

Title:	Gifts and Gratuities			
Section:	Corporate	PRH:	Manager, Human Resources	Policy & Procedure

1.0 INTRODUCTION

The purpose of this Policy is to outline the processes to be used at Bass Coast Health to ensure transparency and accountability in respect of receiving gifts, hospitality, sponsorship and other gratuitous benefits.

The aim of this policy is to help all those employed, engaged by or otherwise undertaking activities (including Volunteers) on behalf of Bass Coast Health (unless otherwise specified, referred to as staff in this document) to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of Bass Coast Health (BCH) and manage risk.

Invitation to events, offers of sponsorship and gifts from suppliers can be an ethical minefield for public sector employees. Bass Coast Health is committed to providing an ethical, efficient and accountable environment for the conduct of its operations.

All staff at BCH are required to:

- Perform their duties in a fair, transparent and unbiased way and not make decisions which are affected by self-interest or personal gain
- Be mindful of the appearance of influence that may be created by gifts, hospitality, sponsorship and other gratuitous benefits and seek approval for retaining such benefits from an Executive Director or the CEO.

This policy is to be read in conjunction with:

[Code of Conduct](#)

Procurement

Procurement Strategy

Supply of Goods

[Contractor/s](#)

[Clinical Practices – Introduction of New Technology &/or Clinical Practice \(TCP\)](#)

[Financial Code of Practice](#)

[Disposal of Assets – Clinical & Non-Clinical](#)

[Instrument of Delegation](#)

[Risk Management Policy](#)

[Fraud](#)

Conflicts of Interest

[HR-020 Gifts & Gratuities Request for Approval Form](#)

2.0 RESPONSIBILITY

CEO and Board	The BCH Board and CEO are subject to this policy. The CEO is responsible for the management of the Gifts and Gratuities Register
Executive Directors / Department Managers	Managers and Executive Directors are subject to this policy and must make their staff aware of it.
BCH Staff including full time, part time, sessional or casual	Comply with requirements of this policy

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3.0 SCOPE

This Policy focuses on, but is not limited to, gifts, hospitality, sponsorship and other gratuitous benefits being offered by, or received from, suppliers or potential suppliers, and individuals associated with those suppliers.

The definition of **“supplier”** in this context is broad and:

- (a) encompasses any person, body, company or entity that could potentially supply goods or services of any kind to Bass Coast Health in the future
- (b) includes situations where goods or services have been or will be provided to Bass Coast Health:
 - (i) free of charge
 - (ii) through a loan, trial, donation or hire arrangement
 - (iii) partially or entirely funded by DHHS or another Government entity
- (c) includes situations where a particular supplier of goods or services is mandated by legislation or is selected for Bass Coast Health by DHHS or another Government entity
- (d) is not restricted to private sector agencies, and could include the supply of goods or services by another public sector agency (e.g. another health service, a university, or Government Department or entity)

4.0 POLICY

Staff should not seek or accept any payment, gift or benefit intended or likely to influence, or that could be reasonably perceived as intended or likely to influence, the staff member:

- to act in a particular way (including making a particular decision),
- to fail to act in a particular circumstance,
- to otherwise deviate from the proper exercise of their duties.

Staff should generally avoid situations in which an appearance or impression may be created that any person, body, company or entity, through the provision of gifts, hospitality, sponsorship or other gratuitous benefits, is attempting to secure the influence or favour of an individual staff member. This is true of all business dealings, and is especially important for public sector agencies like Bass Coast Health in its dealings with suppliers and potential suppliers.

In addition, staff should take reasonable steps to ensure that their immediate family members and friends are not the recipients of gifts, hospitality, sponsorship or other gratuitous benefits, which could give the appearance of an indirect attempt to secure the influence or favour of a staff member.

External requirements

The Victorian Government seeks to observe high ethical standards and conduct in commercial engagements.

