

## Gifts and Benefits Procedure

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**Overarching Policy:** [Employment Obligations – DHHS – Policy](#)  
[Employment Obligations – Worker – Policy](#)

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**Contact:** Director, Human Resources Management and Strategy

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### Approval

Prepared by	Belinda Dickenson	HR Advisor, Employment Policy	6166 3822	June 2014
Through	Louise Downham	HR Consultant, Employment Policy	6166 3682	June 2014
Approved by	David Nicholson	Deputy Secretary, Strategic Control Workforce and Regulation	6166 3680	30 June 2014

### Revision History

Revision No. 1	Processes refined and clarified			
Revised by	Belinda Dickenson	HR Advisor, Employment Policy	6166 3832	15 May 2015
Approved by	Erin Baker	Acting Director, Human Resources and Workplace Safety	6166 3697	15 May 2015
Revision No. 2	Processes refined as per recommendations made by the Integrity Commission following Operation Kilo findings			
Revised by	Jenni Mandersloot	Advisor - Workforce Development and HR Policy	6166 3686	July 2016

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Through	Renee Anderson	Director, Human Resources Management and Strategy	6166 3688	August 2016
Approved by	Michael Reynolds	A/Deputy Secretary, Corporate Policy and Regulatory Services	6166 3808	

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# Introduction

- The Department of Health and Human Services (DHHS) is committed to appropriately managing the giving and receiving of gifts and benefits in order to ensure that it performs its functions in a fair, transparent, ethical, professional and impartial manner.
- This procedure supports the [Employment Obligations – Worker – Policy](#) and [Employment Obligations – DHHS – Policy](#) and applies to workers working with, engaged by, or performing duties on behalf of the DHHS.
- The offer and acceptance of gifts and benefits potentially creates a conflict of interest between a worker’s private interests and their public duty. It therefore poses a risk to the Agency’s perceived (and actual) integrity and public reputation.
- Workers should not expect to receive extra for carrying out their salaried duties, nor should they personally benefit (beyond their salary and Award entitlements) from their role in the public service.
- The DHHS promotes a culture which encourages workers to make ethical decisions with regard to gifts and benefits and seek Delegate approval where necessary.
- Non-compliance with this procedure may result in legal action under the *Criminal Code*, disciplinary action under the [State Service Act 2000](#), or other action as deemed appropriate.
- Workers have a duty to report any concerns they have in relation to the giving and receiving of gifts or benefits, in relation to both themselves and others.
- This procedure does not describe the requirements associated with conflicts of interest arising from the giving and receiving of gifts and benefits – refer to the [Conflict of Interest and Improper Use of Power Procedure](#).
- This procedure describes the requirements associated with giving and receiving gifts and benefits and the procedural steps for how to manage:
  - an offer to receive a gift or benefit
  - the receipt of a gift or benefit.

## Key Definitions

- ‘Backdoor’ is an attempt by an unsuccessful tenderer to undermine a contract through special offers.
- ‘Benefit’ is a non-tangible item of value offered to a worker which is not part of their normal salary or employment entitlement in accordance with their relevant Award/Agreement. Refer to Attachment One for examples
- ‘Bequest’ is property or money left to a person in a Will and, in this procedure, refers to a bequest from a client or patient.

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- 'Bribe' is a gift or benefit offered to or solicited by a worker to influence a person to act in a particular way. Refer to Attachment One for examples.
- 'Conflict of interest' describes an actual, potential or perceived conflict between a worker's private interests and their duties, responsibilities or obligations as a DHHS worker.
- 'Disclosure' is notification provided by a worker that a gift or benefit has been received or that an invitation to receive a gift or benefit has been received.
- 'Employee' is a permanent or fixed-term employee appointed under Section 37 of the [State Service Act 2000](#) and encompasses 'Identified and Surplus Employees' and 'Officers'.
- 'Gift' is any item of value offered to a worker which is not part of their normal salary or employment entitlement in accordance with their relevant Award/Agreement, and as defined in [Employment Direction No. 8 – Gifts and Benefits](#). Refer to Attachment One for examples.
- 'Token gift or benefit' refers to items which hold minimal value, pose no conflict of interest risk and are consistent with community expectations to be received by a DHHS worker in the course of their employment or engagement. Items of a token nature commonly include mass produced promotional items offered as a matter of course during normal work interactions.
- 'Officer' is a person appointed as a holder of a prescribed office, senior executive or equivalent specialist in accordance with Section 31 of the [State Service Act 2000](#).
- 'Relevant Delegate' The employee or officer who has delegated authority to approve actions are described in the [DHHS Delegations and Administrative Authorities – Human Resources Management Delegations and Administrative Authorities](#). In accordance with [Employment Direction No. 8 – Gifts and Benefits](#), an employee or officer who is appropriately delegated authority by the head of the agency can make decisions about reportable gifts and benefits.
- 'Workers' are individuals working with, engaged by, performing duties or fulfilling responsibilities on behalf of the DHHS. Workers include officers, employees, government purchasers, students, selection panel members, volunteers, labour hire workers, council/committee members and independent contractors.

