Ethics Committee approval, or publish a protocol manuscript as soon as practicable.
- within 12 months of completion of the grant activity, disseminate the research findings through:
 - ensuring that research findings are available in an open access repository
 - content specific forums
 - submission to peer-reviewed journals



 make lay summaries available to research participants, concurrently with sharing and dissemination of research results.

Grantees are encouraged to publish de-identified research data following completion of the grant in an open access repository and in accordance with best practice.

9.6. How we pay the grant

The grant agreement will state the:

- maximum grant amount we will pay
- proportion of eligible expenditure covered by the grant (grant percentage)
- any in-kind contributions you will make
- any financial contribution provided by you or a third party.

We will not exceed the maximum grant amount under any circumstances. If you incur extra costs, you must meet them yourself.

We will make payments according to an agreed schedule set out in the grant agreement. Payments are subject to satisfactory progress on the project.

9.7. Grants Payments and GST

If you are registered for the Goods and Services Tax (GST), where applicable we will add GST to your grant payment and provide you with a recipient created tax invoice. You are required to notify us if your GST registration status changes during the project period. GST does not apply to grant payments to government related entities⁵.

Grants are assessable income for taxation purposes, unless exempted by a taxation law. We recommend you seek independent professional advice on your taxation obligations or seek assistance from the <u>Australian Taxation Office</u>. We do not provide advice on tax.

10. Announcement of grants

We will publish non-sensitive details of successful projects on GrantConnect. We are required to do this by the *Commonwealth Grants Rules and Guidelines* unless otherwise prohibited by law. We may also publish this information on business.gov.au. This information may include:

- name of your organisation
- title of the project
- description of the project and its aims
- amount of grant funding awarded and grant duration
- Australian Business Number
- business location
- your organisation's industry sector.

⁵ See Australian Taxation Office ruling GSTR 2012/2 available at ato.gov.au



11. How we monitor your grant activity

11.1. Keeping us informed

You should let us know if anything is likely to affect your organisation or impact successful delivery of your project.

We need to know of any key changes to your organisation or its business activities, particularly if they affect your ability to complete your project, carry on business and pay debts due.

You must also inform us of any changes to your:

- name
- addresses
- nominated contact details
- bank account details.

If you become aware of a breach of terms and conditions under the grant agreement you must contact us immediately.

You must notify us of events relating to your project and provide an opportunity for the Minister or their representative to attend.

11.2. Reporting

You must submit reports in line with the grant agreement. We will provide the requirements for these reports as appendices in the grant agreement. We will remind you of your reporting obligations before a report is due. We will expect you to report on:

- progress against agreed project milestones
- risks arising during the project
- project expenditure, including expenditure of grant funds
- contributions of participants directly related to the project.

The amount of detail you provide in your reports should be relative to the project size, complexity and grant amount.

We will monitor the progress of your project by assessing reports you submit and may conduct site visits to confirm details of your reports if necessary. Occasionally we may need to re-examine claims, seek further information or request an independent audit of claims and payments.

11.2.1. Progress reports

Progress reports must:

- include details of your progress towards completion of agreed project activities, including any risks arising and how they are being managed to ensure planned project outcomes are met
- show the total eligible expenditure incurred to date
- be submitted by the report due date
- include information about your project that supports evaluation of the MRFF.

We will only make grant payments when we receive satisfactory progress reports.

You must discuss any project or milestone reporting delays with us as soon as you become aware of them.

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11.2.2. End of project report

When you complete the project, you must submit an end of project report.

End of project reports must:

- include the agreed evidence as specified in the grant agreement (including, but not limited to, evidence of project impact)
- identify the total eligible expenditure incurred for the project
- include information about your project that supports evaluation of the MRFF
- include a declaration that the grant money was spent in accordance with the grant agreement and to report on any underspends of the grant money
- be submitted by the report due date.

11.2.3. Ad-hoc reports

We may ask you for ad-hoc reports on your project. This may be to provide an update on progress, or any significant delays or difficulties in completing the project, or to support evaluation of the MRFF.

11.3. Independent audits

We may ask you to provide an independent audit report. An audit report would verify that you spent the grant in accordance with the grant agreement. The audit report requires you to prepare a statement of grant income and expenditure. The report template is available on business.gov.au and GrantConnect.

11.4. Compliance visits

We may visit you during the project period, or at the completion of your project to review your compliance with the grant agreement. We may also inspect the records you are required to keep under the grant agreement. For large or complex projects, we may visit you after you finish your project. We will provide you with reasonable notice of any compliance visit.

