

Senate Environment and Communications References Committee
Australia Post inquiry
Responses to Questions Taken on Notice from 27 April 2021 Hearing

Question	Response
<p>Ms Willmott: Thank you very much. We had, as has been discussed elsewhere in evidence, a strategy meeting on 20 February, and BCG came and presented some slides to talk about their report. I would like to say that for those who had been on the board for some time the report was actually quite underwhelming, and I would support Ms Holgate's evidence that she objected rigorously to the recommendations. The reality is that the report told us nothing new. We know that letters are declining and we know that parcels are increasing, and there are only a limited numbers of levers that can be examined. We did not discuss the report ever, to my recollection, after that meeting; in fact, at that meeting we appointed another consultant to do some detailed work for us.</p> <p>Senator McKENZIE: Who was that?</p> <p>Ms Willmott: That's been canvassed elsewhere in evidence. It was McKinsey.</p> <p>Senator McKENZIE: Okay. We'll get the terms of reference for McKinsey's contract, if we could, on notice.</p> <p>CHAIR: Very well. Thank you.</p>	<p>The terms of reference and agreed for the work by McKinsey is as follows:</p> <p>The objective of this project is to define the future state delivery network for Australia Post. This includes transport, production and first / last mile. The future role of, and implications for, the post office network and parcel lockers also need to be tightly interwoven into this design, given their importance to the last mile and customer experience.</p> <p>In order to build this future state model, it will be important to develop a robust fact base on market evolution under a set of scenarios. This needs to be driven by a view on Australia Post's aspiration for customer experience (across merchants, businesses, consumers / households, etc.) This process will incorporate key strategic choices around product in to the network design (e.g., oversize parcels, business-to-business (B2B) road express business), refining these choices where necessary.</p> <p>The outcome will be a future state view of the delivery network, estimate of the customer service levels / experience and economics (including investment required) it will deliver, execution roadmap and required enablers (e.g. capabilities, enterprise agreement (EBA), regulatory). For clarity, this will not be a "geospatial blueprint" of exactly what the future network looks like (e.g. location of sorting centres, where to locate fleet etc.), although it will provide the underpinning for that subsequent detailed design work.</p> <p>The Alternating Day Delivery Model (ADM) currently being piloted is a critical stepping stone in building the future network for Australia Post. As such, an additional objective of this project is to work with the Operations team to understand opportunities to maximise the value of this model.</p>
<p>Senator KITCHING: I ask Mr Macdonald if he could table section 9 of Ms Holgate's employment contract—the policies and procedures that are listed from (a) to (d).</p> <p>Mr Macdonald: I will take it on notice.</p> <p>CHAIR: Thank you.</p>	<p>Policies applicable across the organisation on 22 October 2020 are enclosed, noting some have been revised since that date. Collating all procedures applicable across the organisation on that date (e.g. standards, practices, procedures, and similar documents) would require a significant diversion of resources. For completeness, also enclosed is a list of the policies revised, created or retired between 23 October 2020 and 27 April 2021.</p> <p>The policies contain confidential information (except for those published by Australia Post, like 'Our Ethics' (Code of Conduct) and privacy policy) and Australia Post's intellectual property. Australia Post respectfully requests that the Committee consider limiting publication to those policies, if any, that are directly relevant to the Inquiry's terms of reference.</p>

Policies revised, created or retired between 23 October 2020 and 27 April 2021

Our Ethics (Revised)
Anti-Bribery & Corruption (Revised)
Competition and Consumer Protection (Revised)
Conflicts of Interest (Revised)
Corporate Responsibility (Revised)
Credit Card (Revised)
Domestic and Family Violence (Revised)
Environment (Revised)
Gifts, Benefits and Hospitality (Revised)
Harassment, Discrimination & Bullying (Revised)
Investment Management (Revised)
Procurement (Revised)
Social Media (Revised)
Tax Governance (Revised)
Travel & Entertainment (Revised)
Treasury (Revised)
Whistleblower (Revised)
Reward & Recognition (Created)
Security (Created)
Technology (Retired)

Group Delegations Policy

Policy Level: 1

Accountable Executive: EGM Corporate Services

Date Approved: 13 December 2018

Date Effective: 13 December 2018

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Statement of Policy

Overview

This Group Delegations Policy (**Policy**):

- provides information about the structure and operation of the Australia Post Group's delegations of authority (**Delegations**)
- explains the legal and regulatory framework that provides the Australia Post Group with its powers and functions, and which underpins the Delegations
- sets out requirements in relation to employees exercising delegated authority.