## Mandatory Requirements

### Worker Obligations

- Workers must not offer gifts or benefits to anyone, or receive gifts or benefits from anyone in relation to their employment or engagement with the DHHS or Tasmanian State Service (TSS) which:
  - have the potential to influence, or could be perceived to influence the DHHS' ability to perform its functions in a fair, transparent, ethical, professional and impartial manner
  - create a potential, perceived or actual conflict of interest
  - are illegal or inconsistent with community expectations.

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- Workers must ensure that immediate family members are not the recipients of gifts or benefits that could be perceived as attempting to influence the behaviour of the worker.
- Gifts or benefits offered to the immediate family member of a worker which could be perceived as an attempt to influence the worker in relation to their public duties, must be reported and managed the same as if the offer had been directly made to the worker.
- All Government purchasers must decline and report any offers of a gift or benefit made either during a procurement process or in response to a procurement decision.
- Selection panel members, including those not employed by the TSS/DHHS must decline and report any offers of a gift or benefit made during a recruitment process.
- Any worker engaged in procurement processes must observe the Procurement Ethical Standards and abide by the Procurement Code of Conduct as described in [Treasurer's Instruction](#) No. 1101 (goods and services). For further information, refer to the definition contained in [Buying for Government](#).
- Workers must report any concerns they have in relation to the giving and receiving of gifts or benefits, in relation to both themselves and others. Concerns should be reported to:
  - an appropriate Human Resources Management and Strategy (HRMS) team member; or
  - the Director, Human Resources Management and Strategy; or
  - the Integrity Commission.
- Workers must not solicit gifts or benefits under any circumstances.

## Training and Guidance

- Workers must be provided with, and participate in, induction and training in this procedure and the Code of Conduct.
- Managers must ensure that all workers have received adequate training in relation to Gift and Benefits
- Information and guidelines must be available for all DHHS employees, including on the DHHS intranet.

## Sponsored Travel

- Requests by workers to accept an offer of sponsored travel must only be authorised where:
  - there is a benefit to the Agency; and
  - a conflict of interest (real or perceived) does not exist; and
  - the worker has been advised that they are required to share their learning on return.
- Sponsored travel is not made more acceptable when undertaken in a worker's own time, or where the worker considers it as unofficial, if there is a link (whether real or perceived) between the gift and their employment, and therefore must be declared.

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## Reporting and Managing Offers and Receipts

- Workers who receive an offer of a gift or benefit (whether accepted or declined) must disclose the offer in any circumstances where the offer is:
  - intended to influence a decision
  - of substantial value
  - illegal
  - one of a series
  - made in secret
  - following an unsuccessful procurement bid
  - likely to be perceived as 'suspect'
- Workers who receive an offer of a gift or benefit (whether accepted or declined) must disclose the offer where there is likely to be a public expectation that the offer should be declared
- Workers who receive an offer of a gift or benefit (whether accepted or declined) must disclose the offer in any circumstances where the offer can be considered as suspect, with reference to the guide in Attachment One.
- Workers, and their immediate family, must never accept the offer of a gift or benefit where accepting that gift could constitute bribery. Bribery is a crime, therefore if an offer or suggestion of a bribe is made directly or indirectly:
  - the worker must reject the offer and stop interacting with the person
  - the offer must be reported immediately
- Gifts or benefits received as a bequest through a will, and therefore cannot be declined, can be accepted without authorisation but must be declared.
- Any gift received which was unable to be declined, was accepted without authorisation, or has not yet been returned, remains the property of the DHHS until otherwise determined by the Delegate (unless it is a bequest).
- Workers who wish to accept the offer of a gift or benefit must not accept until authorised by the relevant Delegate and approval documented on the Gifts and Benefits Declaration Form (unless it is a bequest).
- Arrangements where points are accumulated and rewards offered should be avoided for Government purchases, and a discount negotiated as an alternative wherever possible. Where arrangements for the accumulation of points are in place, clear guidelines must exist to ensure that:
  - points are used for the benefit of the Agency only
  - purchasing decisions are not influenced
  - all benefits gained from the accumulation of points are declared.

