

Museums Victoria Policy Statement

Gifts, Benefits, Hospitality and Attendance Policy

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1 Policy Objective/Intent

This policy states Museums Victoria's position for its Workers in relation to:

- responding to offers of Gifts, Benefits and Hospitality
- providing Gifts, Benefits or Hospitality; and
- attending Official Business Events

This policy is intended to support all Museums Victoria Workers and Museums Victoria to avoid Conflicts of Interest and maintain high levels of integrity and public trust.

Museums Victoria has issued this policy to support behaviour consistent with the *Code of Conduct for Victorian Public Sector Employees* and the *Code of Conduct for Directors of Victorian Public Entities* (the Code). All Workers are required under clause 1.2 of the Code to comply with this policy.

This policy has been developed in accordance with requirements outlined in the minimum accountabilities for the management of Gifts, Benefits and Hospitality issued by the Victorian Public Sector Commission (see Appendix C).

2 Policy Statement

Museums Victoria Workers must exercise considerable care in accepting any offer of a Gift, Benefit or Hospitality as it could suggest that they are open to being influenced in their public duty, thereby undermining the perception of their and Museums Victoria's integrity.

The default position in relation to offers of Gifts, Benefits and Hospitality is to politely say 'no thank you'. The only exceptions to this position are:

- Token Offers, mementos, small Gifts (eg flowers, chocolates, office stationery, bottle of wine) and modest Hospitality, where refusal would cause embarrassment or offence
- Ceremonial and certain Thank You Gifts
- Certain conference and seminar attendance
- Where there are strong business reasons in the public interest to accept.

All event attendance and Hospitality acceptance must be work-related, and strong business reasons for acceptance in the public interest must be capable of being demonstrated, if the decision is made to accept these offers.

Museums Victoria Workers will adopt a risk management approach in relation to Gifts, Benefits and Hospitality and Official Business Events and act in accordance with the *Code of*

Conduct for Victorian Public Sector Employees and the Code of Conduct for Directors of Victorian Public Entities and Museums Victoria's Values.

Gifts and donations offered to Museums Victoria as a standalone entity, for example a collection object donation, are addressed in the Fundraising and Philanthropy Policy. This policy applies to gifts, benefits or hospitality offered to individual Workers, which may include Ceremonial Gifts, accepted by individuals, on behalf of Museums Victoria.

3 Key Policy Principles

Museums Victoria is committed to and will uphold the following principles in applying this policy:

3.1 Impartiality

Workers 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 reasonable perception of, or actual, bias or preferential treatment. Workers do not accept offers from those about whom they are likely to make business decisions. Appendix A, the GIFT test, provides considerations in determining whether to accept or decline a Gift.

3.2 Accountability

Workers are accountable for:

- declaring all Non-Token Offers of Gifts, Benefits and Hospitality valued at \$50 or more;
- declining Non-Token Offers of Gifts, Benefits and Hospitality, or where an exception applies under this policy, seeking approval to accept the offer; and
- the responsible provision of Gifts, Benefits and Hospitality.

Workers 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 and Attendance at Official Business Events policies and processes.

3.3 Integrity

Workers 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.

3.4 Risk-based approach

Museums Victoria, through its policies, processes and Audit and Risk Committee, will ensure Gifts, Benefits and Hospitality risks are appropriately assessed and managed. The annual Gifts, Benefits and Hospitality and Attendance at Official Business Events Registers will be submitted to the Audit and Risk Committee. A public version of the Gifts, Benefits and Hospitality Register will be published on the Museums Victoria website.

Workers with direct reports will ensure that 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. If a Non-Token Offer is accepted, the relevant Manager is responsible for determining the appropriate course of action for managing the offer.

Workers will:

- seek advice from a department head or divisional director if unsure about how to respond to an offer of Gifts, Benefits or Hospitality.
- speak up if they consider that Gifts, Benefits and Hospitality or Conflict of Interest within Museums Victoria may not have been declared or is not being appropriately managed and notify their manager or the Chief Operating Officer.

Management of offers of Gifts, Benefits, and Hospitality

3.5 When deciding whether to accept an offer, Workers 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.

3.6 Workers are to refuse all offers:

- likely to influence them, or be perceived to influence them, in the course of their duties or that raise an actual, potential or perceived Conflict of Interest;
- that could bring them, Museums Victoria or the public sector into disrepute;
- made by a person or organisation about which they will likely make or influence a decision (this also applies to processes involving grants, sponsorship, regulation, enforcement or licensing), particularly offers:
 - made by a current or prospective supplier;
 - made during a procurement or tender process by a person or organisation involved in the process; or
- 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 organisations; or
- made in secret.

3.7 Workers may generally accept Token Offers without approval or declaring the offer on Museums Victoria's Gifts, Benefit and Hospitality Register, as long as the offer does not create a Conflict of Interest or lead to reputational damage.

