
Title GIFTS, BENEFITS & HOSPITALITY

PURPOSE

This policy states Alfred Health's position on:

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

This policy is intended to support individuals and the Alfred Health to avoid conflicts of interest and maintain high levels of integrity and public trust.

Alfred Health has issued this policy to support behavior 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 policy.

APPLICATION

This policy applies to all workplace participants. For the purpose of this policy, this includes: all employees, Board members, Visiting Medical Officers, contractors¹, consultants and any individuals or groups undertaking activity for or on behalf of Alfred Health.

POLICY PRINCIPLES

This policy has been developed in accordance with requirements outlined in the *Minimum accountabilities for managing gifts, benefits and hospitality* issued by the Victorian Public Sector Commission.

Alfred Health is committed to and will uphold the following principles in applying this policy:

Public interest: individuals 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 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 policy, 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.

Risk-based approach: Alfred Health, through its policies, processes and audit committee, 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 in their team's work and functions and monitor the risks to which their direct reports are exposed.

¹ Note the application of clause 1.4 of the Code of conduct for Victorian public sector employees to the engagement of contractors and consultants. Contractors and consultants are only bound by the code if explicitly required by their contract for services.

Title GIFTS, BENEFITS & HOSPITALITY

MINIMUM ACCOUNTABILITIES

The Victorian Public Sector Commission has set binding minimum accountabilities for the appropriate management of gifts, benefit and hospitality. These can be found at Appendix A.

POLICY STATEMENT/S**DEFINITIONS**

Business associate an external individual or entity which the organisation has, or plans to establish, some form of business relationship, or who may seek commercial or other advantage by offering gifts, benefits or hospitality.

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.

Conflicts of 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.

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.

Legitimate business benefit gifts, benefits and hospitality accepted or provided for a business purpose, in that it furthers the conduct of official business or other legitimate goals of the organisation, public sector or State.

Public official has the same meaning as under section 4 of the Public Administration Act 2004. This includes:

- public sector employees;
- statutory office holders; and
- directors of public entities.

Register is a record, preferably electronic, of all declarable gifts, benefits and hospitality. It records the date an offer was made and by whom, the nature of the offer, its estimated value, the raising of any actual, potential or perceived conflicts of interest or reputational risks and how the offer was managed. For accepted offers, it details the business reason for acceptance and the officer approving the acceptance.

Title GIFTS, BENEFITS & HOSPITALITY

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.

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 more than \$50 (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 more than \$50 are non-token offers and must be recorded on a gift, benefit and hospitality register.

MANAGEMENT OF OFFERS OF GIFTS, BENEFITS AND HOSPITALITY

This section sets out the process for accepting, declining and recording offers of gifts, benefits and hospitality.

Token offers

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.

Individuals may accept token offers of gifts, benefits and hospitality without approval or declaring the offer on the Alfred Health register.

Individuals are to refuse all offers (excluding token hospitality, such as sandwiches over a lunchtime meeting, modest box of chocolates or flowers as a token of thanks etc.) made by a current or prospective supplier or by anyone involved in a procurement or tender process.

Requirement for refusing non-token offers

Individuals should consider the GIFT test at **Table 1** and the requirements below to help respond to a non-token offer.

Individuals are to refuse non-token offers:

- likely to influence them, or be perceived to influence them, in the course of their duties or raise an actual, potential or perceived conflict of interest;
- by a person or organisation about which they will likely make a decision (also applies to processes involving grants, sponsorship, regulation, enforcement or licensing);
- likely to be a bribe or inducement to make a decision or act in a particular way;
- that extend to their relatives or friends;
- with no legitimate business benefit;
- 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;

Title GIFTS, BENEFITS & HOSPITALITY

- 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 agencies; and
- made in secret.

If an individual considers they have been offered a bribe or inducement, the offer must be reported to the Chief Executive or their delegate (who should report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-Corruption Commission).

Table 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 contractors, 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 valuable non-token offer? Does its timing coincide with a decision I am about to make or endorse a product or service?</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?</p> <p>What would my colleagues, family, friends or associates think?</p>

Requirements for accepting 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 Executive Director or authorised delegate, recorded 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 individual, the Alfred Health or the public sector into disrepute (the 'GIFT' test at **Table 1** is a good reminder of what to think about in making this assessment); and
- 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 to the Alfred Health, public sector or the State.

