

Gifts, Benefits and Hospitality Policy & Procedure

Responsible Reviewer: Chief Executive Officer
Endorsing Committee: Board of Directors

Department: Governance
Section: Legislative Compliance
(Governance)

Purpose

The purpose of this policy and procedure is to ensure Omeo District Health (ODH) upholds the highest standards of integrity, impartiality, transparency and accountability in the management of gifts, benefits and hospitality.

This policy supports compliance with:

- Standing Directions 2018 (Financial Management Act 1994)
- Victorian Public Sector Commission (VPSC) Gifts, Benefits and Hospitality Framework and Circular 2024-30
- Public Administration Act 2004 (Vic)

The policy aims to prevent conflicts of interest, corruption and improper influence, and to maintain public trust in ODH's decision-making.

Scope

This policy applies to:

- All ODH employees
- Board Directors
- Volunteers
- Contractors, consultants and labour-hire personnel
- Students and trainees undertaking placement at ODH

Policy Statement

Omeo District Health is committed to ethical conduct and accountable decision-making in the public interest.

ODH will not accept or provide gifts, benefits or hospitality that could improperly influence, or be reasonably perceived to influence, the performance of public duties. All gifts, benefits and hospitality will be managed in accordance with the VPSC minimum accountabilities and Standing Directions 2018.

Principles

This policy is underpinned by the following principles:

- **Integrity and impartiality:** Decisions must be free from improper influence.
- **Accountability and transparency:** Gifts and hospitality must be declared, recorded and reported.
- **Risk management and harm minimisation:** Corruption and reputational risks are actively managed.
- **Community trust:** Conduct must meet community expectations of the public sector.

- **Consistency and fairness:** Requirements apply equally to all covered persons.

Procedure

1. General Prohibitions

The following **must not be accepted** under any circumstances:

- Cash or cash-equivalent items (including gift cards and vouchers)
- Gifts, benefits or hospitality that create an actual, potential or perceived conflict of interest
- Gifts or hospitality offered during procurement, tendering, recruitment or decision-making processes
- Bribes or inducements of any kind

Any attempted bribe or inducement must be reported immediately to the CEO.

2. Declaration and Approval Requirements

- All non-token offers valued at \$50 or more must be declared, whether accepted or declined
- All official gifts and items must be declared regardless of value
- Declarations must be recorded on the Gifts, Benefits and Hospitality Register
- Written approval must be obtained before accepting any non-token offer

The estimated market value of the gift or hospitality must be recorded.

3. Token Gifts and Modest Hospitality

The following may be accepted only where no conflict exists:

- Modest refreshments provided during business meetings
- Low-value, infrequent promotional items (e.g. inexpensive stationery at conferences)

Repeated token gifts from the same source must be declared and reviewed.

4. Small Gifts of Appreciation

Small, infrequent tokens of appreciation (e.g. chocolates) may only be accepted where:

- The value is less than \$50
- There is no actual, potential or perceived conflict of interest
- Acceptance would meet community expectations

When in doubt, the offer must be declined or declared.

5. Providing Gifts, Benefits and Hospitality

When providing gifts, benefits or hospitality on behalf of ODH, staff must ensure:

- There is a legitimate business purpose
- No conflict of interest exists
- Costs are proportionate and reasonable
- The conduct is consistent with community expectations

Public funds must not be used for private benefit.

6. Fundraising

Fundraising undertaken by, or on behalf of, ODH must comply with this policy and the VPSC minimum accountabilities.

Private fundraising by staff is permitted only where clearly undertaken in a personal capacity and without use of organisational resources.

7. Business Associates and Suppliers

ODH will communicate its position on gifts, benefits and hospitality to business associates through:

- Procurement documentation
- Contractual terms and conditions
- Supplier engagement processes

Business associates acting contrary to this policy may be subject to contract review or termination.

8. Breaches and Escalation

Any suspected breach must be reported immediately to the CEO or Board Chair.

ODH may respond through:

- Education or counselling
- Performance management
- Disciplinary action
- Contract termination
- Referral to Victoria Police or IBAC where appropriate

Roles and Responsibilities

Role	Responsibility
Board of Directors	Oversight of integrity framework and policy approval.
Finance, Risk & Audit Committee	Annual oversight, risk analysis and assurance.
Chief Executive Officer	Implementation, reporting, publication and compliance.
Managers	Promote compliance and approve declarations.
Employees and Contractors	Declare offers and comply with policy requirements.

Monitoring, Evaluation, and Audit

- The Gifts, Benefits and Hospitality Register will be reviewed regularly
- The CEO will report at least annually to the Finance, Risk & Audit Committee on:
 - compliance with this policy
 - emerging risks and trends
 - repeat offers and business associate risks
 - improvement actions
- Relevant incidents may be monitored through RiskMan
- Findings will inform continuous improvement activities

Training and Education

- All staff will be made aware of this policy on commencement
- Targeted education will be provided to high-risk roles (e.g. procurement, executive, board)
- Refresher training may be delivered as required

Definitions

- **Business associate:** An external individual or entity 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 (Victorian Public Sector Commission, 2024).
- **Benefits:** 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 employment or other opportunities (Victorian Public Sector Commission, 2024).

