

## Gifts, Benefits and Hospitality Policy

### Purpose

This policy states Court Services Victoria's position on:

- responding to offers of gifts, benefits and hospitality; and
- providing gifts, benefits and hospitality.

This policy is intended to support individuals and Court Services Victoria (CSV) to avoid conflicts of interest; any actual, potential or perceived impropriety; and maintain high levels of integrity and public trust.

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### Scope

This policy applies to all CSV executive officers, staff, contractors and consultants where offers of gifts, benefits and hospitality are made by/to external parties such as service providers, contractors, consultants or court users.

This policy does not apply to gifts, benefits or hospitality offered internally i.e. by a judicial officer, VCAT member or CSV staff member to a CSV staff member.

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### Legislative and Policy Context

This policy should be read in conjunction with:

- *Public Administration Act 2004*,
- Code of Conduct for Victorian Public Sector Employees (Code of Conduct),
- Victorian Public Sector Commission's (VPSC) Gifts, Benefits and Hospitality Policy Framework,
- Minimum accountabilities for the management of gifts, benefits and hospitality, VPSC.

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### Principles

CSV is committed to and will uphold the following principles in applying this policy:

#### Public interest

Individuals have a duty to place the public interest above their private interests when carrying out their official functions. They will not accept gifts, benefits or hospitality that could raise a perception of, or actual, bias or preferential treatment. Individuals do not accept offers from those about whom they are likely to make business decisions.

#### Accountability

Individuals are accountable for:

- declaring all non-token offers of gifts, benefits and hospitality;
- declining non-token offers of gifts, benefits and hospitality, or where an exception applies under this policy, seeking approval to accept the offer; and
- the responsible provision of gifts, benefits and hospitality.

Individuals with direct reports are accountable for modelling good practice and promoting awareness of gifts, benefits and hospitality policies and processes.

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Responsibility for the management of the refusal or acceptance of non-token gifts, benefits and hospitality rests with:

- For non-executive staff and executive officers, the relevant jurisdiction CEO (or the CSV CEO for Jurisdiction Services);
- For CEOs, the relevant head of jurisdiction; and
- For the CSV CEO, the Courts Council.

### **Risk-based approach**

CSV through its policies, processes and audit committee, will ensure gifts, benefits and hospitality risks are appropriately assessed and managed. Individuals with direct reports will ensure they are aware of the risks inherent in their team's work and functions and monitor the risks to which their direct reports are exposed.

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## **Policy**

### **Overview**

CSV aims to create an environment of exemplary work standards and conduct, and to ensure high levels of positive public opinion.

This policy has been developed in accordance with requirements outlined in the Minimum accountabilities for managing gifts, benefits and hospitality issued by the Victorian Public Sector Commission (VPSC). These can be found at Schedule A.

#### Quick reference guide

##### **Responding to offers of gifts, benefits and hospitality**

- Decline **all** offers of gifts, benefits and hospitality, no matter how small, that are offered in order to influence an outcome or future treatment, or could be perceived to have such an influence, and from those about whom you are likely to make business decisions.
- **Token** offers of gifts, benefits and hospitality which would not be reasonably perceived within or outside the organisation as influencing you or raising an actual, potential or perceived conflict of interest, and in any case not worth more than \$50, may be accepted.
- **Non-token** offers of gifts, benefits and hospitality, including anything valued at more than \$50, should ordinarily be declined.
- **All non-token offers must be recorded using the Gifts, Benefits and Hospitality Declaration Form.** The individual receiving the non-token offer must complete the form and provide it to the relevant person to approve:
  - For non-executive staff and executive officers, the relevant jurisdiction CEO (or the CSV CEO for Jurisdiction Services);
  - For CEOs, the relevant head of jurisdiction; or
  - For the CSV CEO, the Courts Council.
- In exceptional circumstances, non-token offers may be accepted, where it does not raise an actual, potential or perceived conflict of interest or have the potential to bring the individual, CSV or the public sector into disrepute **and** there is a legitimate business reason for acceptance.
- Decisions about **ownership** of tangible non-token offers that are accepted are to be made by reference to this policy, with the approval of the relevant person (as set out above) and detailed on the Gifts, Benefits and Hospitality Declaration Form. In some circumstances, employees must transfer ownership of gifts to CSV.
- Completed and approved Gifts, Benefits and Hospitality Declaration Forms must be forwarded to CSV's Legal and Governance team for recording on CSV's Gifts, Benefits and Hospitality Register, which is publicly available on CSV's website.

