

Gifts, Hospitality, Sponsorship and Other Gratuitous Benefits Policy



1. Policy Statement

The Royal Women's Hospital (the Women's) is committed to providing an ethical, efficient and accountable environment for the conduct of its operations and will ensure transparency and accountability in respect of, the receiving of gifts, hospitality, sponsorship and other gratuitous benefits.

Staff must 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 must 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 the Women's in its dealings with suppliers and potential suppliers.

In addition, staff must 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 a conflict of interest or, an indirect attempt to secure the influence or favour of a staff member.

2. Definitions

Gift or Benefit

A gift or benefit may take a wide range of forms. In general, a gift or benefit is an item of value provided for no, or greatly reduced, cost. Gifts or benefits may be tangible (of lasting value) or intangible (of no lasting value).

For the purposes of this policy, a gift or benefit has its common meaning and includes, but is not limited to:

- a gift or benefit of money or shares;
- a gift or benefit of a physical object, that may include bottles of wine, manufacturers' samples or personal items, promotional materials, including clothing, books or compact discs, works of art, memorabilia; or
- indirect or concealed gifts or benefits, such as:
 - the permanent or indefinite loan of money or property;
 - the sale or transfer of property at less than full value; or the provision of a benefit which has a financial or commercial value for less than full value.

Hospitality

In this context includes meals, alcohol, entertainment, events and attendance at interstate or overseas conferences. 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.

3. Responsibility

The Executive Director of People and Culture is responsible for this policy. General Counsel will maintain the Women's Gifts and Benefits Register.

This policy applies to ALL staff, volunteers and Board members of the Women's.

Consequences of breaching this Policy

Any staff member, who accepts a gift or benefit without following the appropriate procedures as outlined in this policy and the Gifts, Hospitality, Sponsorship and Other Gratuitous Benefits Guideline may be subject to disciplinary action.

A breach of this policy may also constitute:

- A breach under the Women's Disciplinary Policy.
- A breach under the *Code of Conduct for Victorian Public Sector Employees*.

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4. Key Guidelines and Procedures related to this policy

The requirements for implementation of the policy are detailed in the following documents:

[Gifts, Hospitality, Sponsorship and Other Gratuitous Benefits Guideline](#)

[Disciplinary Procedure](#)

5. Evaluation, monitoring and reporting of compliance to this policy

Compliance with this policy will be monitored, evaluated and reported by all gifts (other than Token Gifts), hospitality, sponsorship and benefits being offered being approved by the relevant Executive Director (or the CE) and recorded on the Women's Gifts and Benefits Register.

The Executive Director People and Culture and General Counsel will report at least annually to the Board's Audit and Corporate Risk Management Committee (ACRMC) on the administration of:

- this policy, and
- the Gifts, Hospitality, Sponsorship and Other Gratuitous Benefits Guideline, and
- the Women's Gifts and Benefits Register

Reports to the ACMRC will include analysis of the organisation's gifts, benefits and hospitality risks (if any), risk mitigation measures and any proposed improvements.

6. Publication online

General Counsel is responsible for publishing this policy and the Women's Gifts and Benefits Register on the organisation's external website. Publication of the Register will protect the privacy of individuals.

7. References (evidence, best practice, professional codes, websites, etc.)

1. Gifts, benefits and hospitality – Policy framework (Victorian Public Sector Commission, October 2016)
2. Code of Conduct for Victorian Public Sector Employees (Victorian Public Sector Commission, June 2015)
3. Conflict of Interest and Duty – A practical guide for directors of public entities (Victorian Public Sector Commission, August 2016)
4. Good Practice Guidelines – Conduct of Commercial Engagements in Government (Government Procurement Group of the Department of Treasury and Finance, Victoria, 2006)
5. Probity Controls in Public Hospitals for the Procurement of Non-clinical Goods and Services (Ombudsman, Victoria, 2008)

8. Legislation related to this policy

Section 7 (b)(iv) of the *Public Administration Act 2004* (Vic)

Protected Disclosure Act 2012 (Vic)

9. Appendices

Not applicable.