- **Conflict of interest:**
 - Actual conflict: A real conflict between an employee's public duties and private interests.
 - Potential conflict: Private interests that could foreseeably conflict with public duties.
 - Perceived conflict: A third party or a reasonable observer could view private interests as improperly influencing decisions (Victorian Public Sector Commission, 2024).
- **Gifts**: Free or discounted items and any item that would generally be seen by the public as a gift. These include items of high value (e.g. artwork), low value (e.g. small bunches of flowers), consumables (e.g. chocolates) or other items offered at no cost or below market value (Victorian Public Sector Commission, 2024).
- **Hospitality**: The friendly reception and entertainment of guests. Hospitality may range from light refreshments at a business meeting to restaurant meals, event tickets, travel and accommodation (Victorian Public Sector Commission, 2024).
- **Legitimate business benefit**: A gift, benefit or hospitality accepted or 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 (Victorian Public Sector Commission, 2024).
- **Token offer**: An offer of a gift, benefit or hospitality of inconsequential or trivial value to both the person making the offer and the individual which would not be reasonably perceived to influence an individual or raise an actual, potential or perceived conflict of interest; and which is worth no more than \$50 or as adjusted in organisational policy (Victorian Public Sector Commission, 2024).
- **Non-token offer**: An offer of a gift, benefit or hospitality that is of more than inconsequential or trivial value and/or valued at more than \$50, and that would, or may be perceived to, influence the performance of official duties (Victorian Public Sector Commission, 2024).

Key Legislation

- *Financial Management Act 1994* (Vic)
- *Standing Directions 2018*
- *Public Administration Act 2004* (Vic)

Key Standards

- VPSC Gifts, Benefits and Hospitality Framework
- VPSC Circular 2024-30

References and Resources

Department of Treasury and Finance. (2018). *Standing Directions 2018 under the Financial Management Act 1994*. State of Victoria. Retrieved January 2026, from <https://www.dtf.vic.gov.au/standing-directions-2018-under-financial-management-act-1994>

Victorian Public Sector Commission. (2018). *Gifts, benefits and hospitality*. State of Victoria. Retrieved January 2026, from <https://www.vpsc.vic.gov.au/ethics-behaviours-culture/gifts-benefits-hospitality/>

Victorian Public Sector Commission. (2024). *Gifts, benefits and hospitality – Governance and integrity resources*. State of Victoria. Retrieved January 2026, from <https://www.vpsc.vic.gov.au/leading-public-sector-organisations/governance-and-integrity/gifts-benefits-and-hospitality/>

Related Documents

- [ODH Financial Code of Practice](#)
- [ODH Conflict of Interest Policy](#)

Appendices

- **Appendix 1:** Gifts, Benefits and Hospitality Declaration Form

Appendix 1: Gifts, Benefits and Hospitality Declaration Form

This declaration form supports the Omeo District Health [Gifts, Benefits and Hospitality Policy & Procedure](#).

All employees, Board Directors, contractors and volunteers must complete this form to declare all non-token offers (valued at \$50 or more) of gifts, benefits or hospitality, whether accepted or declined, and all official gifts or items regardless of value, in accordance with *Standing Directions 2018* and the Victorian Public Sector Commission minimum accountabilities.

Completed forms must be submitted for inclusion in the Gifts, Benefits and Hospitality Register.

Note: Sections 1 – 4 are to be completed by recipient. Section 5 is to be completed by the approving manager or organisational delegate.

Section 1: Individual Details

1. Declaration date: _____
2. Name: _____
3. Position / Role: _____
4. Department / Unit: _____
5. Employment type: ☐ Employee ☐ Board Director ☐ Contractor / Consultant
☐ Volunteer ☐ Other (specify): _____

Section 2: Details of the Gift, Benefit or Hospitality

6. Date offered: _____
7. Description of gift, benefit or hospitality: (include nature, location, and circumstances of the offer)

8. Estimated market value (AUD): \$ _____
9. Type of offer: ☐ Gift ☐ Benefit
☐ Hospitality ☐ Official gift / official item
10. Offered by (individual / organisation): _____
11. Is the offeror a business associate of Omeo District Health? ☐ Yes ☐ No
 If Yes, describe the nature of the business relationship:

12. Reason provided for making the offer:

Section 3: Conflict of Interest and Business Benefit Assessment

13. Does the offer create an actual, potential or perceived conflict of interest?

☐ Yes ☐ No

If Yes, provide details: (Note: If YES, the offer must be declined in accordance with ODH's policy.)

14. Would accepting the offer bring you, Omeo District Health, or the public sector into disrepute?

☐ Yes ☐ No

15. Is there a legitimate business benefit to the organisation, public sector or State?

☐ Yes ☐ No

If Yes, confirm all that apply:

- ☐ Offered during the course of official duties. ☐ Related to official responsibilities.
- ☐ Provides a clear and documented business benefit.

Provide details of the business benefit:

Section 4: Declaration by Individual

16. Outcome of offer: ☐ Accepted ☐ Declined

17. Declaration

I declare that the information provided above is true and complete to the best of my knowledge and that I have complied with the Omeo District Health *Gifts, Benefits and Hospitality Policy & Procedure*.

Signature: _____ Date: _____

Section 5: Manager / Delegate Review

(To be completed by the approving manager or organisational delegate)

18. Name: _____

19. Position / Role: _____

20. Relationship to individual: _____

21. Decision (tick one)

☐ Offer declined

I have reviewed this declaration and confirm the offer has been declined and recorded on the Gifts, Benefits and Hospitality Register.

☐ Offer approved for acceptance

I confirm that accepting this offer:

- does not create an actual, potential or perceived conflict of interest;
- will not bring the individual, organisation or public sector into disrepute; and
- provides a legitimate business benefit consistent with policy and community expectations.

Signature: _____ Date: _____

Completed forms must be forwarded to the Chief Executive Officer and Manager, Finance & Operations for recording in the Gifts, Benefits and Hospitality Register.