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- Workers must comply with their relevant Delegate's decision.
- The relevant Delegate must send the completed Gifts and Benefits Declaration Form to the Director, Human Resources Management and Strategy within five working days of receiving the form from the worker.
- Information from Gifts and Benefits Declaration Form must be recorded on the Gifts and Benefits Register.
- The Director, Human Resources Management and Strategy must consult with the Secretary as soon as practicable if concerns related to gifts and benefits arise.

## Other

- Actions associated with this procedure must be appropriately authorised in accordance with the [DHHS Delegations and Administrative Authorities – Human Resources Management Delegations and Administrative Authorities](#).
- For officers and employees, non-compliance with this procedure may constitute misconduct and will be dealt with in accordance with [Employment Direction No. 5 – Procedures for the Investigation and Determination of Whether an Employee has breached the Code of Conduct](#).
- Conflicts of interest which arise through the giving or receiving of gifts and benefits must be managed in accordance with the [Conflict of Interest and Improper Use of Power Procedure](#).
- The Director, Human Resources Management and Strategy must ensure that documentation associated with gifts and benefits is:
  - managed and stored appropriately
  - made available for audit, investigation and reporting purposes

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# Procedure

## How to manage receipt of an offer of a gift or benefit

- 1 A worker is offered, or has received, a gift or benefit.
- 2 The worker determines if the offer or receipt should be declared, obtaining advice if required and with reference to the mandatory requirements and the attached guides:
  - 2.1 if the gift or benefit is determined to be token, non-suspect, and the worker identifies that it does not need to be declared, the process ends
  - 2.2 if the gift or benefit is not of a token nature, is suspect, or otherwise should be declared, the process continues.
- 3 The worker:
  - 3.1 politely declines the offer; or
  - 3.2 determines that the gift or benefit cannot be declined or returned; or
  - 3.3 identifies that they wish to make application to the Delegate for authorisation to accept the gift or benefit.
- 4 The worker records the details on Section 1 of the [Gifts and Benefits Declaration Form](#) and:
  - 4.1 If the worker has declined the offer and does not wish to make application to accept, forwards the form to the relevant Delegate, details are recorded on the [Gifts and Benefits Declaration Form](#) and the process ends.
  - 4.2 If the worker was unable to decline the offer, follow the procedure for 'How to manage the receipt of a gift that was unable to be declined'.
  - 4.3 If the worker has accepted the offer without authorisation, and it cannot be returned, follow the procedure for 'How to manage the unauthorised acceptance of a gift or benefit'.
  - 4.4 If the worker wishes to make application to accept the gift or benefit, the worker completes section 3 of the [Gifts and Benefits Declaration Form](#), and forwards the form to the Delegate.

## How to manage the unauthorised acceptance of a gift or benefit

- 1 The worker has accepted a gift or benefit without authorisation which cannot be returned.
- 2 The worker records the details on Section 1 and Section 2 of the [Gifts and Benefits Declaration Form](#); and
  - 2.1 if they wish to request authorisation for acceptance of the gift, Section 3: or
  - 2.2 if the gift cannot be transferred or disposed of (e.g. if it has already been used or consumed), completes Section 3 and Section 5.

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- 3 The Delegate reviews the declaration, requesting more information from the worker (if required), and determines if:
  - 3.1 the worker acted appropriately and no further action is required. The procedure for 'How to manage an offer which was unable to be declined' can then be followed; or
  - 3.2 the worker acted inappropriately and further action is required, including:
    - 3.2.1 the provision of training and advice; or
    - 3.2.2 further investigation of the circumstances; or
    - 3.2.3 the commencement of disciplinary processes.
- 4 The Delegate documents the actions to be taken in the 'Additional Comments' section of the [Gifts and Benefits Declaration Form](#), forwards a copy of the form to the Director, HRMS and ensures that the recommended actions are implemented.