11.5. Evaluation

We will evaluate the grant to measure how well the outcomes and objectives have been achieved. We may use information from your application and project reports for this purpose, and for the purpose of the evaluation of MRFF more broadly. We may also interview you, or ask you for more information to help us understand how the grant impacted you and to evaluate how effective the program was in achieving its outcomes.

We may contact you up to two years after you finish your project for more information to assist with this evaluation, or the evaluation of MRFF more broadly.

11.6. Grant acknowledgement

If you make a public statement about a project funded under the grant opportunity, including in a brochure or publication, you must acknowledge the grant by using the following:

'This project received grant funding from the Australian Government.'

If you erect signage in relation to the project, the signage must contain an acknowledgement of the grant.

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12. Probity

We will make sure that the grant opportunity process is fair, according to the published guidelines, incorporates appropriate safeguards against fraud, unlawful activities and other inappropriate conduct and is consistent with the CGRGs.

12.1. Conflicts of interest

Any conflicts of interest could affect the performance of the grant opportunity or program. There may be a conflict of interest, or perceived conflict of interest, if our staff, any member of a committee or advisor and/or you or any of your personnel:

- has a professional, commercial or personal relationship with a party who is able to influence the application selection process, such as an Australian Government officer or member of an external panel
- has a relationship with or interest in, an organisation, which is likely to interfere with or restrict the applicants from carrying out the proposed activities fairly and independently, or
- has a relationship with, or interest in, an organisation from which they will receive personal gain because the organisation receives a grant under the grant program/ grant opportunity.

As part of your application, we will ask you to declare any perceived or existing conflicts of interests or confirm that, to the best of your knowledge, there is no conflict of interest.

If you later identify an actual, apparent, or perceived conflict of interest, you must inform us in writing immediately.

Conflicts of interest for Australian Government staff are handled as set out in the Australian <u>Public</u> <u>Service Code of Conduct (Section 13(7))</u>⁶ of the <u>Public Service Act 1999</u> (Cth)⁷. Committee members and other officials including the decision maker must also declare any conflicts of interest.

We publish our conflict of interest policy on the department's website⁸.

12.2. How we use your information

Unless the information you provide to us is:

- confidential information as per 12.2.1, or
- personal information as per 12.2.3,

we may share the information with other government agencies for a relevant Commonwealth purpose such as:

- to improve the effective administration, monitoring and evaluation of Australian Government programs
- for research
- to announce the awarding of grants.

⁶ https://www.legislation.gov.au/Details/C2017C00270/Html/Text#_Toc491767030

⁷ https://www.legislation.gov.au/Details/C2017C00270

⁸ https://www.industry.gov.au/sites/g/files/net3906/f/July%202018/document/pdf/conflict-of-interest-and-insider-trading-policy.pdf

12.2.1. How we handle your confidential information

We will treat the information you give us as sensitive and therefore confidential if it meets all of the following conditions:

- you clearly identify the information as confidential and explain why we should treat it as confidential
- the information is commercially sensitive
- disclosing the information would cause unreasonable harm to you or someone else
- you provide the information with an understanding that it will stay confidential.

12.2.2. When we may disclose confidential information

We may disclose confidential information:

- to the committee and our Commonwealth employees and contractors, to help us manage the program effectively
- to the Auditor-General, Ombudsman or Privacy Commissioner
- to the responsible Minister or Assistant Minister
- to a House or a Committee of the Australian Parliament.

We may also disclose confidential information if

- we are required or authorised by law to disclose it
- you agree to the information being disclosed, or
- someone other than us has made the confidential information public.

12.2.3. How we use your personal information

We must treat your personal information according to the Australian Privacy Principles (APPs) and the *Privacy Act 1988* (Cth). This includes letting you know:

- what personal information we collect
- why we collect your personal information
- to whom we give your personal information.

We may give the personal information we collect from you to our employees and contractors, the committee, and other Commonwealth employees and contractors, so we can:

- manage the program
- research, assess, monitor and analyse our programs and activities.

We, or the Minister, may:

- announce the names of successful applicants to the public
- publish personal information on the department's websites.

You may read our <u>Privacy Policy</u>⁹ on the department's website for more information on:

- what is personal information
- how we collect, use, disclose and store your personal information
- how you can access and correct your personal information.