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The *Gifts, Benefits and Hospitality Policy Framework* (revised April 2012) published by the Victorian Public Sector Commission (VPSC) provides the following minimum requirements for all Public Officials:

1. Do not solicit gifts, benefits or hospitality,
2. Refuse all offers of gifts, benefits or hospitality that could be reasonably perceived as undermining the integrity and impartiality of their organisation or themselves,
3. Refuse all offers of gifts, benefits or hospitality from people or organisations about whom they are likely to make decisions involving:
 - a) Tender processes;
 - b) Procurement;
 - c) Enforcement;
 - d) Licensing; or
 - e) Regulation,
4. Refuse all offers of money or items easily converted to money such as shares,
5. Refuse bribes and report bribery attempts to the head of the public sector organisation,
6. If unsure about how to respond to the offer of a gift, benefit or hospitality of more than nominal value, seek advice from a manager or other appropriate organisational delegate.

The *Code of Conduct for Victorian Public Sector Employees (No. 1) 2007* published by the VPSC provides that:

- a) Public sector employees do not – for themselves or others – seek or accept gifts or benefits that could be reasonably perceived as influencing them.
- b) Public sector employees comply with any policies of their public sector employer in relation to accepting, declaring and/or recording the receipt of gifts or benefits.
- c) Public sector employees who are unsure about accepting a gift or benefit seek advice from their manager.

Good Medical Practice: A Code of Conduct for Doctors in Australia, consistent with the Health Practitioner Regulation National Law Act 2009 and published by the Medical Board of Australia in 2010, provides the following:

Good medical practice involves:

- Not asking for or accepting any inducement, gift or hospitality of more than trivial value, from companies that sell or market drugs or appliances that may affect, or be seen to affect, the way your prescribe for, treat or refer patients.
- Not asking for or accepting fees for meeting sales representatives.
- Not encouraging patients to give, lend or bequeath money or gifts that will benefit you directly or indirectly.
- Being transparent in financial and commercial matter relating to your work, including in your dealings with employers, insurers and other organisations or individuals.

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Under the Victorian *Public Administration Act 2004*, public sector employees involved in procurement must not make improper use of their position.

The *Victorian Government Purchasing Board - All Procurement Policies* (December 2012) published by the VGPB Secretariat, Department of Treasury and Finance includes the *Conduct of Commercial Engagements Policy*. The *Good Practice Guidelines – Conduct of Commercial Engagements* provides the following:

Can I accept gifts and favours?

You should not seek or accept favours or gifts for services performed in connection with your official duties. Included in this category are gifts in kind, such as free accommodation or travel or entertainment vouchers whether for you or members of your family. The general principle to be followed is that you should not seek or accept favours or gifts from anyone who could benefit by influencing you.

Immediately report to the CEO any circumstances where an offer of a benefit or gift is made, regardless of whether it is accepted or not, if you feel that such circumstances involve an attempt to induce favoured treatment.

Where a gift is given without your prior knowledge or consent or where a gift is given as a token of goodwill to the State, the CEO must be informed as soon as possible. Gifts of more than \$50 should in all cases remain the property of the State and be recorded in a publicly available gifts register.

Organisations vary in their policies on accepting gifts and benefits depending on the nature of their business. It is expected, however, that token gifts in the nature of souvenirs, mementos or symbolic items of low material value may be accepted in circumstances approved by the CEO.

You must not use your position to obtain a private benefit for someone else. Family or other personal relationships must not improperly influence your decisions

How do you know whether there might be appearance or impression of influence?

When considering whether there might be an appearance or impression of influence, the relevant standard to be applied is that of an ***“impartial observer”***.

Factors that could impact upon the likelihood of gift or benefit creating an impression of influence include:

- the scale or lavishness of the gift or benefit
- the cost, expense or value of the gift or benefit
- the frequency of occurrence
- the degree of openness and transparency surrounding the occasion
- the timing of when a gift or benefit is offered or accepted (e.g. a current or future tender or selection process, or ongoing negotiations with a supplier).