##### **Providing gifts, benefits and hospitality**

- The provision of gifts, benefits and hospitality must:
  - Be for a business or other legitimate reason;
  - Entail costs that are proportionate to the benefits obtained for CSV or the State; and
  - Uphold the reputation of CSV and the public sector.
- CSV's procurement rules and relevant finance policies relating to financial authorisations and expenditure, as well as any relevant jurisdiction specific policies, must be adhered to.

[approved version of this policy, consult the CSV intranet.](#)

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## Offers of gifts, benefits or hospitality

Whilst working for CSV, you must not solicit (ask for) gifts, benefits or hospitality for you or any other individual.

This section sets out how to decline, accept, and record offers of gifts, benefits and hospitality made to you by any external party.

### Declining offers

Individuals are to refuse all offers, no matter how small (excluding token hospitality, such as sandwiches over a lunchtime meeting):

- made by a current or prospective supplier;
- made during a procurement or tender process by a person or organisation involved in the process;
- likely to influence them, or be perceived to influence them, in the course of their duties or raise an actual, potential or perceived conflict of interest;
- by a person or organisation about which they will likely make a decision (applies to the exercise of quasi-judicial powers, processes involving grants, sponsorship, regulation, enforcement or licensing);
- 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;
- where, in relation to hospitality and events, the organisation will already be sufficiently represented to meet its business needs;
- where acceptance could be perceived as endorsement of a product or service, or acceptance would unfairly advantage the sponsor in future procurement decisions;
- made by a person or organisation with a primary purpose to lobby Ministers, Members of Parliament or public sector agencies; or
- made in secret.

If an individual considers they have been offered a bribe or inducement, the offer must be reported to your manager, who should then report it to the relevant jurisdiction CEO (or CSV CEO for Jurisdiction Services staff). Any criminal or corrupt conduct must be reported to Victoria Police and / or the Independent Broad-based Anti-corruption Commission.

### Accepting 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.

Whilst 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.

Except as set out above under the heading 'Declining offers', individuals may accept token offers of gifts, benefits and hospitality without approval or declaring the offer on CSV's Gifts, Benefits and Hospitality Register.

#### *Cumulative token offers*

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. This means that if an individual receives multiple token offers from the same person/organisation over a twelve month period which exceed the cumulative value of \$50, the policy guidelines and process for

non-token offers should be applied.

### Accepting non-token offers

There will be some exceptions where there is a legitimate business reason for accepting a non-token offer. All accepted non-token offers **must** be approved in writing using the Gifts, Benefits and Hospitality Declaration Form, recorded in CSV's 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, CSV or the public sector into disrepute (the 'GIFT' test at Table 1 is a good reminder of what to think about in making this assessment); 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 CSV, the public sector or the State.

Individuals may be offered a gift or hospitality where there is no opportunity to seek written approval 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 complete the Gifts, Benefits and Hospitality Declaration Form and seek approval within five business days.

Individuals should consider the GIFT test at **Table 1** to help respond to a non-token offer.