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 that would be considered a basic courtesy, such as light refreshments during a meeting.

3.8 Workers 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 delegate, declared 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 Worker, Museums Victoria or the public sector into disrepute; and
- there is a legitimate business reason for acceptance. It is offered in the course of the Worker's official duties, relates to the Worker's responsibilities and has a benefit to Museums Victoria, public sector or the State.

- 3.9 Workers 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.
- 3.10 If the Gift would likely bring you or the organisation into disrepute, the organisation should return the Gift. If it represents a Conflict of Interest for you, the organisation should either return the Gift or transfer ownership to the organisation to mitigate this risk.
- 3.11 Gifts, Benefits or Hospitality offered to a family member of a Worker because of their position at Museums Victoria must be treated as though they have been offered to the Museums Victoria Worker.
- 3.12 A fringe Benefit may arise if an offer of a Gift, Benefit and/or Hospitality is accepted that is offered under an agreement between a third party and Museums Victoria as the employer of the individual. Guidance on the application of Fringe Benefit Tax to the acceptance of Gifts, Benefits and Hospitality should be sought from the Head of Finance.

Declaring Non-Token offers of Gifts, Benefits and Hospitality

- 3.13 All Non-Token Offers, valued at \$50 or more, whether accepted or declined, must be recorded in Museums Victoria's Gifts, Benefits and Hospitality Register by completing the Gifts, Benefits, Hospitality Declaration. The business reason for accepting the Non-Token Offer must be recorded in the register with sufficient detail to link the acceptance to the Worker's work functions and benefit to Museums Victoria, public sector or State.

Ownership of Gifts offered to Workers

- 3.14 Non-Token Gifts with a legitimate business benefit that have been accepted by a Worker for their work or contribution may be retained by the individual where the Gift is not likely to bring them or Museums Victoria into disrepute, and where their manager or delegate has provided written approval.
- 3.15 Where possible, Gifts will be shared with other Workers or kept on Museums Victoria premises.
- 3.16 Workers must not accept tips. Visitors who offer a tip should be advised of donation machines at the admissions desks and in the museums' shops.
- 3.17 Workers must transfer to Museums Victoria Ceremonial Gifts or any gift of cultural significance or significant value. In some cases, the decision may be to donate a Gift, including a speaker fee, to charity.
- 3.18 Where a Worker accrues a Benefit from an activity where they are representing Museums Victoria (e.g. speaker's fee, financial grant, door prize), this Benefit belongs to Museums Victoria and must be recorded on the Register.

Repeat offers

- 3.19 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 you. Workers should refuse repeat offers from the same source if they create a Conflict of Interest or may lead to reputational damage.

Ceremonial Gifts

- 3.20 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 Museums Victoria, irrespective of value, and should be accepted by individuals on behalf of Museums Victoria. The receipt of Ceremonial Gifts will be recorded on Museums Victoria's Gifts, Benefits and Hospitality Register.

Hospitality provided by Victorian public sector organisations

- 3.21 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 (see Appendix C).

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 Worker's attendance is consistent with Museums Victoria's functions and objectives and with the individual's role.

Official Business Events

- 3.22 Many core business activities of Museums Victoria involve MV Workers receiving invitations to attend Official Business Events. Official Business Events are events where the reason for attendance is consistent with Museums Victoria's organisational goals and supports our strategic directions and is consistent with the roles of the Workers attending. Attendance at these events is acceptable.

- 3.23 Attendance may be required for any of the below listed reasons:

- Relationship management: business leveraging, including pursuing grant, fundraising and sponsorship activities
- Sector knowledge
- State functions, events and travel
- Professional Development

Excluded from Official Business Events are activities for which Museums Victoria has paid attendance fees, including through membership fees, and those which appear to be limited to Hospitality or personal Benefit such as: private breakfasts, dinners, lunches, Christmas functions, golf days, comedy nights, etc. Workers should decline Benefits or Hospitality where there is no public Benefit in attending private functions in an official capacity.

- 3.24 Workers must seek approval to attend Official Business Events and register attendance in Museums Victoria's Events Attendance Register. There is no requirement to register events where people receive an invitation but elect not to attend.