Title GIFTS, BENEFITS & HOSPITALITY

Individuals may be offered a gift or 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 from their Executive Director or authorised delegate within five business days.

Recording non-token offers of gifts, benefits and hospitality

All non-token offers, whether accepted or declined, must be recorded in the Alfred Health'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 Alfred Health, public sector or State.

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

Unacceptable: "Networking"

"Maintaining stakeholder relationships"

Acceptable: "Individual is responsible for evaluating and reporting outcomes of the Alfred Health's sponsorship of Event A. Individual attended Event A in an official capacity and reported back to the Alfred Health on the event."

"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 Alfred Health's property."

Approving Gifts

Approval to accept an offer of a non-token gift, benefit or hospitality must be sought and obtained from an employee's Executive Director or the Chief Executive prior to acceptance. Employees must request approval by completing the Authorisation to Accept a Gift Declaration (which is included in appendix B).

In deciding whether to approve the acceptance of an offer of a gift, the Chief Executive or Executive Director should use sound judgement to ensure there can be no reasonable public perception of partiality. In particular consideration should be given to:

- Why the offer was made;
- The frequency of offers from particular suppliers. For example, one function per year may be acceptable, whereas attending functions on a monthly basis would not;
- The nature of the offer. Events with a clear networking focus with staff from other hospitals or similar professions, or with an associated educational or professional development presentation would more likely to be acceptable;
- Who has been invited? An event with representatives from multiple hospitals is more likely to be acceptable than one-on-one dining or entertainment. In some circumstances the nature of the event might make it appropriate for an employee's partner to attend, but other family members should not be considered;
- The relationship between the donor and the recipient. If the employee is in a position to provide advice or make decisions on matters including (but not limited to) tendering outcomes, granting licences, inspecting and regulating businesses or giving approvals, it is more likely the gift would be perceived as inappropriate;

Title GIFTS, BENEFITS & HOSPITALITY

- The transparency and openness of the gift. If the gift is offered to an employee in a public forum, it is less likely to be perceived as a gift of influence than if it were offered in a private context.

Approval Authorities

Employees must seek approval to accept a gift that exceeds the nominal value from the following authorised delegates:

Employee	Authorised Delegate
All Staff	Executive Director or CEO
Executive Director	CEO
CEO	Board Chair*

CEO* all gifts, benefits and hospitality received are reported annually to the Secretary of the Department of Health.

Reporting of Gifts and Benefits

Employees must declare all non-token gifts which they are offered, regardless of whether or not those gifts are accepted. Declaration is through the Gifts and Benefits Register, which is located [here](#).

If multiple gifts, benefits or hospitality are received from the same donor by an employee and in any financial year the cumulative value of these is more than \$50 then each individual gift, benefit or hospitality event must be declared.

The Executive Director of Finance will be responsible for ensuring the gifts and benefits register is subject to regular review and is reviewed annually by the Audit Committee. The purpose of the review should include analysis for repetitive trends or patterns which may cause concern and require corrective and preventive action.

The Alfred Health's Audit Committee will receive a report at least annually on the administration and quality control of the gifts, benefits and hospitality policy, processes and register. The report will include analysis of Alfred Health'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.

Ownership of gifts offered to individuals

Non-token gifts accepted by an individual for their work or contribution may be retained by the individual where their authorised delegate has provided written approval. Employees must transfer to the Alfred Health official gifts or any gift of cultural significance or significant value (over \$50).

Title GIFTS, BENEFITS & HOSPITALITY

Transferring Gifts to the organisation's ownership

Representing Alfred Health

When employees attend a conference as a participant or a speaker or apply for an award in recognition of their public sector work, they are representing the organisation. Consequently, any benefits accruing from the employee's activities belong to Alfred Health if greater than the nominal value. This includes door prizes, fees for speaking and financial grants. Details of any revenue from fees and grants must be recorded on the Gift Register and in the case of grants, Alfred Health may choose to use the gift to fund the employee's further work or development.

