



Gifts, Benefits and Hospitality Policy

Contents

Summary of Roles and Responsibilities.....	2
Process steps	2
1. Purpose	2
2. Scope.....	2
3. Principles and key things you must do	2
4. Definitions.....	3
5. Responding to offers – Integrity Check.....	4
6. Declaring offers.....	6
7. Official gifts or items.....	6
8. Offers to the Collaborative Centre.....	6
9. Providing gifts, benefits and hospitality	7
10. Alleged breaches	7
11. Speak up	8
12. Related policies	8
13. Approval and review	8
Appendix —Minimum accountabilities.....	9

Summary of Roles and Responsibilities

Responsibility	Who	Details
Non-token offer made/received	Recipient	Default position: ‘Thanks is enough’ and decline unless it meets minimum accountabilities Accept only with authorised delegate’s prior written approval if it meets the Integrity check
Upon decision (accept or decline)	Recipient	Declare offer in the online (internal) register or on the declaration form within 5 business days
Complex issues or uncertain	Chairperson	Discuss with recipient and escalate to the board
Report to FAR Committee	Chairperson	Annual analysis of processes, register, risks, mitigation and proposed measures
Publish public register	Chairperson	Annual publication on the website by October
Communicate policy	Chairperson	Publish or distribute, including possible repercussions to business associates

Process steps

1. Is it a non-token offer (estimate value \$50 or more)?
 - a. No – you may accept. Consider applying default position ‘Thanks is enough’ and decline. Consider cumulative value if multiple token offers from the same source.
 - b. Yes - Apply default position or, in limited cases, you may accept if it is in the public interest and meets the integrity check and minimum accountabilities.
2. Declare (even if you decline the offer) using the Declaration Form issued.
3. FAR Committee annually reviews report on administration and quality control of processes.
4. Annually publish public register on the website with the policy and communicate policy to business associates.

1. Purpose

This policy sets out the Collaborative Centre’s policy position and processes on responding to, and providing gifts, benefits and hospitality.

2. Scope

This policy is binding on employees, contractors, consultants, members of the Board, Board sub-committees and advisory groups (**workplace participants or you**).

3. Principles and key things you must do

You must perform your duties with integrity and impartiality, consistent with the establishing legislation, the [Public Administration Act 2004](#) and applicable code of conduct. In doing so, you must place the public interest above your private interests.

You must comply with the minimum accountabilities in the Appendix. You must act with integrity, model good practice and foster an ethical culture to maintain community trust.

You must not seek (solicit) or accept any gifts, benefits or hospitality that could reasonably be seen as connected to your position or to influence your duties. The Collaborative Centre's default position is to decline any offer, 'thanks is enough'.

You must obtain the Chairperson's written approval before accepting the offer and declare any offer valued at \$50 or more even if you decline it.

Employees, contractors, consultants and others engaged by the Collaborative Centre are required to complete the [Code of Conduct eLearn module](#) to help you understand your responsibilities and obligations under the code while working in or with the public sector.

Chairperson

The Chairperson must fulfil their minimum accountabilities 8 to 14 in the Appendix, including to:

- establish and communicate this policy position and the [Supplier Code of Conduct](#) to business associates on making offers to workplace participants, including possible repercussions for acting contrary to this policy
- maintain an internal register, publish this policy and the public register on the website
- report annually to the Finance, Audit and Risk Committee on the administration and quality control of gifts, benefits and hospitality processes, including an analysis of the register, risks, mitigation measures and proposed improvement recommendations.

The Chairperson must obtain the Minister's or Secretary's written approval before accepting an offer valued at \$50 or more.

4. Definitions

Benefits: Preferential treatment, privileged access, favours or other advantage—for example, access to discounts and loyalty programs, promises.

Business associate: An individual, group or organisation that the Collaborative Centre has/plans to have a business relationship with, or who may seek commercial or other advantage. This includes suppliers, contractors and any funded agency.

Conflict of interest may be:

- **Actual:** There is a real conflict between your public duties and private interests.
- **Potential:** You have private interests that could conflict with your 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 your private interests could improperly influence your decisions or actions, now or in the future.

Gift: Items or services that are free, discounted or that the public would generally see as a gift. These include but are not limited to:

- donations of goods (for example, personal protective equipment)
- free tickets to attend a paid event (for example, conference or forum)
- vouchers and gift cards
- chocolate, flowers, artwork
- services such as maintenance.

Note: You must decline vouchers and gifts cards because they are prohibited under the minimum accountabilities. Refer to the department’s guidance on accepting offers to attend events [here](#).