This Policy is a key element of the Enterprise Risk and Compliance Management Framework and related policies.

The General Counsel is the custodian of the Delegations and the Policy Owner.

Rationale & Scope

Delegation is the process by which employees occupying specified levels or positions within the Australia Post Group are authorised to make decisions and commitments on behalf of a Group Company.

The Delegations establish an overarching framework for authorising the conduct of the Australia Post Group's business operations and administrative functions so that it can meet its strategic and operational objectives together with its corporate governance obligations.

A robust delegations framework is essential so that:

- the Australia Post Group is able to perform its powers and functions and meet its legal obligations through sound commercial practice
- employees know what delegated authority they have been given and that the scope and limits of authority are both properly understood and agreed to
- there is a clear responsibility trail to support transparency, accountability and decision escalation (employees understand which matters must be referred to a higher decision-making level and delays and bureaucracy are minimised)
- material assets and arrangements are protected from undue risks and liabilities
- counter parties and third parties have certainty in their dealings with the Australia Post Group (third parties can be confident that the Group Company delegates with whom they deal are authorised to commit that Group Company to a particular activity or arrangement).

Nothing in this Policy is intended to, and nor does it, delegate any power or authority to anyone. Such delegation occurs under separate instruments executed by:

- in the case of Australia Post, the Managing Director (**MD**) or another employee authorised by the Board of Australia Post to make delegations (**Authorised Persons**)
- in the case of a Subsidiary, the Board of that Subsidiary.

This Policy is not an exhaustive summary of all requirements and considerations in relation to exercising delegated authority. Many of these are set out in the Delegations issued under this Policy. Other sources of authority include individual employee's' position descriptions, policies, and business-unit specific processes and controls (e.g. SAP, which limits how expenditure is incurred).

For specific advice in relation to a particular circumstance, please contact Group Legal.

Audience

Only directors and employees of a Group Company can exercise delegated authority. However, this Policy is also relevant to committees and to any consultants or contractors, as they need to understand how the delegations framework operates.

Application

All activities covered by this Policy and associated materials must be complied with for any new projects, activities or initiatives. Existing systems should work towards complying with these requirements but are not subject to retrospective compliance obligations.

If there are limitations to complying with new requirements, a policy exception can be requested following the standard process. However, our "risk based approach" should take precedence in all cases – business owners should continually analyse the risk associated with their business process and system and make improvements consistent with these policy statements.

Awareness, Training & Induction

Awareness, communication and compliance programs for this Policy will be developed.

Employees may be required to provide a written acknowledgement each year to certify that they understand and will comply with this Policy and the Delegations.

It is also the responsibility of managers to effectively communicate to their employees the requirements of this Policy and the Delegations.

Enforcement & Monitoring

All actual or suspected breaches of this Policy (or of the Delegations of Authority issued under this Policy), that are reported or otherwise detected, must be escalated to Group Risk, Security & Compliance for appropriate investigation (and if necessary, further escalation to the Board's Audit & Risk Committee).

Breaches may be subject to counselling or disciplinary action appropriate to the circumstances and seriousness of the behaviour. Disciplinary action may include dismissal or termination of employment.

An employee may be found in breach for failure to behave consistently with the requirements and principles of the Policy.

Review

This Policy is to be reviewed every 3 years. It is the responsibility of the Policy Owner to consider whether at any time there has been a change in circumstances that warrants a change to the Policy.

Policy Guidelines

Functions & Powers

Overview – Australia Post

Australia Post's corporate governance practices are informed primarily by the *Australian Postal Corporation Act 1989* (Cth) (**APC Act**) and the *Public Governance, Performance and Accountability Act 2013* (Cth) (**PGPA Act**), as well as current best practice for Commonwealth Government business enterprises (**GBEs**).

The APC Act continues the existence of Australia Post as a statutory corporation operating on a commercial basis at arms' length to the Federal government. It identifies Australia Post's functions and the powers necessary to support those functions.

Australia Post is responsible for its day-to-day operations under the direction of its Board.

The Commonwealth Government as its sole shareholder has oversight through various planning and accountability mechanisms.

Australia Post's Functions and Powers

The APC Act specifies the functions that Australia Post is authorised to undertake, which are:

- **principal function** – to provide a domestic postal service consistent with community expectations within Australia and between Australia and places outside Australia
- **subsidiary function** – to carry on, outside Australia, any business or activity relating to postal services
- **incidental function** – to carry on, within or outside Australia, any business or activity that is incidental to the principal function or the subsidiary function.

