

POLICY

Corangamite CMA Gifts benefits and hospitality Policy

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1. Purpose

This policy states the Corangamite Catchment Management Authority's (CMA) 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 Corangamite CMA to avoid conflicts of interest and maintain high levels of integrity and public trust.

The Corangamite CMA has issued this policy to support behaviour consistent with the Code of Conduct for Victorian Public Sector Employees, and the Code of Conduct for Directors of Victorian Public Entities (the Code). All employees are required under clause 1.2 of the Code to comply with this policy.

This policy applies to all workplace participants. For the purpose of this policy, this includes: executives, board members, employees, contractors, consultants and any individuals or groups undertaking activity for or on behalf of the Corangamite CMA.

2. Policy Principles

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

The Corangamite CMA 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.

Risk-based approach: the Corangamite CMA, 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.

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 accepting a gift, benefit or hospitality, or the application of this policy, should ask their manager, Board and Executive Officer or General Manager Business and Governance Services for advice.

3. Management of offers of gifts, benefits and hospitality

3.1 Conflict of interest and reputational risks

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.

(a) Figure 1. GIFT test

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

G	Giver	<p>Who is offering 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 my endorsement of 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? 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>

3.2 Requirement for refusing offers

Individuals should consider the GIFT test at Figure 1 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, the Corangamite CMA 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, grant awarding or tender process by a person or organisation involved in the process;
 - setting of policy or
 - enforcement, licensing or regulation
- 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 (eg Gift Vouchers), or something easily converted to money (eg Shares);
- 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.
- is inconsistent with **community expectations**; or
- could in any other way bring their **integrity**, or that of the authority, into disrepute.

3.3 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.

The minimum accountabilities state that token offers cannot be worth more than \$50.

Individuals may generally accept token offers by gaining manager approval and declaring the offer on the Corangamite CMA's register, as long as the offer does not create a conflict of interest or lead to reputational damage in line with the considerations of refusing a gift above.

Please note that the receipt of sustenance as part of official duties (light food and drink with business meetings) does not require declaration.

3.4 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 organisational 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 Corangamite CMA or the public sector into disrepute (in line with the considerations of refusing a gift above); 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 Corangamite CMA 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. This should be outlined in the declaration form.

Unacceptable business reasons:

- Networking
- 'Refusal would offend (except in exceptional circumstances approved by CEO or Board Chair)
- Maintaining stakeholder relationships

Acceptable business reasons:

- Costs of travel, accommodation, meals and conference admission for presenting at a conference
- The completion of the GIFT test would otherwise deem the gift as acceptable

3.5 Reporting and Recording non-token offers of gifts, benefits and hospitality

The Gift Offer Declaration form COM POL 034 F002 is available as a stand-alone document on the Approved Policies and Procedures page on SharePoint.

All non-token offers, whether accepted or declined, must be reported and recorded in the Corangamite CMA's gifts, benefits and hospitality register. A gifts declaration form (COM POL 034 F001) needs to be completed and sent to the General Manager Business and Governance Services. 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 the Corangamite CMA, public sector or State.

For token offers, the board member or employee who receives the offer must send an email to the Business and Governance Services General Manager that sets out:

- the date of the offer;
- the source (organisation or individual) of the offer;
- what was offered and why;
- that it was a token offer, including an estimate of:
 - the value of the gift offered; and
 - the combined value of all gifts offered to them from that source in the last 12 months;
- whether it was a prohibited gift (item 3) and, if so, why; and
- whether the offer was accepted or refused.

A gifts declaration form (COM POL 034 F002) does not need to be completed for token offers.

Access to the register is restricted to General Manager Business and Governance Services and Board and Executive Officer within the Corangamite CMA.

The public register will contain a subset of the information detailed in the Corangamite CMAs internal register, be identified and only list non token offers.

3.6 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.

3.7 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 Corangamite CMA. The receipt of ceremonial gifts should be recorded on the Corangamite CMA's register but this information does not need to be published online.

