

Gifts Benefits and Hospitality Policy and Procedure

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1. Purpose

The Gordon has issued this policy to support behaviour consistent with the Code of Conduct for Victorian Public Sector Employees and/or the Code of Conduct for Directors of Victorian Public Entities (the Code).

This Policy and Procedure is intended to support individuals and The Gordon to avoid conflicts of interest and maintain high levels of integrity and public trust in line with the Standing Directions of the Minister of Finance 2018.

This Policy supports behaviour consistent with the Institute’s Code of Conduct and sets out how the organisation and employees:

- Respond to offers of gifts benefits and hospitality
- Provide gifts benefits and hospitality

The organisation is working to develop a culture of “thanks is enough”, moving away from acceptance even where permitted under the policy.

2. Scope

This Policy and Procedure applies to all workplace participants including board members, executives, managers, individuals, contractors, consultants and any individual/s or groups undertaking activity for or on behalf of The Gordon.

This Policy and Procedure does not apply to donations and sponsorship (refer to *Sponsorship Policy MARK PO 02*).

This policy does not apply to gifts, benefits and hospitality provided to employees by The Gordon.

3. Policy

Under the Instructions supporting the *Standing Directions of the Minister for Finance 2018*, the Victorian Public Sector Commission has set binding minimum accountabilities for the appropriate management of gifts, benefits and hospitality.

4. Minimum accountabilities - offers made to employees

The Victorian Public Sector Commission (VPSC) issues minimum accountabilities for the management of gifts, benefits and hospitality which are binding on The Gordon.

These are as follows:

4.1 Do not seek or solicit gifts, benefits and hospitality

Individuals must not seek or solicit gifts, benefits and/or hospitality.

4.2 Integrity test - Offers you must refuse

Individuals will refuse all offers of gifts that may be one of the following:

- i. **Money** – Money or items used in a similar way to money, or items easily converted to money.
- ii. **Conflict of interest** – may give rise to an actual, potential or perceived conflict of interest.

Example:

You are involved in managing a tender for a major contract and as a part of the process are required to interview each applicant. One applicant offers to host the meeting in their office and provide food for the meeting. Even if the value of the meal was well below \$50, it would be reasonable for people to believe it could influence the decision on how the public duty of impartially in awarding the contract was performed. The offer must be declared and refused.

- iii. **Public Trust** - may adversely affect their standing as a public official or which may bring their public sector employer or the public sector into disrepute.
- iv. **Community expectations** – you must refuse the offer if it is not consistent with community expectations. Non-token offers without a legitimate business benefit.
- v. **Bribes** - You must refuse the offer if it could reasonably be seen as a bribe or other inducement. Report the offer to the head of your 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).
- vi. **Non-token offer without a legitimate business reason** - you must refuse a non-token offer unless there is a legitimate business reason to accept it. The offer must further the conduct of official business or other legitimate goals of The Gordon, the public sector or the State. Offers of sponsored hospitality, travel and/or accommodation such as to attend an industry conference or tour or as part of a tender process must be declined. If the event or function is in the interest of The Gordon, the Institute will pay for the travel/accommodation. Where there is no clear benefit to the Institute, the invitation should be declined.

Example:

You are required to meet with a supplier to conduct business. The supplier invites you to meet them at a corporate box during a sporting event paid fully by the supplier. There is no legitimate business reason for the meeting to take place in this way. The offer must be refused and declared.

- vii. **Repeat offers** – these are multiple offers from the same person, group or organisation. Their combined effect can lead to the perception that they could influence you.

Example

You are responsible for managing a relationship with one of our suppliers, often meeting them at a café because it's a convenient place for both parties to meet. The supplier has offered to pay for your coffee. It may be appropriate for you to accept the offer a single time or perhaps occasionally. However, if the supplier offers every or most times it would not be appropriate to accept each time or more than occasionally, because it could create the perception of influence. A member of the public could reasonably infer that you expect suppliers to pay for your food and drink when you meet and that this may influence your decision making.

- viii. **Decisions you are likely to make or influence** – refuse the offer if it is from a person, group or organisation you are likely to make or influence a decision about in the foreseeable future. This could be seen as a conflict of interest.

