



GIFTS, BENEFITS AND HOSPITALITY POLICY

This policy and any subsequent amendments are issued pursuant to Mallee Catchment Management Authority Board Charter of Corporate Governance.

Metadata

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1. Purpose

This policy states the Mallee Catchment Management Authority (CMA) position on:

- Responding to offers of gifts, benefits and hospitality; and
- Providing gifts, benefits and hospitality.

This policy is intended to support individuals and the Mallee CMA to avoid conflicts of interest and maintain high levels of integrity and public trust.

The Mallee CMA has issued this policy to support behavior consistent with the *Code of conduct for Victorian public sector employees* (the Code). All employees are required under clause 1.2 of the Code to comply with this policy.

This policy applies to all workplace participants. For the purpose of this policy, this includes: executives, board members, individuals, contractors¹, consultants and any individuals or groups undertaking activity for or on behalf of the Mallee CMA.

2. Policy principles

This policy has been developed in accordance with requirements outlined in the *Minimum accountabilities for managing gifts, benefits and hospitality* issued by the Victorian Public Sector Commission - refer Appendix 3.

The Mallee CMA is committed to and will uphold the following principles in applying this policy:

Public interest:

Individuals have a duty to place the public interest above their private interests when carrying out their official functions. They will not accept gifts, benefits or hospitality that could raise a perception of, or actual, bias or preferential treatment. Individuals do not accept offers from those about whom they are likely to make business decisions.

Accountability:

Individuals with direct reports are accountable for overseeing management of their direct reports' acceptance or refusal of non-token gifts, benefits and hospitality, modelling good practice and promoting awareness of gifts, benefits and hospitality policies and processes.

Culture of Integrity:

Mallee CMA fosters a culture of integrity. Board members and employees are supported to raise any unresolved gifts issues.

Risk-based approach:

The Mallee CMA, through its policies, processes and audit committee, will ensure gifts, benefits and hospitality risks are appropriately assessed and managed. Individuals with direct reports will ensure they are aware of the risks inherent in their team's work and functions and monitor the risks to which their direct reports are exposed.

¹ Note the application of clause 1.4 of the Code of conduct for Victorian public sector employees to the engagement of contractors and consultants. Contractors and consultants are only bound by the code if explicitly required by their contract for services.

Processes:

The Mallee CMA procedures are transparent and accountable. Processes are in place to ensure that board members and employees are aware of the requirements of this policy and how to comply with it.

3. Roles and Responsibilities

Role	Responsibility
All employees	Individuals are accountable for: <ul style="list-style-type: none">• Declaring all non-token offers of gifts, benefits and hospitality;• Declining non-token offers of gifts, benefits and hospitality, or where an exception applies under this policy, seeking approval to accept the offer;• The responsible provision of gifts, benefits and hospitality;• Immediately disclosing to their Manager, all gifts, benefits and hospitality they are offered or receive;• Forwarding the signed CMA 042 FORM Gifts, benefits and hospitality declaration form to the Chief Financial Officer (CFO).
General Managers and Managers	Are responsible to: <ul style="list-style-type: none">• Make employees aware of:<ul style="list-style-type: none">○ the Code of Conduct for Victorian Public Sector Employees○ the Victorian Public Sector Commission's (VPSCs) Gifts, benefits and hospitality policy framework, October 2016; and○ this policy.• Monitor the work of employees and the risks they are exposed to with respect to the receipt of gifts, benefits and hospitality;• Consider their direct reports' personal and professional interests and the types of gifts, benefits and hospitality that could have high relative value to those employees and contractors;• Ensure that gifts, benefits and hospitality of more than nominal value are disclosed using the Offer of Gifts, Benefits and Hospitality Declaration Form and forwarded to the CFO; See: Disclosing gifts, benefits and hospitality received.• Report bribery attempts to the CFO and• Ensure that when providing gifts and hospitality it reflects prudent use of public resources and does not compromise the real or perceived integrity of recipients.
Chief Finance Officer (CFO)	It is the responsibility of the CFO to: <ul style="list-style-type: none">• Securely maintain a Gifts, benefits and hospitality register;• Ensure that the register and this policy are subject to regular scrutiny, including annual review of the policy;• Ensuring that the Audit Committee and Board receive a report at least annually on the administration and quality control of the gifts, benefits and hospitality policy, processes and register;• Assist employees by providing advice and training in relation to this policy;• Provide an avenue for reporting bribery or corruption attempt; and• Take appropriate action regarding reported bribery attempts (e.g. involving Victoria Police).• Will publish organisation gifts, benefits and hospitality policy and register on the Mallee CMA website. The published register will cover the current and the previous financial year.