3.8 High Risk Gift offers of hospitality

To ensure compliance with the above requirements, board members and employees must be particularly cautious about accepting gift offers of hospitality (i.e. food, drink, travel, accommodation, events or activities). Gift offers of hospitality are often inconsistent with community expectations. There is also a high risk of conflict of interest.

In particular, note that the following high risk events and activities that should only be attended where there is a legitimate business reason and does not meet the test for refusing offers:

High risk events and activities

Invitations to attend or participate in a sporting, social, 'industry', arts, entertainment, or other event or activity are high risk. Examples of gift offers that must be refused include:

- attend as a guest in a corporate box at the football or sport or racing event;
- attend a concert or theatre event;
- attend an industry golf day or play golf at a reduced fee;
- be 'shouted' a meal at a restaurant; or
- accept complimentary or discounted tickets for a family member to attend the tennis.

Please note that the receipt of sustenance as part of official duties (light food and drink with business meetings) does not require declaration.

3.9 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 the Corangamite CMA into disrepute, and where their manager or organisational delegate has provided written approval. As part of risk mitigation, transfer of gifts may also be made to the Corangamite CMA or gifts may be auctioned with staff with the proceeds going to charity.

4. Management of the provision of gifts, benefits and hospitality

4.1 Requirements for providing gifts, benefits and hospitality

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

(b) Figure 2. HOST test

H	Hospitality	<p>To whom is the gift or hospitality being provided? Will recipients be external business partners, or individuals of the host organisation?</p>
O	Objectives	<p>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?</p>
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>

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 at Figure 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.

Employees and Board Members must 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.

4.2 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, and the Code of Conduct for Directors of Public Entities. 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?

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

4.3 Hospitality provided by Corangamite CMA

Corangamite CMA 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 Corangamite CMAs functions and objectives and with the individual's role.

Corangamite CMA policy is that hospitality offered by both public and private sector organisations as part of official business is not published in the public register. This is based on the need to attend events for the purposes of stakeholder engagement, to develop professional and sector knowledge, and to collaborate on projects.

4.4 Specific Guidance on Gifts, Benefits and Hospitality

Reward and recognition programs

Modest gifts may be provided to employees in exceptional circumstances as part of the *Recognising Our Staff* program. Financial gifts to employees such as vouchers or gift cards are prohibited. Where financial gifts for reward and recognition programs are currently in use, it is recommended that they be phased out by mid-2020.

Maximum expenditure on unbudgeted gifts

Corangamite CMA has set a nominal limit of \$100 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. Such gifts must be approved by the CEO or Board Chair.

Flowers

Flowers can be purchased in the event of the death of an employee/Board Member or close family member. Likewise in the case of serious health issues (including surgery) flowers may also be purchased for an employee/ Board Member. Should work colleagues choose to recognise life events such as the birth of a child flowers and gifts are funded through staff collections.

Providing catering and alcohol for external events

Catering is provided at functions for external guests subject to the following criteria:

- there is a real benefit to the Corangamite CMA,
- 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.

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

- 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 guests impaired by alcohol (e.g. if standard office hours are worked, the event should be held in the late afternoon or early evening),
- events with alcohol service do not exceed two hours in duration,

- no more than two standard drinks per person are provided, and
- the provision of alcohol should be incidental to the overall level of hospitality provided.

Providing alcohol at internal events

Corangamite CMA 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.

Corangamite CMA practice for recognition events is that the business unit funds a modest meal and soft drinks. Staff/Board Members purchase alcohol if they choose.

Providing catering at internal events

Corangamite CMA provides 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, or
- the need to balance the positive benefits of public recognition with community expectations in relation to modest expenditure by public officials.

Celebrations of events such as birthdays, marriages or the birth of a child are not catered with public funds.

Corangamite CMA practice is that meetings are scheduled to avoid conflict with meal times. Where that is not possible, a break is encouraged to enable participants to seek their own refreshments. If an event or meeting extends over meal times, modest hospitality can be provided.

