

Policy	Gifts, Benefits & Hospitality	
Purpose	1.1	<p>This policy states the Victorian Legal Services Board and Commissioner's (VLSB+C) position on:</p> <ul style="list-style-type: none"> • responding to offers of gifts, benefits and hospitality; and • providing gifts, benefits and hospitality. <p>This policy is intended to support individuals and the VLSB+C to avoid conflicts of interest and maintain high levels of integrity and public trust.</p> <p>The VLSB+C have issued this policy to support behaviour consistent with the <i>Code of Conduct for Victorian Public Sector Employees</i> (the Code). All employees are required under clause 1.2 of the Code to comply with this policy.</p>
Application	2.1	<p>This policy applies to all workplace participants. For the purpose of this policy, this includes employees of the VLSB+C, the members of the Victorian Legal Services Board (the Board), the Victorian Legal Services Commissioner (the Commissioner), members of the VLSB+C's Committees, contractors¹, consultants and any individuals or groups undertaking activity for or on behalf of the VLSB+C.</p>
Policy principles	3.1	<p>This policy has been developed in accordance with requirements outlined in the <i>Minimum accountabilities for managing gifts, benefits and hospitality</i> issued by the Victorian Public Sector Commission (VPSC) (see Attachment A – Minimum Accountabilities). In developing this policy, the VLSB+C has been guided by the VPSC's model policy.</p>
		<p>The VLSB+C is committed to and will uphold the following principles in applying this policy.</p>
	3.2	<p>Impartiality</p> <p>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 reasonably 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.</p>
	3.3	<p>Accountability</p> <p>Individuals are accountable for:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>

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.

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3.4 **Risk-based approach**

The VLSB+C, through its policies, processes and Audit Committees 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.

3.5 **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.

Definitions

5.1 **Business associate**

Is an external individual or entity with which the 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.

5.2 **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.

5.3 **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 VLSB+C, irrespective of value, and should be accepted by individuals on behalf of the VLSB+C. The receipt of ceremonial gifts should be recorded on the register but does not need to be published online.

5.4 **Conflicts 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 **form the view** that an employee's private interests could improperly influence their decisions or actions, now or in the future.

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- 5.5 **Gifts**
- Gifts are free or discounted items or services and any item that would generally be seen by the public as a gift. This includes items of high value (for example, artwork, jewellery or expensive pens), low value (for example, a small bunch of flowers), consumables (for example, chocolates) and services (for example, 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.
- 5.6 **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.
- 5.7 **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 organisation, public sector or the State.
- 5.8 **Public official**
- Public official has the same meaning as under section 4 of the *Public Administration Act 2004* and includes public sector employees, statutory office holders and directors of public entities.
- 5.9 **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 6.8 below.
- 5.10 **Register**
- A register is a record, preferably digital, 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 interests 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.
- 5.11 **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 a basic courtesy). The minimum accountabilities state that token offers cannot be worth more than \$50.
- 5.12 **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.

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Management of offers of gifts, benefits and hospitality

6.1 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 relevant organisational delegate:

- VLSB+C staff must seek approval from their director
- Board members and members of VLSB+C Committees must seek approval from the Chairperson of the Board.

6.2 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 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 the Manager, Corporate Governance for advice

Figure 1: GIFT test

G	Giver	<p><i>Who is providing the gift, benefit or hospitality and what is their relationship to me?</i></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><i>Are they seeking to gain an advantage or influence my decisions or actions?</i></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><i>Are they seeking a favour in return for the gift, benefit or hospitality?</i></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><i>Would accepting the gift, benefit or hospitality diminish public trust?</i></p> <p>How would the public view acceptance of this gift, benefit or hospitality? What would my colleagues, family, friends or associates think?</p>

6.3 Requirement for refusing offers

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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 VLSB+C, 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 issuing of practising certificates and includes all parties to any matter that is the subject of a formal complaint or is under investigation by the VLSB+C), particularly offers:
 - made by a current or prospective supplier, or
 - 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
- with no legitimate business benefit
- of money, or used in a similar way to money, or something easily converted to money (for example, shares, gift cards)
- where, in relation to hospitality and events, the VLSB+C 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 agencies
- made in secret.

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

6.3 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 which would be considered a basic courtesy, such as light refreshments offered during a meeting.

While 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.

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Subject to the requirements of section 6.2 above, individuals may generally accept token offers without approval or declaring the offer on the VLSB+C register, as long as the offer does not create a conflict of interest or lead to reputational damage.