Chief Executive Officer (CEO)	<p>The CEO is responsible for:</p> <ul style="list-style-type: none"> • Determining the ownership of reportable gifts received by Board members and employees; • Providing approval (where required) for gifts, benefits or hospitality offered to employees using the CMA 042 FORM Gifts, benefits and hospitality declaration form.
Audit Committee and Mallee CMA Board	<p>Responsible for:</p> <ul style="list-style-type: none"> • Conducting an analysis of Mallee CMA's gifts, benefits and hospitality risks, at least annually, (including multiple offers from the same source and offers from business associates), risk mitigation measures and any proposed improvements.

4. Business rules

Activity	Rules
Board and employees	<p>Mallee CMA Board members and employees:</p> <ul style="list-style-type: none"> • Must not seek or accept gifts, benefits or hospitality from people seeking to influence their decisions; • Ensure that when providing hospitality it reflects prudent use of public resources and does not compromise the real or perceived integrity of recipients; • Only accept hospitality, gifts and benefits and/or provide hospitality in limited circumstances; • Must be aware of and act in accordance with: <ul style="list-style-type: none"> ○ The Code of Conduct for Victorian Public Sector Employees; ○ The Victorian Public Sector Commission Gifts, Benefits and Hospitality Policy Framework, for Victorian Public Sector employees; ○ This policy - Note: a breach in relation to this policy could result in disciplinary action as set out in the Mallee CMA Disciplinary guidelines procedure; and ○ Should seek advice from their Manager (or the CFO) if unsure about the offer of or provision of gifts, benefits and hospitality. <p>It is the responsibility of Board members and employees to:</p> <ul style="list-style-type: none"> • Not solicit gifts, benefits or hospitality for themselves or others in any form; • Refuse offers of gifts, benefits or hospitality where the Mallee CMA's, Board members, or integrity, impartiality or decision making are undermined; <i>Refer below: Requirements for refusing non-token offers</i> • Refuse all offers of gifts, benefits or hospitality from people or organisations about whom they are likely to make decisions involving: <ul style="list-style-type: none"> ○ Tender processes; ○ Procurement; ○ Enforcement; ○ Licensing; and ○ Regulation. • Not accept in any circumstances, offers of money or items easily converted to money (e.g. shares); • Refuse bribes and report bribery attempts to their Manager or the CFO.
Direct or indirect	<p>A gift offer can be direct or indirect. It can be made to you or to someone with whom you are closely associated. It can benefit you directly or because it benefits someone such as:</p> <ul style="list-style-type: none"> • A member of your immediate family (e.g. spouse, partner, parent, sibling, child); • A regular member of your household (i.e. a person who normally resides with you,