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Staff need to appreciate that, in the context of gifts, hospitality, sponsorship and other gratuitous benefits, they will be judged by the appearance of what they do, regardless of their actual motives. The fact that the staff member's own moral standards were not offended will be irrelevant if their conduct warrants investigation.

Explanations such as the following will not be of assistance:

- *"everybody else is doing it"*
- *"we've been doing this for years"*
- *"I was just networking"*
- *"we were fostering the business relationship"*
- *"it was harmless"*
- *"there are so many of these occasions that I don't bother seeking approval"*
- *"it's just part of the job"*
- *"this is part of the culture and to refuse would cause offence"*
- *"public officials are not paid enough and should be entitled to keep the extra reward"*

What sorts of gifts, hospitality, sponsorship and benefits are covered by this Policy?

In general, staff have a responsibility NOT to accept the following from suppliers or potential suppliers, or individuals associated with those suppliers, if the circumstances could potentially create an impression of influence or favour, to an outside observer:

- | | |
|-----------------|---|
| • gifts | • discounts |
| • rewards | • donations |
| • travel | • souvenirs, mementos and symbolic items |
| • meals | • sponsored meetings (e.g. where food is supplied paid for by a sponsor) |
| • expenses | • invitations to corporate sponsored events (e.g. races, sports events, concerts) |
| • accommodation | • other sponsorship |
| • entertainment | • other hospitality or benefits |
| • tickets | |
| • vouchers | |

If a staff member wishes to accept a gift or another benefit including those listed above, they are required to follow the procedures set out in this Policy. Failure to comply with this Policy may lead to disciplinary action.

4.1 TOKEN GIFTS

At Bass Coast Health ***"token gifts"*** are regarded as acceptable (with CEO approval) and may be retained by the recipient, provided the gift or benefit meets each of the following criteria:

- (1) the gift has an approximate value of less than AUD\$50
- (2) the gift must be modest (e.g. single bottles of reasonably priced alcohol, or a box of chocolates, or flowers, or some other gift of insignificant commercial value, including souvenirs, mementos or symbolic items)

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- (3) the gift must have been offered in circumstances that might be considered deserving or appropriate by an outside observer (e.g. in recognition of giving a presentation or hosting a visitor)
- (4) the gift must have been offered in circumstances where there was a degree of openness (e.g. at a public occasion or end of year function).

Any gift or benefit under AUD\$50 that does not clearly meet **all** the above criteria requires the approval of the CEO before the staff member is entitled to keep the gift or benefit, regardless of its value. This includes:

- a voucher of any value from a supplier
- a Christmas gift of any value from a supplier

Where a gift or benefit under AUD\$50 does not meet all the above criteria, the staff member must complete the form attached in *Appendix 1* to seek approval from the CEO. If the CEO's approval is not given, the gift or benefit must be returned or declined.

The receipt of a token gift must be a single, one-off event for that staff member. Repeated or multiple gifts received from, or offered by, a particular supplier or potential supplier, whether token or non-token, must be reported to the CEO.

It is acceptable for a staff member to share a token gift (e.g. chocolates) amongst work colleagues at work, provided that the circumstances of its receipt meet all the above criteria. If the gift was given to the individual on behalf of a team, then it would be inappropriate for that individual to keep the gift personally. Note that all employees must comply with Bass Coast Health's policy on *Code of Conduct and Instrument of Delegation* in respect of consuming alcohol at work. Staff could consider making the gift available to an auxiliary to be part of a raffle.

If an individual staff member receives a small token of appreciation with modest value from a grateful **patient, client or resident** of Bass Coast Health, even if it is under the value of AUD\$50, requires CEO approval. It should be noted that taking monetary gifts from patients is generally deemed to be unacceptable. All such gifts that might be approved, must be logged onto the gifts register.

