

# Gifts, Benefits and Hospitality Procedure

## 1 Purpose

The Gifts, Benefits and Hospitality Procedure sets out the process for accepting, declining and recording offers of gifts, benefits and hospitality. Any exceptions to this process must have the prior written approval of the relevant organisational delegate.

## 2 Scope / Responsibilities

Role/Title	Responsibilities
<b>All staff</b>	<p><i>This Procedure applies to all staff. For the purpose of this policy, this includes Board Directors, executives, individuals, contractors, consultants and any individuals or groups undertaking activity for or on behalf of the Women's.</i></p> <p><i>Any exceptions to this procedure must have the prior written approval of the CEO if the exception relates to a staff member or the Board Chair, or the Board Chair if the exception relates to the CEO or Directors.</i></p>

## 3 Definitions

Term/Abbreviation	Explanation
<b>Business associate</b>	<p><i>An individual or body that the public sector organisation has, or plans to establish, some form of business relationship with, or who may seek commercial or other advantage by offering gifts, benefits or hospitality.</i></p>
<b>Benefits</b>	<p><i>Benefits include preferential treatment, privileged access, favours or other advantage offered to an individual. They may include invitations to sporting, cultural or social events, access to discounts and loyalty programs, and promises of a new job.</i></p> <p><i>The value of benefits may be difficult to define in dollars, but as they are valued by the individual, they may be used to influence the individual's behaviour.</i></p>
<b>Ceremonial gifts</b>	<p><i>Ceremonial gifts are official gifts provided as part of the culture and practices of communities and government, within Australia or internationally. Ceremonial gifts are usually provided when conducting business with official delegates or representatives from another organisation, community or foreign government.</i></p> <p><i>Ceremonial gifts are the property of the public sector organisation, irrespective of value, and should be accepted by individuals on behalf of the public sector organisation. The receipt of ceremonial gifts should be recorded on the register but does not need to be published online.</i></p>

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## Conflicts of interest

- **Actual**

There is a **real conflict** between an employee's public duties and private interests.
- **Potential**

An employee has private interests that **could conflict** 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.
- **Perceived**

The public or a third party could **form the view** that an employee's private interests could improperly influence their decisions or actions, now or in the future.

## Gifts

*Gifts 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 (eg. artwork, jewellery, or expensive pens), low value (e.g. small bunch of flowers) and consumables (e.g. chocolates).*

## Hospitality

*Hospitality is 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

*A gift, benefit or hospitality may have a legitimate business benefit if it furthers the conduct of official business or other legitimate goals of the public sector organisation, the public sector or the State.*

## Register

*The electronic register used by the Women's to record all declarable gifts, benefits and hospitality.*

## Non-token offer

*A non-token offer is 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.*

## Token offer

*A token offer is a gift, benefit or hospitality that is of inconsequential or trivial value to both the person making the offer and the recipient (such as basic courtesy). The minimum accountabilities state that token offers cannot be worth more than \$50.*

## 4 Procedure

### 4.1 Minimum accountabilities

Under the *Instructions supporting the Standing Directions of the Minister for Finance 2016*, the Victorian Public Sector Commission has set binding minimum accountabilities for the appropriate management of gifts, benefits and hospitality. These can be found at Appendix B to this Procedure.

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## 4.2 Management of offers of gifts, benefits and hospitality

This section sets out the process for accepting, declining and recording offers of gifts, benefits and hospitality.

### ***Conflict of interest and reputational risks***

When deciding whether to accept an offer, individuals should first consider if the offer could be perceived as influencing them in performing their duties, or lead to reputational damage. The more valuable the offer, the more likely that a conflict of interest or reputational risk exists.

### ***Requirement for refusing offers***

Individuals should consider the GIFT test at Table 1 (below) and the requirements below to help respond to and help decide whether to refuse an offer.

Individuals are to refuse offers:

- made by a pharmaceutical company;
- 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;
- could bring them, the Women's or the public sector into disrepute;
- made by a person or organisation about which they will likely make a decision (also applies to processes involving grants and sponsorship) particularly offers:
  - made by a current or prospective supplier; and / or
  - made during a procurement or tender process by a person or organisation involved in the process.
- likely to be a bribe or inducement to make a decision or act in a particular way;
- that extend to their relatives or friends;
- 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;
- made by a person or organisation with a primary purpose to lobby Ministers, Members of Parliament or public sector agencies; and
- made in secret.