The only exception is that you can accept an offer if it is:

- Token hospitality

- A learning opportunity e.g., webinar and all of the following apply:
 - It is relevant to your work duties
 - It has a legitimate business reason / benefit
 - It is free to all attendees
 - The covering or discounting of additional costs (travel, accommodation) is not included in the offer
 - It is consistent with community expectations

- ix. **Offers by suppliers or contractors** for free or discounted development opportunities that they were not engaged to supply will not pass the integrity test in some circumstances. These may only be accepted where there is a legitimate business reason, attendance meets community expectations and any risk of conflict of interest can be appropriately managed.

Examples:
An organisation you are likely to make, or influence, a decision about in the foreseeable future offers you a learning opportunity that is relevant to your work duties and has a legitimate business benefit. It is free for all attendees.
You can accept the offer if it is also consistent with community expectations.

An offer to attend a free webinar is far more likely to be consistent with community expectations than an offer to attend a conference – particularly if the latter includes accommodation, travel or related benefits, such as a gala dinner.
Refuse the offer if it is made by a person, group or organisation whose primary purpose is to lobby ministers, members of parliament or public sector agencies.

- x. **Endorsement** – refuse offer if accepting it would be seen as endorsing a product or service.

Example:
We are offered several vehicles to use by a dealership. The dealership is making the offer on the basis that it can include advertising indicating that it is the preferred dealer of vehicles to Government. In this instance the offer should be refused.

- xi. **Advantage to a supplier or sponsor** – refuse the offer if accepting it could be seen as advantaging a supplier or sponsor in a future procurement.

Example:
You are attending a conference, paid for by The Gordon, as part of your work. At the conference you should avoid accepting offers from the sponsors of the conference or any exhibitors. A member of the public might see this as an attempt by the offeror to make The Gordon more favourable to them in the future.

- xii. **Sufficient attendees** - For hospitality and events, refuse the offer if The Gordon will already be sufficiently represented to meet its business needs or – as is the case for all other offers – if it does not comply with other elements of the integrity test.

- xiii. **Other** – offers should also be declined if they are extended to the individuals relatives or friend or, made in secret.

4.3 Declining offers

In most cases where the offer should or must be refused, you should decline it at the time the offer is made. There are occasions where this may be difficult:

- Offer has arrived via mail making it difficult to decline
- Declining the offer may cause offence or be unsafe.
- There may be some other reason why in the moment you are unable to decline.

4.4 Token offers – what you must do

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.

You can only accept the offer if it passes the 'integrity test' (item 8).

- Remember, thanks is enough. Do you need to accept?
- You do not need to declare the offer.
- You do not need a legitimate business reason to accept.
- You do not need approval from your manager to accept.
- You are the owner of the gift, benefit or hospitality.

Individuals may accept token offers of gifts, benefits and hospitality without approval or declaring the offer on The Gordon Gifts, Benefits and Hospitality Register, Refer FIN FO 26.02

4.5 All non-token offers must be declared – what you must do

A 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 \$50 or more are deemed **non-token** offers.

There will be some exceptions where there is a legitimate business reason for accepting a non-token offer. All accepted non-token offers must be approved in writing by the individual's manager or organisational delegate, recorded in the gifts, benefits and hospitality register and be consistent with the following requirements:

- It does not raise to an actual, potential or perceived conflict of interest or have the potential to bring the individual, The Gordon or the public sector into disrepute; Refer to the "Gift" test in section 7 below.
- 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 The Gordon, public sector or the State.

Recording non-token offers of gifts, benefits and hospitality

All non-token offers, whether accepted or declined, must be recorded in The Gordon's gifts, benefits and hospitality register. The business reason for accepting the non-token offer must be recorded in the register and provide sufficient detail to link the acceptance to the individual's work functions and benefit to The Gordon, public sector or State. In the event of a multi-employee declaration The Gordon will refuse or accept on behalf of the employees and let the employees know that this has been done.

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

Unacceptable:	<p>"Networking"</p> <p>"Maintaining stakeholder relationships"</p>
Acceptable:	<p>"Individual is responsible for evaluating and reporting outcomes of The Gordon's sponsorship of Event A. Individual attended Event A in an official capacity and reported back to The Gordon on the event."</p> <p>"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 Gordon's property."</p>

Individuals may be offered a gift of hospitality where there is no opportunity to seek written approval 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 within five (5) business days.