6.4 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, recorded in the VLSB+C 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 VLSB+C 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 the VLSB+C, 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 VLSB+C 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.

6.8 Recording non-token offers of gifts, benefits and hospitality

All non-token offers, whether accepted or declined, must be declared and recorded in the VLSB+C's gifts, benefits and hospitality register. The business reason for accepting a 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 VLSB+C, public sector or State.

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

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

This information is collected in the [Gifts, benefits and hospitality declaration form](#) which is completed by employees and their managers and then provided to the Manager, Corporate Governance for inclusion on the register.

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6.9 **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 VLSB+C into disrepute, and where their manager has provided written approval. Employees must transfer to the VLSB+C official gifts or any gift of cultural significance or significant value (over \$50). In some circumstances it may be appropriate to keep the gift within the VLSB+C offices. Similarly, gifts from visiting delegations or personalised gifts, such as plaques with the VLSB+C name engraved can be retained.

When a non-token gift is received that cannot be retained by the individual, the recipient's manager will decide how to dispose of it in an appropriate manner. The disposal of any non-token gift must also be recorded in the register. Some options for disposal include:

- returning the gift
- donating the gift, or
- holding an auction with the proceeds going to a charity.

6.10 **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.

6.11 **Ceremonial gifts**

Ceremonial gifts are official gifts provided as part of the culture and practices of communities and government, with Australia or internationally. Ceremonial gifts are the property of the VLSB+C, irrespective of value, and should be accepted by individuals on behalf of the VLSB+C. The receipt of ceremonial gifts should be recorded on the VLSB+C's register but this information does not need to be published online.

6.12 **Hospitality provided by Victorian public sector organisations**

Victorian public sector organisations may provide hospitality to stakeholders, as part of their functions. When offered hospitality by a Victorian public sector organisation, individuals should consider the requirements of the minimum accountabilities.

Accepted hospitality offered by a Victorian public sector organisation as part of official business does not need to be declared or reported, where the reason for the individual's attendance is consistent with the VLSB+C's functions and objectives and with the individual's role.

Managing the provision of gifts, benefits and hospitality

7.1 This section sets out the requirements for providing gifts, benefits and hospitality by the VLSB+C.

Figure 2: HOST test

H	Hospitality	<i>To whom is the gift or hospitality being provided?</i> Will recipients be external business partners, or individuals of the host organisation?
O	Objectives	<i>For what purpose will hospitality be provided?</i> 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	<i>Will public funds be spent?</i> 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	<i>Will public trust be enhanced or diminished?</i> 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?

7.2

Requirements for providing gifts, benefits and hospitality

Gifts, benefits and hospitality may be provided to welcome guests, to facilitate the development of business relationships, further public sector business outcomes, to celebrate achievements and to recognise staff contributions. This may include activities provided by internal committees such as the Health & Wellbeing Committee.

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)
- it does not raise an actual, potential or perceived conflict of interest.

When proposing to give a gift or benefit to another agency or person, an individual should:

- consult with their manager about the proposed gift (Board members and Committee members must consult with the Chairperson of the Board)
- consider the VLSB+C's rules on catered functions for staff (see section 7.4)
- consider the VLSB+C's rules for the provision of alcohol (see section 7.5).

Staff with corporate purchasing cards are reminded that as per the *Instructions supporting the Standing Directions 2018 under the Financial Management Act 1994*,

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purchasing cards cannot be used for gifts and hospitality other than in accordance with this policy (Instruction 5.3(e)).

7.3

Containing costs

Individuals should contain costs involved in the provision of gifts, benefits and hospitality wherever possible, and should comply with financial probity and efficient use of resources guidance outlined in the *Code of Conduct for Victorian Public Sector Employees*. 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?
- 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 unnecessary or excessive?

7.4

Catered functions

The VLSB+C may cater events for staff, Board members and members of Committees. This may include meeting with external representatives, presentations, training sessions and staff recognition events.

Staff organising an event should consider the following matters when determining whether the organisation should pay for catering:

- whether the event will contribute to organisational objectives
- the duration of the event and/or whether it will fall across meal times
- whether catering the event would be consistent with community expectations of modest and prudent expenditure by public officials.

Where events are catered by the VLSB+C, catering should not be excessive and should be appropriate to the size and type event.

When employees are arranging catering, they are encouraged to consider using a Social Benefit Supplier. A list of Social Benefit Catering suppliers is available on the intranet.

7.5

Serving of alcohol

Alcohol may be supplied at events hosted by the VLSB+C.