Fundraising: in a way that does not breach the minimum accountabilities because it occurs under a fundraising policy that is consistent with relevant legislation, codes of conduct issued by the VPSC and any government policy is not prohibited.

Hospitality: Includes meals, drinks, accommodation and travel. It can range from light refreshments to expensive restaurants and hotels.

Legitimate business benefit: Furthers the official business or other legitimate goals of the Collaborative Centre or the State.

Official business events: Official business events are activities that an individual is required to attend as part of their role. It may include a seminar, conference, or working lunch. To qualify as an official business event, it must be directly related to their work and the Collaborative Centre’s business.

Official gift or item: Items with cultural, ceremonial, religious, historic or other significance.

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

Public register: The official record of information made public from the internal register.

Register (Official or Internal): The official record of all declarable offers of gifts, benefits and hospitality made to the Collaborative Centre and workplace participants whether accepted or declined.

Token offer: An offer valued at \$50 or more.

Non-token offer: A token offer has a value of less than \$50. It has trivial value to both the person making the offer and the recipient (for example, a box of chocolates).

Note: Some offers may be described as ‘free’ but there are real costs involved, like services, catering, venue hire. These costs must be considered when estimating the value.

5. Responding to offers – Integrity Check

The default position is to decline any offer and apply the ‘thanks is enough’ approach.

Declaration rule: You must declare all non-token offers even if you decline any.

Declaration form: You must declare all non-token offers (valued at \$50 or more) via the portfolio department’s [online register](#), which records entries for the Collaborative Centre also. If you have connectivity issues with the online register please contact the Secretariat to obtain an electronic form to complete.

Approval: In limited circumstances where you can accept an offer, you must obtain the Chairperson’s prior approval and apply the integrity check below.

Consider:	What you must do:
Money, gift cards or similar	Refuse all offers of money, gift cards, or items that can be converted to money regardless of value.
Conflict of interest	You must refuse offers that create an actual, potential or perceived conflict of interest. Offers from business associates/suppliers can lead to a conflict of interest and must be refused unless there is a legitimate business benefit, and the conflict of interest can be managed.
Public trust / disrepute	Would it pass the public perception test (‘pub test’)?

	You must refuse offers that are not consistent with community expectations, would damage the public's trust in the Collaborative Centre or its reputation.
Legitimate business benefit	Refuse all offers that do not have a legitimate business benefit. Networking and relationship building are not sufficient business benefits.
Bribe	Refuse all offers that could reasonably be seen as a bribe or inducement. These must be reported to the Integrity Unit.

Further considerations when deciding whether to accept an offer

Consider:	What you should do:
Repeat offers	Be aware that repeat offers from the same individual or organisation may create a conflict of interest, even if the value is low.
Decisions you are likely to make or influence	Refuse offers if it is from an individual, group or organisation that you are likely to make or influence a decision about in the foreseeable future. For example, procurement, recruitment, grants management, funding agreements, enforcement and regulatory functions.
Lobbying	Refuse all offers made by an individual, group or organisation whose primary purpose is to lobby Ministers, Members of Parliament or public sector agencies.
Endorsement	Refuse if the offer could reasonably be seen as endorsing a product or service.
Sufficient attendees	Refuse an offer if the Collaborative Centre will already be sufficiently represented to meet the business needs.
Your own judgement	Refuse if you feel that accepting an offer would breach the Code, or if you have any ethical concerns about accepting.

Ownership of non-token gifts (value \$50 or more)

In most cases, non-token gifts belong to the Collaborative Centre. If you received the gift in specific recognition of your work or contribution, you may retain it if:

- it is not an official gift (see [section 7](#))
- it is unlikely to bring you or the Collaborative Centre into disrepute
- it would be consistent with community expectations
- your manager or delegate provides written approval.

Exemptions to the declaration rule

Generic offers that are refused: In the course of your public duties, you may receive generic offers. These may include:

- emails targeting employees with offers to attend a seminar or webinar at a discount rate
- marketing emails or other offers.

You do not need to declare a generic offer if you refuse it. If you want to accept the offer, you will need to ensure it meets the [integrity check](#) and then declare it.

Multiple-member declaration: Sometimes multiple workplace participants receive the same offer from an organisation or individual. In this instance it may be appropriate to make a single declaration for the total cumulative value. A multi-member declaration must have a consistent response (accept or decline) from at least three workplace participants. Only one workplace participants should make the declaration on behalf of the group.

6. Declaring offers

You must declare all non-token offers (value of more than \$50), whether you accept or decline. Declare the offer via the department's [online register](#) or the Declaration Form provided by the Collaborative Centre within five business days.

