SPCEF Delegations Policy – 2026

1 DOCUMENT INFORMATION

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The Foundation	Entity Name: ST PHILIP'S CHRISTIAN EDUCATION FOUNDATION LTD ABN: 34002919584
Other policy relationships	Education Act 1990 (NSW), Registered and Accredited Individual Non-government Schools (NSW) Manual; funding and accreditation requirements; St Philip's Governance Handbook
Document location	MySPCC Policies and Procedures
Key dates	
Date of issue/last revision	Feb 2026
Date submitted to the Board	Feb 2026
Date ratified by the Board	
Review date	Oct 2027
Policy review	This policy will be reviewed every second year, or as otherwise required, with the objective of the policy being available for implementation from 1 January of the following school year
Applies to	All companies, entities, schools, campuses, divisions and operations of the Foundation including associated entities (Foundation Trust, PBI, Tertiary Company etc)

2 VERSION CONTROL

Version	Date	Description
Version 1	February 2026	Draft submitted for Board approval

1. Purpose

This Policy sets out how decision-making authority is reserved, delegated, and exercised across the MSO under the new St Philip's Operating Model. It clarifies roles, approval thresholds, segregation of duties, and assurance mechanisms to ensure transparent, fair, safe, efficient and effective operations.

2. Scope

This Policy applies to the Board of Directors, CEO, Deputy CEO, CFO, COO, Executive Principal K–12, Executive Principal - Early Narnia & SA, Executive Principal - Tailored Education, Executive Principal - Tertiary Education, Principals and all CDLT members, and all employees who act under a delegation.

3. Principles

- Board-reserved matters are explicit and not delegated.

- Delegations follow the St Philip's Operating Model, with clear decision rights (Approve, Recommend, Consult, Implement).
- Segregation of duties separates initiation, evaluation, approval, contracting, receiving, and payment.
- Risk-based thresholds apply; higher risk/value requires higher level approval and tighter controls e.g. Business Case documented for higher risk/value approvals by executive.
- Compliance with legislation, funding, accreditation, child safety, privacy, WHS and industrial instruments is embedded.
- Transparency and auditability: all delegated decisions are traceable in systems and records (ERP process with System Control ID)
- Acting arrangements allow continuity; sub-delegation is not permitted beyond what the Board approves in this Policy.
- Conflicts of interest must be declared and managed; no delegate may approve matters from which they derive personal benefit.
- Periodic review at least biennially or sooner upon material changes to law, regulation, or operating model.

4. Operating Model Roles & Decision Domains

Board: strategy, risk appetite, major capital and debt, CEO appointment and evaluation, adoption of key policies.
CEO: execution of Board-approved strategy and budget; enterprise risk owner; cascade delegations aligned to this Policy; chair of Senior Executive Team (SET).
Deputy CEO: enterprise policy coordination; cross-divisional programs; strategic initiatives; acts for CEO per acting arrangements.
CFO: financial and commercial strategy and control; risk & compliance management, ICT, budgeting, reporting, tax, insurance, procurement framework, treasury and fundraising.
COO: operations including HR & People, Marketing & Communications, Building Infrastructure, and Partnerships and Growth.
EP K–12: K–12 educational delivery, quality and compliance, enrolments within policy, student welfare. NESA Regulations.
EP Narnia & SA: compliance with NQF/ACECQA and OOSH regs; program quality; staffing ratios; pricing within policy.
EP Tailored Education: specialised programs and supports; interagency coordination; funding compliance.
EP Tertiary Education: academic governance, AQF/TEQSA/ASQA compliance, partnerships.
Principals and other budget managers: work within the perimeters set by this Delegation Policy.

5. Reserved Matters (Board)

- Adoption/variation of group strategy and risk appetite.
- Approval of annual operating and capital budgets.
- Approval of capital projects above the CEO threshold and all property acquisitions/disposals.
- Approval of debt facilities and major financing arrangements.
- Appointment, termination and remuneration framework of the CEO.
- Approval of the Delegations of Authority Policy and material changes.
- Adoption of group policies for governance, safeguarding/child safety, whistleblowing, privacy and code of conduct.

6. Delegations Framework & RACI Definitions

Delegations are recorded in the Delegations Schedule. Decision rights use RACI: **Approve** (A – one role only), **Recommend** (R – one role), **Consult** (C – one or more roles), **Implement** (I – one role). System workflows enforce thresholds and segregation of duties.