The APC Act also specifies a wide number of postal, postal related and other powers of Australia Post, including the power to enter into contracts, acquire or dispose of property and form or participate in the incorporation of companies.

Australia Post's Obligations when Performing Functions and Powers

The APC Act confers a number of obligations on Australia Post when performing its functions, such as:

- to perform its functions consistent with sound commercial practice¹
- to carry out the terms of its Community Service Obligations²
- to perform its functions consistent with general policies of the Australian Government, comply with directions issued by the Minister and comply with Australia's obligations under international conventions.

Australia Post must also adhere to performance standards introduced by the Government in the *Australian Postal Corporation (Performance Standards) Regulations 1998*.

¹ In a proper, efficient and economic manner.

² To provide a letter service that is reasonably accessible to all Australians and meets the social, industrial and commercial needs of the community.

Classification: Internal

As a corporate Commonwealth entity, Australia Post is also governed by the PGPA Act. Australia Post is classified as a GBE by the *Public Governance, Performance and Accountability Rule 2014* (Cth) (**PGPA Rule**).

The PGPA Act prescribes reporting, notification and auditing requirements, sets standards of conduct of officers and provides a mechanism for the application of Commonwealth policies.

As Australia Post's Board has ultimate responsibility for Australia Post's performance, it decides the objectives, strategies and policies to be followed.

The Directors of a GBE are expected to follow a disclosure principle that is similar to the continuous disclosure requirements of the ASX Listing Rules; (i.e. as soon as a GBE comes aware of any information that may have a material effect on its value, that information must be provided to the Shareholder Ministers).

Australia Post also has specific notification obligations under the PGPA Act summarised in the section titled "Exercising delegated authority" below.

Who can Exercise Australia Post's Powers?

The powers of Australia Post can be exercised by:

- Australia Post's Board, under section 23 of the APC Act
- the MD, under section 24 of the APC Act
- an employee under, and to the extent of, a delegation of authority made under section 93 of the APC Act
- an employee or director of Australia Post under a delegation of authority made by Australia Post's Board under section 94 of the APC Act³.

This Policy governs delegations applicable to the Australian Postal Corporation and made pursuant to section 93 of the APC Act. This Policy also governs delegations made in relation to subsidiary companies within the Australia Post group (under section 198D of the Corporations Act or the subsidiary's constitution). For further information on subsidiary delegations, please see section headed, 'Subsidiary Delegation' (below).

Committees

The Executive Team is the peak senior management body. It advises the MD on operational matters and is responsible for the design of strategies, policies and proposals prepared for the Board of Australia Post.

Aside from the delegations discussed in this Policy, decision making within the Australia Post Group is supported by a number of cross-functional and/or specialist management committees.

Each of these has its own charter defining its role and authority. Recommendations of management committees may only be put into effect by employees with appropriate delegation (the committees and other groups themselves do not have any delegated authority). The individual delegates remain accountable for the exercise of their delegated authority and compliance with this Policy.

Subsidiary Delegations

Each Subsidiary's corporate governance practices are informed primarily by the *Corporations Act 2001* (Cth) (**Corporations Act**) and its constitution.

³ For example, in relation to the power to determine the terms and conditions which apply to services supplied where Australia Post and a person have not agreed on specific terms and conditions of supply under sub-section 32(1)(b) of the APC Act.
Australia Post Group Delegations Policy

Under section 198D of the Corporations Act, unless a Subsidiary's constitution provides otherwise, the Subsidiary's Board may delegate any of its powers to:

- a committee of the Subsidiary's directors or a director of the Subsidiary
- an employee of the Subsidiary
- any other person.

Under each Subsidiary's constitution, the Subsidiary's Board may delegate any of its powers to any persons it selects for any period, to be exercised for any objects and purposes on any terms and subject to any conditions and restrictions as it thinks fit.

In addition to governing Delegations applicable to the Australian Postal Corporation pursuant to s 93 of the APC Act, this Policy governs delegations made in relation to subsidiary companies within the Australia Post group under section 198D of the Corporations Act or a Subsidiary's constitution (as applicable).