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 organisation, irrespective of value, and should be accepted by individuals on behalf of The Gordon. The receipt of ceremonial gifts should be recorded on The Gordon's register but this information does not need to be published online.

4.7 Ownership of gifts offered to individuals

Non-token gifts (greater than \$50 and less than \$200) 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 Gordon into disrepute, consistent with community expectations and where their manager or organisational delegate has provided written approval.

Non-token gifts (greater than \$200) with a legitimate business benefit that have been accepted by an individual for their work or contribution must be transferred to The Gordon where the gift is not likely to bring them or The Gordon into disrepute, consistent with community expectations and where their manager or organisational delegate has provided written approval.

4.8 Offers made to our organisation

In the event an offer is made to the Gordon, for example the donation or use of equipment or offers which are made to provide The Gordon with a benefit like discounts, free tickets or equipment for employees must be assessed to consider whether the offer passes the integrity test in 4.2 ensuring they have done their due diligence being careful to scrutinise:

- The people or organisation making the offer
- The nature and circumstances of the offer
- The level of public benefit if the offer is accepted.

The Gordon is required to reject any offer which is not consistent with community expectations.

Donations or gifts given on The Gordon's behalf, where an individual or business that has a relationship with our organisation seeks to donate or gift to a third party like a charity in our name or on our behalf must be approved by executive members. There are reputational risks associated with any donation or gift made on our behalf. Where there is no opportunity to refuse the donation or gift and had has already occurred the parties are required to be made aware of our expectations of donations made in our name can only occur with a formal offer and approval. In the situation where it has occurred without prior approval it is required to be listed on the gifts, benefits and hospitality register noting that there was no opportunity to accept or refuse.

4.9 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 Gordon's functions and objectives and with the individual's role.

4.10 Report to audit committee

The Gordon's Audit and Risk Management Committee will receive a report at least annually on the administration and quality control of this policy, related processes and register. The report will include analysis of The Gordon'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.

4.11 Accountability Publishing the gifts, benefits and hospitality register on website

The Institute's gift, benefits and hospitality register will be published on The Gordon website. The public register will contain a subset of the information detailed in The Gordon's internal register.

5. Minimum accountabilities - providing to others

Integrity test - providing gifts, benefits and hospitality to business associate

When providing gifts, benefits and hospitality on behalf of the Gordon, you must ensure the following:

- It is for a **business reason**, there must be a legitimate business benefit that furthers the conduct of official business or other legitimate goals of our organisation, the public sector or the State. They may be provided to welcome guests, facilitate the development of business relationships, further public sector business outcomes and to celebrate achievements.
- There is **no conflict of interest**, actual or perceived.
- **Proportionate costs** – any costs incurred are proportionate to the benefits obtained.
- **Consistent with community expectations** – ensure that the event would be considered reasonable and consistent with community expectations.

Example:

The Gordon is running a workshop for all staff, with mandatory attendance. It is an all-day event and we have organised catering to provide lunch for all attendees. This is a legitimate business reason for our organisation to provide hospitality. It does not raise a conflict of interest, it is proportionate in costs, and it is consistent with community expectations

Refer to the 'Host' test in section 7 below for guidance on gifts, benefits or hospitality to others.

Our organisation has processes and procedures for providing gifts, benefits and hospitality at internally focussed events and externally focussed events. These requirements must be complied with. For example, requirements in relation to alcohol, financial expenditure and approval, catering for employees and for office functions, reward and recognition programs and recording and reporting.

When hospitality is provided, individuals must demonstrate professionalism in their conduct, and uphold their obligation to extend a duty of care to other participants.

6. Policy breaches

A breach of the policies or processes contained in this document may constitute a breach of binding codes of conduct and may result in disciplinary action. A breach may also constitute criminal or corrupt conduct.

Dealing with an alleged breach

If you may have breached this policy notify your manager in writing immediately. This enables us to assess how best to mitigate the risk – for example, we may arrange to return the gift.

The Gordon will respond to alleged breaches of this policy consistent with the Act, the code, this policy and any other obligations that apply. A graduated approach will be undertaken ensuring that the response will be fair, reasonable and proportionate. In some instances, no action will be taken. In others, we will deal with the matter:

- On an informal basis, for example, through education or counselling
- Through a performance management process or similar, or
- If other methods are not appropriate, through a misconduct process.