## How to manage authorisation to accept the offer of a gift or benefit

- 1 A worker has received authorisation from their relevant Delegate to accept a gift or benefit as indicated on the [Gifts and Benefits Declaration Form](#).
- 2 The worker accepts the gift or benefit and completes Section 5 of the Gifts and Benefits Declaration Form.
- 3 The worker provides the completed [Gifts and Benefits Declaration Form](#) to the Director, Human Resources Management and Strategy within five working days of the receipt of the gift or benefit.
- 4 The Director, Human Resources Management and Strategy:
  - 4.1 arranges for the appropriate storage of the [Gifts and Benefits Declaration Form](#)
  - 4.2 updates the Gifts and Benefits Register.

## How to manage the offer of a gift or benefit which was unable to be declined

- 1 A worker has advised their relevant Delegate of the receipt of a gift or benefit that they have identified as unable to be declined and completes Section 1 of the [Gifts and Benefits Declaration Form](#).
- 2 The Delegate determines if the gift or benefit is appropriate for acceptance, documents the decision in Section 4 of the [Gifts and Benefits Declaration Form](#), and:
  - 2.1 where it is determined that it is appropriate for the worker to accept the gift or benefit, follows the procedure for 'How to manage the receipt of a gift or benefit'.

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- 2.2 where it is determined as inappropriate for the worker to accept the gift or benefit, or the worker does not wish to personally accept, determines the appropriate action to take, including:
- retaining the gift for the benefit of the DHHS
  - donation to charity
  - destruction/disposal of the gift
- 2.3 where it is determined that the worker should have declined the offer and has accepted the gift or benefit without authorisation, follows the procedure for 'How to manage the unauthorised acceptance of a gift or benefit'.
- 3 The Delegate records the action on the [Gifts and Benefits Declaration Form](#), forwards it to the Director, Human Resources Management and Strategy within five working days, and it is recorded on the register.

## Roles and Responsibilities/Delegations

- The Secretary is responsible for:
  - supporting, endorsing and enforcing this procedure
  - supporting a culture which encourages the disclosure, declaration and appropriate management of gifts and benefits
  - overseeing the gifts and benefits processes including the Gifts and Benefits Register
  - exercising judgment and providing direction in relation to gifts and benefits
  - upholding their obligations as a worker in relation to gifts and benefits and consulting the Tasmanian Integrity Commission if required
  - ensuring that all workers have adequate access to information and training
  - ensuring conflicts of interest which arise as a result of gifts and benefits are appropriately managed in accordance with the [Conflict of Interest and Improper Use of Power Procedure](#).
- Delegates are responsible for:
  - supporting and enforcing this procedure
  - supporting a culture which encourages the disclosure, declaration and appropriate management of gifts and benefits
  - ensuring that workers within their area of responsibility are sufficiently knowledgeable in relation to this procedure
  - exercising judgment and providing direction in relation to the management of gifts and benefits
  - ensuring conflicts of interest which arise as a result of gifts and benefits are appropriately managed in accordance with the [Conflict of Interest and Improper Use of Power Procedure](#).

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- upholding their obligations as a worker in relation to gifts and benefits and seeking direction from the Secretary and/or Tasmanian Industrial Commission should gifts or benefits-related concerns arise.
- Deputy Secretaries, Directors and Managers are responsible for:
  - supporting and enforcing this procedure
  - supporting a culture which encourages the disclosure, declaration and appropriate management of gifts and benefits
  - educating, training and inducting workers in relation to gifts and benefits
  - providing direction to workers on a case by cases basis related to gifts and benefits decisions and documenting the direction provided
  - ensuring conflicts of interest which arise as a result of gifts and benefits are appropriately managed in accordance with the [Conflict of Interest and Improper Use of Power Procedure](#).
  - upholding their obligations as a worker in relation to gifts and benefits and seeking direction from the relevant Delegate, the Secretary and/or the Tasmanian Integrity Commission should it be required.
- The Director, Human Resources Management and Strategy is responsible for:
  - supporting and promoting this procedure
  - supporting a culture which encourages the disclosure, declaration and appropriate management of gifts and benefits
  - exercising judgment and providing advice in relation to gifts and benefits
  - arranging for the appropriate storage of completed [Gifts and Benefits Declaration Forms](#)
  - maintaining a Gifts and Benefits Register with received gifts and benefits
  - upholding their obligations as a worker in relation to gifts and benefits and consulting the Secretary for direction should gifts or benefits-related concerns arise
  - ensuring conflicts of interest which arise as a result of gifts and benefits are appropriately managed in accordance with the [Conflict of Interest and Improper Use of Power Procedure](#).
  - providing gifts and benefits related documentation and information for audit, investigation and reporting purposes.
- HR teams are responsible for:
  - supporting and promoting this procedure
  - supporting a culture which encourages the disclosure, declaration and appropriate management of gifts and benefits
  - exercising judgment and providing advice in relation gifts and benefits