Delegations Framework

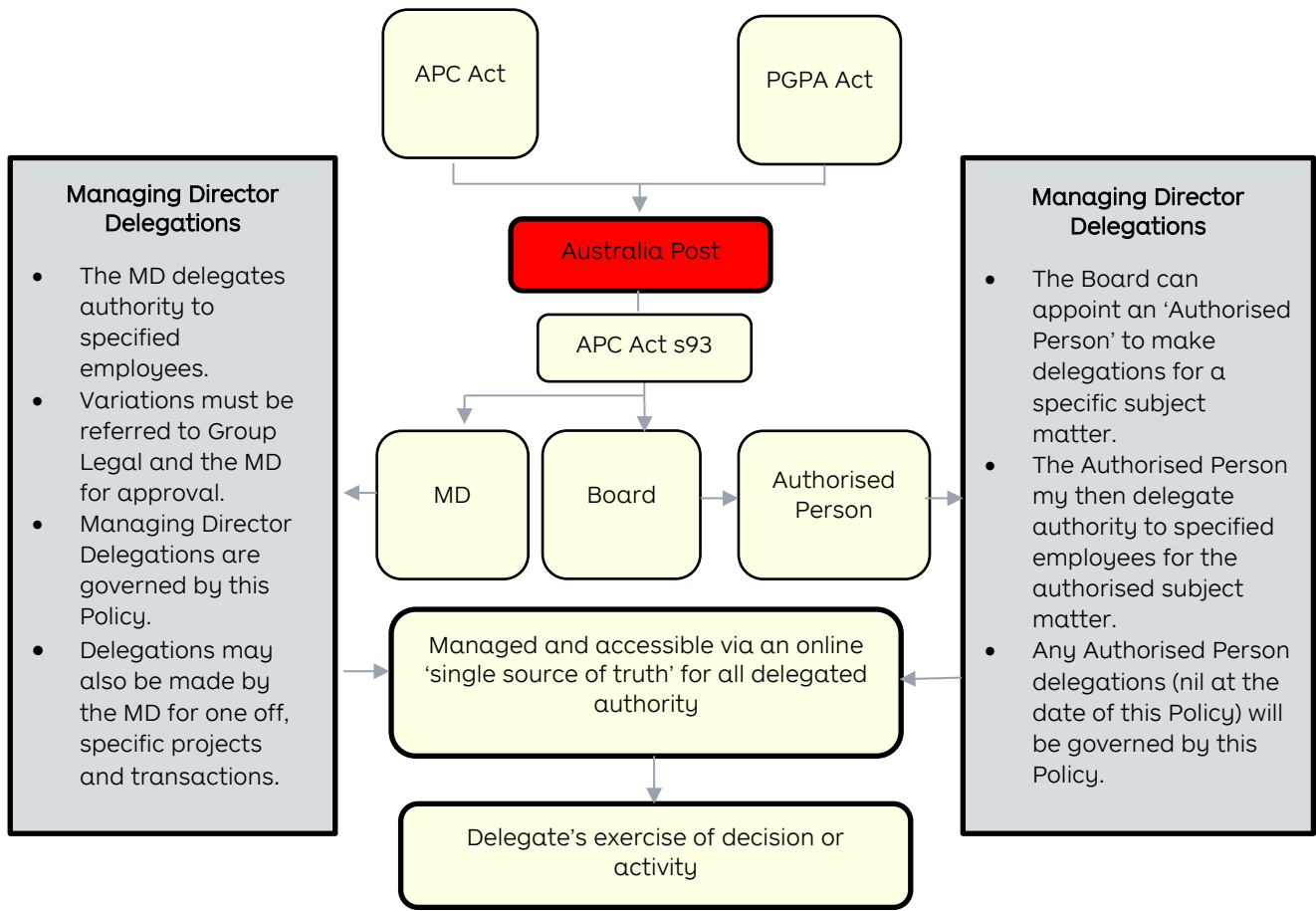
Introduction

The delegations framework was developed by Group Legal in order to:

- reflect current best practice by way of a principles based approach
- in the case of Australia Post, foster effective governance by delivering clarity and sufficient levels of both control and flexibility appropriate to a large, complex and evolving GBE
- assist each Group Company to manage its risk by delegating authority appropriately (the greater the risk, the higher the level of decision-making authority required)
- develop a 'single source of truth' for access to, and effective management and control of, all sources of delegated authority.

Australia Post's Delegations Framework

Australia Post's delegations framework is summarised in the following diagram:



Authority can be delegated to specified employees under section 93⁴ of the APC Act by:

- the MD (**Managing Director Delegations**)
- specific individuals appointed by Australia Post's Board (**Authorised Person Delegations**).

