

Approved: 3 October 2022

Review due: October 2025

1. Objective

This Procedure gives effect to the Governance Policy and provides the process for

- responding to offers of gifts, benefits and hospitality
- providing gifts, benefits and hospitality
- processes and reporting for gifts, benefits and hospitality

This procedure supports:

- individuals and GMW avoid conflicts of interest and maintain high levels of integrity and public trust
- behavior consistent with GMW's *Directors' Code of Conduct* and the *Code of Conduct for Victorian Public Sector Employees*. All employees are required under Clause 1.2 of the Code to comply with this Procedure.

This Procedure is based on:

- the DELWP model GBH Policy (July 2019)
- the VPSC GBH Model Policy (1 July 2018)

2. Scope

This Procedure applies to all:

- Directors
- employees
- other staff including 'in house' contractors and consultants

3. Principles

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

Impartiality - 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 reasonable 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.

Integrity - individuals 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.



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Risk-based approach: GMW, through its policies, processes and Risk, Audit and Finance 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.

4. Minimum Accountabilities

The following are the minimum accountabilities for the appropriate management of gifts, benefits and hospitality:

GMW staff 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 GMW 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) in the GMW Integrity Register, which workflows to obtain approval from their Manager, General Manager or the Manager Governance to accept any non-token offer.
4. Refuse bribes or inducements and report inducements and bribery attempts to their Manager, General Manager or the Manager Governance

GMW providing gifts, benefits and hospitality:

5. 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. Any costs are proportionate to the benefits obtained for GMW, and would be considered reasonable in terms of community expectations.
7. When hospitality is provided, individuals demonstrate professionalism in their conduct, and uphold their obligation to extend a duty of care to other participants.

GMW will:

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 GMW staff that, at a minimum, records sufficient information to effectively monitor, assess and report on these minimum accountabilities.
10. Communicate and make clear within GMW that a breach of the gifts, benefits and hospitality policies or processes may:
 - be a breach of the employee or director code of conduct
 - be criminal or corrupt conduct
 - result in disciplinary action
11. Establish and communicate a clear policy position to business associates on the offering of gifts, benefits and hospitality to GMW staff, 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 quarterly to GMW’s Risk, Audit and Finance Committee on the administration and quality control of its gifts, benefits and hospitality policy, processes and register. This report must include analysis of GMW’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 GMW’s gifts, benefits and hospitality policy and register on GMW’s public website. The published register should cover the current and the previous financial year.

5. 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. Any exceptions to this process must have the prior written approval of the Manager Governance.

5.1 Deciding whether to accept an offer

When deciding whether to accept an offer, individuals should first consider if the offer could be perceived as influencing them in performing their duties or lead to reputational damage. The more valuable the offer, the more likely that a conflict of interest or reputational risk exists.

The table below is a useful tool when considering how to respond to a gift offer.

GIFT test

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



5.2 Requirement for refusing offers

Individuals should consider the GIFT test in the table above and the requirements below to help decide whether to refuse an offer. Individuals are to refuse 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
- could bring them, GMW 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
- 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
- made in secret

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

5.3 Token vs Non-Token Offers

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

At GMW token offers cannot be worth more than \$50.

Individuals may generally accept token offers without approval or declaring the offer on GMW's register, as long as the offer does not create a conflict of interest or lead to reputational damage.

Non-Token Offers

Individuals 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 the Manager Governance, recorded in the gifts, benefits and hospitality register and be consistent with the following requirements:



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- it does not raise an actual, potential or perceived conflict of interest or have the potential to bring the individual, GMW or the public sector into disrepute; 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 GMW, public sector or the State.

Individuals 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.



Where 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.

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

Unacceptable	<ul style="list-style-type: none"> • Networking • Maintaining stakeholder relationships
Acceptable	<ul style="list-style-type: none"> • Individual is responsible for evaluating and reporting on the outcomes of GMW's sponsorship of Event A. Individual attended Event A in an official capacity and reported back to GMW 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 on behalf of GMW.