Table 1: GIFT test

<b>G</b>	Giver	<b>Who is providing the gift, benefit or hospitality and what is their relationship to me?</b> <i>Does my role require me to select contractors, award grants, regulate industries or determine government policies? Could the person or organisation offering the gift, benefit or hospitality benefit from a decision I make?</i>
<b>I</b>	Influence	<b>Are they seeking to influence my decisions or actions?</b> <i>Has the gift, benefit or hospitality been offered to me publicly or privately in my role as a CSV staff member or individual? Is it a courtesy, a token of appreciation or highly valuable? Does its timing coincide with a decision I am about to make?</i>
<b>F</b>	Favour	<b>Are they seeking a favour in return for the gift, benefit or hospitality?</b> <i>Has the gift, benefit or hospitality been offered honestly? Has the person or organisation made several offers over the last 12 months? Would accepting it create an obligation to return a favour?</i>
<b>T</b>	Trust	<b>Would accepting the gift, benefit or hospitality diminish public trust?</b> <i>How would I feel if the gift, benefit or hospitality became public knowledge? What would my colleagues, family, friends or associates think?</i>

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

All non-token offers, whether accepted or declined, must be recorded in CSV's Gifts, Benefits and Hospitality Register. The business reason for accepting the 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 CSV, the public sector or State.

CSV's Gifts, Benefits and Hospitality Declaration Form must be completed and approved for all non-token offers of gifts, benefits and hospitality (whether accepted or declined). Approvals are to be obtained as follows:

- for non-executive staff and executive officers, the relevant jurisdiction CEO (or the CSV CEO for Jurisdiction Services);
- for CEOs, the relevant head of jurisdiction; or
- for the CSV CEO, the Courts Council.

The completed form must be forwarded by the person approving the form to the Legal and Governance team, Jurisdiction Services, so that the information may be recorded on CSV's Gifts,

Benefits and Hospitality Register.

The Gifts, Benefits and Hospitality Register for the current and previous financial years will be published on CSV's website, as required by the VPSC's *Minimum accountabilities for managing gifts, benefits and hospitality*.

CSV's Audit and Risk Portfolio Committee will receive a report at least annually on the administration and quality control of the gifts, benefits and hospitality policy, processes and register. The report will include analysis of CSV'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.

### **Ownership of gifts offered to individuals**

Non-token gifts accepted by an individual for their work or contribution may be retained by the individual where approved.

Employees must transfer to CSV **official gifts or any gift of cultural significance**, particularly where it is of significant value (over \$50).

Options for retaining the gift at CSV may include:

- displaying the gift at an appropriate CSV location
- using the gift in CSV as an additional shared resource.

### **Disposal of gifts**

When a gift is received and is valued at \$50 or above, and cannot be retained by the individual or CSV, the relevant jurisdiction CEO (or CSV CEO for Jurisdiction Services staff) may order the appropriate disposal of the gift. The disposal must be recorded in the Gifts, Benefits and Hospitality Register via the Gifts, Benefits and Hospitality Declaration Form.

**Subject to conflict of interest principles, options for appropriate disposal include:**

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

**Note:** Public entities such as the National Gallery of Victoria, State Library of Victoria and Museum Victoria retain a right of first refusal over any official gifts intended for the State that are deemed to be of historical or cultural significance. To determine whether any of these organisations, or another public entity may want to accept and retain the gift, an email should be sent to the Director, Arts Victoria describing the item and seeking advice on its retention.

### **Prizes**

Where a staff member wins a prize as a result of entering a competition in their capacity as a public official or at a work-related event, the prize should be treated as a gift in accordance with the table above. However, if the provider of the prize has business dealings with CSV and could reasonably be perceived to benefit from the awarding of such a prize, it should be declined and/or returned. Refer also to CSV's Conflicts of Interest and Declaration of Private Interests Policy.

### **Providing gifts, benefits or hospitality**

Gifts, benefits and hospitality may be provided to welcome guests, facilitate the development of business relationships that are in the interests of CSV, a particular jurisdiction or the State, further public sector business outcomes and to celebrate achievements or the events such as the opening of a new court or tribunal.