The VLSB+C has obligations in relation to the provision of alcohol under the *Occupation Health and Safety Act 2004*, the *Liquor Control Reform Act 1998* and the Code of Conduct.

Any event where alcohol is served should not exceed two hours in duration, unless agreed with the Commissioner + CEO (for example, for the end of year luncheon) and

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should be held at a time which minimises the risk of employees returning to work impaired by alcohol. The amount of alcohol provided should be limited to two standard drinks per person attending the event. Further, the provision of alcohol should be incidental to the overall level of hospitality provided.

Reporting

8.1

Gifts, benefits and hospitality declaration form

Employees are required to complete the Gifts, benefits and hospitality declaration form found on the intranet to declare all non-token offers of gifts, benefits and hospitality (whether accepted or declined).

The form acts as written approval from managers for the acceptance of any non-token offer.

Completed forms must be returned to the Manager, Corporate Governance who will use the forms to populate the register

8.2

VLSB+C Gifts, benefits and hospitality register

The Manager, Corporate Governance is responsible for maintaining and updating the register.

The public register will contain a subset of the information detailed in the VLSB+C's internal register.

8.3

VLSB+C Audit Committees

The Manager, Corporate Governance will provide a report to the VLSB+C Audit Committees at least annually on the administration and quality control of the gifts, benefits and hospitality policy, processes and the register.

The report will include analysis of VLSB+C'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.

Related policy, legislation and other documents

9.1

Legislation and Victorian Government policies and guidelines

Minimum accountabilities for the management of gifts, benefits and hospitality

Instructions supporting the Standing Directions 2018 under the Financial Management Act 1994

Public Administration Act 2004

Code of Conduct for Victorian Public Sector Employees

Code of Conduct for Directors of Victorian Public Entities

Victorian Public Sector Commission's *Gifts, Benefits And Hospitality Policy Guide* (www.vpsc.vic.gov.au)

Victorian Public Sector Commission's *Conflict of interest policy framework*

9.2

Related VLSB+C polices, guidelines and other documents

- Guidance – Catering & Staff Gifts
- VLSB+C Integrity Framework
- Conflict of Interest Policy

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		<ul style="list-style-type: none"> • Fraud, Corruption and Other Losses Policy • Public Interest Disclosures Policy • Managing Financial Information Policy • Risk Management Framework, Policy and Guidelines • VLSB+C Gifts and Hospitality Register • VLSB+C Gifts Declaration Form • VLS+C Human Resources Policies and Processes Handbook • VLSB+C Financial Code of Practice
	9.3	<p>Forms</p> <p>The Gifts, Benefits and Hospitality Declaration Form is available on the intranet.</p>
<p>Authorising officer and organisational delegate</p>	10.1	<p>This policy is issued under the Authority of the Victorian Legal Services Commissioner and is subject to three-yearly review.</p> <p>The staff member responsible for maintaining the gifts register is the Manager, Corporate Governance.</p>
<p>Enforcement</p>	11.1	<p>Breaches</p> <p>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 VLSB+C's Conflict of interest policy.</p> <p>Actions inconsistent with this policy may constitute misconduct under the <i>Public Administration Act 2004</i>, which includes:</p> <ul style="list-style-type: none"> • breaches of the binding <i>Code of Conduct for Victorian Public Sector Employees</i>, such as sections of the Code covering conflict of interest, public trust and gifts and benefits; and • individuals making improper use of their position. <p>For further information on reporting breaches of this policy, please contact the Manager, Corporate Governance.</p> <p>The VLSB+C 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.</p>
	11.2	<p>Speak up</p> <p>Individuals who consider that gifts, benefits and hospitality or conflict of interest within the VLSB+C may not have been declared or is not being appropriately managed should speak up and notify their manager or the Commissioner. Individuals who believe they have observed corrupt conduct in their colleagues may also make a public interest disclosure (previously known as a public interest disclosure or 'whistleblower' complaint) directly to the Independent Broad-based Anti-corruption Commission (IBAC).</p>

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

Conflicts

12.

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 the Manager, Corporate Governance for advice.

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	<p>Responsible for review and update Manager, Corporate Governance</p> <p>Approved by Director, Corporate Services</p> <p>Endorsed by Senior Leadership Team, 14 October 2020</p> <p>Last review date 14 July 2021</p> <p>Next review July 2024</p>

Attachment A – Minimum Accountabilities

Under the *Instructions supporting the Standing Directions 2018 under the Financial Management Act 1994* the VPSC has set binding minimum accountabilities for the appropriate management of gifts, benefits and hospitality. These are set out below.

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.
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.