Recording Non-Token Offers

All non-token offers, whether accepted or declined, **must** be recorded in GMW's Integrity Register. The business reason for accepting the non-token offer must be recorded in the register with sufficient detail to link the acceptance to the individual's work functions and benefit to GMW, public sector or State.

Who	When	What	How
Staff Directors WSC Contractors	Whenever offered a non-token gift, benefit or hospitality	Complete a declaration in the GMW Integrity Register	Via GMW's online Integrity Register 
Manager	When notified that a staff member in your team has made a GBH declaration	Review details and approve action taken by staff member (accept/decline)	Found under Applications 



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5.4 Other Issues

Ownership of gifts offered to individuals

Non-token gifts 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 GMW into disrepute, and where their manager or Manager Governance has provided written approval. Employees must transfer to GMW official gifts or any gift of cultural significance or significant value.

Repeat offers

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. Individuals should refuse repeat offers from the same source if they create a conflict of interest or may lead to reputational damage.

Hospitality provided by other 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 outlined in the GMW Gifts, Benefits and Hospitality Policy.

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 GMW's functions and objectives and with the individual's role.

6. Management of the provision of Gifts, Benefits and Hospitality

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

6.1 Deciding whether to provide

Individuals before providing gifts, benefits and hospitality must ask themselves the HOST test.

HOST test

H	Hospitality	To whom is the gift or hospitality being provided? Will recipients be external business associates, 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?



H	Hospitality	<p>To whom is the gift or hospitality being provided?</p> <p>Will recipients be external business associates, or individuals of the host organisation?</p>
S	Spend	<p>Will public funds be spent?</p> <p>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?</p> <p>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>

6.2 Requirements for providing gifts, benefits and hospitality

Gifts, benefits and hospitality may be provided when welcoming guests, to 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 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 (the 'HOST' test in the table above 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.

6.3 Containing Costs

Individuals should contain costs involved with providing gifts, benefits and hospitality wherever possible, and should comply with the financial probity and efficient use of resources guidance outlined in the:

- Code of Conduct for Victorian Public Sector Employees
- GMW's Directors Code of Conduct

The following questions may be useful to assist individuals to decide on 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?
- Does the size of the event and number of attendees align with intended outcomes?
- Is the gift symbolic, rather than financial, in value?



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- Will providing the gift, benefit or hospitality be viewed by the public as excessive?

6.4 Reward and recognition programs

Modest gifts may be provided to employees in exceptional circumstances as part of a staff recognition program. Financial gifts to employees such as vouchers or gift cards are prohibited.

6.5 Maximum expenditure on unbudgeted gifts

GMW has set a nominal limit of \$150 for the maximum expenditure on gifts to others, where the expenditure has not been explicitly budgeted for. This nominal limit is a total for a discrete, unbudgeted gift. It is not per person or an annual total.

6.6 Flowers

Flowers can be purchased from public funds in the event of the death of an employee or close family member. Should work colleagues choose to recognise life events such as the birth of a child flowers and gifts are funded through staff collections.

6.7 Catering and Alcohol

Catering

As a general rule, corporate catering should not be provided by GMW. Meetings should be scheduled where possible either before or after the lunch period.

GMW can provide modest catering where a meeting extends for more than 4 hours, and there's no opportunity for participants to have a lunch break.

GMW can also provide modest catering for employees for events such as annual recognition events or marking the completion of a major project based on the following considerations:

- the extent to which the event will contribute to organisational objectives by, for example, reinforcing particular values or motivating staff
- whether there have been multiple recent events that would result in perceptions of excess
- the need to balance the positive benefits of public recognition with community expectations in relation to modest expenditure by public officials

For further details on what catering can be provided please refer to the Travel and Catering Procedure.

Birthdays, marriages, special occasions, or farewell morning or afternoon teas are paid by individuals, not GMW.



