

DISCRETIONARY GRANT POLICY

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BANKSETA DISCRETIONARY GRANT POLICY

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1. Introduction

- 1.1 The Banking Sector Education and Training Authority (BANKSETA) is a statutory body established through the Skills Development Act 97 of 1998, as amended, to develop skills in the banking and alternative banking sector. In terms of the Skills Development Act 97 of 1988, the BANKSETA enables its stakeholders to advance the national and global position of the banking and alternative banking sector. BANKSETA develops policies to manage operations and high-level decisions that have an impact on the organisational strategy.

2. Definitions and Abbreviations

In this policy, unless the context otherwise indicates –

Abbreviation/Word	Description
AA	Accounting Authority
ATR	Annual Training Report
CEO	Chief Executive Officer
CET College	Community Education and Training College
DHET	Department of Higher Education and Training
GM	General Manager
IT	Information Technology
PIVOTAL	In relation to the BANKSETA Discretionary Grant Project the following delivery methodologies are included: Professional Programmes (including Candidacy Programmes), Internships, Vocational Programmes, Occupational Programmes, Technical Programmes, Academic Programmes and learnerships. In addition, Recognition of Prior Learning against any of the aforementioned programmes
NGO	Non-Governmental Organisation
PFMA	Public Finance Management Act, 1999
SME	Small / Micro Enterprise
TVET	Technical / Vocational Education and Training College
WSP	Workplace Skills Plan

3. Purpose of the Policy

The purpose of the Discretionary Grant Policy is to provide a framework for discretionary grants and to reflect specific BANKSETA requirements with respect to the allocation of discretionary funds, criteria for funding and how the funds should be applied for.

4. Legislative Framework

The main pieces of legislation which this policy aligns with are:

- 4.1 Skills Development Act 97 of 1998, as amended;
- 4.2 Skills Development Levies Act 09 of 1999;
- 4.3 SETA Grant Regulations, 2012;
- 4.4 The National Qualifications Framework Act 67 of 2008;
- 4.5 South African Qualifications Authority Act 58 of 1995;
- 4.6 Employment Equity Act 55 of 1998;
- 4.7 Public Finance Management Act 29 of 1999; and
- 4.8 The BANKSETA Constitution and associated Charters.

5. Scope and application

This policy applies to all BANKSETA employees and business units.

6. Implementation overview

Discretionary Grant funded projects may be once off projects; these are projects confined to one financial year and not repeatable or it may be rolling projects from one financial year to the other; these are projects that are multiyear in nature and/or repeatable in the following financial year(s);

There are three types of Discretionary Grant funded projects that the BANKSETA shall make available from time to time namely; funding windows and strategic projects and responsive proposals.

6.1 Funding windows

The objective of a funding window is to allow stakeholders the flexibility to implement programmes in a way that is appropriate to their organisation. It also allows flexibility in content, duration, implementation dates and training provision platforms. Each funding window will have its own funding cost structure, additional qualifying criteria, timelines for disbursement of grants and criteria for supporting documents required to make payment. This will be approved by the BANKSETA Board before publishing it to stakeholders.

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A funding window is an invitation to stakeholders to apply for funding from the SETA for the programmes that the funding window is intended for. The programmes may include but is not limited to learnerships, internships, and bursaries, etc. or may be aimed at a particular stakeholder grouping for example Medium to Large Organisations, Small or Micro Enterprises, Co-operatives, Universities, etc. The window period would open on a specified date and have a closing date.