⁹ https://www.industry.gov.au/data-and-publications/privacy-policy



12.2.4. Freedom of information

All documents in the possession of the Australian Government, including those about the program, are subject to the *Freedom of Information Act 1982* (Cth) (FOI Act).

The purpose of the FOI Act is to give members of the public rights of access to information held by the Australian Government and its entities. Under the FOI Act, members of the public can seek access to documents held by the Australian Government. This right of access is limited only by the exceptions and exemptions necessary to protect essential public interests and private and business affairs of persons in respect of whom the information relates.

If someone requests a document under the FOI Act, we will release it (though we may need to consult with you and/or other parties first) unless it meets one of the exemptions set out in the FOI Act.

12.3. Enquiries and feedback

For further information or clarification, you can contact us on 13 28 46 or by <u>web chat</u> or through our <u>online enquiry form</u> on business.gov.au.

We may publish answers to your questions on our website as Frequently Asked Questions.

Our <u>Customer Service Charter</u> is available at business.gov.au. We use customer satisfaction surveys to improve our business operations and service.

If you have a complaint, call us on 13 28 46. We will refer your complaint to the appropriate manager.

If you are not satisfied with the way we handle your complaint, you can contact:

Head of Division – AusIndustry – Support for Business Department of Industry, Innovation and Science GPO Box 2013 CANBERRA ACT 2601

You can also contact the <u>Commonwealth Ombudsman¹⁰</u> with your complaint (call 1300 362 072). There is no fee for making a complaint, and the Ombudsman may conduct an independent investigation.

10 http://www.ombudsman.gov.au/



13. Glossary

Term	Definition
Administering entity	When an entity that is not responsible for the policy, is responsible for the administration of part or all of the grant application processes
Application form	The document or computerised submission system that applicants use to apply for funding under the grant opportunity.
Assessment criteria	Are the specified principles or standards, against which applications will be judged. These criteria are also used to assess the merits of proposals and, in the case of a competitive grant opportunity, to determine application rankings.
AusIndustry	The division of the same name within the department.
Chief Investigator	A member of the research team.
Chief Investigator A	The member of the research team that takes the lead role in conducting the project and reporting on the outcomes of the project as specified in the grant agreement.
Commencement date	The expected start date for the grant activity
Committee	The body established by the Department to consider and assess eligible applications and make recommendations for funding under the program.
Commonwealth Grants Rules and Guidelines (CGRGs)	Establish the overarching Commonwealth grants policy framework and articulate the expectations for all non- corporate Commonwealth entities in relation to grants administration. Under this overarching framework, non- corporate Commonwealth entities undertake grants administration based on the mandatory requirements and key principles of grants administration
Completion date	The expected date that the grant activity must be completed and the grant spent by
Date of effect	Can be the date on which a grant agreement is signed or a specified starting date. Where there is no grant agreement, entities must publish information on individual grants as soon as practicable
Decision maker	The person who makes a decision to award a grant.
Department	The Department of Industry, Science, Energy and Resources.



Term	Definition
Eligibility criteria	Refer to the mandatory criteria which must be met to qualify for a grant. Assessment criteria may apply in addition to eligibility criteria
Eligible activities	The activities undertaken by a grantee in relation to a project that are eligible for funding support as set out in 4.1.
Eligible application	An application or proposal for services or grant funding for which the Program Delegate has determined is eligible for assessment in accordance with these guidelines.
Eligible expenditure	The expenditure incurred by a grantee on a project and which is eligible for funding support as set out in Section 4.3 and Appendix A.
Footprint	The footprint is the outline of the total area of the lot or site surrounded by the exterior walls of a building or portion of a building, exclusive of courtyards.
Grant activity/activities	Refers to the project/tasks/services that the grantee is required to undertake.
Grant agreement	Sets out the relationship between the parties to the agreement, and specifies the details of the grant.
<u>GrantConnect</u>	Is the Australian Government's whole-of-government grants information system, which centralises the publication and reporting of Commonwealth grants in accordance with the CGRGs.
Grantee	The individual/organisation which has been selected to receive a grant.
Grant funding or grant funds	The funding made available by the Australian Government to grantees under the program.
Grant opportunity	Refers to the specific grant round or process where a Commonwealth grant is made available to potential grantees. A grant opportunity is aimed at achieving government policy outcomes under a Portfolio Budget Statement Program.
Minister	The Australian Government Minister for Health.