Ceremonial and other significant gifts

International delegations may offer ceremonial gifts on behalf of their country or organisation to an employee. Ceremonial gifts of significant value become the property of Alfred Health and should be recorded on the asset register. If these gifts are of cultural significance they may be offered to an appropriate public institution such as the Melbourne Museum, National Gallery of Victoria or similar organisation. Significant gifts or the proceeds from their sale may be donated to The Alfred Foundation.

Sponsored Travel and Accommodation

Employees must not accept **personal** sponsorship or offers of other support from suppliers. For example, offers of sponsored travel for the purpose of assessing new medical equipment located at a supplier's premises or in operation at other hospitals or healthcare organisations must be declined because of the potential for a conflict of interest. However, if the offer is considered to be in the best interests of the public or Alfred Health you may apply via the appropriate process to seek approval. If the matter is of personal interest, all cost must be paid by the employee.

If in the course of the tender process, the evaluation panel has shortlisted suppliers or selected a piece of equipment, the panel may recommend to a relevant Executive Director that further assessment of the item is necessary before it can make an informed purchasing decision. In this situation the panel may recommend that an offer of support (in the form of free or subsidised travel) from the tenderer be accepted. As a general principle it will be a requirement of tenders that access to a working example of equipment can be provided during the tender evaluation process. The Executive Director or the Chief Executive will nominate the appropriately qualified employee/s to conduct the visit.

Suppliers may offer **corporate** sponsorship in support an Alfred Health department's research, open days, grand rounds, clinical symposiums, or functions such as Research Week. Appropriate sponsorship may be accepted where there is clear and demonstrable benefit to the public, an Alfred Health hospital or the health service or where such sponsorship allows Alfred Health to optimise limited resources.

From time to time suppliers may offer sponsorship and free or subsidised travel and/or accommodation to support an Alfred Health employee's attendance at conference or to be part of a group of clinical or technical specialists reviewing the performance of a drug or other form of medical treatment or technology as a result of that staff member's recognised expertise in the field. Staff may also be offered participation in an industry familiarisation tour which may include free or subsidised travel and accommodation. If accepted, any resulting monetary payments must be paid into the employee's cost centre for the benefit of the employee's department.

Unless the offer arises as a result of the employee's medical or technical expertise, such sponsorship must be an offer to the organisation and not to the individual employee of Alfred Health. An offer to an individual will only be considered if the recipient is attending in an official business capacity and is chairing the conference or a major session at the conference, presenting a paper, contributing their

Title GIFTS, BENEFITS & HOSPITALITY

knowledge and expertise as a recognised clinical or technical expert or otherwise making an active and essential contribution to the event. The decision on whether to accept the offer and the conditions of the acceptance will be the responsibility of the Executive Director or Chief Executive.

The distinction between corporate sponsorship (permitted except during a tender) and personal sponsorship (prohibited), is that corporate sponsorship is in the best interest of the public and provides clear and demonstrable benefit to the organisation as a whole, as opposed to being of private benefit to an individual employee.

No corporate sponsorship can be considered from a supplier if they are in the process of submitting a response to a tender request from the organisation (or other market engagement request), being evaluated as a respondent to such a request, or in negotiations with the organisation. At all other times Alfred Health encourages its suppliers and local businesses to provide support to its hospitals through The Alfred Foundation.

The following examples may be helpful in determining whether it is appropriate to accept sponsored travel or accommodation. However, given the wide range of potential offers the GIFT test should always be considered first in determining whether the offer is acceptable.

In all cases approval must be obtained from the appropriate Authorised Delegate before the offer is accepted.

Example 1:

A supplier extends an invitation direct to an Alfred Health staff member to attend their head office in Germany to view and assess new medical equipment. The invitation includes all travel and accommodation expenses.

The invitation must be declined as it was made to an individual and is deemed personal sponsorship.

Example 2:

A supplier offers a sponsorship to The Alfred for a staff member to attend their head office in Germany to view new medical equipment. If the Authorised Delegate (refer 8.2 Approval Authorities) deems that there is a clear and demonstrable benefit to the health service the Authorised Delegate may accept the sponsorship, approve the trip and select the most appropriate candidate to attend.