Australia Post's Delegations of Authority currently consist of only Managing Director Delegations. Authorised Person Delegations may also be issued from time to time should Australia Post's Board wish to appoint another employee to be an Authorised Person.

A delegation of authority by Australia Post's Board, the MD or an Authorised Person:

- can be revoked by the delegator at any time
- does not prevent the exercise of the power by Australia Post's Board or by the MD
- continues in force regardless of a change in the membership of Australia Post's Board or of the MD.

In the event of any inconsistency or conflict, the authority of Australia Post's Board and MD prevail.

⁴ **Section 93** provides that an authorised person may, in writing, delegate all or any of Australia Post's powers to an employee of Australia Post. An "**authorised person**" means the MD or an employee of Australia Post who is authorised by the Board.
Australia Post Group Delegations Policy

Managing Director Delegations

Managing Director Delegations must be in writing and approved in advance by the MD. Except where the Managing Director Delegations constitute a 'specific' delegation (this concept is discussed further below), they must be prepared in a standard form template provided by Group Legal and reviewed by the General Counsel (before submission to the MD).

Most Managing Director Delegations are for matters of general application that will not require regular updating to reflect, for example, organisational or policy changes. When amendments are required, however, they must be approved by the process described above.

Managing Director Delegations can also be used for specific projects or transactions on a time-limited (as opposed to an on-going) basis. Group Legal can arrange such delegations when required. These 'specific' delegations must be in writing and either signed by the MD or by email from the MD, and should be maintained for record-keeping purposes.

Authorised Person Delegations

Before Authorised Person Delegations can be issued, the relevant Authorised Person must be appointed by Australia Post's Board under section 93 of the APC Act.

Authorised Person Delegations devolve accountability for the delegation of authority to an 'Authorised Person' in relation to highly specialised or technical subject matters or where processes and procedures may change frequently. Here, Australia Post's Board empowers an Authorised Person to create, exercise, delegate and also to vary that authority (variations to Authorised Person Delegations do not need to be referred back to Australia Post's Board or the MD, provided they are within the scope of the Authorised Person's appointment and any limits prescribed by the Board).

Once an Authorised Person has been appointed by the Australia Post Board, Authorised Person Delegations must be in writing and approved in advance by the relevant Authorised Person. They must be prepared in a standard form template provided by Group Legal and reviewed by the General Counsel (before submission to the Authorised Person for execution).

