

# Gifts, benefits and hospitality policy

Effective date: 15 July 2025

## Purpose

The Victorian Public Sector Commission (VPSC) issues minimum accountabilities for managing gifts, benefits and hospitality under the *Standing Directions of the Minister for Finance 2018*. This policy intends to assist VIT employees respond to or provide such offers while performing their duties for and on behalf of VIT.

## Scope

The Gifts, Benefits and Hospitality Policy applies to VIT employees, VIT hearing panel, sub-committee and Council members, contractors, consultants, auditors and other individuals or entities undertaking activities or providing services for or on behalf of VIT (referred to as 'employees' or 'associated individuals' throughout this document).

## Key policy points

Adherence to minimum accountabilities	All employees must adhere to the minimum accountabilities (issued by VPSC) relating to receiving and providing gifts, benefits and hospitality while undertaking their duties for and on behalf of VIT.
Conflicts of interest	Employees must recognise any real, perceived or potential conflicts of interest that may arise from receiving or providing any gifts, benefits or hospitality while undertaking their duties for and on behalf of VIT and must comply with relevant procedures issued from time to time.

## Operational roles and responsibilities

Chief Executive Officer	<ul style="list-style-type: none"><li>• model good practice and foster a culture of integrity</li><li>• develop, apply, and review policies and processes for managing gifts, benefits, and hospitality</li><li>• ensure this policy covers minimum accountabilities when employees speak up in good faith; ensure VIT supports and protects employees</li><li>• take action against anyone who discriminates or victimises an employee speaking up in good faith</li><li>• respond constructively to information provided; ensure this policy and related processes are communicated effectively to employees.</li></ul>
Directors and Managers	<ul style="list-style-type: none"><li>• ensure employees understand this policy and implement it effectively</li><li>• review all gifts, benefits and hospitality declared in accordance with this policy</li><li>• notify the Corporate Legal Counsel, Governance &amp; Council Secretariat of their concerns about any gift, benefit or hospitality being offered to employees and why.</li></ul>
Employees	<ul style="list-style-type: none"><li>• comply with this policy and procedure; are accountable for activities involving receiving or giving gifts, benefits, or hospitality as a public official in conducting their business activities</li></ul>

	<ul style="list-style-type: none"> <li>ensuring they act with integrity and demonstrate they are not influenced in the performance of their duties.</li> </ul>
Corporate Legal Counsel, Governance & Council Secretariat	<ul style="list-style-type: none"> <li>maintain the Gifts, Benefits and Hospitality Register for all reportable gifts, benefits, and hospitality, including decisions to not accept significant or influential offers</li> <li>review VIT's Gifts, Benefits and Hospitality Register regularly and provide guidance to managers and employees when applying this policy</li> <li>consult with the CEO to ensure gifts that are not retained by employees are appropriately held, distributed, or disposed of.</li> </ul>

# Contents

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1. Policy statement.....	4
2. Receiving Gifts, Benefits and Hospitality (as an individual employee) .....	4
3. Receiving gifts, benefits, hospitality (in personal capacity – outside of a work setting) .....	6
4. Receiving gifts, benefits, hospitality (offers made to VIT) .....	6
5. Declining Gifts, Benefits and Hospitality .....	6
6. Applying for ownership of gifts .....	8
7. Declaration of Gifts, Benefits or Hospitality .....	8
8. Providing gifts, benefits and hospitality.....	10
9. Internal events .....	11
10. Conduct during hospitality .....	11
11. Breaches of Policy .....	11
12. Documentation and records .....	12
Definitions.....	13
Relevant legislation and policy.....	16
Appendices .....	16
Appendix 1 – GIFT test.....	17
Appendix 2 – HOST Test.....	18

## 1. Policy statement

- 1.1 This policy outlines how employees are expected to conduct themselves if they are offered or required to provide gifts, benefits and hospitality while undertaking their duties for and on behalf of VIT.
- 1.2 The principles that guide this policy are