4.2 NON-TOKEN GIFTS AND OTHER GRATUITOUS BENEFITS

For the purposes of this policy, a gift with a value of AUD\$50 or greater is regarded as a **"non-token gift"**.

All gifts and benefits of a non-token nature require the written approval of the CEO before the staff member is entitled to keep the gift or benefit. The relevant permission should be sought in advance of accepting the gift or benefit. Any Bass Coast Health staff member wishing to retain the following items **MUST** complete the form attached in *Appendix 1*, and seek permission from the CEO to retain it:

- a gift or benefit worth AUD\$50 or more

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- a gratuitous benefit of any value, such as a voucher, discount, points in a loyalty or reward program, or preferential treatment
- a Christmas gift from a supplier of any value.

Gift splitting of the items received, or amongst other staff members, in order to get around the AUD\$50 threshold is not permitted and will be deemed to be improper.

Where a gift is given as a token of goodwill to Bass Coast Health (e.g. from an overseas visitor), it will normally be regarded as the property of Bass Coast Health. The form attached in *Appendix 1* should be completed by the recipient as a record of such a gift. In appropriate cases the gift may require addition to the Assets Register.

4.3 HOSPITALITY

The AUD\$50 threshold applies to offers of hospitality. If a staff member intends to accept any offer of hospitality, of any value, this requires the written approval of the CEO before the staff member is entitled to attend the event or accept the benefit.

The staff member should complete the form attached in *Appendix 1* in advance of the event. The CEO will determine whether the offer of hospitality or other benefit may be accepted.

Examples of situations that require the approval of the CEO include (but are not limited to):

- *a current or potential supplier invites managers to a corporate box event or corporate golf day*
- *a current or potential supplier invites a group of staff out to dinner in a restaurant to launch to promote a new product*
- *a current or potential supplier gives movie tickets to a few staff for their families*
- *a current or potential supplier invites staff to Christmas drinks after 5pm*
- *a current or potential supplier provides or sponsors a free education session at the supplier's offices in the city and invites attendees to stay afterwards for a wine and cheese function*
- *a current or potential supplier offers points in a loyalty or reward program to individual staff who purchase on behalf of Bass Coast Health as part of their role*
- *a supplier that has been selected by DHS invites key staff out to dinner at the end of a project.*

This Policy applies even if a sponsored event will occur on a public holiday or when the staff member has taken annual leave (e.g. to attend a corporate box at the Melbourne Cup, Grand Final or Grand Prix), if receipt of the invitation might be perceived by an outside observer as being connected in any way with the staff member's role at Bass Coast Health.

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A staff member does **not** need to seek approval under this Policy to:

- (a) *accept tea, coffee and biscuits offered by most organisations as a courtesy to visitors attending a meeting*
- (b) *accept a modest lunch or other food and refreshments offered to attendees during a working group or meeting (unless sponsored by a supplier or potential supplier)*
- (c) *attend a Charity Golf Day if it is not being sponsored by a supplier or potential supplier (however the staff member may need to apply for leave from their supervisor to attend if during work hours).*

Where Bass Coast Health is currently undertaking or will soon undertake a tender or other selection process, or where it is currently engaged in negotiations that might affect a particular supplier or potential supplier, all staff on the Tender Evaluation Group and other staff involved should decline all social invitations received from such suppliers and report the invitation to the CEO.

A part-time or casual member of staff is required to seek approval under this Policy in respect of an offer of hospitality if the offer might be perceived by an impartial observer as being connected in any way with the role of that staff member at Bass Coast Health.

If a staff member is unsure about whether permission is required to attend a particular event or accept hospitality offered, they should ask the CEO.

4.4 SPONSORSHIP

It is not unusual for public sector agencies to look to outside sponsorship for financial support in specific areas, such as conference attendance and education sessions. Contrary views may exist about the appropriateness of particular sponsors in relation to some aspects of public health service activity.