Term	Definition
Personal information	Has the same meaning as in the <i>Privacy Act 1988</i> (Cth) which is:
	Information or an opinion about an identified individual, or an individual who is reasonably identifiable:
	 a. whether the information or opinion is true or not; and
	b. whether the information or opinion is recorded in a material form or not.
Program Delegate	An Australian Government official in the Department of Health with responsibility for the grant opportunity.
Project	A project described in an application for grant funding under this grant opportunity.
Value for Money	Value with money in this document refers to 'value with relevant money' which is a judgement based on the Grant Proposal representing an efficient, effective, economical and ethical use of public resources and determined from a variety of considerations.
	When administering a grant opportunity, the relevant financial and non-financial costs and benefits of each proposal are considered including, but not limited to:
	 the quality of the project proposal and activities;
	 fitness for purpose of the proposal in contributing to government objectives;
	 that the absence of a grant is likely to prevent the grantee and government's outcomes being achieved; and
	 the potential grantee's relevant experience and performance history.



Appendix A. Eligible expenditure

This section provides additional guidance on the eligibility of expenditure referred to in Section 4.3.

Applicants are encouraged to utilise existing research infrastructure to support their research wherever possible to reduce duplication and achieve the best return on project funding, and grant funds can be requested to support access to existing research facilities and infrastructure.

Applicants are encouraged to consider utilising research infrastructure projects such as those funded by the Australian Government through the National Collaborative Research Infrastructure Strategy (NCRIS). The NCRIS projects encompass a variety of infrastructure relevant to health research such as the Translating Health Discovery (THD) project and the Population Health Research Network (PHRN) project. Further information including access and pricing is available at www.education.gov.au/national-collaborative-research-infrastructure-strategy-ncris.

Your approach to accessing research facilities or infrastructure may impact our assessment of the suitability and value for money of the requested budget.

How we verify eligible expenditure

If your application is successful, we may ask you to verify project costs that you provided in your application when we negotiate your grant agreement. You may need to provide evidence such as quotes for major costs.

The grant agreement will include details of the evidence you may need to provide when you achieve certain milestones in your project. This may include evidence related to eligible expenditure.

If requested, you will need to provide the agreed evidence along with your progress reports.

You must keep payment records of all eligible expenditure, and be able to explain how the costs relate to the agreed project activities. At any time, we may ask you to provide records of the expenditure you have paid. If you do not provide these records when requested, the expense may not qualify as eligible expenditure.

At the end of the project, you will be required to provide an independent financial audit of all eligible expenditure from the project.

Equipment

You may purchase equipment, provided you can demonstrate it is critical to meeting project objectives and outcome.

Applicants can request funding to pay for equipment costing over \$10,000 that is essential to the research. The total equipment requested cannot exceed \$80,000.

Applicants must clearly outline the total value of all items of equipment for each year, why the equipment is required for the proposed research and why the equipment cannot be provided by the institution.

The applicant must be prepared to meet all service and repair costs in relation to equipment funded.

Funds will not be provided for the purchase of computers except where these are an integral component of a piece of laboratory equipment or are of a nature essential for work in the research



field, for example, a computer which is dedicated to data collection from a mass spectrometer, or used for the manipulation of extensively large datasets (i.e. requiring special hardware).

Labour expenditure

Eligible labour expenditure for the grant covers the direct labour costs of employees you directly employ on the core elements of the project. We consider a person an employee when you pay them a regular salary or wage, out of which you make regular tax instalment deductions.

We consider costs for technical, administrative and project management activities eligible labour expenditure, provided there are direct, demonstrated and monitored links to project objectives and outcomes.

We consider labour expenditure for leadership or administrative staff (such as CEOs, CFOs, accountants and lawyers) as eligible expenditure, provided there are direct, demonstrated and monitored links to project objectives and outcomes. However, we limit these costs to 10 per cent of the total amount of eligible labour expenditure claimed.

Eligible salary expenditure includes an employee's total remuneration package as stated on their Pay As You Go (PAYG) Annual Payment Summary submitted to the ATO. We consider salary-sacrificed superannuation contributions as part of an employee's salary package if the amount is more than what the Superannuation Guarantee requires.

The maximum salary for an employee, director or shareholder, including packaged components that you can claim through the grant is \$175,000 per financial year.

For periods of the project that do not make a full financial year, you must reduce the maximum salary amount you claim proportionally.

You can only claim eligible salary costs when an employee is working directly on agreed project activities during the agreed project period.