A finding of misconduct may amount to a breach of the code of conduct. Serious misconduct can result in termination of employment.

Contractors may be subject to contract renegotiation or termination.

If a criminal offence may have occurred, the Victorian or Federal Police may investigate and prosecute.

You are encouraged to speak up if you believe a breach of this policy has happened, is happening or might be about to happen. You can do so by notifying your manager or if you believe corrupt or improper conduct is occurring, you can make a complaint directly to the Independent Broad-based Anti-Corruption Commission (IBAC) or the Victorian Ombudsman. This can occur on a whistle-blower basis as a public interest disclosure.

The Gordon will respond to any reports of breaches by ensuring they:

- Actively support and protect employees who speak up in good faith
- Take decisive action, including possible disciplinary action, against anyone who discriminates against or victimises an employee who speaks up in good faith
- Respond in a constructive manner to the information provided.

7. Procedure

Action	Responsibility	Guidance	
Being offered and accepting or declining gifts, benefits and hospitality			
Being offered and accepting or declining gifts, benefits and hospitality	All staff participants	<p>Refuse all offers of gifts that:</p> <ul style="list-style-type: none"> • Are money, items used in a similar way to money, or items easily converted to money. • Give rise to an actual 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? <p>Refuse bribes or inducements and report inducements and bribery attempts to the CEO.</p>	
	CEO	Report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-Corruption Commission).	
	All staff participations	If unsure as to whether you should accept or decline a gift, benefit or hospitality refer to the following gift test. If in doubt, seek the advice of your manager.	
		G	<p>Who is providing the gift, benefit or hospitality and what is their relationship to me?</p> <p>Giver</p> <p>Does my role require me to select contractors, award grants, or determine policies? Could the person or organisation benefit from a decision I make?</p>
I		<p>Are they seeking to influence my decisions or actions?</p> <p>Influence</p> <p>Has the gift, benefit or hospitality been offered to me publicly or privately? Is it a courtesy, a token of appreciation or highly valuable? Does its timing coincide with a decision I am about to make?</p>	
F		<p>Are they seeking a favour in return for the gift, benefit or hospitality?</p> <p>Favour</p> <p>Has the gift, benefit or hospitality been offered honestly?</p> <p>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	<p>Would accepting the gift, benefit or hospitality diminish public trust?</p> <p>Trust</p> <p>How would I feel if the gift, benefit or hospitality became public knowledge? What would my colleagues, family, friends or associates think?</p>		

Action	Responsibility	Guidance			
Recording gifts, benefits and hospitality	All staff participants	Where a gift benefit or hospitality is offered, whether accepting or declining an offer and its value is estimated to be \$50 or more, report the gift by completing Gifts, Benefits and Hospitality Declaration Form FIN FO 26.01 and seek approval from the relevant supervisor at Board Chair, CEO, Executive Director / COO, Chief Finance Officer or Manager level. In the case of the Board Chair, approval will be sought from another Independent Board Director.			
	Relevant Responsible Manager	Consider the circumstances of the offer in the context of this policy and procedure and either approve or disapprove.			
	All staff participants	If acceptance of the gift benefit or hospitality is not approved by the relevant supervisor it must be returned to the person making the offer.			
		Forward the completed and authorised form to the Chief Finance Officer within 10 business days.			
	Chief Finance Officer	Whether accepted or declined, record the offer, gift benefit or hospitality on The Gordon Gifts, Benefits & Hospitality Register for the relevant annual period.			
All staff participants	<p>Non-token gifts with a legitimate business benefit that have been accepted by an individual for their work or contribution where the gift is not likely to bring them or The Gordon into disrepute, and where their manager or organisational delegate has provided written approval. Ownership guidelines based on gift value:</p> <ul style="list-style-type: none"> • Greater than \$50 and less than \$200: Individual may retain. • Greater than \$200: Surrender to The Gordon. • Gifts of cultural significance, irrespective of value: Surrender to The Gordon. 				
Provide gifts, benefits and hospitality to external parties	All staff participants	<p>Ensure that any gift, benefit and hospitality offered is provided for a business purpose and that any cost is proportionate to the benefits obtained for The Gordon, and would be considered reasonable in terms of community expectations.</p> <p>If unsure as to whether you should accept or decline a gift, benefit or hospitality refer to the following host test. If in doubt, ask the advice of your manager.</p>			
		<table border="1"> <tr> <td data-bbox="719 1400 770 1628">H</td> <td data-bbox="770 1400 943 1628">Hospitality</td> </tr> </table>	H	Hospitality	<p>To whom is the hospitality being provided?</p> <p>Will recipients be external business partners, or individuals of the host organisation?</p>
		H	Hospitality		
O	Objectives	<p>For what purpose will hospitality be provided?</p> <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>			