Example 3

X is a doctor who occasionally works as a renal specialist at the hospital. He is hoping to attend a symposium in China on the emerging field of commercial kidney donation for transplants and is seeking sponsorship for his trip. The hospital has declined due to lack of funds and interest in the symposium. X sends an email to various pharmaceutical suppliers seeking funding for the trip in exchange for promoting their products within the hospital.

This would be unacceptable as X breached the guidelines by soliciting for funds for personal benefit and compromised his position further by offering to promote the company's products. If X attends the symposium it must be at his own expense and he must not promote the products he observes at the symposium

Example 4:

Z has been invited to give a key note address and chair a major session at a medical conference in London. The conference organisers have offered to pay his conference registration, travel and accommodation. Z requires the approval of the Executive Director or Chief Executive to accept the offer. In most circumstances registration, travel and accommodation costs will be paid directly by the supplier. If any of the costs are met by making a monetary contribution, the monetary contribution must be paid to Alfred Health and placed in Z's cost centre, rather than to Z directly. The registration, travel and accommodation will then be paid by Alfred Health from that cost centre.

Title GIFTS, BENEFITS & HOSPITALITY

MANAGEMENT OF THE PROVISION OF GIFTS, BENEFITS AND HOSPITALITY

This section sets out the requirements for providing gifts, benefits and hospitality.

Requirements for providing gifts, benefits and hospitality

Gifts, benefits and hospitality may be provided to welcome guests, facilitate the development of business relationships, further public sector business outcomes and to celebrate achievements.

When deciding whether to provide gifts, benefits or hospitality or the type of gift, benefit or hospitality to provide, individuals 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 **Table 2** is a good reminder of what to think about in making this assessment); and
- it does not raise an actual, potential or perceived conflict of interest.

Table 2. HOST test

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?

Containing costs

Individuals should contain costs involved in the provision of gifts, benefits and hospitality wherever possible. The following questions may be useful to assist individuals to decide the type of gift, benefit or hospitality to provide:

- Will the cost of providing the gift, benefit or hospitality be proportionate to the potential benefits?
- Is an external venue necessary or does the organisation have facilities to host the event?
- Is the proposed catering or hospitality proportionate to the number of attendees?

Title GIFTS, BENEFITS & HOSPITALITY

- Does the size of the event and number of attendees align with intended outcomes?
- Will providing the gift, benefit or hospitality be viewed by the public as excessive?
- Is the proposed catering or hospitality in accordance with Entertainment and Expenditure Guidelines?

BREACHES

Disciplinary action consistent with the relevant industrial instrument and legislation, including dismissal, may be taken where an individual fails to adhere to this policy. This includes where an individual fails to avoid wherever possible or identify, declare and manage a conflict of interest related to gifts, benefits and hospitality in accordance with the Alfred Health's Conflict of interest policy.

Actions inconsistent with this policy may constitute misconduct under the *Public Administration Act 2004*, which includes:

- breaches of the binding *Code of conduct for Victorian public sector employees*, such as sections of the Code covering conflict of interest (section 3.7), public trust (section 3.9) and gifts and benefits (section 4.2); and
- individuals making improper use of their position.

For further information on managing breaches of this policy, please contact the Legal Department.

SPEAK UP

Individuals who consider that gifts, benefits and hospitality or conflict of interest within the Alfred Health may not have been declared or is not being appropriately managed should speak up and notify their manager or authorised delegate.

The Alfred Health 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

A conflict of interest resulting from the acceptance of a gift, benefit or hospitality is not always clear to those who have them. Individuals who are unsure about the acceptance of a gift, benefit or hospitality, or the application of this policy, should ask their manager or authorised delegate for advice.