Labour on-costs

You may increase eligible salary costs such as employer paid superannuation, payroll tax, workers compensation insurance, and leave entitlements (including paid maternity leave, sick leave, long service leave and recreation leave). These costs must be reasonable and be separately identified in the project budget.

You should calculate eligible salary costs using the formula below:



You cannot calculate labour costs by estimating the employee's worth. If you have not exchanged money (either by cash or bank transactions) we will not consider the cost eligible.

Evidence you will need to provide can include:

- details of all personnel working on the project, including name, title, function, time spent on the project and salary
- ATO payment summaries, pay slips and employment contracts.



Contract expenditure

Eligible contract expenditure is the cost of any agreed project activities that you contract others to do. These can include contracting:

- another organisation
- an individual who is not an employee, but engaged under a separate contract.

All contractors must have a written contract prior to starting any project work—for example, a formal agreement, letter or purchase order which specifies:

- the nature of the work they perform
- the applicable fees, charges and other costs payable.

Invoices from contractors must contain:

- a detailed description of the nature of the work
- the hours and hourly rates involved
- any specific plant expenses paid.

Invoices must directly relate to the agreed project, and the work must qualify as an eligible expense. The costs must also be reasonable and appropriate for the activities performed.

We will require evidence of contractor expenditure that may include:

- an exchange of letters (including email) setting out the terms and conditions of the proposed contract work
- purchase orders
- supply agreements
- invoices and payment documents.

You must ensure all project contractors keep a record of the costs of their work on the project. We may require you to provide a contractor's records of their costs of doing project work. If you cannot provide these records, the relevant contract expense may not qualify as eligible expenditure.

Travel and overseas expenditure

Eligible travel and overseas expenditure may include:

- domestic travel limited to the reasonable cost of accommodation and transportation required to conduct agreed project and collaboration activities in Australia
- domestic travel for third parties (i.e. certifiers, tradesman), where the travel is essential to the successful completion of the grant activity
- overseas travel, where it is formally documented and agreed by the Delegate, as essential to the conduct of the project, in advance of the travel being taken and is limited to the reasonable cost of accommodation and transportation
- applicants may request funding for a component of the research to be undertaken overseas if the equipment/resources required for that component are not available in Australia and the component is critical to the successful completion of the research project. However, the expectation is the majority of the research activities and funding expenditure will occur in Australia.



Eligible air transportation is limited to the economy class fare for each sector travelled; where noneconomy class air transport is used:

- only the equivalent of an economy fare for that sector is eligible expenditure
- the grantee will require evidence showing what an economy air fare costs at the time of travel

grant funding only up to the economy air fare cost at the time of travel amount can be used.
 When considering an application for overseas travel, the Delegate will undertake a Value for
 Money assessment to determine whether the cost of overseas expenditure is eligible. This may
 depend on:

- the proportion of total grant funding that you will spend on overseas expenditure
- the proportion of the service providers total fee that will be spent on overseas expenditure
- how the overseas expenditure is likely to aid the project in meeting the program objectives.

Eligible overseas activities expenditure is generally limited to 10 per cent of total eligible project expenditure.

Other eligible expenditure

Other eligible expenditures include costs directly related to the project activity that are not already being supported through any other sources, or where other Commonwealth, state or territory governments do not have primary responsibility, including:

- staff training that directly supports the achievement of project outcomes
- financial auditing of project expenditure
- costs you incur in order to obtain planning, environmental or other regulatory approvals during the project period. However, associated fees paid to the Commonwealth, state, territory and local governments are not eligible
- insurances which are specifically required to cover the grant activity
- contingency costs up to a maximum of 10% of the eligible project costs. Note that we make payments based on actual costs incurred.

Other specific expenditures may be eligible as determined by the Program Delegate.

Evidence you need to supply can include supplier contracts, purchase orders, invoices and supplier confirmation of payments.



Appendix B. Ineligible expenditure

This section provides guidance on what we consider ineligible expenditure.

The Program Delegate may impose limitations or exclude expenditure, or further include some ineligible expenditure listed in these guidelines in a grant agreement or otherwise by notice to you.