	<p>including a person paying rent or board or providing 'in kind' support); or</p> <ul style="list-style-type: none"> Someone else with whom you are closely associated (e.g. friend, relative, business partner).
Reputation for ethical behaviour	<ul style="list-style-type: none"> The community expects high standards of integrity, impartiality and responsible use of public resources from Victorian public sector employees and directors of public entities. A reputation for integrity and impartiality can only be achieved and maintained if the community is confident that public sector employees are not influenced by gifts, benefits, hospitality or bribes. Employees should never expect to get anything extra for doing what they are paid to do. Similarly when providing gifts and hospitality, they need to ensure that it reflects prudent use of public resources and does not compromise the real or perceived integrity of recipients.
Requirements for accepting non-token offers	<p>There will be some exceptions where there is a legitimate business reason for accepting a non-token offer. All accepted non-token offers must be approved in writing by the individual's manager or organisational delegate, recorded in the gifts, benefits and hospitality register and be consistent with the following requirements:</p> <ul style="list-style-type: none"> It does not raise an actual, potential or perceived conflict of interest or have the potential to bring the individual, the Mallee CMA or the public sector into disrepute (the 'GIFT' test (refer Appendix 1) is a good reminder of what to think about in making this assessment); and There is a legitimate business reason for acceptance. It is offered in the course of the individual's official duties, relates to the individual's responsibilities and has a benefit to the Mallee CMA, public sector or the State. <p>Individuals may be offered a gift or hospitality where there is no opportunity to seek written approval from their manager prior to accepting. For example, they may be offered a wrapped gift that they later identify as being a non-token gift. In these cases, the individual must seek approval from their manager within five business days.</p> <p>NB: All offers worth more than \$50 are non-token offers and must be recorded on a gift, benefit and hospitality register.</p>
Requirements for refusing offers	<p>Individuals should consider 'GIFT' test (refer Appendix 1) and the requirements below to help respond to a non-token offer.</p> <p>Individuals are to refuse non-token offers:</p> <ul style="list-style-type: none"> Likely to influence them, or be perceived to influence them, in the course of their duties or raise an actual, potential or perceived conflict of interest; By a person or organisation about which they will likely make a decision (also applies to processes involving grants, sponsorship, regulation, enforcement or licensing); Likely to be a bribe or inducement to make a decision or act in a particular way; That extend to their relatives or friends; With no legitimate business benefit; Of money, or used in a similar way to money, or something easily converted to money; Where, in relation to hospitality and events, the organisation will already be sufficiently represented to meet its business needs; where acceptance could be perceived as endorsement of a product or service, or acceptance would unfairly advantage the sponsor in future procurement decisions

	<ul style="list-style-type: none"> • Made by a person or organisation with a primary purpose to lobby Ministers, Members of Parliament or public sector agencies; and • Made in secret. <p>In addition, individuals are to refuse all offers (excluding token hospitality, such as sandwiches over a lunchtime meeting):</p> <ul style="list-style-type: none"> • Made by a current or prospective supplier; • Made during a procurement or tender process by a person or organisation involved in the process. 				
Recording Gifts, benefits and hospitality received	<p>The Mallee CMA maintains a Gifts, benefits & hospitality register, ensuring records are subject to regular scrutiny including an annual review by the Audit Committee and Mallee CMA Board.</p> <p>Individuals may accept token offers of gifts, benefits and hospitality without approval or declaration of the offer on the Mallee CMA Gifts, benefits and hospitality register.</p> <p>The following information outlines when gifts, benefits or hospitality must be disclosed and registered on the Gifts, Benefits and Hospitality Register:</p> <ul style="list-style-type: none"> • All gifts and benefits received that are deemed to be of a reportable value; • All hospitality that is deemed to be of a reportable value, prior to attendance or immediately following the event; and • Any gifts, benefits and hospitality received that could be perceived as creating a conflict of interest, regardless of value. <p><i>Recording non-token offers of gifts, benefits and hospitality</i></p> <p>All non-token offers, whether accepted or declined, must be recorded in the Mallee CMA's gifts, benefits and hospitality register. The business reason for accepting the non-token offer must be recorded in the register and provide sufficient detail to link the acceptance to the individual's work functions and benefit to the Mallee CMA, public sector or State.</p> <p>Individuals should consider the following examples of acceptable and unacceptable levels of detail to be included in the Mallee CMA's register when recording the business reason:</p> <table border="1" data-bbox="352 1245 1434 1536"> <tr> <td data-bbox="352 1245 536 1285">Unacceptable</td> <td data-bbox="536 1245 1434 1285">"Networking" or "Maintaining stakeholder relationships"</td> </tr> <tr> <td data-bbox="352 1285 536 1536">Acceptable</td> <td data-bbox="536 1285 1434 1536"> <p>"Individual is responsible for evaluating and reporting outcomes of the Mallee CMA's sponsorship of Event A. Individual attended Event A in an official capacity and reported back to the Mallee CMA on the event."</p> <p>"Individual presented to a visiting international delegation. The delegation presented the Individual with a cultural item worth an estimated \$200. Declining the gift would have caused offence. The Gift was accepted, written approval was subsequently obtained for the gift, which became the Mallee CMA's property."</p> </td> </tr> </table> <p>Note: A conflict of interest resulting from the acceptance of a gift, benefit or hospitality is not always clear to those who have them. Individuals who are unsure about the acceptance of a gift, benefit or hospitality, or the application of this policy, should ask their manager or CFO for advice.</p> <p>If there is any remaining doubt as to whether a perceived conflict of interest may exist, Board members and employees must record the received gifts, benefits and hospitality.</p>	Unacceptable	"Networking" or "Maintaining stakeholder relationships"	Acceptable	<p>"Individual is responsible for evaluating and reporting outcomes of the Mallee CMA's sponsorship of Event A. Individual attended Event A in an official capacity and reported back to the Mallee CMA on the event."</p> <p>"Individual presented to a visiting international delegation. The delegation presented the Individual with a cultural item worth an estimated \$200. Declining the gift would have caused offence. The Gift was accepted, written approval was subsequently obtained for the gift, which became the Mallee CMA's property."</p>
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Attempts to bribe	If an individual considers they (or another employee) have been offered a bribe or inducement, the offer must be refused and reported immediately to their Manager or the CFO (who should report any criminal or corrupt conduct to Victoria Police or the IBAC).				