The AUD\$50 threshold does **not** apply to offers of sponsorship. If Bass Coast Health or an individual staff member intends to accept any offer of sponsorship or payment of expenses, of any value, this requires the written approval of the CEO before the staff member is entitled to accept the benefit and attend the meeting, conference or event.

The staff member should complete the form attached in *Appendix 1* in advance of the event. The CEO will determine whether the offer of sponsorship or payment of expenses may be accepted.

Examples of situations that require the approval of the CEO include (but are not limited to):

- *a pharmaceutical company offers to pay the airfares of a dietician to attend a professional interstate conference to learn about dietary supplements,*

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- *a pharmaceutical company offers to pay the overnight accommodation expenses of a full-time senior doctor who has been asked to attend a regional location as a guest speaker,*
- *an oncology or diabetes research staff member is expected to attend an overseas protocol or investigator meeting funded by the drug trial sponsor,*
- *a medical equipment supply company offers to fund a traveling fellowship to enable doctors from overseas to work at Bass Coast Health for periods of 6 months,*
- *a drug trial sponsor offers to pay travel and accommodation for a doctor and his wife to attend a professional conference overseas to present the doctor's research findings,*
- *a current or potential supplier sponsors an education lunch for junior medical staff to be held at Bass Coast Health.*

A staff member does **not** need to seek approval under this policy to:

- (a) *accept a modest lunch or other refreshments provided to participants at a conference (where airfares, accommodation and other travel expenses have been met by Bass Coast Health),*
- (b) *participate in a networking lunch or dinner at a conference if it is part of the conference fee,*
- (c) *accept modest promotional items or samples from suppliers or potential suppliers.*

No offer of sponsorship or payment of expenses can be accepted if it is provided in a manner or upon conditions that might potentially interfere with or limit:

- the independence of a health care professional's treatment or advice, or his or her prescribing or dispensing practices
- the independence of a manager in making procurement and other operational decisions in the interests of Bass Coast Health
- Bass Coast Health's ability to carry out all its functions fully and impartially.

4.5 APPROVAL FROM THE CEO

When the CEO receives a completed application in the form of *Appendix 1*, or a written request containing equivalent information, he or she will determine whether the gift, hospitality, sponsorship or other gratuitous benefit may be retained or accepted, after giving consideration to the following factors:

- (a) the value and nature of the gift, hospitality, sponsorship or other benefit
- (b) whether the gift, hospitality, sponsorship or benefit has been offered by virtue of that staff member's role
- (c) the degree of openness surrounding the gift, hospitality, sponsorship or benefit
- (d) whether the gift or benefit is to be given to a staff member in a public forum in appreciation for that staff member's work, assistance or involvement (or on behalf of their team)

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- (e) whether the companies that supply medications to Bass Coast Health's patients, including situations where medications are not supplied directly to Bass Coast Health but where the prescribing and dispensing practices of individual health care professionals employed by Bass Coast Health will impact on which company supplies medications for a patient in the community (e.g. discharge medications).
- (f) whether refusal of the gift, hospitality or benefit would cause embarrassment or offence
- (g) whether the supplier currently supplies goods or services to Bass Coast Health, and if so, the nature and approximate value of the total supply of those goods and services per annum
- (h) whether Bass Coast Health is currently undertaking or will soon undertake a tender or other selection process, or is engaged in current negotiations, that might affect that supplier or potential supplier
- (i) whether there is any possibility that the staff member involved might be, or might appear to be, compromised in any procurement or business process or otherwise in relation to the staff member's role
- (j) whether the gift, hospitality, sponsorship or benefit implies any obligation or expectation that favours could be granted

Acceptance of the gift, hospitality, sponsorship or benefit must be unlikely to be perceived by an impartial observer to create a conflict of interest or influence the performance of the staff member's duties or Bass Coast Health's functions. Any circumstances must be able to successfully withstand public and professional scrutiny and conform to professional and community standards of ethics, good taste and appropriateness.