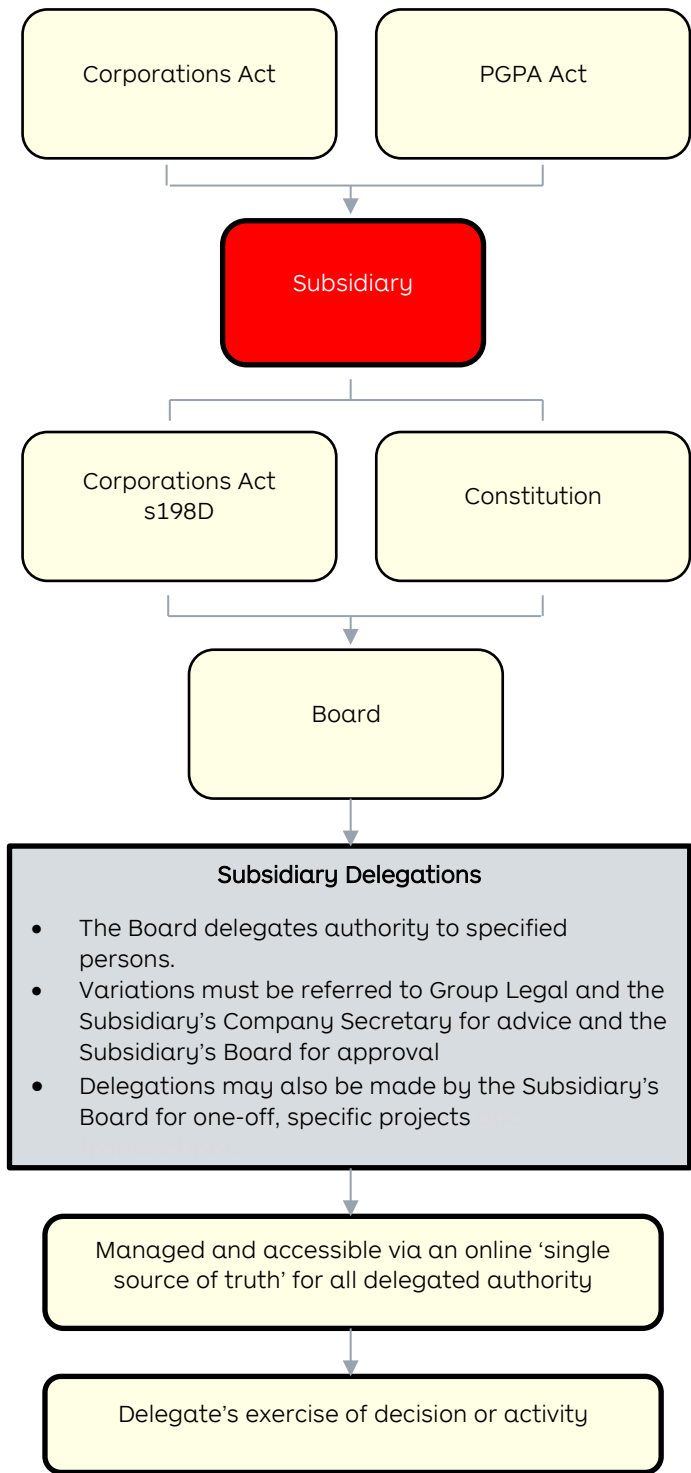
Subsidiary Delegations

Subsidiary Delegations must be in writing and approved in advance by the relevant Subsidiary's Board. They must be prepared in a standard form template provided by Group Legal and reviewed by the General Counsel and the Subsidiary's Company Secretary (before submission to the relevant Subsidiary's Board).

Most Subsidiary Delegations are for matters of general application that will not require regular updating to reflect, for example, organisational or policy changes. When amendments are required, however, they must be approved by the process described above.

Subsidiary Delegations can also be used for specific projects or transactions on a time-limited (as opposed to an on-going) basis. Group Legal or the Subsidiary's Company Secretary can arrange such delegations when required.

Each Subsidiary's delegations framework is summarised in the diagram over the page:



Classification: Internal

Employee Authority

A delegate may exercise, subject to the requirements of this Policy, any delegation of authority:

- granted specifically to that delegate's position
- granted generally to a category of employees of which the delegate is a member
- granted to the delegate's direct or indirect reports.

In other words, delegations of authority held by any delegate are deemed to be held by that delegate's line manager (e.g. a delegation to a GM effectively delegates that same authority to the corresponding EGM).

Routine Decision Making

Specific delegations are not required for decisions that are covered by organisational policy, procedures and protocols or that are made in the ordinary course of employees fulfilling their day-to-day roles and duties. If you are unsure whether you have authority to proceed with a particular activity or decision, contact your manager.

SRC Delegations and APSS Delegations

The SRC Delegations and Australia Post Superannuation Scheme Delegations (**APSS Delegations**) will continue to operate in their current form but may be amended in the future. To the extent applicable, the exercise of authority under those delegations will be governed by this Policy.

Exercising Delegated Authority

Overview

Effective decision-making requires unambiguous statements of the nature and limits of authority. Clarity ensures effective decision-making and reduces delay, confusion and bureaucracy.

All employees need a clear understanding of when they can make decisions and commitments on behalf of a Group Company. Equally, employees need to understand which matters must be referred to a higher decision-making level.

This Policy is not an exhaustive summary of all requirements and considerations in relation to exercising delegated authority. For specific advice in relation to a particular circumstance, please contact your manager or Group Legal.

Mandatory Threshold Requirements

Each time you exercise any delegated authority, you must first satisfy yourself that it is:

- necessary for, and directly relevant to, your specific role and usual responsibilities (as set out in your position description and designated level)
- within the operational scope of, and usual activities conducted by, your relevant business unit, and as set out in any applicable strategic intents, policies and procedures
- if you are exercising delegated authority on behalf of Australia Post, consistent with Australia Post's statutory functions and powers and its status as a GBE.

In exercising any delegation, you must consult with all relevant stakeholders and ensure that you comply with:

- our Group Conflicts of Interest Policy and Our Ethics

- all other applicable Australia Post policies and procedures and the rules, procedures and processes of any committee, governance forum or directive issued by a business area
- any specified budget or other applicable limitations
- applicable laws and regulations.

Australia Post's Notification Requirements

Exercising delegated authority could trigger notification and approval requirements.