If an individual considers they have been offered a bribe or inducement, the offer must be reported to the General Counsel (who will report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-corruption Commission).

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**Table 1 - GIFT test**

<b>G</b>	Giver	<b>Who is providing the gift, benefit or hospitality and what is their relationship to me?</b> Does my role require me to select contractors, award grants? Could the person or organisation benefit from a decision I make?
<b>I</b>	Influence	<b>Are they seeking to gain an advantage or influence my decisions or actions?</b> 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?
<b>F</b>	Favour	<b>Are they seeking a favour in return for the gift, benefit or hospitality?</b> 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?
<b>T</b>	Trust	<b>Would accepting the gift, benefit or hospitality diminish public trust?</b> How would the public view acceptance of this gift, benefit or hospitality? What would my colleagues, family, friends or associates think?

## 4.3 Token offers

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.

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.

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.

Individuals may generally accept token offers of gifts, benefits and hospitality without approval or declaring the offer on the Women's register.

## 4.4 Non-token offers

Individuals can only accept non-token offers if they have a legitimate business benefit.

All accepted non-token offers must be approved in writing by the individual's manager or organisational delegate using the form at Appendix A, recorded in the gifts, benefits and hospitality register and be consistent with the following requirements:

- it does not raise an actual, potential or perceived conflict of interest or have the potential to bring the individual, the Women's or the public sector into disrepute; and

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- 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 Women's, the public sector or the State.

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.

- Where the gift would likely bring the individual or the Women's into disrepute, the Women's will return the gift.
- If the gift represents only a personal conflict to an individual staff member, the Women's should either return the gift or transfer ownership to the organisation to mitigate this risk.

## ***Recording non-token offers of gifts, benefits and hospitality***

All non-token offers, whether accepted or declined, must be recorded in the Women's gifts, benefits and hospitality register, maintained by the General Counsel. The business reason for accepting the non-token offer must be recorded in the register with sufficient detail to link the acceptance to the individual's work functions and benefit to the Women's, the public sector or State.

Individuals should consider the following examples of acceptable and unacceptable levels of detail to be included in the Women's register when recording the business reason:

### **Unacceptable**

"Networking"

"Maintaining stakeholder relationships"

### **Acceptable**

"Individual is responsible for evaluating and reporting outcomes of the Women's sponsorship of Event A. Individual attended Event A in an official capacity and reported back to the Women's on the event."

"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 Women's property."

## ***Reporting non-token offers of gifts, benefits and hospitality***

The Audit and Corporate Risk Management Committee will receive an annual report on the administration and quality control of the Gifts, Benefits and Hospitality Framework and Procedure, and a copy of the Women's register.

The report will include analysis of the Women's gifts, benefits and hospitality risks (including multiple offers from the same source and offers from business associates), risk mitigation measures and any proposed improvements.

The Women's will publish the gifts, benefits and hospitality register on its internet site annually.

## ***Ownership of gifts offered to individuals***

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Non-token gifts with a legitimate business benefit that have been accepted by an individual for their work or contribution may be retained by the individual where the gift is not likely to bring them or the Women's into disrepute, and where their manager or organisational delegate has provided written approval.

Employees must transfer to the Women's any gift of cultural significance or significant value (over \$50).

## 4.5 Repeat offers

Receiving multiple offers (token or non-token) from the same person or organisation can generate a stronger perception that the person or organisation could influence the individual. Individuals should refuse repeat offers from the same source if they create a conflict of interest or may lead to reputational damage.

If an individual considers they are receiving repeated offers, this must be reported to the General Counsel

## 4.6 Ceremonial gifts

Ceremonial gifts are official gifts provided as part of the culture and practices of communities and government, within Australia or internationally. Ceremonial gifts are the property of the Women's, irrespective of value, and should be accepted by individuals on behalf of the Women's.

The receipt of ceremonial gifts should be recorded on the Women's register but this information will not be published online.

## 4.7 Hospitality provided by Victorian public sector organisations

Victorian public sector organisations may provide hospitality to stakeholders, as part of their functions. When offered hospitality by a Victorian public sector organisation, individuals should consider the requirements of the minimum accountabilities.

