

# Gifts, Benefits and Hospitality policy



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RESPONSIBLE OFFICER:	Chief Finance Officer	APPROVING COMMITTEE:	Audit Committee
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Policy Statement	Purpose and Scope	Definitions and Abbreviations
Legislation, Acts and Standards	References	Key Aligned Documents

## Policy Statement

Corryong Health acknowledges that our community expects high standards of integrity and impartiality from Corryong Health employees. Corryong Health employees are expected to:

- Earn and sustain public trust
- Be honest, open and transparent in their dealings
- Make decisions and provide advice without bias
- Avoid any real or apparent conflicts of interest
- Use their powers responsibly
- Report improper conduct
- Seek to achieve best use of resources; and
- Submit themselves to appropriate scrutiny

Employees must not accept gifts, benefits or hospitality from people seeking to influence their decisions unfairly. When providing hospitality, employees must ensure that it reflects prudent use of public resources and does not compromise the real or perceived integrity of recipients.

## Policy Applies To

All Staff, Board Members and Volunteers

## Purpose and Scope

All employees are required to comply with the following minimum requirements:

- Do not solicit gifts, benefits or hospitality
- Refuse all offers of gifts, benefits or hospitality that could be reasonably perceived as undermining the integrity and impartiality of the organisation or themselves.
- Refuse all offers of gifts, benefits or hospitality from people or organisations about whom they are likely to make a decision involving tender processes, procurement, licensing, enforcement or regulation
- Refuse all offers of money or items easily converted to money such as shares
- Refuse bribes and report bribery attempts directly to their manager who will notify the head of the public sector organisation or their delegate.

## Accepting Gifts and Hospitality

Accepting a gift or hospitality from a consumer beyond a small, one off token of appreciation has the potential to compromise the professional relationship between consumer and the staff member.

Corryong Health does not endorse an individual staff member accepting a gift(s) from clients, residents and/or patients. Corryong Health understands and accepts that consumers may send to departments or

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the organisation as a whole, flowers or gifts which are appreciated and provide the opportunity to acknowledge appreciation of work by all staff members.

Corryong Health acknowledges that a total ban on the acceptance of all gifts and hospitality for our organisation and industry is impractical and unrealistic. However there is a low risk tolerance for the acceptance of gifts, benefits and hospitality which may influence integrity and impartiality or employee solicitation of gifts, benefits and hospitality.

Employees may only accept gifts under the following circumstances:

- Gifts are to be reported to management and registered on the Gift Register maintained by CFO.
- No gift over the value of \$50 shall be accepted by a single employee unless approved by management under special circumstances.
- Employees may accept small tokens of appreciation, mementos and small gifts such as chocolates, flowers, and stationery. These gifts, where practicable, should be shared with other employees.

If a staff member receives a gift from a consumer beyond a small, one off token of appreciation, the staff member should attempt to decline the gift and report this immediately to their manager. Sometimes it is difficult to refuse a gift without offending the person offering it and staff may need to discuss with their manager how you will deal with that person in the future. If staff are offered a gift they should consider the following:

- Is this offer made for reasons of genuine appreciation for something I have done, without any encouragement from me?
- If I accept it, would a reasonable bystander be confident that I could be independent in doing my job?
- Could I always feel free of any obligation to do something in return for the donor?
- Would I be comfortable if the gift was transparent to my organisation, its clients and to the public?

Modest hospitality such as light refreshments should be proportionate to the occasion (e.g. catering at a conference) and when offered as part of official business is not a reportable gift.

When employees attend a conference they are representing their organisation and any benefits (door prize, speaker fee, grants etc) belong to the organisation.

## Providing Gifts and Hospitality

Hospitality provided by Corryong Health to external guests and catered functions and gifts for staff should be determined based on a balanced judgement between the costs incurred and the potential benefits, and whether the proposed hospitality and/or gift is in line with community expectations.

## Definitions and Abbreviations

### Benefits

Benefits are the preferential treatment, privileged access, favours or other advantage offered to an employee. They include invitations to sporting, cultural or social events, access to discounts and loyalty programs, and promises of a new job. While their value may sometimes be difficult to quantify in dollars, they may be highly valued by the intended recipient and therefore used to influence their behaviour.

### Bribes

Bribes are money or other inducements given or promised to employees to corruptly influence the performance of their role. Bribery of a public official is an offence punishable by a maximum of ten years imprisonment

### Conflicts of Interest

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Conflicts of interest occur when an employee's private interests conflict with their public duty. Employees have a duty to always resolve a conflict in the public interest, not their own. This may mean that they decline a gift or transfer the gift to their employer's ownership if this is identified as being in the public interest.

## Gifts

Gifts are the free or heavily discounted items, intangible benefits or hospitality exceeding common courtesy that are offered to employees in association with their work. They may be enduring such as a work of art or consumables such as a box of chocolates. They range in value from nominal to significant and may be given for different reasons.

## Gift Register

Gift Register is a register of reportable gifts maintained by the CFO.

## Hospitality

Hospitality is the friendly reception and treatment of guests, ranging from offers of light refreshment at a business meeting to restaurant meals and sponsored travel and accommodation.

## Reportable Gifts

Reportable gifts are those that must be recorded on a gift register including accepted gifts, benefits and hospitality. They could also include gift offers of any value, whether they are accepted or not. The gifts may have been offered to an employee directly or extended to them as a guest of their partner or other close relation.

## Consumer

Consumer includes service providers and suppliers of goods and services to Corryong Health

## Legislation, Acts and Standards

NSQHS Standard 1.

## References

- Public Administration Act 2004
- Financial Management Act 1994
- Code of Conduct for Victorian Public Sector Employees

## Key Aligned Documents

## Governance

Version Control and Change History		
Version Number	Approval Date	Amendment
2.0	08/02/2018	Put in new format