Speaking up (in good faith)	<p>Individuals who consider that gifts, benefits and hospitality or conflict of interest within the Mallee CMA may not have been declared or is not being appropriately managed should speak up and notify their manager or CFO.</p> <p>The Mallee CMA will take decisive action, including possible disciplinary action, against individuals who discriminate against or victimise those who Speak Up in good faith.</p>
Ownership of gifts offered to individuals	<p>Non-token gifts accepted by an individual for their work or contribution may be retained by the individual where their manager or organisational delegate has provided written approval.</p> <p>Employees must transfer to the Mallee CMA official gifts or any gift of cultural significance or significant value (over \$50).</p>
Requirements for providing gifts, benefits and hospitality	<p>Gifts, benefits and hospitality may be provided to welcome guests, facilitate the development of business relationships, further public sector business outcomes and to celebrate achievements.</p> <p>When deciding whether to provide gifts, benefits or hospitality or the type of gift, benefit or hospitality to provide, individuals must ensure:</p> <ul style="list-style-type: none"> • Any gift, benefit or hospitality is provided for a business reason in that it furthers the conduct of official business or other legitimate organisational goals, or promotes and supports government policy objectives and priorities; • That any costs are proportionate to the benefits obtained for the State, and would be considered reasonable in terms of community expectations (the 'HOST' test - refer Appendix 2, is a good reminder of what to think about in making this assessment); and • It does not raise an actual, potential or perceived conflict of interest. <p>The Mallee CMA may provide a gift for the purposes of making guests feel welcome and to provide a reminder of the visit.</p> <ul style="list-style-type: none"> • The gift should normally be symbolic, rather than financial, in value. <p>The Mallee CMA may provide a donation to a not-for-profit organisation providing the donation:</p> <ul style="list-style-type: none"> • Is made in accordance with this policy; • Would be considered symbolic rather than financial in value; • Is recorded in the Gifts, Benefits and Hospitality Register. <p>Note:</p> <ul style="list-style-type: none"> • The provision of gifts, benefits and hospitality must comply with the Mallee CMA Purchasing and Procurement policy. • The provision of alcohol at work related events must be consistent with the Mallee CMA Alcohol and Drugs Policy.
Containing costs	<p>Individuals should contain costs involved in the provision of gifts, benefits and hospitality wherever possible. The following questions may be useful to assist individuals to decide the type of gift, benefit or hospitality to provide:</p> <ul style="list-style-type: none"> • Will the cost of providing the gift, benefit or hospitality be proportionate to the potential benefits? • Is an external venue necessary or does the organisation have facilities to host the event? • Is the proposed catering or hospitality proportionate to the number of attendees? • Does the size of the event and number of attendees align with intended outcomes? • Will providing the gift, benefit or hospitality be viewed by the public as excessive?