7. Sub-Delegation, Acting & Withdrawal

Sub-delegation: Not permitted beyond the delegations explicitly stated in this Policy and Schedule. The Board delegates to the CEO and other roles named herein; those roles may not further sub-delegate their authority, save for Acting arrangements.

Acting: A formally appointed Acting role may exercise the delegations attached to the substantive role, subject to any conditions recorded at appointment.

Withdrawal: The Board may withdraw a delegation. The CEO may withdraw or restrict a delegate's authority within the CEO's delegated remit, with written reasons, interim measures, and review timelines recorded and reported to the Board.

8. Conflicts of Interest

Delegates must disclose conflicts before exercising authority. No delegate may approve their own leave, salary changes, expense claims, procurement in which they have a personal interest, or matters from which they or close associates derive personal benefit.

9. Assurance & Audit

Systems will record approvals with role-based limits; Internal Audit and external auditors may test adherence. Breaches may render decisions voidable and subject the staff member to disciplinary action.

Appendix A: Quick Summary of Approval Thresholds (Proposed)

Appendix B: Detailed Delegations Approvals across all disciplines and functions (to be finalised)

St Philip's ST PHILIP'S CHRISTIAN EDUCATION FOUNDATION LTD

FOR THE WHOLE OF LIFE

Document Number:

Date Reviewed: Jan 2026

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LEVELS OF AUTHORITY TO COMMIT

	Capital, Special Projects & Contracts					OPERATING EXPENDITURE			Non-Financial MOUs	Banking		Int'l Travel		Asset Disposals and Bad Debt						Human Resources					
						Outside of Board approved Budget and Outside of TASS			Within approved Operating Budget Requisitions in TASS																
Signing Approval and Authorisations for:	Value > $1 million and Term > 3 Years	Value > $250k to $1 million and Term > 1 Year and <= 3 Years	Value < $250k and Term <= 1 Year	Any Strategic / Reputational / Unusual Contract / Project / Impact		Value >$250	Value $50k to $250k	Value < $50k	Value > $250k	Value to $250k	Value to $50k	Value to $30k	Value to $10k	Value to $5k	Value to $1k	InterCompany MOUs and non-financial external MOUs	Supplier Payments >$5m (per payrun)	Supplier Payments <$5m (per payrun)	Payroll payments	6-9 Formal Approval to proceed and book flights etc	New / Non-recurring: 12 month pre-approval to commence planning & investigation		Asset Disposal with WDV > $1 m	Asset Disposal with WDV $250k to $1m	Asset Disposal with WDV < $250k	Bad Debt > $100k (Per Individual Account)	Bad Debt $50K to $100K (Per Individual Account)	Bad Debt < $50k (per individual Account)	CEO Appointment	Senior Leadership Appointment (SET & Entity Head)		Increasing non-budgeted FTE	Replacing Budgeted FTE		MEA changes / MEA Interpretation Changes		Contracts, Remuneration & Step Changes
SPCEF Board	A			A		A																	A			A			A	C					
Chief Executive Officer	C	A		C		C	A		A											A	A		C	A		C	A			A		A			A	
Deputy Chief Executive Officer																				C	C											A				
Chief Financial Officer	C	C	A	C		C	C	A		A						C	C						C	C	A	C	C	A				A			C	
Relevant SET Member/s	C	C	C	C		C	C	C			A					A				C	C		C	C	C	C	C	C	C	C	C	C	C	C	C	
Head of Entity / CO Department						C	C	C					A			C				C	C		C	C	C	C	C	C				C	A			A	
Director of Finance	C	C	C			C	C	C				A				C	A	A	A	C	C		C	C	C	C	C	C								
Director People & Culture																													C	C	C	C	C	A		
Operations Manager						C	C	C						A						C	C															
Relevant Manager/s														A			A	A	A	C	C															
Entity / Division Admin / EA															A																					

Code:
- **A** Approver authorisation required
- **C** To be Consulted prior to authorisation

Process: Whoever (Implementer etc) is bringing the matter to the approver, has to ensure that the other parties have been consulted before authorisation is obtained. These processes and escalations can be automated through systems and online forms