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Event / Item	Rule	Approval
Full day internal meeting/ workshop	GMW can provide modest catering, where meetings extend for more than 4 hours, and there's no opportunity for participants to have a lunch break.	Written approval must be obtained from a MD, GM or SLT member. Approval must include: <ul style="list-style-type: none"> • meeting name/date • reason catering is required • attach agenda and attendee list
Recognition/ Appreciation events	GMW can provide modest catering for employees for events such as annual recognition events or marking the completion of a major project with a modest meal and soft drinks, morning tea or afternoon tea. Staff purchase alcohol if they choose. All employees and contractors are required to be 0% for alcohol and drug content in their system when working for GMW.	
Functions with external guests attending	Catering can be provided at functions for external guests subject to the following criteria: <ul style="list-style-type: none"> • there is a real benefit to GMW • the expenditure is modest and proportionate to the benefit • it is not excessive • it is not too frequent, and • it is consistent with community expectations 	

* A Corporate Card Special Purchase Approval form (A2165327) must be completed prior to the purchase.

Alcohol Internal events

GMW does not permit the purchase of alcohol with public funds for internal events. Having non-employees, guests or stakeholders at an event does not necessarily mean it is not an internal event.

GMW practice for recognition events is that the business unit funds a modest meal and soft drinks. Staff purchase alcohol if they choose. All employees and contractors are required to be 0% for alcohol and drug content in their system when working for GMW.

Events with external guests

Alcohol may be purchased with public funds to serve at functions for external guests based on the following:

- prior approval from Managing Director must be obtained for any purchases of alcohol
- provision of alcohol would be relatively uncommon and be associated with a meal
- any event where alcohol is served should be held at a time that minimises the risk of employees returning to work impaired by alcohol (e.g. if standard office hours are worked, the event should be held in the late afternoon or early evening). All employees and contractors are required to be 0% for alcohol and drug content in their



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system when working for GMW. For further information, refer to GMW's Drug, Alcohol and Rehabilitation Procedure (A2758569) or your HR Partner

- events with alcohol service do not exceed two hours in duration
- not generally more than two standard drinks per person are provided
- the provision of alcohol should be incidental to the overall level of hospitality provided.

7. Breaches

GMW may take disciplinary action (consistent with the relevant industrial instrument and legislation, including dismissal) where an individual fails to adhere to the Gifts, Benefits and Hospitality procedure including 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 GMW's Conflict of Interest Policy.
- actions inconsistent with this policy constitute misconduct under the Public Administration Act 2004 including:
 - breaches of the binding Code of Conduct for Victorian Public Sector Employees and/or the GMW Code of Conduct for Directors such as sections of the Code covering conflict of interest, public trust and gifts and benefits
 - individuals making improper use of their position

8. Speak Up

Individuals who consider that gifts, benefits and hospitality or conflict of interest within GMW may not have been declared or is not being appropriately managed should speak up including notifying their Manager or the Manager Governance.

Individuals who believe they have observed corrupt conduct in their colleagues may also make a protected disclosure directly to the Independent Based-based Anti-corruption Commission (IBAC).

GMW will take decisive action, including possible disciplinary action, against individuals who discriminate against or victimise those who speak up in good faith. Please refer for more detail to GMW's Fraud Prevention Procedure.

9. Definitions

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.

Benefits - 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.

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



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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.

Conflict of interest - Conflicts may be:

- **Actual:** There is a real conflict between an employee's public duties and private interests.
- **Potential:** 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:** The public or a third party could reasonably form the view that an employee's private interests could improperly influence their decisions or actions, now or in the future.

Gifts - 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, jewelry, 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.

GMW Staff - Includes all of the persons specified in the Scope section above e.g. includes directors and contractors

Hospitality - 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.

Integrity Register - Is GMW's digital record of all declarable gifts, benefits and hospitality available to staff via Applications.

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.

Public official - Public official has the same meaning as section 4 of the Public Administration Act 2004 and includes, public sector employees, statutory office holders and directors of public entities.