Conference and Seminar Attendance

- 3.25 Workers who have been approved to present at a conference or seminar or perform other official roles at the event may accept funded or sponsored travel, accommodation and / or registration as part of their agreement with the event organiser. Offers from persons or organisations other than the event organiser must be considered carefully to ensure that there is no Conflict of Interest, for example if travel is provided by a third-party sponsor.
- 3.26 Workers who are attending a conference or seminar as a participant must not accept sponsored travel, accommodation and / or registration. An exception may occur where attendance is part of an intra or inter-government arrangement. Acceptance of these offers must be approved by the Chief Executive Officer.
- 3.27 If a Worker is offered an invitation to an event which they believe they should attend, but doing so would conflict with this policy, they should not accept the offer, and instead pay for their attendance.
- 3.28 All offers Valued at \$50 or more must be registered in the Gifts, Benefits and Hospitality Register.
- 3.29 In some cases, when attending conferences or undertaking fieldwork, Museums Victoria Workers may accept offers of private accommodation and Hospitality from colleagues in these locations. It is not necessary to register these offers on the Gifts, Benefits and Hospitality Register.

Management of the provision of Gifts, Benefits and Hospitality

- 3.30 Gifts, Benefits and Hospitality may be provided to welcome guests, facilitate the development of business relationships, further business outcomes and to celebrate achievements. Museums Victoria related Gifts are provided, rather than purchasing from external sources. Approval of provision of Gifts and Hospitality must be in line with the Gifts and Hospitality Expenses procedure. Approval of the provision of alcoholic beverages must be endorsed by the Chief Operating Officer and approved by the Chief Executive Officer.

The HOST test at Appendix B is helpful when deciding whether to provide Hospitality or Gifts to staff or stakeholders.

- 3.31 When deciding whether to provide Gifts, Benefits or Hospitality, or the type of Gift, Benefit or Hospitality to provide, Workers must ensure:
- that any Gift, Benefit or Hospitality is provided for a business reason that 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
 - that it does not raise any actual, potential, or perceived Conflict of Interest.
 - when Hospitality is provided, individuals representing Museums Victoria will behave professionally, and uphold their duty of care to other participants. If alcohol is provided, consideration will be made to minimise the associated risks
 - Hospitality expenditure is recorded and reported in accordance with accountability and reporting requirements.

- 3.32 Staff members should only attend functions if they can advance Museum business by their presence and in line with the principle of aiming to minimise the number of staff attendees at any event. The final composition is at the discretion of the Chief Executive Officer and Divisional Directors and dependent on the purpose of the function.

Breaches

- 3.33 Non-compliance with this policy will be treated as a breach of the *Code of Conduct for Victorian Public Sector Employees*, and investigated as outlined in the Staff Partnership Agreement, or if the Gift or Benefit is a Bribe, as an offence under the *Crimes Act 1958* (Vic). This includes where a Worker fails to avoid wherever possible or identify, declare and manage a conflict of interest related to Gifts, Benefits and Hospitality in accordance with Museums Victoria's Conflict of Interest Policy.
- 3.34 If a Worker considers they have been offered a bribe or inducement, the offer must be reported to the Chief Executive Officer, who should report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-corruption Commission.
- 3.35 Museums Victoria will communicate its policy on the offering and provision of Gifts, Benefits and Hospitality to contractors, consultants and other business associates. Those identified as acting inconsistently with this policy may be subject to contract re-negotiation, including termination.

Speak Up

- 3.36 Individuals who consider that Gifts, Benefits and Hospitality or Conflict of Interest within Museums Victoria may not have been declared or is not being appropriately managed should speak up and notify their manager or the Chief Operating Officer/Chief Financial Officer.
- 3.37 Workers who believe they have observed corrupt conduct in their colleagues may also make a protected disclosure directly to the Independent Broad-based Anti-corruption Commission (IBAC).
- 3.38 Museums Victoria will take decisive action, including possible disciplinary action, against individuals who discriminate against or victimise those who speak up in good faith.

Contacts for further information

- 3.39 A Conflict of Interest resulting from the acceptance of a Gift, Benefit or Hospitality may not always be clear. Workers who are unsure about a possible Conflict of Interest, or the application of this policy, should contact the Head, Strategic Information and Compliance for advice.

4 Key Definitions

- 4.1 'Bribes' are money or other inducements, given or promised to corruptly influence an individual in the performance of their role. Bribery of a public official is an offence punishable by a maximum of ten years imprisonment.
- 4.2 '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.

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.

- 4.3 'Conflicts of Interest' occur when a Worker's private interests conflict with their public duty. Workers 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.

Actual Conflict of Interest: There is a real conflict between an employee's public duties and private interests.

Potential Conflict of Interest: 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 Conflict of Interest: 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.

- 4.4 'Gifts, Benefits and Hospitality' are free or heavily discounted items, intangible Benefits or Hospitality exceeding common courtesy that are offered to Museums Victoria Workers in association with their work.

'Gifts' are free or discounted items or services and any item or service 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), consumables (e.g. chocolates) and services (e.g. painting and repairs). Fundraising by public sector organisations that is consistent with relevant legislation and any government policy is not prohibited under the minimum accountabilities.