6.1.1 Funding Window Invitation and Application Process

- i) BANKSETA shall publish all funding window invitations on the BANKSETA website: www.bankseta.org.za.
- ii) Each funding window shall remain open for at least 6 weeks except for Funding Windows which remain open throughout the year.
- iii) Each funding window shall have a set of guidelines aimed at assisting applicants with the application process.
- iv) No late applications shall be accepted. Applicants must meet the eligibility criteria as indicated in each funding window to qualify for funding.
- v) The evaluation panel shall apply predetermined evaluation criteria to score applications. This will be indicated in the Guidelines for each Funding Window.
- vi) Applications and other related documents are to be submitted on BANKSETA templates, and as per the prescribed submission process. Failure to do so may result in disqualification of the applications.
- vii) Applicants agree to provide information as required by BANKSETA for the purposes of reporting to the Department of Higher Education and Training, as well as other statutory stakeholders.
- viii) Each funding category will have its own performance information requirements.
- ix) Applicants are required to submit separate applications per category where applicable.
- x) Applicants are not limited on the number of applications per category. However, applicants are requested to carefully consider business needs and prioritize applications as funding may be limited and applications may be declined considering the funding available and the number of applications received.
- xi) Each application will be evaluated individually.
- xii) Applicants must keep a copy for their internal use and backup purposes.

6.1.2 Evaluation and Allocation Process

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- i) In all cases an evaluation panel shall be established and approved by the CEO to evaluate applications.
- ii) All panel members will be required to sign a declaration of interest.
- iii) The evaluation panel decision will be recorded for audit purposes.
- iv) All grants are VAT inclusive.
- v) BANKSETA will evaluate all applications and approve funding in a way that will ensure the equitable allocation of funding by limiting the number of learners approved for each application and limiting the amount per learner where necessary.
- vi) In the allocation of funding to qualifying applicants, equity targets, national spread and focus on rural areas may be encouraged.
- vii) BANKSETA reserves the right to approve / decline applications, without any preference given to any applicant, and to apply discretion to equitably distribute funding per category, based on the availability of funds and to reallocate funds from undersubscribed categories.
- viii) BANKSETA may approve additional applications or increase the funding for a particular application should additional funding become available at a later stage, subject to Board approval.
- ix) Feedback on the status of the application must be provided to unsuccessful applicants.

6.1.3 Funding Window Approval, Appeal and Change Process

- i) The evaluation documentation should be submitted for Probity Review and this report submitted to the CEO for review.
- ii) Once the CEO has reviewed and approved, the report and supporting evidence as required will be submitted to the Finance and Remuneration Committee for recommendation to the BANKSETA Board. Final approval will be done by the BANKSETA Board.
- iii) In terms of the Delegations of Authority (DoA) Policy the CEO may approve funding applications as delegated by the Board.
- iv) Should an (unsuccessful) applicant believe that (i) the decision in relation to an application is incorrect or (ii) there is mitigating circumstances for an application not having met the requirements, the applicant may submit a request to appeal the decision of the Board.
- v) This request must be submitted in writing within one month of receiving the evaluation outcome of the funding window application.
- vi) The request must motivate why the application meets the requirements of the Funding Window Guidelines and why the decision of the Evaluation Panel is incorrect.
- vii) The request must provide supporting documentation to substantiate the reason for the appeal.
- viii) After CEO review, the appeal request will be tabled at the Board to reconsider.

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- ix) After their reconsideration the Board's decision is final.
- x) Change requests will be managed in line with the BANKSETA Project Change Control Policy.

6.1.4 Contracting

- i) Agreements shall include approved partnerships with employers, public training institutions, professional bodies, Non-Governmental Organisations (NGOs), and other enterprises that allow BANKSETA to derive value for its projects.
- ii) When funds for these type of strategic projects are approved by the Accounting Authority, partnerships and funding arrangements with public institutions, professional bodies, NGOs, and other enterprises as well as with qualifying member organisations are formalised through Memoranda of Understanding or Memoranda of Agreement.
- iii) The Memoranda is signed by the CEO in accordance with the BANKSETA Delegations of Authority Policy. This includes extensions and amendments (non-financial). A record of all signed agreements and payments related to it is recorded on the Commitment Schedule and submitted to the Finance and Remuneration Committee and BANKSETA Board on a quarterly basis as part of the BANKSETA Financial Management Accounts.

6.2 Strategic Projects

- 6.2.1 The BANKSETA shall identify specific interventions that will have benefit for the sector, and which will support the National Skills Development Plan and/or the BANKSETA's strategic priorities.
- 6.2.2 These interventions will be addressed through projects that are managed by BANKSETA and funded by discretionary funds. Where necessary, projects will be outsourced to specialist providers and due procurement process will be followed as per the BANKSETA Supply Chain Management Policy.
- 6.2.3 These projects may also be implemented through partnership agreements. Partnership agreements are aimed at organisations or other public entities with a strategic synergy with the BANKSETA. In all instances partnership agreements must be approved by the BANKSETA Board.
- 6.2.4 Participation in all projects is available to all BANKSETA Stakeholders subject to a learner selection process.

