



TITLE: Gifts, Benefits and Hospitality

Document Type:	Procedure	Approved by:	Chief Finance Officer
Directorate:	Finance, Procurement + IT	Section:	Directorate Level Related Documents
Author/Prepared by:	Rachael McAlister	Position:	Financial Controller

INTRODUCTION

Goulburn Valley Health (GV Health) employees must not accept any gift or benefit that is intended to, or has the potential to, influence the employee in such a way as to compromise integrity or impartiality, or to create a conflict of interest, real or perceived.

DEFINITIONS:

Gratuity: is a gift or reward, usually in the form of money, given in return for service.

Non-Token Offer: is 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 \$50.00 are non-token offers and must be recorded on the gifts, benefits and hospitality register.

Token Offer: is an offer of a gift, benefit or hospitality that is offered as a courtesy, or is of inconsequential or trivial value to both the person making the offer and the individual. These offers must be valued at less than \$50.00.

Official Items: are sometimes given as a part of business with official delegates or representatives of community groups, organisations, or government. Usually items with cultural, ceremonial, religious, historic, or other significance.

Official Gifts: are sometimes given in recognition of relationships and successful work, not items with cultural, ceremonial, religious, historic, or other significance.

CONTEXT:


This procedure applies to all GV Health employees.

RECEIVING OFFERS OF GIFTS, BENEFITS AND HOSPITALITY

PRINCIPLES:

The general principle is that any gift or benefit which is accepted by GV Health staff, regardless of monetary value, does not imply a relationship which is likely to interfere with objectivity and independence.

1. Staff should not solicit or accept a Non-Token Offer of any kind from any third-party transacting with GV Health (including, but not limited to, patients and suppliers or potential future patients and suppliers) that could be reasonably perceived as influencing actions or decision making. For example, gifts or benefits from current or potential suppliers, contractors and consultants must not be accepted if they might reasonably compromise (or reasonably be seen to compromise) the integrity of the procurement process.
2. Staff must refuse all offers that are money, items used in a similar way to money, or items easily converted to money. Staff must also refuse any gifts or benefits that could be considered a gratuity.
3. Staff must refuse repeat offers (Token or Non-Token) from the same individuals, groups or organisations where the offer could be perceived as influential, or be seen as adding up to a conflict of interest over time.
4. Staff must refuse any offers from any persons, groups or organisations if they're likely to make decisions about the person, group or organisation in the foreseeable future and the receipt of the offer could be reasonably seen as a conflict of interest.

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5. Staff may only accept offers from suppliers or contractors for free or discounted opportunities where there is a legitimate business reason and conflict of interest can be appropriately managed. To ensure staff have development opportunities which do not raise conflicts of interest, GV Health should endeavour to build such opportunities into contracts as deliverables where possible.
6. Staff should refuse offers where acceptance could be seen as endorsing a product or service.
7. Staff can only accept a Non-Token Offer, Official Gift or Official Item after completing the Gift or Benefit Notification Form and obtaining approval from the relevant Manager, Director or Executive.
8. Token Offers of appreciation, Official Gifts or Official Items, valued at less than \$50, may be accepted providing the acceptance does not compromise integrity or impartiality, or create a conflict of interest, real or perceived.

RESPONSIBILITY:

All GV Health employees including members of the Board and its Sub-Committees and volunteers.

METHOD:

1. Staff must seek approval from the relevant Manager, Director or Executive to accept a Non-Token Gift.
2. Staff must complete the Gift, Benefit or Hospitality Notification Form (FIN008).
3. Staff must forward the completed form to the Office of the CFO.
4. The Office of the CFO collates the information from the forms received onto a Gifts and Benefits Register.
5. The CFO presents the Gifts and Benefits Register annually to the Audit & Risk Committee and publishes this on the website.
6. The CE makes a Certification annually to the appropriate State Government authorities.
7. At the end of each Fringe Benefits Tax (FBT) year the Office of the CFO reviews the GV Health Gifts Register to assess the FBT implications of any Non-Token Officers.
8. Staff must immediately report to the CE any attempt to bribe them or their colleagues with money or any other gift.
9. Staff must immediately report to their Manager any colleague who tries to solicit a bribe.
10. Breaches of the guideline will constitute a breach of the GV Health Code of Conduct and result in disciplinary action.
11. Any staff member who receives a bribe, receives a corrupting benefit or abuses a public office may be guilty of an offence under the *Criminal Code Act 1995 (Cth)* or under the *Crimes Act 1958 (Vic)*. In addition, involvement in suspect conduct exposes Directors and employees to scrutiny by the Independent Broad-based Anti-Corruption Commission (IBAC).