'Benefits' – includes preferential treatment, privileged access, favours or other advantage offered - includes offers of club membership, invitations to industry, sporting, cultural or social events, which are not Official Business Events, access to discounts and loyalty programs, sponsored travel and accommodation, and promises of a new job. 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.

'Hospitality' is the friendly reception and entertainment of guests, ranging from light refreshment at a business meeting or seminar / conference, to expensive restaurant meals, and sponsored travel and accommodation.

Offers that are made up of a combination of the above should be defined by the component that it is the dominant purpose of the offer.

Offers of a gift as an item at any time, including offers made when attending an event, should be separately registered (if required) on all occasions.

- 4.5 'Gifts, Benefits and Hospitality Declaration' is the online form used to declare reportable gifts. It is available through the Museums Victoria intranet: Musenet.
- 4.6 'Gifts, Benefits and Hospitality Register' is a register of reportable Gifts, Benefits or Hospitality. It records the date of offer, information about the donor and recipient, the

nature of the Gift, Benefit or Hospitality, its estimated Value and how it was handled (ie declined or accepted (with evidence of line manager approval). The Register is maintained by the Chief Operating Officer and is used for auditing, reporting and attestation purposes. The Audit and Risk Committee will review the Gifts, Benefits and Hospitality Register at least annually to ensure there is no evidence of attempts to improperly influence the decisions or actions taken by Museums Victoria.

- 4.7 'Official Business Event': Museums Victoria's business activities span programs and projects that require Workers to interact extensively with the private and public sectors in the pursuit of Museums Victoria's strategic objectives. Museums Victoria's Workers may be invited to attend ticketed public events, which commonly form part of a program of activity, and may occur inside or outside normal business hours. These include events where the organiser is providing Museums Victoria with a specified number of tickets or passes as part of their agreement with Museums Victoria for the event's conduct.

Excluded from Official Business Events are activities for which Museums Victoria has paid attendance fees, including through membership fees, and those which appear to be limited to Hospitality or personal Benefit such as: private breakfasts, dinners, lunches, Christmas functions, golf days, comedy nights, etc.

- 4.8 '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 the gift, benefit and hospitality register
- 4.9 '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.
- 4.10 Reportable Gifts, Benefits or Hospitality' is one of significant Value (defined as being at or above an estimated \$50) that is accepted or declined. Two or more offers less than \$50 may be considered a Reportable Gift, Benefit or Hospitality if the same person makes similar offers to more than one person in the same area of the organisation, or to the same person over a 12-month period – it is incumbent upon the Worker and their line manager to monitor this and report accordingly. Gifts, Benefits or Hospitality of less than \$50 are considered as being of nominal Value. A person, or their manager, can register Gifts, Benefits or Hospitality of any Value on the Gifts, Benefits or Hospitality Register.
- 4.11 'Value' is the estimated or actual Value in Australian dollars. The threshold of \$50 for registration purposes applies in both Australia and overseas. It is to be calculated on a per person basis.
- 4.12 'Worker' is defined as an individual who carries out work in any capacity, and includes: employees, contractors, subcontractors, volunteers, and Board members.

5. Related Policies

- Conflict of Interest Policy
- Corporate Partnerships Policy
- Financial Management (Code of Practice) Policy
- Fraud and Corruption Control Policy
- Fundraising and Philanthropy Policy
- Procurement Policy

- Risk Management Policy

6. Associated Documents, Guidelines and Procedures

- Attendance at Official Business Events Procedure
- Code of Conduct for Directors of Victorian Public Entities
- Code of Conduct for Victorian Public Sector Employees
- Department of Jobs, Precincts and Regions' Gifts, Benefits and Hospitality Policy
- Gifts and Hospitality Expenses Procedure
- Standing Directions of the Minister for Finance 2018 under *the Financial Management Act 1994*.
- Museums Victoria Staff Partnership Agreement 2016
- Victorian Public Sector Gifts, Benefits and Hospitality Policy Framework (Victorian Public Sector Commission)

7. Legislation

- *Crimes Act 1958* (Vic.)
- *Financial Management Act 1994* (Vic.)
- *Independent Broad-based Anti-Corruption Commission Act 2011*
- *Public Administration Act 2004* (Vic.)

Appendix A:

The G I F T test in the following Table outlines the considerations in determining whether to accept or decline a gift. If in doubt, ask your Manager.

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?
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 past 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 B:

HOST test

The HOST test in the following table is helpful when deciding whether to provide Hospitality or gifts to staff or stakeholders. Take the HOST test and if in doubt, ask your Manager.

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 C:

Minimum Accountabilities

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 more¹) 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.

¹ Except where a person employed under the *Education and Training Reform Act 2006* in a Victorian Government school receives an offer from or on behalf of a parent, guardian, carer or student intended to express appreciation of the person's contribution to the education of a student or students, in which case non-token includes any offer worth more than \$100.

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.