6.3 Responsive proposals

- 6.3.1 These are applications sent by prospective applicants regardless of whether a funding window or a bid has been issued or not.
- 6.3.2 BANKSETA will accept responsive proposals at any point in the year.
- 6.3.3 These applications will be evaluated and where they are found to be contributing to the strategic outcomes of the BANKSETA, the applications will go through the evaluation processes and structures as outlined in the Guidelines for Responsive Proposals.
- 6.3.4 The funding of applications under this category will be limited and will focus on promoting innovation or creativity or immediate needs or national government priorities or a mix thereof and more importantly subject to budget availability.
- 6.3.5 This approach is intended to allow for a creative and / or innovative or interventionist approach towards skills development. Such skills development proposals are classified as responsive proposals and follow the responsive proposal funding process.
- 6.3.6 The applicants include but are not limited to Private/Public Skills Development training providers, Non-Government Organisations (NGO), Non-Profit Organisations.

7. Allocation of Discretionary grants

- 7.1 49.50% of the received levy income shall be allocated to discretionary grants each month including any approved surplus funds.
- 7.2 The discretionary amount as at 1 April of each year together with the amounts received each month of that financial year will be allocated/committed to discretionary projects subject to board approval.
- 7.3 80% of the available discretionary grants within a financial year will be allocated to PIVOTAL programmes that address scarce and critical skills.
- 7.4 The allocation of funds will seek to achieve partnerships with public education and training institutions, where applicable while addressing skills development needs and priorities including the delivery of PIVOTAL programmes.
- 7.5 The SETA must transfer any unclaimed mandatory funds and any interest earned thereon by 31 March of each financial year into the discretionary funds.
- 7.6 The SETA must transfer any unspent administrative funds and any interest earned thereon by 31 March of each year to the discretionary reserve fund.

8. Unsolicited proposals

BANKSETA stakeholders including private enterprises may submit unsolicited proposals and such proposals will be dealt with in line with Treasury regulations and guidelines and BANKSETA Supply Chain Policy and the details contained therein.

9. Delivery Models

Discretionary funded projects mainly focus on skills development and are delivered through bridging programmes, learnerships, internships, work readiness programmes, bursaries, work experience grants, occupational training, academic training, facilitated learning and coaching, worker education, centres of excellence, career advise service and capacity building of public institutions including CET Colleges, NGOs, SMEs, and Cooperative Financial Institutions. Projects may also include research and benchmarking not funded through the BANKSETA Administration budget for example funding relevant Research Chairs at Public Universities and funding of Doctoral and Post-Doctoral Students. Such research will then be in the public domain and accessible to all BANKSETA Stakeholders.

10. Project administration

The BANKSETA applies the following principles to projects managed, directly or indirectly, by BANKSETA Staff:

10.1 A proportion of the discretionary grants can be used for administration or project management purposes in various grant and project categories provided it is limited to a maximum of 7.5 % of the budget. Where the administration of the project resides with BANKSETA, then the administration cost will be managed by BANKSETA to perform the following among others:

- a) Project initiation including due diligence
- b) Monitoring and Evaluation
- c) General project support including marketing and advocacy
- d) *Salaries of employees directly linked to the implementation of discretionary grants contracts;*
- e) Moderation of learning;
- f) Advertisements relating to the implementation of learning programmes and projects;
- g) Curriculum design and qualification development;
- h) *Any other costs related directly to the implementation of discretionary grants (including availability of tools of trade such as laptops, mobile phones; data)*

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- 10.2 The Project, if not funded by a Discretionary Grant, would not take place.
- 10.3 Administration costs incurred by BANKSETA staff outside of normal operational costs may include, but are not limited to, travel, accommodation, subsistence, visas, and insurance. These costs are incurred only to enable the objectives of the project, which would otherwise not be able to proceed and are included in the limit of 7.5%.
- 10.4 Project cost savings achieved after the establishment of the project will not affect the committed administration costs, which will remain at the level agreed at the commencement of the project.

