

Gifts, Benefits and Hospitality – Framework

Aligned to: Governance Policy



the women's
the royal women's hospital

1. Purpose

The purpose of this Gifts, Benefits and Hospitality Framework is to outline the key principles that govern the management of gifts, benefits and hospitality issued by the Victorian Public Sector Commission. These minimum accountabilities are binding under Instruction 3.4.11 of the Standing Directions 201.

2. Scope / Responsibilities

This Gifts, Benefits and Hospitality Framework applies to all staff.

3. Definitions

Term/Abbreviation	Explanation
Benefits	<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>
Conflicts of interest <ul style="list-style-type: none">• Actual• Potential• Perceived	<p><i>There is a real conflict between an employee's public duties and private interests. An employee has private interests that could conflict with their public duties.</i></p> <p><i>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></p> <p><i>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.</i></p>
Gifts	<p><i>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 (e.g., artwork, jewellery, or expensive pens), low value (e.g., small bunch of flowers) and consumables (e.g., chocolates). Fundraising by public sector organisations that is consistent with relevant legislation and any government framework is not prohibited under the minimum accountabilities.</i></p>
Hospitality	<p><i>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.</i></p>
VPSC	<p><i>Victorian Public Sector Commission</i></p>

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4. Principles

The Women's acknowledges that transparent and accountable practices are vital to maintaining the Victorian community's trust in the public sector, and its confidence that public resources are being used responsibly and appropriately. The Women's undertakes to manage offers of gifts, benefits, and hospitality in accordance with the requirements of the VPSC Gifts, Benefits and Hospitality Policy.

This framework states the Women's position on:

- responding to offers of gifts, benefits, and hospitality; and
- providing gifts, benefits, and hospitality.

This framework is intended to support individuals and the Women's to avoid conflicts of interest and maintain high levels of integrity and public trust.

The Women's has issued this framework and its associated procedure to support behaviour 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 framework.

This framework applies to all workplace participants, including board directors, executive, employees, contractors, consultants and any individuals or groups undertaking activity for and on behalf of the Women's.

The Women's is committed to and will uphold the following principles in applying this framework:

Impartiality

Individuals have a duty to place the public interest above their private interests when carrying out their official duties. They will not accept gifts, benefits or hospitality that could raise a reasonable 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 are accountable for:

- 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 framework, seeking approval to accept the offer; and
- the responsible provision of gifts, benefits, and hospitality.

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.

Integrity

Individuals strive to earn and sustain public trust through providing or responding to offers of gifts, benefits and hospitality in a manner that is consistent with community expectations. Individuals will refuse any offer that may lead to an actual, perceived, or potential conflict of interest.

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Risk-based approach

The Women's, through its policies, processes and Audit and Corporate Risk Management Committee (ACRMC), 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.

5. Compliance

Failure to comply with this Framework and its associated procedures may result in disciplinary action. Breaches will be managed in accordance with the Disciplinary Procedure.

Compliance with this framework 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 framework, and
- the Gifts, Benefits and Hospitality Procedure, and
- the Women's Gifts and Benefits Register.

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

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

6. References

Public Administration Act 2004 (Vic)

This Framework should be read in conjunction with the following procedures

- The requirements for implementation of the framework are detailed in the following documents:
- [Gifts, Benefits and Hospitality Procedure](#)

7. Appendices

Nil

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