<p>Requirements for providing hospitality at employee events</p>	<p>The Mallee CMA may occasionally provide catered activities for Board members and employees. These include:</p> <ul style="list-style-type: none"> • As part of a larger employee related event e.g. a training course, workshop, planning day, meeting, seminar or conference; and • To recognise an organisational or individual achievement. <p>Catering for an employee event can be an effective way of celebrating achievements or promoting particular behaviours and is common business practice.</p> <p>The organiser of the event should consider the following when deciding to pay for all or some of the costs:</p> <ul style="list-style-type: none"> • The extent to which the event will contribute to organisational objectives; • Whether there have been multiple recent events that would result in perceptions of excess should further events be funded; and • The need to balance the positive benefits of public recognition with community expectations in relation to modest and prudent expenditure by public officials. <p>Refer: Mallee CMA Recognition of Service, Departure Gift and Floral Tributes Policy and Procedure</p> <p>Note: The provision of alcohol at work related events must be consistent with the Mallee CMA Alcohol and Drugs Policy.</p>
<p>Interstate and Overseas Travel and Conference Attendance</p>	<ul style="list-style-type: none"> • Board members and employees must ensure that there is no conflict of interest if accepting funds from a sponsoring organisation and should provide a disclaimer that there is no commitment on their behalf to the sponsor other than to attend/present a paper at the conference. • An invitation to attend or present a paper at an overseas conference or seminar must not be accepted unless preliminary approval has been received from the CEO. For interstate conferences or seminars, manager's prior approval is required. • Board members and employees must not accept an invitation to attend or present a paper at an interstate or overseas conference or seminar while on recreation or long service leave without prior approval of the Board Chair/CEO.
<p>Breaches</p>	<p>Disciplinary action consistent with the relevant industrial instrument and legislation, including dismissal, may be taken where an individual fails to adhere to this policy. This includes where an individual fails to avoid wherever possible or identify, declare and manage a conflict of interest related to gifts, benefits and hospitality in accordance with the Mallee CMA's Conflict of interest policy.</p> <p>Actions inconsistent with this policy may constitute misconduct under the Public Administration Act 2004, which includes:</p> <ul style="list-style-type: none"> • Breaches of the binding Code of conduct for Victorian public sector employees, such as sections of the Code covering conflict of interest (section 3.7), public trust (section 3.9) and gifts and benefits (section 4.2); and • Individuals making improper use of their position. <p>For further information on managing breaches of this policy, please contact the CFO. Those identified as acting inconsistently with this policy may be subject to contract re-negotiation, including termination.</p>

5. Definitions

Term	Meaning						
Benefits	Include preferential treatment, privileged access, favours or other advantage offered to an individual, e.g. invitations to sporting, cultural or social events, access to discounts and loyalty programs, and promises of a new job. The value of benefits may be difficult to define in dollars, but may be used to influence an individual's behaviour.						
Bribe	A "Bribe" is an offer of money or other inducement made with the intention to corruptly influence a board member or employee in the performance of their duties. Bribery or attempted bribery of a public official is a criminal offence.						
Business Associate	An external individual or entity which the organisation has, or plans to establish, some form of business relationship, or who may seek commercial or other advantage by offering gifts, benefits or hospitality.						
Conflicts of interest	<table border="1"> <tr> <td><i>Actual conflict of interest</i></td> <td>There is a <u>real conflict</u> between an employee's public duties and private interests.</td> </tr> <tr> <td><i>Potential conflict of interest</i></td> <td>An employee has private interests that <u>could conflict</u> with their public duties. This refers to circumstances where it is foreseeable that a conflict may arise in future and steps should be taken now to mitigate that future risk.</td> </tr> <tr> <td><i>Perceived conflict of interest</i></td> <td>The public or a third party could <u>form the view</u> that an employee's private interests could improperly influence their decisions or actions, now or in the future.</td> </tr> </table>	<i>Actual conflict of interest</i>	There is a <u>real conflict</u> between an employee's public duties and private interests.	<i>Potential conflict of interest</i>	An employee has private interests that <u>could conflict</u> with their public duties. This refers to circumstances where it is foreseeable that a conflict may arise in future and steps should be taken now to mitigate that future risk.	<i>Perceived conflict of interest</i>	The public or a third party could <u>form the view</u> that an employee's private interests could improperly influence their decisions or actions, now or in the future.
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<i>Perceived conflict of interest</i>	The public or a third party could <u>form the view</u> that an employee's private interests could improperly influence their decisions or actions, now or in the future.						
Gifts	<p>Are free or discounted items and any item that would generally be seen by the public as a gift. These include items of high value (e.g. artwork, jewellery, or expensive pens), low value (e.g. small bunch of flowers) and consumables (e.g. chocolates).</p> <p>Fundraising by public sector organisations that is consistent with relevant legislation and any government policy is not prohibited under the minimum accountabilities.</p>						
Gifts, benefits and hospitality register	A record, preferably electronic, of all declarable gifts, benefits and hospitality. It records the date an offer was made and by whom, the nature of the offer, its estimated value, the raising of any actual, potential or perceived conflicts of interest or reputational risks and how the offer was managed. For accepted offers, it details the business reason for acceptance and the officer approving the acceptance.						
Hospitality	The friendly reception and entertainment of guests. Hospitality may range from light refreshments at a business meeting to expensive restaurant meals and sponsored travel and accommodation.						
Legitimate business benefit	Gifts, benefits and hospitality accepted or provided for a business purpose, in that it furthers the conduct of official business or other legitimate goals of the organisation, public sector or State.						
Public official	Has the same meaning as under s4 of the Public Administration Act 2004, including: <ul style="list-style-type: none"> • Public sector employees; • Statutory office holders; and • Directors of public entities. 						
Responsible Person	The "responsible person" is the person whom the board member or employee notifies of any gift offers they receive, notifies of suspected bribery attempts; and seeks advice from about this policy and how to comply.						
	<table border="1"> <tr> <td><i>Employee</i></td> <td>Unit Manager</td> </tr> </table>	<i>Employee</i>	Unit Manager				
<i>Employee</i>	Unit Manager						