11. Discretionary Grant Approvals

- 11.1 In accordance with the Delegations of Authority (DoA) Policy the BANKSETA Board approval is required for the following unless otherwise indicated by the DoA Policy:
 - 11.1.1 All Discretionary Grant funded projects;
 - 11.1.2 Transfer of funds between projects;
 - 11.1.3 The allocation of additional funds or savings to existing projects.
- 11.2 The CEO may approve write back of savings from a milestone / project to the same project or to the Discretionary Grant pool of funds.
- 11.3 The approval of discretionary grants:
 - 11.3.1 Are subject to the availability of funds.
 - 11.3.2 Should benefit the broader banking and alternative banking sector and its stakeholder groups or address a national need.
 - 11.3.3 Must conform to BANKSETA governance criteria and the requirements of the PFMA.
 - 11.3.4 Must adhere to the requirements of the BANKSETA Supply Chain Management Policy or,
 - 11.3.5 Must adhere to the Board approved Funding Window Guidelines.
 - 11.3.6 Should be transparent and open.
- 11.4 Funding may include settlement of unemployed student debts at Public Universities after completion to enable them to receive their certificate and enter the job market.
- 11.5 Funding may be for learners who have already started their qualification before funding is approved.

12. Project Savings

No savings from the allocated discretionary grant funds will be used for other purposes by the recipient. Such savings are to be written back to the discretionary funds with CEO approval. Reallocation of such

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savings to another activity or project is subject to Board approval. Reallocation of savings may include existing or new projects.

13. Value for money

BANKSETA will in all instances ensure that it obtains value for funds spent. No payments will be made without the necessary deliverables as specified in the contract or memorandum of agreement being received. BANKSETA will **not** recoup tranche payments already made if learners do not complete successfully.

14. Monitoring and Evaluation

Monitoring and evaluation by BANKSETA are applicable to all the disbursed discretionary funds including their related projects. As such BANKSETA monitoring and evaluation will include but not be limited to:

- 14.1 Funding Spend and related procurement;
- 14.2 Quality of delivery;
- 14.3 Project management efficiencies;
- 14.4 Risks;
- 14.5 Confirmation of beneficiaries and feedback.

15. Impact Assessment

BANKSETA will determine the impact of funding allocated in line with the Monitoring and Evaluation Framework for SETAS as published by the Department of Higher Education and Training and other parameters that may be set by the BANKSETA Board.

16. Scope and application

- 16.1 The Discretionary Grant Policy applies to all BANKSETA employees without exception.
- 16.2 Non-adherence to the Discretionary Grant Policy shall be dealt with in line with the Disciplinary Code and Procedure.

17. Roles and responsibilities

- 17.1 Chief Executive Officer
 - 17.1.1 Appoint the members of the Evaluation Panels

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17.1.2 Review the funding window submissions after probity and submit to Board unless delegated to approve in terms of the DoA Policy.

17.1.3 Review appeals and submit to Board.

17.2 Chief Finance Officer

17.2.1 All activities as it relates to the SETA Grant Regulations and the BANKSETA Supply Chain Policy.

17.3 GM: Operations

17.3.1 Co-ordinate the overall funding window process ensure that documents are prepared on time and to the required standard to be submitted for board approval.

17.3.2 Review policies and procedures and the process to ensure continuous improvement.

17.4 Departmental Managers

17.4.1 Ensure the Funding Window process as indicated in this policy is followed and documents are submitted on time.

17.5 Funding Window Evaluation Panels

17.5.1 To fulfil their duty as instructed in the appointment letter from the CEO.

17.6 All additional responsibilities as required by the Supply Chain Management Policy and the Delegations of Authority Policy.

18. Review of the Policy

18.1 This policy shall be reviewed at least once every third financial year or earlier should the need arise.

18.2 Any amendments of whatever nature to the policy shall be recommended by the Chief Executive Officer (CEO) and approved by the Board by way of a formal and minuted resolution.