5. Monitoring compliance

The administration and quality control of the authority's policy and processes, including the gifts register and gift offer declaration forms, must be subject to regular scrutiny.

The General Manager Business and Governance Services will monitor compliance with the policy.

Annual report by CEO to Audit committee

The CEO must provide a report at least annually to the Audit committee that includes the matters set out in Appendix 1 in relation to:

- risk analysis;
- steps taken to improve compliance; and
- recommendations for improvement.

Annual report by Audit committee to board

The Audit committee must submit a report at least annually to the board that takes into account the CEO's report and includes any other information or recommendations that the Audit committee chooses to include.

6. Promoting and improving compliance

6.1 Induction and refresher training – board members and employees

The chair (for board members and the CEO) and the CEO (for employees) must ensure that all board members and employees receive **induction training** and **refresher training**, including:

- information about the aim, principles, accountabilities, and requirements of this policy;
- practical guidance on how to comply with it (e.g. where to obtain gift offer declaration forms, how to refuse a gift without giving offence, etc.); and
- advice that a breach of this policy may constitute a breach of a binding code of conduct and may result in disciplinary action and, in the case of corrupt conduct, criminal prosecution.

A copy of the authority's policy and related practical guidance must be provided to each board member and employee when they commence their term of appointment/employment. Updates to the policy and related guidance must be provided as soon as practicable after they occur.

6.2 Contracts for 'in house' contractors and consultants

All contracts for 'in house' contractors and consultants (including those engaged through an employment authority) must explicitly state that the contractor or consultant is bound by this policy and by the [Code of Conduct for Victorian Public Sector Employees](#).

6.3 External stakeholders (tenderers, suppliers, external contractors etc.)

All contracts for suppliers and external contractors must ensure that the contract can be revoked (or renegotiated) by the authority if the supplier or external contractor offers a prohibited gift to a board member or employee.

The CEO must have processes in place to ensure that external stakeholders have ready access to information that explains the prohibitions and restrictions in this policy. This includes ensuring that:

- an up-to-date copy of this policy is published on the authority's external website; and
- suitable guidance material is:
 - included in information packages for prospective tenderers and suppliers;
 - provided directly to all suppliers and external contractors, with regular reminders thereafter; and
 - published on the authority's website.

7. Banned Behaviours and Breaches

7.1 Misuse of position

Accepting a prohibited gift offer may constitute misuse of a board member's or employee's position, a breach of this policy and/or a breach of the relevant code of conduct and may result in disciplinary action. In addition, if the gift was offered with the expectation of something in return, such as preferential treatment, accepting it may constitute a bribe (item 4) or other form of corruption and lead to criminal prosecution.

7.2 Attempts to bribe

A board member or employee who receives a gift offer that he/she believes is an attempted bribe must refuse the offer. He or she must:

- immediately notify the responsible person and lodge a gift offer declaration form (COM POL 034 F002), so that their refusal can be properly recorded; or
- report the matter to the Independent Broad-based Anti-corruption Commission (IBAC) as a protected disclosure.

A board member or employee who believes that another board member or employee may have solicited or been offered a bribe which the other person has not reported must either notify the responsible person or report the matter to IBAC as a protected disclosure.

The CEO must have processes in place to ensure that he or she is notified when a responsible person becomes aware of a bribery issue. The CEO must notify IBAC of any matter which he/she believes on reasonable grounds may be corrupt conduct or, if appropriate, notify the police of a suspected offence.

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

Commission). For more information please see the Corangamite CMA's Fraud, Corruption and Other losses Prevention and Management Policy COM POL 006 and Protected Disclosure Policy COM POL 015.

7.3 Ban on soliciting gifts

Board members and employees must not solicit gifts for themselves or anyone else, in any form. To do so may constitute misuse of their position, a breach of this policy and/or a breach of the relevant code of conduct and may result in disciplinary action. It may also constitute corruption and lead to criminal prosecution.