Any offer of sponsorship or any payment of expenses for Bass Coast Health or its staff should:

- (i) be in writing, on the letterhead of the sponsoring company, addressed to Bass Coast Health, setting out full details of the offer
- (ii) be simple, modest and secondary to the educational content of the meeting, conference or other event
- (iii) be relevant to health care services
- (iv) be provided in an environment that enhances the quality of health care, education and learning
- (v) not present a real or apparent conflict between the objectives, mission and values of Bass Coast Health, and those of the proposed sponsor
- (vi) not be conditional upon any obligation to purchase a particular product or prescribe a particular drug
- (vii) not involve endorsement of the sponsor or any of the sponsor's products
- (viii) make it clear whether it is being offered in connection with a sponsored clinical drug trial
- (ix) preferably be considered against criteria predetermined by Bass Coast Health that have been published or circulated in advance, so as to give other potential sponsors a similar opportunity

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(x) not subsidise or pay for the costs of family members or companions of attendees at educational meetings and conferences.

In some circumstances it may be appropriate for the CEO to approve a sponsorship with conditions. No offer of sponsorship or payment of expenses can be accepted if it is provided in a manner or upon conditions that might potentially interfere with or limit:

- the independence of a health care professional’s treatment or advice, or his or her prescribing or dispensing practices
- the independence of a manager in making procurement and other operational decisions in the interests of Bass Coast Health
- Bass Coast Health’s ability to carry out all its functions fully and impartially.

Depending on the circumstances, the public interest may be best served by Bass Coast Health calling for expressions of interest in respect of securing sponsorship, or by using other mechanisms to make other potential or competing sponsors aware of the need.

While Bass Coast Health as an organisation is legitimately entitled to seek expressions of interest for sponsorship, individual employees must not **seek or solicit sponsorship** from anyone where there could be a perception that they might stand to personally benefit. For example, it would be inappropriate for a staff member to write a letter to a pharmaceutical or other supply company to request funding to assist them personally to attend a conference or pay for other accommodation. A manager can write such a letter in respect of their staff. This avoids the appearance of soliciting benefits for oneself, which is not permissible especially in the public sector.

In some circumstances it may be appropriate to record the terms and conditions of an approved sponsorship arrangement in a written agreement. This will be determined by the CEO. The CEO is required to consider a request for approval under this Policy within a reasonable timeframe, so as not to compromise the event, hospitality or sponsorship that is proposed.

Gifts and Gratuities Register

Once the CEO has indicated his or her approval (or otherwise) on the form attached in *Appendix 1*, a copy of the completed form will be returned to staff member who is seeking permission, and the original completed form will be retained in the office of the Chief Executive for secure storage. These forms will **not** be added to the employee’s personnel record.

The Board, the Board Secretary, the CEO, the Internal Auditors, the Manager, Human Resources, and the staff member’s relevant Executive Director will have access to the forms in the Gifts and Gratuities Register. This register will be maintained by the Board Secretary, and in the event of an investigation, only authorised persons will have access to the forms kept within.

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The Bass Coast Health Finance, Audit and Risk Committee will review the Gifts and Benefits register for the previous calendar year at its first meeting of the year to assure the organisation that there is transparent reporting of accepted gifts, benefits and hospitality, and there is no evidence of attempts to improperly influence the decisions or actions taken by its employees.

This Gifts and Gratuities Register will assist Bass Coast Health to comply with the reporting and recording obligations required as a public sector organisation.

Promotional Items and Samples

Staff are permitted to retain and use modest promotional items and samples provided by suppliers or potential suppliers (e.g. pens, notepads, calendars, diaries, medical consumables), within reason. However staff should remain mindful that the use of multiple or significant promotional items bearing a supplier’s name or logo might be viewed as endorsing or promoting that supplier or their products.