When declaring an accepted offer, you must clearly document the legitimate business benefit and provide sufficient detail to explain the reason for accepting the offer. You should describe the nature of the benefit and how it relates to a specific function or activity.

Publication of register: The Collaborative Centre publishes the Public Register, together with this policy, on its website.

Retrospective approval: You must try to obtain approval before you accept a non-token offer. If this is not possible, you can seek retrospective approval from your manager. You must do this within five business days.

This is limited to situations where:

- it was not possible to know that the offer was non-token—for example, a wrapped gift
- it was an official gift or item and declining the offer at the time may have caused offence.

If the Chairperson rejects a member's decision to accept an offer, it must be returned.

Board or committee members on multiple boards/committees or organisations: If you serve or hold positions in other boards, committees or organisations, you must declare any offer of a gift, benefit or hospitality in connection with your role on another board, committee or organisation to the relevant organisation to which the offer relates. You must also notify the Chairperson, to determine whether the offer may reasonably be seen to give rise to a conflict of interest with your duties to the Collaborative Centre.

7. Official gifts or items

Official gifts may be offered as part of the culture and practices of communities and governments, within Australia or internationally.

If you accept an official gift, or official item, you do so on behalf of the Collaborative Centre. This is regardless of monetary value. An official gift or item:

- must be declared
- will be recorded on the official register
- will not usually be published in the public register.

Applying for ownership of an official gift or item

If you receive a gift or item that was specifically intended as recognition of your work or contribution, you may only retain it with written approval from your manager and if it passes the [integrity check](#).

8. Offers to the Collaborative Centre

When deciding whether to accept an offer made to the Collaborative Centre, such as offers of personal protective equipment, you must consider:

- whether accepting the offer creates a conflict of interest
- the nature and circumstances of the offer
- the level of inconsistency, if any, with this policy
- the level of public benefit if the offer is accepted.

You must reject any offer that is not consistent with community expectations.

Donations or gifts given to others on behalf of the Collaborative Centre

An organisation may want to donate to a charity, as a way of saying thank you or recognising your contribution. You should refuse such offers. If the donation has already been made, you should make clear that in future, it is not permitted without prior approval. You must declare non-token donations on the Register.

9. Providing gifts, benefits and hospitality

You may provide gifts, benefits and hospitality to welcome guests, further public sector business outcomes, celebrate significant work-related achievements. If you are providing an official gift or item, you must make reasonable enquiries to ensure it is appropriate to do so.

When deciding whether to provide gifts, benefits or hospitality and what you should provide, you must complete the following integrity check.

Integrity check – providing gifts, benefits and hospitality

Consider	What you should do
Legitimate business benefit	Ensure there is a legitimate business benefit for the Collaborative Centre, the public sector or the State. Some examples of legitimate business benefits are to: <ul style="list-style-type: none">• welcome guests• facilitate the development of relationships and outcomes• celebrate significant work related achievements.
Conflict of interest	Ensure it does not raise a conflict of interest (actual, potential or perceived).
Proportionate costs	Ensure that any costs incurred are proportionate to the benefit.
Community expectations	Ask yourself if providing the gifts, benefits and hospitality would pass the public perception (pub) test and that is whether it is consistent with community expectations.

Refer to the department's [Hospitality and Conference Expenses Guideline](#) when organising events.

Providing gifts, benefits and hospitality to other workplace participants

Formal and local recognition activities often also operate within the Collaborative Centre. The value of recognition purchases must be token and pass the integrity check. The Chairperson's prior approval is required and purchasing guidelines must be followed.

Celebrations of events such as birthdays, marriages, or childbirth are not to be funded using public money. You must ensure that when hospitality is provided other workplace participants demonstrate professionalism in their conduct and uphold their obligation to extend a duty of care to other participants. If you are accepting hospitality, you must also comply with these standards.

10. Alleged breaches

The Collaborative Centre will respond to alleged breaches of this policy consistently with applicable legislation and the Code of Conduct.

Alleged breaches of this policy may constitute misconduct and could result in disciplinary action or possible repercussions for business associates acting contrary to this policy. This will take into consideration the [Victorian Government Supplier Code of Conduct](#) and the Collaborative Centre's default position to discourage the making of offers.

Workplace participants must notify their manager or delegate.

Board must notify the Chairperson and committee members must notify the Chairperson of the Committee who will notify the Chairperson of the Board if they may have breached this policy.

If you have integrity concerns about or believe another workplace participant has breached the policy, they must notify their manager, delegate, executive officer or the Chairperson. If your integrity concerns relate to the Chairperson, you must report it to the Integrity Unit of the Department of Health at integrity@health.vic.gov.au

The Chairperson or delegate will decide whether a breach of this policy occurred. When uncertain, it will be escalated to the Board or Committee or the department’s integrity unit. It may be appropriate, for example, to return a gift. In those circumstances, the Register will be updated. When uncertain, the matter will be escalated to the Board (IBAC).