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<i>Board Member or CEO</i>	Chair.				
<i>Chair</i>	Deputy Chair. Where appropriate, the chair should also seek advice from the Minister and/or the Department of Environment, Land, Water and Planning (DELWP).				
Token offer	<p>A token offer is an offer of a gift, benefit or hospitality that is of inconsequential or trivial value to both the person making the offer and the individual. It may include promotional items such as pens and note pads, and modest hospitality which would be considered a basic courtesy, such as light refreshments offered during a meeting.</p> <p>Whilst the primary determinant of a token offer is that it would not be reasonably perceived within or outside the organisation as influencing an individual raising an actual, potential or perceived conflict of interest, it cannot be worth more than \$50 (including cumulative offers from the same source over a 12 month period). If token offers are made often by the same person or organisation, the cumulative value of the offers, or the perception that they may influence the recipient, may result in the offers becoming non-token.</p>				
Non-token offer	<p>An offer of a gift, benefit or hospitality that is, or may be perceived to be by the recipient, the person making the offer or by the wider community, of more than inconsequential value. All offers worth more than \$50 are non-token offers and must be recorded on a gift, benefit and hospitality register.</p>				

6. Related documents

Internal

- QMS 002 REG Gifts, benefits & hospitality register
- CMA 042 FORM Gifts, benefits and hospitality declaration form
- CMA 024 PRO Disciplinary guidelines procedure
- CMA 009 GPOL Purchasing and procurement policy
- CMA 017 GPOL Conflict of interest policy - Employees
- CMA 020 GPOL Recognition of service, departure gift and floral tribute policy and procedure
- CMA 030 OPOL Alcohol and drugs policy
- CMA 045 GPOL Code of conduct policy
- CMA 061 GPOL Conflict of interest policy - Board and Committees

External

- Standing Directions of the Minister for Finance*
- Public Administration Act 2004*
- Code of conduct for Victorian public sector employees 2015
- Code of conduct for Directors of Victorian public entities 2016
- Victorian Public Sector Commission's *Gifts, benefits and hospitality policy framework*
- Financial Management Act 1994*

7. Appendices

Appendix 1 - GIFT test

G	Giver	Who is providing the gift, benefit or hospitality and what is their relationship to me? Does my role require me to select contractors, award grants, regulate industries or determine government policies? Could the person or organisation benefit from a decision I make?
I	Influence	Are they seeking to gain an advantage or influence my decisions or actions? Has the gift, benefit or hospitality been offered to me publicly or privately? Is it a courtesy or a token of appreciation or valuable non-token offer? Does its timing coincide with a decision I am about to make or endorse a product or service?
F	Favour	Are they seeking a favour in return for the gift, benefit or hospitality? Has the gift, benefit or hospitality been offered honestly? Has the person or organisation made several offers over the last 12 months? Would accepting it create an obligation to return a favour?
T	Trust	Would accepting the gift, benefit or hospitality diminish public trust? How would the public view acceptance of this gift, benefit or hospitality? What would my colleagues, family, friends or associates think?