Action	Responsibility	Guidance	
		S Spend	<p>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?</p>
		T Trust	<p>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?</p>
<p>When providing hospitality, demonstrate professional conduct, and uphold your obligation to extend a duty of care to other participants.</p>			
<p>Reporting and Publishing of Gifts, Benefits and Hospitality</p>	<p>Chief Finance Officer</p>	<p>Provide an annual report to The Gordon Board Audit & Risk Management Committee on the administration and quality control the Institute gifts, benefits and hospitality policy and procedure, 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.</p> <p>Publish the organisation's gifts, benefits and hospitality policy and procedure and register on the organisation's public website. The published register should cover the current and the previous financial year and include the following detail:</p> <ul style="list-style-type: none"> • Date offered • Offered to (individual's name, position, unit/division) - [Name may be de-identified when published on the organisation's website] • Description of the gift, benefit or hospitality • Estimated or actual value • Cumulative value of offers made by individual/organisation • Offered by (name of individual/organisation making the offer) • Decision regarding the offer: <ul style="list-style-type: none"> a) declined or accepted (state which) b) ownership (e.g., state whether individual retained; was transferred to Institute's ownership; returned to offeror etc.) 	

8. Responsibilities

Position	Responsibility / Governance
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Chief Finance Officer	Provides policy and procedure, oversight and review and maintains The Gordon Gifts, Benefits and Hospitality Declaration register.
Staff and contractors	Comply with this policy and procedure.

9. Definitions

The following terms and abbreviations are specific to this policy and procedure:

Name	Description
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. 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.
Business associate	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.
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 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.
Conflicts of interest	Actual conflict of interest is where there is a real conflict between an employee's public duties and private interests. Potential conflict of interest is where 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 is where 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	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 policy is not prohibited under the minimum accountabilities.
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.
Internal Register	The official record of all declarable offers of gifts, benefits and hospitality made to the Gordon and its employees, whether accepted or declined.
Public Register	The official record of information made public from the Internal Register.
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.
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 accepting the offer? 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 or raising an actual, potential or perceived

	conflict of interest, it cannot be worth \$50 or more (including cumulative offers from the same source over a 12-month period).
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 \$50 or more are non-token offers and must be recorded on a gift, benefit and hospitality register (except for specific offers received by a person employed in a Victorian Government school, as defined under 'token offer').

10. Key Aligned Internal Documents

Refer to the [Operational Management System \(OMS\)](#) for copies of all policies, procedures and supporting documents.

Gifts, Benefits and Hospitality Declaration Form FIN FO 26.01

The Gordon Gifts, Benefits and Hospitality Declaration Register FIN FO 26.02

Employee Code of Conduct SHRD RD 20.01

Declaration of Interest Policy and Procedure SHRD PO 16

11. Key Aligned Legislation / Documents

[VPSC Gifts Benefits and Hospitality Policy Guide](#)

[Standing Directions of the Minister for Finance](#)

[Code of Conduct for Victorian Public Sector Employees](#)