Serious breaches must be reported to the Health Secretary and the Minister.

Alleged criminal offences will be referred to integrity or law enforcement authorities, such as the Independent Broad-based Anti-corruption Commission or Victoria Police.

11. Speak up

Individuals who consider that gifts, benefits and hospitality or conflict of interest within the Collaborative Centre may not have been declared or is not being appropriately managed should speak up and notify the Chairperson, or the Secretary for the Chairperson.

If you believe corrupt or improper conduct is occurring, you may make a complaint or protected disclosure directly to the Independent Based-based Anti-corruption Commission (IBAC).

The Collaborative Centre will support and protect individuals who speak up in good faith about a possible breach, and take decisive action, including possible disciplinary action, against individuals who discriminate against or victimise those who speak up in good faith.

12. Related policies

- [Code of Conduct for Directors of Victorian Public Entities](#)
- [Code of conduct for Victorian public sector employees](#)
- [Conflict of Interest Policy \(Board\)](#) and Board Portal > Documents
- [Conflict of Interest Policy \(executives and employees\)](#)
- [Victorian Government Supplier Code of Conduct](#)

13. Approval and review

Approved by	Collaborative Centre Board
Owner	Chief Operations Officer
Date approved	26 August 2025
Next review	August 2028

Appendix — Minimum accountabilities

Receiving offers of gifts, benefits and hospitality

1. You must not solicit (seek) any gift, benefit or hospitality, for yourself or others, if the offer could reasonably be seen as connected to your employment.
2. You must always refuse a gift, benefit or hospitality (token or not token) if any of the following apply:
 - a) If it is money, used in a similar way to money, or easily converted to money and gives rise to an actual, potential or perceived conflict of interest.
 - b) If it gives rise to a conflict of interest (actual, potential or perceived). This means you must refuse the offer if it could influence, or reasonably be seen to influence, how you perform your public duties.
 - c) If it could compromise the public's trust that you will perform your public duties in an impartial manner or the public's trust in the impartiality of your organisation or the public sector.
 - d) If it is not consistent with community expectations.
 - e) If it could reasonably be seen as a bribe or other inducement. Report the offer to the head of your 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).
 - f) Even if the offer complies with all the other requirements above, you must refuse a non-token offer unless there is a legitimate business reason to accept it. The offer must further the conduct of official business or other legitimate goals of your organisation, the public sector or the State.
3. If you receive a non-token offer (valued at \$50 or more), you must declare the offer in writing, even if you refuse it, and always refuse it unless it complies with minimum accountability 2 and you have approval as set out in this policy. The offer and outcome will be recorded on the official internal register and in the public register.

Providing gifts, benefits and hospitality

4. You must ensure that any gift, benefit and hospitality (token or non-token) you provide is 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.
5. You must ensure that the cost of providing a gift, benefit and hospitality is proportionate to the benefits obtained for the State and would be considered reasonable in terms of community expectations.
6. You must ensure that you do not provide a gift, benefit and hospitality unless no conflict of interest exists (actual, potential, perceived), or you declare a conflict and the Collaborative Centre develops a management plan that explicitly allows you to provide it.
7. You must ensure that when hospitality is provided, participants demonstrate professionalism in their conduct and uphold their obligation to extend a duty of care to other participants. If you are a participant who is accepting hospitality, you must also comply with these standards.

Additional obligations for the Chairperson as head of the Collaborative Centre

8. Model good practice and foster a culture of integrity.
9. Establish, implement and review organisational policies and processes for the effective management of gifts, benefits and hospitality that comprehensively address these minimum accountabilities.
10. Communicate this policy and related processes effectively to workplace participants, including that a breach of the policy may constitute a breach of a binding code of conduct, criminal or corrupt conduct.

11. Establish and communicate a clear policy position to business associates on the offering of gifts, benefits and hospitality to public officials and employees, including possible repercussions for a business associate acting contrary to this policy position. This must take into consideration any whole of Victorian Government supplier codes of conduct and that the Collaborative Centre discourages the making of offers.
12. Report at least annually to the Finance, Audit and Risk Committee on the administration and quality control of its gifts, benefits and hospitality policy, processes and register. This report must include analysis of the 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. Ensure that an official internal register of non-token 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.
14. Publish this policy and public register on the Collaborative Centre's public website. The public register should cover the previous financial year and be published within four months of each new financial year.