Public register - A public register is a digital record of a subset of information contained in the GMW Integrity Register, for publication as required by the GMW Gifts, Benefits and Hospitality Procedure. Guidance regarding the information that should be published is provided in the Victorian Public Sector Commission Policy Guide.

Token offer - A 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). At GMW token offers cannot be worth more than \$50. Token offers should be recorded in the GMW Integrity Register.

Non-token offer - A 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



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community, of more than inconsequential value. All offers worth more than \$50 are non-token offers and must be recorded in the GMW Integrity Register.

Victorian Public Sector Organisations – The Victorian public sector comprises of two key areas; public service bodies, such as government departments and administrative offices, and public entities, such as hospitals, TAFEs and water authorities.

10. Responsibilities

Responsibility	Who
Approval	Managing Director
Ownership and implementation	Manager Governance
GMW Staff and Directors	Read, understand and adhere to the Policy and Procedure

11. Queries

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 accepting a gift, benefit or hospitality, or the application of this policy, should ask their Manager or any member of the Governance team.

12. Document history

Doc #	Date approved	Approved by	Approval #
A3639223	28/8/19	Board	#A3647639
A3639223	3/10/22	General Manager Business and Finance	#A4500486

13. Associated documents

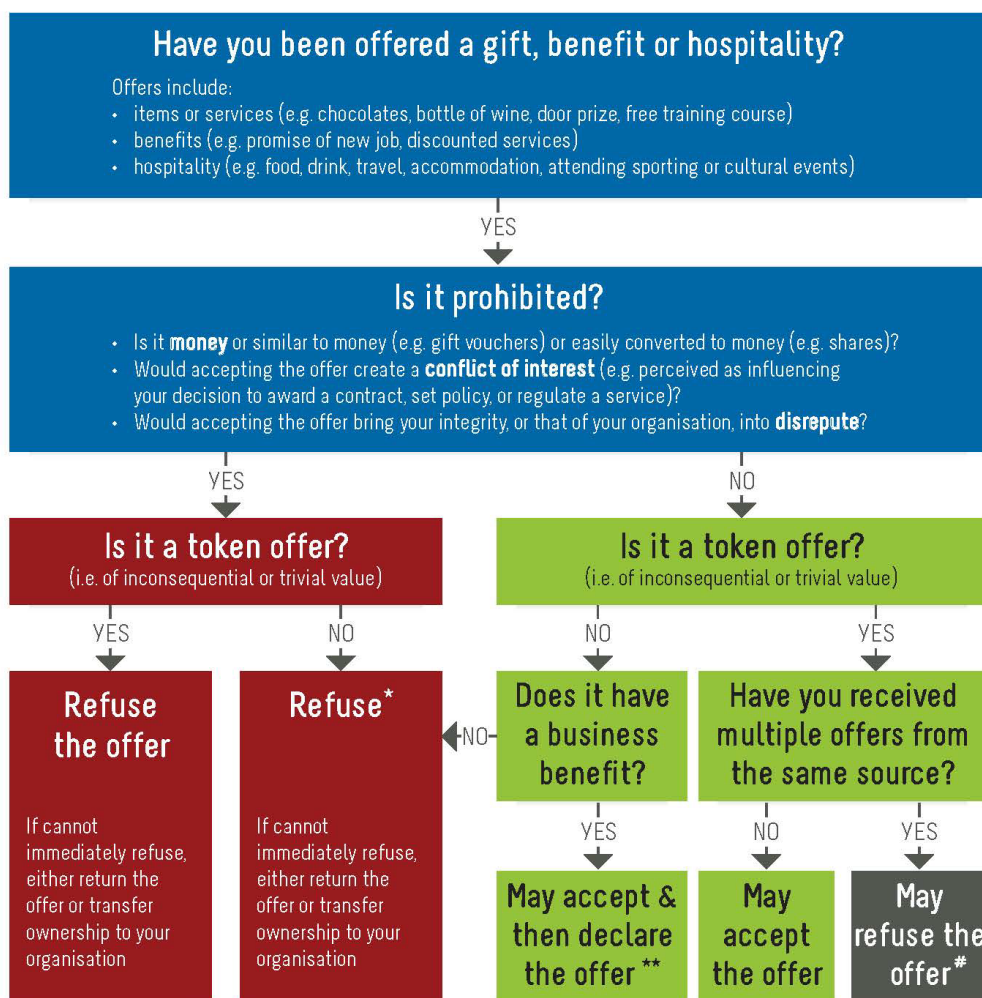
Document name	#
Governance Policy	A3834863
Conflict of Interest Procedure	A3800327
Code of Conduct for Victorian Public Sector Employees	A1313164
GMW Director Code of Conduct	A3817303
Travel and Catering Policy	A3246560