Where the exercise of delegated authority involves a proposal for which Australia Post's exposure exceeds \$20 million, notification to, and/or approval by, the Australia Post Board (and in some cases, its Shareholder Ministers) may be required. Questions regarding the interpretation and application of these requirements should be directed to the Corporate Secretary or the General Counsel.

Financial Limits

Where financial limits are specified for any delegation of authority, these limits apply to the total aggregate value (excluding GST) of the relevant delegated activity (regardless of the number of individual transactions, orders or invoices).

The basis for calculation of financial limits applies to the aggregate amount over the entire life of the contract, project or relevant transaction, unless the delegation specifies otherwise.

Under no circumstances are expenses, revenue or other amounts to be split or assigned to different arrangements or treated as separate transactions to accommodate lower authority limits.

If a delegate has authority to approve a certain type of project or contract up to a specified financial limit, the delegate may approve any number of projects or contracts each up to that limit, regardless of the cumulative total of all projects or contracts which the delegate may approve.

Financial limits are denominated in Australian Dollars.

Other Requirements

Conflicts of interest

Delegated authority must not be exercised in circumstances where doing so gives rise to an actual or potential, or direct or indirect, pecuniary, financial or non-financial benefit or interest for either the delegate or a Group Company. Refer to the Group Conflicts of Interest Policy and Our Ethics for further information.

No sub-delegation

Each delegation is unique to the relevant person or role and is not transferable by the delegate. Employees who are delegated power or authority cannot sub-delegate any of them.

A substitute delegate, however, may be appointed where the primary delegate will be temporarily absent. This is done by the primary delegate (in writing) nominating the substitute delegate to "act" in the role of the primary delegate for a specified period of time.

Restrictions on delegation

Restrictions on the use of the delegated power or authority can be imposed by:

- in the case of Australia Post, Australia Post's Board, the MD or an Authorised Person
- in the case of a Subsidiary, the Subsidiary's Board
- in the case of a Group Company, a senior manager with management control of the delegate.

Delegation subject to budget or adequate funds

Delegates should only approve expenditure where there is available funding in any relevant capital or recurrent budget allocation and sufficient funds in the relevant account.

No 'self-delegation'

No employee is permitted to:

- authorise expenditure or reimbursement or any other benefit to him or herself
- certify his or her own time sheets, or authorise their higher duty allowance, overtime or annual/long service leave, etc

Ostensible authority

Care should be taken by each employee not to give an impression to a third party that the employee's authority extends beyond his or her actual delegated and other authority.

Seeking Guidance and Advice

When in doubt on the operation of delegated power or authority, the advice of a senior manager in line control above the delegate should be obtained, or contact Group Legal for assistance and advice.

Other Considerations

Proof of Authority

A counterparty or third party may request an extract of the relevant delegation or other evidence that a delegate has authority to bind or commit a Group Company to a particular activity or arrangement. In these circumstances, please contact Group Legal.

Powers of Attorney

Powers of Attorney must be executed under seal by a Group Company. Currently, these are limited to real estate and superannuation matters. Please contact Group Legal for assistance and advice.

Electronic Execution of Documents

Documents, such as contracts and agreements, may allow for their execution by way of electronic signature.

An electronic signature is any method that applies a 'signature' to a document in the form of typed name of the signatory, an electronic image of the handwritten signature of the signatory or unique identifying mark. An electronic signature must be able to identify the signatory and indicate the signatory's approval of the document. An electronic signature does not have to be created using specific technology, however common methods for electronic signature are specific document-enabled features (such as a signature box in Microsoft Word document) or online signature software (such as DocuSign or Adobe Echo Sign).

Where a document specifically allows execution by electronic signature, that document may be executed electronically by a person in the proper exercise of his or her delegated authority provided that adequate records are maintained so that a complete decision and document trail (ie what was executed by whom and when) can be easily identified and verified. Please contact Group Legal for assistance and advice.

Amendment of Delegations

All proposed amendments to Delegations should be referred to Group Legal for assistance.

Once prepared by Group Legal / the relevant business unit, all variations must be reviewed by the General Counsel before being submitted for approval by:

- in the case of Australia Post, the MD or relevant Authorised Person
- in the case of a Subsidiary, the Board of that Subsidiary.

Business units are responsible to advise Group Legal of any organisational or other changes and the implications of those changes for existing Delegations.