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- upholding their obligations as a worker in relation to gifts and benefits and seeking direction from the relevant Delegate, the Secretary and/or the Tasmanian Integrity Commission should gifts or benefits-related concerns arise.
- ensuring conflicts of interest which arise as a result of gifts and benefits are appropriately managed in accordance with the [Conflict of Interest and Improper Use of Power Procedure](#).
- Workers are responsible for:
  - compliance with this procedure
  - supporting a culture which encourages the disclosure, declaration and appropriate management of gifts and benefits
  - seeking direction from and complying with direction received from their relevant Delegate in relation to the management of gifts and benefits, prior to acceptance
  - disclosing the receipt of gifts or benefits to the Director, Human Resources and Workplace using the [Gifts and Benefits Declaration Form](#)
  - ensuring conflicts of interest which arise as a result of gifts and benefits are appropriately managed in accordance with the [Conflict of Interest and Improper Use of Power Procedure](#).

## Related Documents/Legislation

- [State Service Act 2000](#)
- [State Service Regulations 2011](#)
- [Public Interest Disclosure Act 2002](#)
- [Employment Direction No. 1 – Employment in the State Service](#)
- [Employment Direction No. 8 – Gifts and Benefits](#)
- [Employment Direction No. 5 – Procedures for the Investigation and Determination of Whether an Employee has Breached the Code of Conduct](#)
- [Employment Obligations – Worker – Policy](#)
- [Employment Obligations – DHHS – Policy](#)
- [Public Interest Disclosure Policy](#)
- [Public Interest Disclosure Procedure](#)
- [Conflict of Interest and Improper Use of Power Procedure](#)
- [Tasmanian Integrity Commission – Speak Up Campaign](#)
- [Tasmanian Integrity Commission – Misconduct Risk Areas](#)
- [Treasurer's Instruction](#)
- [Gifts and Benefits Declaration Form](#)

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# Attachments

- Attachment One: Examples of Common Gifts and Benefits
- Attachment Two: Gifts and Benefits Guide

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# Attachment One:

## Examples of Common Gifts/Benefits

The table below is a guide to common gifts and benefits and supports ethical decision making.

Offer or receipt of a gift or benefit must be declared if:

- there is an actual, perceived or potential conflict of interest
- it could be considered 'suspect'
- there is likely to be a public perception that the offer is suspect

An offer should be considered suspect if:

- it is intended to influence a decision
- it is made in secret
- it is of significant value or could be perceived as of significant value

All the circumstances of any offer should be taken into consideration, and refer to the mandatory requirements in this procedure.

Gift/Benefit	Response- what to do if you receive or are offered	Should the offer be declared?
Personal gift made by a personal friend or family member		NO If offered in a purely personal capacity
Illegal items e.g. drugs	Reject the offer and immediately inform the delegate.	YES
Cash (including gift cards and vouchers)	Cash offers must always be refused and reported immediately.	YES
Frequent flyer/travel points		YES The accumulation of points should be declared.

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Gift/Benefit	Response- what to do if you receive or are offered	Should the offer be declared?
Loyalty cards (personal) providing a benefit to the member in exchange for purchases or similar.	Workers must not use personal loyalty or benefit program memberships in relation to DHHS purchases (eg buying refreshments for a meeting using their own Flybuys card)	YES The accumulation of points should be declared
Loyalty/reward points for DHHS purchases (e.g. frequent buyers card)	Arrangements where points are accumulated and rewards offered should be avoided for Government purchases. Suggest that a discount be offered instead.  The accumulation of points must not influence purchasing decisions. Consider what the points can be used for, and whether individual employees may seek to benefit from the points.	NO - an offer of an arrangement to accumulate reward points does not need to be declared unless it is 'suspect'  YES - Any items purchased (for an individual or the DHHS) using accumulated reward points must be declared.
Alcohol	A gift of alcohol - if inexpensive, may be considered token in non-suspect circumstances - see 'box of chocolates' below.  An offer of a drink bought at a function or conference (see 'cup of coffee' below).	YES - if during or as the result of a procurement process* YES - if during a recruitment process* YES - under any circumstances where the offer was accepted NO - for other circumstances if the gift was declined (unless the offer is 'suspect')
A box of chocolates, bunch of flowers or similar	Respond appropriately to ensure that the giving of gifts does not become a regular or expected occurrence just for doing one's job.  Consider that the gift belongs to the Agency, not any individuals and, if unable to be declined or returned, the Delegate should determine appropriate action.	NO - if non-suspect and of low value on a one off occasion YES – in most other circumstances  Consider the circumstances and value of the item/s.