Title GIFTS, BENEFITS & HOSPITALITY**RELATED POLICY, LEGISLATION AND OTHER DOCUMENTS**

- Victorian Public Sector Commission's *Gifts, benefits and hospitality policy framework* including the minimum accountabilities for the management of gifts, benefits and hospitality.
- Alfred Health's Conflict of interest policy
- *Public Administration Act 2004*
- Code of conduct for Victorian public sector employees 2015
- Code of conduct for Directors of Victorian public entities 2016
- Alfred Health Code of Conduct
- Alfred Health Corporate Credit Card Policy & Guideline
- Alfred Health Procurement Policy
- Alfred Health Financial Code of Practice
- Alfred Health Code of Conduct: Board of Directors

EVALUATION

- The number of breaches of this policy detected each year.

AUTHOR / CONTRIBUTORS

- * denotes key contact

Name	Position	Service / Program
Mark Berryman	Director Supply Chain	Supply Chain
Sean Curtain	Director Workforce	Workforce
Lee Hamley	CMO	Medical Services
David Ruschena	Legal Counsel	Legal Services
Peter Joyce	Executive Director, Finance	Finance
Matthew Dodds	Manager, Financial Control	Finance
Rachelle Anstey	Director, Financial services	Finance

Endorsed by: Peter Joyce	Name/Title: Executive Director, Finance	Date: 6 th June 2013
Approved by: Alfred Health Executive Committee		Date: 19 th June 2013
Disclaimer: This procedure has been developed within the context of Alfred Health service delivery. Alfred Health shall not be responsible for the use of any information contained in this document by another organisation outside of Alfred Health.		

Appendix A

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 more) 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.
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.

Title GIFTS, BENEFITS & HOSPITALITY

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. Establish, implement and review organisational policies and processes for the effective management of gifts, benefits and hospitality that comprehensively address these minimum accountabilities.

Title GIFTS, BENEFITS & HOSPITALITY

Appendix B

Authorisation to accept a gift, benefit or hospitality form

This declaration form supports Alfred Health's Gifts, benefits and hospitality policy. Employees must declare all non-token offers of gifts, benefits and hospitality (whether accepted or declined) on and seek written approval from their manager or organisational delegate to accept any non-token offer.

Part A - Individual to complete	
1. Declaration date	
2. Name, position and unit/division	
Details of the gift, benefit or hospitality	
3. Date offered	
4. Describe the gift, benefit or hospitality offered	
5. Estimated or actual value	
6. Offered by (name of individual/organisation making the offer)	
7. Is the person or entity making the offer a business associate of the organisation (Y/N)? If yes, describe the relationship between them and the organisation. If no, describe the relationship between you and the person or organisation making the offer.	
8. Reason for making the offer	
9. Would accepting the offer: a) create an actual potential or perceived conflict of interest exist (Y/N); or b) bring you, the organisation or the public sector into disrepute (Y/N)? (If either is answered YES, then the offer must be declined in accordance with the minimum accountabilities)	<i>Detail of conflict of interest:</i>
10. Is there a legitimate business benefit to the organisation, public sector or State for accepting the offer, i.e. does it meet the following: a) it was offered during the course of the your official duties (Y/N); and b) it relates to your official responsibilities (Y/N); and c) it has a benefit to the organisation, public sector or State (Y/N). (If NO then offer must be declined, and if YES then the business benefit must be detailed, in accordance with the minimum accountabilities).	<i>Detail of business benefit:</i>
11. I accepted the offer YES / NO	<i>Signature</i> <i>Date</i>

Title GIFTS, BENEFITS & HOSPITALITY

Part B – Authorised Delegate to complete	
1. Name, position and unit/division	
2. Relationship to employee	
Complete if individual declined offer	
3. I have reviewed this declaration form and submitted it for inclusion on the organisation's gifts, benefits and hospitality register.	Signature: Date:
Complete if individual accepted offer	
4. I have reviewed this declaration form and, confirm that, to my knowledge, accepting this offer: a) does not raise an actual, potential or perceived conflict of interest for the individual or myself; and b) will not bring the individual, myself, the organisation or the public sector into disrepute; and c) will provide a clear business benefit to the organisation, the public sector or the State.	Signature: Date:
5. Detail decision regarding ownership of tangible offers (e.g. specify whether employee retained gift; transferred to organisation's ownership; returned; donated to charity etc.)	
<i>Completed form to be submitted for inclusion on the organisation's gifts, benefits and hospitality register.</i>	