Samples received by a staff member from a supplier or potential supplier are for use by Bass Coast Health, and are not the personal property of the staff member.

Bass Coast Health offering Hospitality

Bass Coast Health may from time to time, in appropriate but limited circumstances, wish to entertain outside entities or individuals associated with those entities. Such situations are governed by the principle that Bass Coast Health is committed to providing an ethical, efficient and accountable environment for the conduct of its operations.

When Bass Coast Health is the provider of gifts or hospitality, the same caution and diligence should be exercised as when Bass Coast Health is the recipient, so as to ensure that an impression is not created suggesting that Bass Coast Health is inappropriately attempting to secure the favour or influence of an outside entity or individual.

Bribery and Soliciting Benefits

If any offer or suggestion of a bribe is made to a staff member, the circumstances should be immediately reported to the CEO. Any staff member who accepts a gift or benefit without following the appropriate procedures as outlined in this Policy, may be subject to disciplinary action. Staff must not seek or solicit favours, gifts or benefits from anyone. Such conduct will be viewed seriously.

Under Victorian law, it remains a criminal offence for an employee to receive or solicit any “valuable consideration” which would in any way tend to influence him to show favour in relation to his employer’s business dealings. It is also contrary to the *Public Administration Act 2004*.

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6.0 DEFINITIONS

A **“token gift”** has value of less than AUD\$50.

A **“non-token gift”** has value of AUD\$50 or greater.

A **“gratuitous benefit”** is a free benefit or preferential treatment and includes vouchers, discounts, points in a loyalty or reward program, or use of facilities such as gyms or holiday homes.

“Hospitality” in this content includes meals, alcohol, entertainment and events. It does not include tea, coffee, biscuits or similar modest refreshments that are offered by most organisations as a courtesy to visitors attending a meeting.

“Sponsorship” in this context means a contribution in money or kind, generally by the corporate sector or private individuals, in support of public sector activity. It does not include consultancies, gifts, donations or bequests, where the benefit provided to Bass Coast Health is a unilateral act by a person or entity who is not a potential supplier of goods or services to Bass Coast Health, where there is clearly no potential expectation of future business.

Approved in Executive Meeting 04/10/2016

Review & Update by: 14/10/2019	Last Reviewed: 14/10/2016	ORG-G 1.0
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Title:	Gifts and Gratuities			
Section:	Corporate	PRH:	Manager, Human Resources	Policy & Procedure

APPENDIX 1 - HR-020 Gifts & Gratuities Request for Approval Form

REQUEST FOR APPROVAL BY THE CEO FOR APPROVAL IN RESPECT OF RECEIVING GIFT, HOSPITALITY, SPONSORSHIP OR OTHER GRATUITOUS BENEFIT

Tick the box that best indicates the nature of the gift or benefit in respect of which approval is being sought:

- Token gift (under \$50)
- Non-token gift (anything worth \$50 or more)
- Vouchers from suppliers of any value
- Christmas gifts from suppliers of any value
- Other gratuitous benefit (e.g. tickets, points in a loyalty or reward program)
- Hospitality (e.g. lunch, function, corporate event)
- Sponsorship (e.g. conference expenses)
- Other

Name / Position/Department of staff member who is seeking approval:

Provide full details of type and estimated value of the gift, benefit, hospitality or sponsorship being offered and attach supporting evidence

e.g. offer of sponsorship must be on company's letterhead. NB A gift, benefit, hospitality or sponsorship with a value over \$300 may incur a Fringe Benefits Tax (FBT) liability to Bass Coast Health

Who is the donor or proposed sponsor of this gift or benefit?

(include name of individual, their position, name and details of organisation)

Who is the intended recipient of this gift or benefit?

Is the donor or sponsor a current or potential supplier to Bass Coast Health? If so please outline the nature of the supply relationship including the annual amount of goods and services they supply to us, how they are selected by us, and any current or future tenders or negotiations potentially involving that supplier.

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