Questions regarding interpretation, exceptions and variations to Delegations should be directed to Group Legal.

Glossary

Term	Definition
APC Act	<i>Australian Postal Corporation Act 1989 (Cth)</i>
APSS Delegations	Australia Post Superannuation Scheme Delegations. Pursuant to a services deed between Australia Post and Post Super Pty Ltd (as trustee of the APSS) dated 19 December 1995, Australia Post was delegated certain authority and powers and was granted a power of attorney. Sub-attorneys can “[e]xercise all trusts, authorities, powers and discretions that Australia Post is empowered to exercise under the [deed] as amended from time to time”.
Australia Post	Australian Postal Corporation.
Australia Post Group	Australia Post and its Subsidiaries.
Authorised Person	The MD or an officer or employee of Australia Post who is authorised by the Board to make delegations for a specific subject matter. Section 93 of the APC Act provides that an authorised person may, in writing, delegate all or any of Australia Post’s powers to an employee of Australia Post. These Delegations devolve accountability for the delegation of authority to Authorised Person in relation to highly technical or specialised subject matters or where processes and procedures may change frequently.
Authorised Person Delegations	Authorised Person Delegations are granted, and must be approved by the Authorised Person who has been appointed by the Board to make delegations for a specific subject matter.
Board	Board of Directors of a Group company.
Corporations Act	<i>Corporations Act 2001 (Cth)</i> .
Group Company	Australia Post or one of its Subsidiaries.
MD	Managing Director of Australia Post
Managing Director Delegations	Managing Director Delegations are granted, and must be approved by the MD. These Delegations are exercised in relation to Australia Post’s business operations and administrative functions and are also used for specific projects or transactions on a temporary or limited basis.
PGPA Act	<i>Public Governance, Performance and Accountability Act 2013 (Cth)</i> .
PGPA Rule	<i>Public Governance, Performance and Accountability Rule 2014 (Cth)</i> .
Policy	This Group Delegations Policy.
SRC Act	<i>Safety, Rehabilitation and Compensation Act 1988 (Cth)</i> .
SRC Delegations	Delegation of certain Australia Post powers and functions to a principal officer under the SRC Act.

Classification: Internal

Term	Definition
	<p>The SRC Act provides the legislative basis for the Commonwealth workers' compensation scheme. It establishes Comcare and the Safety, Rehabilitation and Compensation Commission.</p> <p>The SRC Act gives Australia Post certain powers and functions, all or any of which Australia Post can delegate to its principal officer (e.g. any director). Currently, such powers and functions are delegated to the Chairman of Australia Post and administered by Injury Management.</p>
Subsidiary	A 'subsidiary' as defined in the Corporations Act.
Subsidiary Delegations	Subsidiary Delegations are granted, and must be approved by the Subsidiary's Board. These Delegations are exercised in relation to the Subsidiary's business operations and administrative functions and are also used for specific projects or transactions on a temporary or limited basis.

Classification: Internal

Roles & Responsibilities

Policy Governance

Requirement	Responsible area/Role	Activities
General Counsel	Accountable Executive	Oversee the policy application (as well as application of supporting documents)

Policy Operation

Requirement	Responsible area/Role	Activities
Responsible for ensuring general awareness of this policy and applicable Delegations of Authority	Managers	Fostering an environment which encourages compliance with the principles of this policy
Responsible for ensuring compliance with authorised delegation allocated to role	Authorised Delegates	Complying with this policy and the Delegations of Authority relevant to their position responsibilities.

Policy Monitoring & Oversight

Requirement	Responsible area/Role	Activities
Compliance	Group Risk, Security & Compliance	Oversee and ensure APG compliance to principles of the Policy
Breach	Group Risk, Security & Compliance	Will undertake remediation and reporting to ARC (and the board, where required)
Periodic review	Accountable Executive	Undertake periodic reviews to test policy implementation / validating compliance to this policy.

Policy Administration

Key Policy Information

Administrative Area	Policy Information
Document Title	Group Delegations Policy
Policy Level	1
Version No	1.3

Policy Owners and Governance Forums

Administrative Area	Owner / Forum
Accountable Executive	EGM Corporate Services
Policy Owner	General Counsel
Policy Administrator	Chief Risk Officer
Policy Content Owner	General Counsel
Review and Approval Body	Australia Post Board

Key Dates

Administrative Area	Date
Policy Approval Date	13 December 2018
Policy Effective Date	13 December 2018
Next scheduled review	December 2021