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 in that it furthers the conduct of official business or other legitimate organisational goals, or promotes and supports government

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policy objectives and priorities;

- that any costs are proportionate to the benefits obtained for CSV or the State, and would be considered reasonable in terms of community expectations (the 'HOST' test at Table 2 is a good reminder of what to think about in making this assessment); and
- it does not raise an actual, potential or perceived conflict of interest.

Table 2: HOST test

H	Hospitality	<b>To whom is the gift or hospitality being provided?</b> <i>Will the recipients be external business partners, or staff members of an external host organisation?</i>
O	Objectives	<b>For what purpose will hospitality be provided?</b> <i>Is the hospitality being provided to further the conduct of official business? Will it promote and support policy objectives and priorities? Will it contribute to staff wellbeing and workplace satisfaction?</i>
S	Spend	<b>Will public funds be spent?</b> <i>What type of hospitality will be provided? Will it be modest or expensive, and will alcohol be provided? Will the costs incurred be proportionate to and less than the benefits obtained?</i>
T	Trust	<b>Would public trust be enhanced or diminished?</b> <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?</i>

## Containing costs

Individuals should contain costs involved in the provision of gifts, benefits and hospitality wherever possible. 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?
- Will providing the gift, benefit or hospitality be viewed by the public as excessive?

There may be occasions where it is appropriate for a CSV staff member to give a gift to another agency/department or private individual or organisation, such as to thank them for speaking at an event. Expenditure on minor gifts for protocol or of a public relations nature is acceptable where such gifts support CSV's functions and would be considered acceptable and in accordance with community expectations. Where possible, the gift should be symbolic, rather than financial in value.

Gifts of token value may be provided to CSV staff members as part of a recognition or reward scheme for significant achievements, events, service milestones or retirement. A token gift, such as a card and/or flowers, may also be sent to family members of deceased staff members if appropriate.

Personal celebrations, such as birthdays, marriages or the birth of children must not be funded by CSV.

## Compliance

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 CSV's Conflicts of Interest and Declaration of Private Interests

Policy.

Actions inconsistent with this policy may constitute misconduct under the *Public Administration Act 2004*, which includes:

- breaches of the binding Code of conduct for Victorian public sector employees, such as sections of the Code covering conflict of interest (section 3.7), public trust (section 3.9) and gifts and benefits (section 4.2); and
- individuals making improper use of their position.

For further information on managing breaches of this policy, please contact the Workplace Relations team in Jurisdiction Services.

## Speak up

Individuals who consider that gifts, benefits and hospitality or conflict of interest within CSV may not have been declared or is not being appropriately managed should speak up and notify their manager.

CSV will take decisive action, including possible disciplinary action, against individuals who discriminate against or victimise those who Speak Up in good faith.

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## Procedures

Apply the principles and guidance stated in this policy to determine whether you can accept a gift, benefit or hospitality, or offer a gift, benefit or hospitality.

### Offers of gifts, benefits or hospitality

Complete the approved Gifts, Benefits and Hospitality Declaration Form (where required) and forward an electronic copy to the Legal and Governance team within Jurisdiction Services ([declarations@courts.vic.gov.au](mailto:declarations@courts.vic.gov.au)) for registration on the Gifts Register. The original declaration form should be retained in the employees personnel file.

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 Manager, Legal and Governance, Jurisdiction Services, for advice.

### Providing gifts, benefits or hospitality

When procuring hospitality and/or gifts, you must comply with CSV's procurement rules.

Approval for providing gifts, benefits or hospitality is to be obtained in accordance with relevant CSV finance policies including: Financial Authorisation Policy and Procedure, Expenditure Policy and Procedure, Purchasing Card Policy and Procedure, and Petty Cash Policy; and/or any relevant jurisdiction specific policies.

Refer to the Finance Toolshed on the CSV intranet for more information on CSV finance policies.

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## Definitions

### 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

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behaviour.