7.4 Breaches

Breaches of the Corangamite CMA's policies in regards to Gifts, Benefits and Hospitality may constitute a breach of binding codes of conduct and may constitute criminal or corrupt conduct, and may result in disciplinary action.

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 Corangamite CMA'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, and the Code of Conduct for Directors of Public Entities, such as sections of the Code covering conflict of interest, public trust and gifts and benefits; and
- individuals making improper use of their position.

For further information on managing breaches of this policy, please contact People and Culture Co-ordinator and the Corangamite CMA's Coaching, Counselling and Discipline Procedure HRM PRO 018.

The Corangamite CMA will communicate its policy on the offering and provision of gifts, benefits and hospitality to contractors, consultants and other business associates. Those identified as acting inconsistently with this policy may be subject to contract re-negotiation, including termination.

7.5 Speak up

Individuals who consider that gifts, benefits and hospitality or conflict of interest within the Corangamite CMA may not have been declared or is not being appropriately managed should speak up and notify their manager or General Manager Business and Governance Services. 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).

The Corangamite CMA will take decisive action, including possible disciplinary action, against individuals who discriminate against or victimise those who speak up in good faith.

For more information please refer to the Corangamite CMA's Protected Disclosure Policy COM POL 015.

8. Responsibilities

General Manager Business and Governance Services has delegated authority to ensure the Authority fully complies with this procedure and any serious breaches of this procedure are to be brought to the attention of the Chief Executive Officer.

The Board and Executive Officer is responsible for the administration of the Authority's Gift Register. They must ensure that employees are provided with regular reminders of the need to lodge gift offer declaration forms.

The CEO must ensure that the Agency develops policies and procedures that apply the minimum accountabilities set out in the Victorian Public Sector Commission's (VPSC) Gifts, Benefits and Hospitality Policy Framework

The Audit and Risk is responsible for monitoring the administration and management of the Gifts, Benefits and Hospitality framework.

The Board must ensure that the Corangamite CMA establishes, implements and review organisational policies and processes for the effective management of gifts, benefits and hospitality that comprehensively address these minimum requirements and accountabilities.

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 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, jewellery, or expensive pens), low value (e.g. small bunch of flowers), consumables (e.g. chocolates) and services (e.g. painting and repairs). Fundraising by public sector organisations that is consistent with relevant legislation and any government policy is not prohibited under the minimum accountabilities.

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.

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 record, preferably digital, of a subset of the information contained in a register, for publication as required by the minimum accountabilities. Guidance regarding the information that should be published is provided in the [Victorian Public Sector Commission Policy Guide](#).

Register

A register is a record, preferably digital, of all declarable gifts, benefits and hospitality. Guidance regarding the information that should be recorded is provided in the 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). The minimum accountabilities state that token offers cannot be worth more than \$50.

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 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.

Direct or indirect

A gift offer may be direct or indirect. It may be made directly to a board member or employee or indirectly via an offer to their relative or close associate, including:

- a member of their immediate family (e.g. spouse, partner, child, grandchild, parent, sibling);
- a regular member of their household (whether or not they are related); or
- another close associate (e.g. friend, business associate, other relative).

10. References

Directors Code of Conduct – Victorian Public Sector State Services Authority

Code of Conduct for Victorian Public Sector Employees - Victorian Public Sector State Services Authority

Corangamite CMA Conflict of Interest Policy COM POL 035

Corangamite CMA Conflict of Interest Procedure COM PRO 020

Corangamite CMA Protected Disclosure Policy COM POL 015

Corangamite CMA Coaching, Counselling and Discipline Procedure HRM PRO 018

Corangamite CMA's Fraud, Corruption and Other losses Prevention and Management Policy COM POL 006

Corangamite CMA Staff Handbook / Induction Manual

Corangamite CMA Authority Gift Register -

<http://ccmasharepoint1/boardandceo/board/Lists/Gifts%20Register/AllItems.aspx>

IBAC Policy and website