Accepted hospitality offered by a Victorian public sector organisation as part of official business does not need to be declared or reported, where the reason for the individual's attendance is consistent with the Women's functions and objectives and with the individual's role.

## 4.8 Management of the provision of gifts, benefits and hospitality

This section sets out the requirements when the Women's is providing gifts, benefits and hospitality.

### *Requirements for providing gifts, benefits and hospitality*

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.

When deciding whether to provide gifts, benefits or hospitality or the type of gift, benefit or hospitality to provide, individuals must ensure:

- any gift, benefit or hospitality is provided for a business reason in that it furthers the conduct of official business or other legitimate goals of the Women's, or promotes and supports government policy objectives and priorities;

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- that any costs are proportionate to the benefits obtained for the Women's or the State, and would be considered reasonable in terms of community expectations (the 'HOST' test at **Table 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.

**Table 2 - HOST test**

<b>H</b>	Hospitality	<p><b>To whom is the gift or hospitality being provided?</b></p> <p>Will recipients be external business partners, or individuals of the host organisation?</p> <p><b>For what purpose will hospitality be provided?</b></p>
<b>O</b>	Objectives	<p>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?</p> <p><b>Will public funds be spent?</b></p>
<b>S</b>	Spend	<p>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?</p> <p><b>Will public trust be enhanced or diminished?</b></p>
<b>T</b>	Trust	<p>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?</p>

## Containing costs

Individuals should contain costs involved in the provision of gifts, benefits and hospitality wherever possible and should comply with the financial probity and efficient use of resources guidance outlined in the Code of Conduct for Victorian Public Sector Employees.

The following questions may be useful to assist individuals to decide the type of gift, benefit or hospitality to provide:

- 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?

## 4.9 Breaches

Disciplinary action consistent with the relevant industrial instrument and legislation, including dismissal, may be taken where an individual fails to adhere to the Gifts, Benefits and Hospitality Framework and this procedure. 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 Women's Conflict of Interest and Duty Policy.

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Actions inconsistent with this policy may constitute misconduct under the Public Administration Act 2004, which includes:

- 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.

For further information on managing breaches of this policy, please contact the General Counsel.

## 4.10 Speak up

Individuals who consider that gifts, benefits and hospitality or conflict of interest within the Women's may not have been declared or is not being appropriately managed, should speak up and notify their manager or the General Counsel.

Individuals who believe they have observed corrupt conduct in their colleagues may also make a protected disclosure directly to the Independent Based-based Anti-corruption Commission (IBAC).

The Women's will take decisive action, including possible disciplinary action, against individuals who discriminate against or victimise those who speak up in good faith.

## 4.11 Contacts for further information

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 the General Counsel.

## 5 Compliance

Compliance with this policy will be monitored, evaluated and reported by the maintenance of the Women's Gifts and Benefits Register.

General Counsel will report at least annually to the Board's ACRMC on the administration of:

- this policy, and
- the Gifts, Benefits and Hospitality Procedure, and
- the Women's Gifts and Benefits Register.

Reports to the ACMRC will include analysis of the Women's gifts, benefits and hospitality risks (if any), risk mitigation measures and any proposed improvements.

General Counsel is responsible for publishing this policy and the Women's Gifts and Benefits Register on the Women's external website. Publication of the Register will protect the privacy of individuals.

Legislation/regulation related to this procedure: *Public Administration Act 2004* (Vic)

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## 6 References

Minimum accountabilities for the management of gifts, benefits and hospitality (see Instructions supporting the Standing Directions of the Minister for Finance)

Code of conduct for Victorian Public Sector Employees

Code of conduct for Directors of Victorian Public Entities

Victorian Public Sector Commission's Gifts, Benefits and Hospitality Policy and Policy Guide

Royal Women's Hospital policies, procedures and guidelines

- Gifts, Hospitality and Benefits Framework
- Disciplinary Procedure
- Respectful Workplace Behaviours Policy
- Delegation of Authority
- Public Interest Disclosure Policy

## 7 Appendices

Appendix A - Approval of Benefit form

Appendix B – Minimum accountabilities

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## Appendix A - Gifts, Benefits and Hospitality Declaration Form for the approval in respect of receiving a gift, hospitality or benefit

This declaration form supports the Women's Gifts, Benefits and Hospitality Framework and Procedure. Employees must declare all non-token offers of gifts, benefits and hospitality (whether accepted or declined) and seek written approval from their manager or organisational delegate to accept any non-token offer.