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Gift/Benefit	Response- what to do if you receive or are offered	Should the offer be declared?
A cup of coffee at a café	<p>It is advisable to decline the offer and consider if meeting in a café is an appropriate venue.</p> <p>Never appropriate to accept during a specific procurement process or following a procurement decision.</p> <p>Never appropriate to accept during a recruitment process.</p>	<p>YES- if during or as the result of a procurement process*</p> <p>YES - if during a recruitment process*</p> <p>YES - if the offer becomes regular or expected</p> <p>NO - for other circumstances (unless the offer is suspect)</p>
A gift received as a matter of luck or good fortune such as a lucky door prize	<p>Workers should not voluntarily enter competitions while working in an official capacity, e.g. at a conference by submitting business cards as an entry for a prize draw</p> <p>The prize belongs to the Agency, not the individual.</p>	<p>YES - if accepted on behalf of the DHHS (unless a token item of low value)</p> <p>YES -if the worker has accepted or wishes to accept (unless a token item of low value)</p> <p>NO - for other circumstances</p>
Promotional materials e.g. pens/notepads provided at a conference		NO
Catering provided as part of attendance at a meeting or conference  E.g. tea, coffee, sandwiches		NO
Any gift offered 'in secret'	Any gift offered in secret is 'suspect' regardless of the nature or value of the gift/benefit. It must be refused and declared.	YES

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Gift/Benefit	Response- what to do if you receive or are offered	Should the offer be declared?
Bequest	<p>Workers must not seek out or solicit a bequest under any circumstances in the course of their work.</p> <p>While staff may develop strong working relationships, they are not permitted to use those relationships for personal gain or benefit.</p>	<p>YES</p> <p>The bequest can be accepted without authorisation but must be declared.</p>
A meal- not provided at a function or event (for example a meeting over lunch)	<p>It is advisable to decline the offer.</p> <p>If an eatery/hospitality venue is proposed for a meeting, consider the suitability of the arrangement and suggest an alternative.</p>	<p>YES - if during or as the result of a procurement process*</p> <p>YES - if during a recruitment process*</p> <p>YES - if the offer was accepted</p> <p>NO - for other circumstances (unless the offer is suspect)</p>
Free conference registration	<p>Any travel/accommodation offered should be considered separately to the registration (see 'Sponsored travel').</p> <p>Will the DHHS benefit from your attendance?</p>	<p>YES</p>
Sponsored travel	<p>Should not be accepted unless there is a value or benefit to the DHHS, and worker is required to share their learning on return.</p> <p>Not generally acceptable from any private organisation.</p> <p>Must not be accepted if there is a conflict of interest (real or perceived).</p> <p>Not made more acceptable when undertaken in a worker's own time, or where the worker considers it as unofficial, if there is a link (whether real or perceived) between the gift and their employment.</p>	<p>NO - if at the expense of the Commonwealth</p> <p>YES - for all other offers</p>

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Gift/Benefit	Response- what to do if you receive or are offered	Should the offer be declared?
Cultural/ceremonial or other gifts offered to the Agency rather than the individual	May be offered in circumstances where it is not appropriate or possible to decline.	YES – if accepted or unable to be declined
Gifts from co-workers	Take care that the giving of gifts does not become a regular or expected occurrence just for doing one's job.	NO - (unless the offer is suspect)
Functions and hospitality (offers of meals, invitations to events)	It is advisable to decline any offers unless there is a value to the Agency in the worker attending.	YES – if accepted
Publicly available discounts and items purchased at corporate rates		NO
An Award, honorary degree or scholarship		NO - (unless the offer is suspect) YES - if there may be a public perception that that the gift/benefit should be declared.
Sponsorship arrangements e.g. the right to associate the sponsor's name, products or services with the Agency's service, product or activity.	Must be used for business purposes, not to provide a personal benefit to workers.	YES

\* applies to decision makers in the procurement or recruitment process only (unless the offer is 'suspect')

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# Attachment Two

GUIDE ONLY