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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.

Individuals should consider the GIFT test at Figure 1 to help decide whether to refuse an offer.

Figure 1: GIFT Test

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

OUTCOMES:

1. Staff will not, for themselves or others, seek, nor solicit gifts, benefits and hospitality.
2. Staff 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 an employee or which may bring their organisation or the health sector into disrepute; or
 - are non-token offers without a legitimate business benefit;
 - are not consistent with community expectations;
3. Where offers should or must be refused, staff will decline offers at the time the offer is made, or as soon as reasonably possible;
4. Staff declare all Non-Token Offers (valued at \$50 or more) of gifts, benefits and hospitality (whether accepted or declined) on their organisations register and seek approval from the department manager and or Executive Director to accept any Non-Token Offer.
5. Staff will refuse bribes or inducements and report inducements and bribery attempts to the CE (who should report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-corruption Commission).



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PROVIDING GIFTS, BENEFITS AND HOSPITALITY

The general principle is that any gift or benefit which is offered or provided by GV Health including an offer to another Victorian public sector organisation, regardless of monetary value, are proportionate to the benefits obtained for the State, and would be considered reasonable in terms of community expectations. GV Health 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 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 at Figure 2 is a good reminder of what to think about in making this assessment).
- It does not raise an actual, potential or perceived conflict of interest.

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?

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KEY ALIGNED DOCUMENTS:

GV Health form:

- [Gift or Benefit Notification Form](#)

KEY LEGISLATION, ACTS & STANDARDS:

National Standards, Australian Council on Healthcare Standards, Standard 8

National Disability Insurance Scheme (Code of Conduct) Rules 2018

Code of Conduct for Victorian Public Sector Employees

Standing Directions 2018 Under the Financial Management Act 1994

<https://www.dtf.vic.gov.au/standing-directions-2018-under-financial-management-act-1994>

Commonwealth Aged Care Act 1997

Commonwealth Aged Care Act 2025

REFERENCES:

Gifts, Benefits and Hospitality policy:

<https://www.vic.gov.au/dpc-gifts-benefits-and-hospitality-policy>


<https://vpsc.vic.gov.au/ethics-behaviours-culture/gifts-benefits-hospitality/minimum-accountabilities/#heading3>

APPENDICES:


Appendix 1: [Gift, Benefit or Hospitality Notification Form](#)

Contributors to the document

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Appendix 1: Gift or Benefit Notification Form

	FIN008 Gift, Benefit or Hospitality Notification Form											
	<div style="border: 1px solid black; padding: 5px;"> <p>Instructions for Use This form is used to collect information on gifts, benefits and hospitality. Please also refer to GV Health Gifts, Benefits and Hospitality procedure. When completed this form should be forwarded to the Office of Chief Finance Officer.</p> </div>											
Table 1: Recipient of the gift, benefit or hospitality to complete												
Date received:												
Recipient's Name:												
Position:												
Department:												
Received From:												
Organisation:												
Description of Gift/Benefit/Hospitality:												
Reason for Gift/Benefit/Hospitality:												
Estimated Value of Gift/Benefit/Hospitality:	\$											
Signature of Recipient: (Signature)												
Date:												
Table 2: Supervisor/Manager/Chief Finance Officer or Chief Executive to complete												
Decision regarding Gift/Benefit/Hospitality:												
Print Name:												
Signature:												
Date:												
Gift and Benefit Register Noted (send this form to Governance Officer)												
Instructions:												
<i>Note: Any form not completed in its entirety or without approval will not be processed.</i>												
<table border="1" style="width: 100%;"> <tr> <td>Form Title:</td> <td>Gift, Benefit or Hospitality Notification Form</td> </tr> <tr> <td>Form Code:</td> <td>FIN008</td> </tr> <tr> <td>Approval Date:</td> <td>January 2022</td> </tr> <tr> <td>Responsibility for Review:</td> <td>Financial Controller</td> </tr> <tr> <td>Additional copies of this form:</td> <td>Finance Intranet site</td> </tr> </table>			Form Title:	Gift, Benefit or Hospitality Notification Form	Form Code:	FIN008	Approval Date:	January 2022	Responsibility for Review:	Financial Controller	Additional copies of this form:	Finance Intranet site
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