Fields marked in blue will be published on the public gifts and benefits register, which is available on the Women's website.

Individual to complete	
Declaration date	
Name (recipient)	
Position (e.g. Director)	
Unit / Division (e.g. Finance) Published only if the offer is accepted	
Details of the gift, benefit or hospitality	
Date offered	
Estimated or actual value	
Name of person (donor) making the offer	
Position of person making the offer	
Name of organisation making the offer Published only if the offer is accepted	
Is the person or organisation making the offer a business associate of the organisation (Yes / No)? <b>If yes</b> , describe the relationship between them and the organisation <b>If no</b> , describe the relationship between you and the person or organisation making the offer; for example, a personal relationship	
Why is the offer being made?	

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<p>Would accepting the offer create an actual, potential or perceived conflict of interest (Yes / No)?</p> <p><b>If yes</b>, then the offer must be declined in accordance with the minimum accountabilities</p>	
<p>Would accepting the offer bring you, the organisation or the public sector into disrepute (Yes / No)?</p> <p><b>If yes</b>, then the offer must be declined in accordance with the minimum accountabilities</p>	
<p>Is there a legitimate business benefit to the organisation, public sector or State for accepting the offer? (Yes / No)</p> <p>For example:</p> <p>a) Was it offered during the course of your official duties?</p> <p>b) Does it relate to your official responsibilities?</p> <p>c) Does it have a benefit to the organisation, public sector or State?</p> <p><b>If no</b>, then the offer must be declined</p> <p><b>If yes</b>, then the business benefit must be detailed, in accordance with the minimum accountabilities</p>	
<p>Is the offer an official or ceremonial gift provided when conducting business with official delegates or representatives from:</p> <p>a) another organisation;</p> <p>b) the community; or</p> <p>c) a foreign government? (Yes / No)</p> <p><b>If yes</b>, please provide details</p>	
<p>I accepted the offer <b>YES / NO</b></p> <p>Please circle answer</p>	<p>Signature</p>
	<p>Date</p>
<p><b>Manager to complete</b></p>	
<p>Name</p>	
<p>Position (e.g. Director)</p>	

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Unit / Division (e.g. Finance)	
Relationship to employee	
<b>Complete if individual declined offer</b>	
I have reviewed this declaration form and submitted it for inclusion on the organisation's gifts, benefits and hospitality register	Signature
	Date
<b>Complete if individual accepted offer</b>	
<p>I have reviewed this declaration form and, confirm that, to my knowledge, accepting this offer:</p> <p>a) does not raise an actual, potential or perceived conflict of interest for the individual or myself; and</p> <p>b) will not bring the individual, myself, the organisation or the public sector into disrepute; and</p> <p>c) will provide a clear business benefit to the organisation, the public sector or the State</p>	Signature
	Date
<p>Record the decision about ownership of the gift; for example did the employee:</p> <p>a) retain the gift;</p> <p>b) accept an official or ceremonial gift on behalf of the organisation</p> <p>c) transfer ownership of the gift to the organisation;</p> <p>d) return the gift to the donor; or</p> <p>e) donate the gift to charity?</p>	

This approval form, once completed, must be forwarded to the General Counsel's Office for secure storage. It will form part of the Women's Gifts and Benefits Register. A photocopy of the completed form should be returned to the staff member who seeks approval.

## Appendix B - One Page Guide

### ***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 ) 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***

4. 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.
5. Ensure that any costs are proportionate to the benefits obtained for the State, and would be considered reasonable in terms of community expectations.
6. 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***

7. Establish, implement and review organisational policies and processes for the effective management of gifts, benefits and hospitality that comprehensively address these minimum accountabilities.
8. 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.
9. 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.
10. 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.
11. 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.
12. 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. Establish, implement and review organisational policies and processes for the effective management of gifts, benefits and hospitality that comprehensively address these minimum accountabilities.

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