<b>Business associate</b>	an external individual or entity which the organisation has, or plans to establish, some form of business relationship, or who may seek commercial or other advantage by offering gifts, benefits or hospitality.
<b>Conflict of interest</b>	
<i>Actual</i>	There is a real conflict between an employee's public duties and private interests.
<i>Potential</i>	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.
<i>Perceived</i>	the public or a third party could form the view that an employee's private interests could improperly influence their decisions or actions, now or in the future.
<b>Court Services Victoria</b>	includes jurisdictions, Judicial College of Victoria and Jurisdiction Services.
<b>Donor</b>	is the person or organisation offering the gift, benefit or hospitality.
<b>Gifts</b>	are 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, jewellery, or expensive pens), low value (e.g. small bunch of flowers) and consumables (e.g. chocolates). Fundraising by public sector organisations that is consistent with relevant legislation and any government policy is not prohibited under the minimum accountabilities.
<b>Hospitality</b>	is the friendly reception and treatment of guests, ranging from light refreshment at a business meeting to expensive restaurant meals and sponsored travel and accommodation.
<b>Legitimate business benefit</b>	gifts, benefits and hospitality accepted or provided for a business purpose, in that it furthers the conduct of official business or other legitimate goals of the organisation, public sector or State.
<b>Public official</b>	has the same meaning as under section 4 of the Public Administration Act 2004. This includes: public sector employees; statutory office holders; and directors of public entities.
<b>Register</b>	is a record, preferably electronic, 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 interest 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.
<b>Token offer</b>	is an offer of a gift, benefit or hospitality that is offered as a courtesy or is of inconsequential or trivial value to both the person making the offer and the individual.  Whilst the primary determinant of a token offer is that it would not be reasonably perceived within or outside the organisation as influencing an individual or raising an actual, potential or perceived conflict of interest, it cannot be worth more than \$50 (including cumulative offers from the same

source over a 12 month period).

**Non-token offer**

is an offer of 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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## Related Policy and other documents

Gifts, Benefits and Hospitality Declaration Form Gifts Register

*Public Administration Act 2004*

Code of conduct for Victorian public sector employees 2015

Code of conduct for Directors of Victorian public entities 2016

Conflict of Interest and Declaration of Private Interests Policy

Misconduct Policy

Workplace Related Events and Social Functions Policy

*Public Records Act 1973*

*Financial Management Act 1994*

*Freedom of Information Act 1982*

*Crimes Act 1958 (Vic)*

Victorian Public Sector Commission's (VPSC) Gifts, Benefits and Hospitality Policy Framework

Minimum accountabilities for the management of gifts, benefits and hospitality, VPSC

Instructions supporting the Standing Directions of the Minister of Finance 2016

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## Version control

Version	Approved by	Date of Approval	TRIM Reference
V0.2	Audit and Risk Portfolio Committee	18 August 2015	CD/15/294581
V0.2	HR Portfolio Committee	24 August 2015	CD/15/294581
V0.3	HR Portfolio Committee	21 September 2015	CD/16/608122
V1.0	Courts Council	7 October 2015	CD/16/608122
V1.1	HR Portfolio Committee	22 May 2016	CD/16/608122
V2.0	CEO under delegation from Courts Council	27 June 2017	CD/16/608122

### APPROVAL

Approved under the Standing Direction of the Minister for Finance 2.5 delegation from the Courts Council as per its meeting of 7 June 2017.

Signed as per CD/17/341871

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CSV CEO

Name: David Ware

Date: 27 June 2017

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## Schedule A: Minimum accountabilities

### 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<sup>1</sup>) 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.

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<sup>1</sup> Except where a person employed under the Education and Training Reform Act 2006 in a Victorian Government school receives an offer from or on behalf of a parent, guardian, carer, or student intended to express appreciation of the person's contribution to the education of a student or students, in which case non-token includes any offer worth more than \$100.

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. Establish, implement and review organisational policies and processes for the effective management of gifts, benefits and hospitality that comprehensively address these minimum accountabilities.