Appendix 2 - HOST test

H	Hospitality	To whom is the gift or hospitality being provided? Will recipients be external business partners, or individuals of the host organisation?
O	Objectives	For what purpose will hospitality be provided? Is the hospitality being provided to further the conduct of official business? Will it promote and support government policy objectives and priorities? Will it contribute to staff wellbeing and workplace satisfaction?
S	Spend	Will public funds be spent? What type of hospitality will be provided? Will it be modest or expensive, and will alcohol be provided as a courtesy or an indulgence? Will the costs incurred be proportionate to the benefits obtained?
T	Trust	Will public trust be enhanced or diminished? Could you publicly explain the rationale for providing the gift or hospitality? Will the event be conducted in a manner which upholds the reputation of the public sector? Have records in relation to the gift or hospitality been kept in accordance with reporting and recording procedures?

Appendix 3 - Minimum accountabilities for managing gifts, benefits and hospitality issued by the Victorian Public Sector Commission

Public officials offered gifts, benefits and hospitality:

1. Do not, for themselves or others, seek or solicit gifts, benefits and hospitality.

2. Refuse all offers of gifts, benefits and hospitality that:
 - are money, items used in a similar way to money, or items easily converted to money;
 - give rise to an actual, potential or perceived conflict of interest;
 - may adversely affect their standing as a public official or which may bring their public sector employer or the public sector into disrepute; or
 - are non-token offers without a legitimate business benefit.
3. Declare all non-token offers (valued at \$50 or more) of gifts, benefits and hospitality (whether accepted or declined) on their organisation's register, and seek written approval from their manager or organisational delegate to accept any non-token offer.
4. Refuse bribes or inducements and report inducements and bribery attempts to the head of the public sector organisation or their delegate (who should report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-corruption Commission).

Public officials providing gifts, benefits and hospitality:

5. Ensure that any gift, benefit and hospitality is provided for a business purpose in that it furthers the conduct of official business or other legitimate organisational goals, or promotes and supports government policy objectives and priorities.
6. Ensure that any costs are proportionate to the benefits obtained for the State, and would be considered reasonable in terms of community expectations.
7. Ensure that when hospitality is provided, individuals demonstrate professionalism in their conduct, and uphold their obligation to extend a duty of care to other participants.

Heads of public sector organisations:

8. Establish, implement and review organisational policies and processes for the effective management of gifts, benefits and hospitality that comprehensively address these minimum accountabilities.
9. Establish and maintain a register for gifts, benefits and hospitality offered to public officials that, at a minimum, records sufficient information to effectively monitor, assess and report on these minimum accountabilities.
10. Communicate and make clear within the organisation that a breach of the gifts, benefits and hospitality policies or processes may constitute a breach of binding codes of conduct and may constitute criminal or corrupt conduct, and may result in disciplinary action.
11. Establish and communicate a clear policy position to business associates on the offering of gifts, benefits and hospitality to employees, including possible consequences for a business associate acting contrary to the organisation's policy position. This must take into consideration any whole of Victorian Government supplier codes of conduct.
12. Report at least annually to the organisation's audit committee on the administration and quality control of its gifts, benefits and hospitality policy, processes and register. This report must include analysis of the organisation's gifts, benefits and hospitality risks (including repeat offers from the same source and offers from business associates), risk mitigation measures and any proposed improvements.
13. Publish the organisation's gifts, benefits and hospitality policy and register on the organisation's public website (applies only to organisations with an established website). The published register should cover the current and the previous financial year.
14. Establish, implement and review organisational policies and processes for the effective management of gifts, benefits and hospitality that comprehensively address these minimum accountabilities.