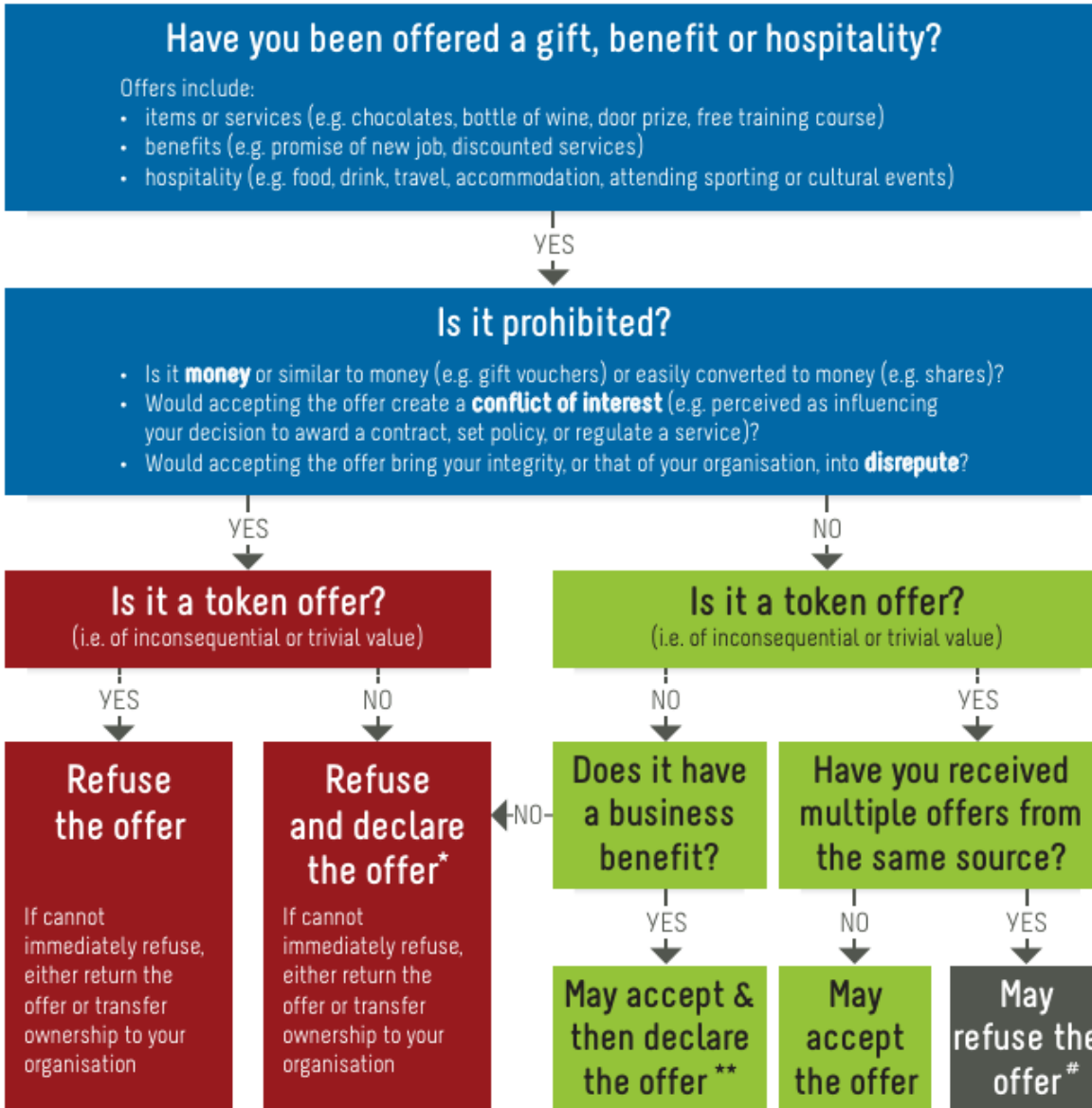
[Code of Conduct for Directors of Public Entities](#)

12. Review and Approval

Business Process Owner	Chief Finance Officer		
Endorsed by (if applicable)	Audit and Risk Management Committee	Approved Date	24 July 2024
Approved by:	The Gordon Board	Approved Date	1 August 2024
Review schedule	This policy and procedure will be reviewed every 3 years (or earlier as required)		
Date of next review	1 August 2027		

Minor Structure changes outside of Review schedule		
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13. Schedule A – flowchart determining action to be taken



* Generic, bulk event invitations that are declined (e.g. spam email offers) do not need to be declared.
 ** Hospitality from Victorian public sector organisations does not need to be declared.
 # More than one token offer may be accepted. However, care should be taken to ensure that multiple offers are not used as a device to avoid offers being recorded on the register.