Examples of ineligible expenditure include:

- major or minor capital works projects
- maintenance or upgrades on buildings or structures
- activities, equipment or supplies that are already being supported through other sources or where other Commonwealth, state or territory governments have primary responsibility
- reimbursement of activities that have commenced prior to the execution of a grant agreement
- research activity undertaken outside of Australia, although funding can be sought to support the Australian-based components of multi-national research activity
- costs incurred prior to us notifying you that the application is eligible and complete
- retrospective costs
- any in-kind contributions
- financing costs, including interest
- debt financing
- costs related to obtaining resources used on the project, including interest on loans, job advertising and recruiting, and contract negotiations
- non-project related staff training and development costs
- costs related to preparing the grant application, preparing any project reports (except costs of independent audit reports we require) and preparing any project variation requests
- conference attendance, and associated travel (except in pre-approved circumstances where the research outputs of the activity are to be presented)
- travel or overseas costs that exceed 10% of total project costs except where otherwise approved by the Program Delegate (see above)
- health insurance, travel insurance, foreign currency, airport and related travel taxes, passports and visas
- entertainment and hospitality costs
- personal subscriptions (e.g. personal journal subscriptions)
- personal membership of professional organisations and groups
- airline club membership
- communications costs (mobiles, telephone calls)
- patent costs
- institutional overheads and administrative costs.

This list is not exhaustive and applies only to the expenditure of the grant funds. Other costs may be ineligible where we decide that they do not directly support the achievement of the planned outcomes for the project or that they are contrary to the objective of the grant opportunity.

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You must ensure you have adequate funds to meet the costs of any ineligible expenditure associated with the project.



Appendix C. Assessment scoring scale

When assessing the merits of your application against the assessment criteria, the Committee will use the following ten-point scale (10 highest, 1 lowest).

Score	Rating Scale
10	Excellent Quality – response to this criterion significantly exceeds expectations. Evidence confirms consistent superior performance against this criterion in all areas. Claims are fully substantiated.
9	Outstanding Quality - response to this criterion exceeds expectations in most key areas and addressed to a very high standard in others. Most Claims are fully substantiated with others very well substantiated.
8	Very Good Quality - response to this criterion meets expectations to a very high standard in all areas. All claims are well substantiated.
7	Good Quality – response to this criterion meets expectations to a high standard in all areas. Claims are well substantiated in key areas.
6	Fair Quality – response to this criterion addresses all areas well. Claims are well substantiated in most areas. Some minor shortcomings.
5	Acceptable Quality – response addresses most key areas to a consistent acceptable standard with no major shortcomings. Most claims are adequately substantiated. Some proposals may be questionable.
4	Marginal Quality – response is marginal and does not fully meet expectations. Some claims unsubstantiated; others only adequately substantiated or lack sufficient detail. Some proposals may be unworkable.
3	Poor Quality – response poorly addresses some areas or fails to address some areas. Claims largely unsubstantiated. A number of proposals may be unworkable.
2	Very Poor Quality – response inadequately deals with most or all areas. Claims almost totally unsubstantiated. A number of proposals may be unworkable.
1	Unacceptable Quality – response doses not meet expectations. Criteria not addressed or insufficient or no information to assess the criterion. Claims unsubstantiated, no evidence and unworkable.



Appendix D. Rating scale for assessment criterion 4: Overall Value and Risk

Rating	Descriptor	
Excellent	The application provides excellent overall value	
	 The proposed budget is detailed, aligns very well with the scope and scale of the proposed project, and is sufficient to undertake all components of work. 	
	 The applicants risk management plan is well considered and appropriate to the project. 	
	• The stated approach to the management, monitoring and reporting of risks is clearly articulated within their application.	
	 Any risks arising through the assessment are tolerable and well mitigated, and not likely to adversely impact on the achievement of stated objectives of the project. 	
Good	The application provides good overall value.	
	 The proposed budget, with some minor shortcomings, is substantiated and will meet the scope and scale of the proposed project. 	
	 The applicants risk management plan is appropriate to the project, with some minor shortcomings. 	
	• The stated approach to the management, monitoring and reporting of risk is articulated within their application, with claims supported across key areas.	
	 Any risks arising through the assessment are tolerable and unlikely to adversely impact on the achievement of stated objectives of the project, although some risks may require additional mitigations and/or monitoring to ensure the delivery of project outcomes. 	
Marginal	The application provides marginal overall value.	
	• The proposed budget is higher than expected for a project of the same scale and scope, with some line items questionable.	
	 The applicant's risk management plan lacks detail in some areas, there are some gaps in risk identification or analysis or some mitigation and management strategies appear questionable. 	
	 Some risks arising through the assessment may require additional mitigation and/or monitoring to ensure that they are managed in a way that doesn't impact on the delivery of some project outcomes. 	