Appendix 1: VPSC – Responding to Gifts, Benefits and Hospitality

RESPONDING TO GIFTS, BENEFITS AND HOSPITALITY

Public officials do not seek offers of gifts, benefits and hospitality.



* 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.



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Appendix 2: Official Business Events

An official business event is when an event hosted by external organisation that it is in the public interest for an employee to attend. These invitations are different to gifts, benefits and hospitality offers and include seminars, conferences and working lunches.

Official business events need to have a tangible connection to an employee's role and be directly related to the agency's work.

Most official business events fall under five categories:

- **funded service delivery** – opportunities to observe the delivery of programs funded by state government grants
- **stakeholder engagement** – opportunities to develop networks with people interested in the department's activities
- **sector knowledge** – opportunities to develop a deeper knowledge of the industry and to improve government programs
- **business leveraging** – opportunities to network with partners interested in investment and collaboration
- **professional knowledge** – opportunities to maintain knowledge relating to a qualification (e.g. CPD points), build expertise in a technical field or become acquainted with industry changes.

In addition to those five categories, there are situations where it is in the public interest for the public service to be represented in some capacity. Those include:

- state functions – attending an event or function hosted by the Government or the Governor
- accompanying the Minister – supporting a government spokesperson (including Ministers and Parliamentary Secretaries) in the execution of their duties
- government events – attending a function organised and hosted by another government agency or public sector entity
- industry stakeholders – attending an event hosted by industry or community stakeholders where attendance provides a legitimate business benefit.
- Employees are required to declare their attendance as official business events. Employees can attend an official business event when:
 - the invitation was extended by the event host rather than a third party
 - the event is directly related to their official duties at the agency
 - it is for a business purpose consistent with the agency's functions and objectives
 - it is in the public interest and the best interests of the agency to be represented at the event
 - the activities and level of hospitality at the event is consistent with community expectations
 - there is no conflict of interest (real, potential or perceived) for the employee to attend
 - attending the event will not bring the employee, the agency, the department or the public service into disrepute
 - the host does not have an interest in any business decision the employee is likely to make or influence as part of their official duties.

Before an official business event invitation is accepted, consider:

- whether the employee is the most appropriate person to attend
- the number of people from the agency attending
- what the employee's purpose to attend is – to present, develop work skills or purely out of interest

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Excellence



Honesty



Accountability

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Courage



Caring

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- if the event is a gift offer rather than official business event attendance

Events that provide a personal benefit or are limited to providing hospitality and serve no business purpose can be regarded as an official business event only if non-attendance would bring the agency into disrepute.

To report a gift, the employee must disclose the offer to the Manager Governance (either by email or in person) as soon as practicable.



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Appendix 3: GMW Integrity Register – GBH Declaration Page

Extract from GMW Integrity Register

Gift, Benefits & Hospitality

I have NOT been offered a gift, benefit or hospitality in the last 12 months

I need to declare the below gift, benefit or hospitality

*** Offered By Name** **Date Offered**

Organisation **Frequency**

Estimated Value (\$) **GBH Decision**

Description **Other Information**

Attachments (Optional)

There is nothing attached.

Attach file

Next

Gifts, Benefits & Hospitality I've declared during the last financial year.



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