Public interest	All employees have a duty to place the interest of VIT above their private interests when carrying out responsibilities or obligations for or on behalf of VIT. They will act fairly and objectively and will not accept gifts, benefits or hospitality that could give rise to, or create a reasonable perception of, actual bias or preferential treatment.
Accountability	Associated individuals and entities are accountable for declaring all gifts, benefits and hospitality in accordance with this policy.
Integrity	Associated individuals and entities must strive to earn and sustain public trust by responding to offers of gifts, benefits and hospitality in a manner that is consistent with this policy and community expectations.
Risk-based approach	<p>The VIT will ensure gifts, benefits and hospitality risks are appropriately assessed and managed in line with the organisation's policies and processes, as well as through the Audit, Risk Management and Finance Committee.</p> <p>Associated individuals with direct reports will ensure they are aware of the risks inherent in their team's work and functions. They will also monitor the risks their direct reports are exposed to.</p>

- 1.3 The GIFT Test (Appendix 1) is a useful tool when making an assessment of when it is appropriate to receive gifts, benefits or hospitality.
- 1.4 The HOST Test (Appendix 2) is a useful tool when making an assessment of when it is appropriate to provide gifts, benefits or hospitality.

## 2. Receiving Gifts, Benefits and Hospitality (as an individual employee)

### Solicitation of Offers

- 2.1 No employee must seek any gift, benefit or hospitality for themselves or others if the offer could reasonably be seen as connected to their employment.

### Refusal of Offers

#### Money

- 2.2 Employees must refuse the offer if it is money, used in a similar way to money, or easily converted to money.

#### Conflict of interest

- 2.3 Employees must refuse an offer if it gives rise to a conflict of interest (actual, potential or perceived). This includes if it could influence, or reasonably be seen to influence, how an employee performs their public duties. If a conflict of interest exists, VIT's [Conflict of Interest Policy](#) will also apply.

## **Public trust**

- 2.4** Employees must refuse the offer that could compromise the public's trust in their impartiality of VIT, or the public sector.

## **Community expectations**

- 2.5** Employees must refuse the offer (token or non-token) if it is not consistent with community expectations.

## **Bribes**

- 2.6** Associated individuals and entities must refuse the offer if it could be seen as a bribe or other inducement and report it to the CEO or the VIT Council Chairperson. Any criminal or corrupt conduct will be reported to Victoria Police or the Independent Broad-Based Anti-Corruption Commission (IBAC).

## **Non-token offer without a legitimate business reason**

- 2.7** Even if an offer complies with all other requirements listed above, employees must refuse a non-token offer unless there is a legitimate business reason to accept, e.g. it will further the conduct of official business or other legitimate goals of VIT, the public sector or the State.

## **Repeat offers leading to a conflict of interest**

- 2.8** Repeat offers are multiple offers from the same person, group or organisation. Their combined effect can sometimes lead to the perception that they could influence you. Refuse the offer if it is a repeat offer (token or non-token) that could reasonably be seen as adding up to a conflict of interest.

## **When an employee is likely to make or influence a decision**

- 2.9** Employees must refuse an offer if it is from a person, group or organisation that is likely to make or influence a decision in the foreseeable future. This could reasonably be seen as a conflict of interest. The only exception an offer can be accepted is if it is a learning opportunity, such as a webinar, and all the following applies

- a.** it is relevant to the employee's work duties
- b.** it has a legitimate business reason (benefit)
- c.** it is free for all attendees
- d.** the covering or discounting of additional costs (i.e. travel or accommodation) is not included in the offer, and
- e.** it is consistent with community expectations.

Employees may only accept development opportunities from suppliers where there is a legitimate business reason, attendance meets community expectations, and any risk of conflict of interest can be appropriately managed. To ensure our staff have development opportunities that do not raise conflicts of interest, VIT intends to build training and development offerings into our contracts as deliverables, wherever appropriate.

## **Endorsement**

- 2.10** Employees must refuse an offer if accepting it could reasonably be seen as endorsing a product or service.

## **Advantages to a supplier or sponsor**

- 2.11** Employees must refuse the offer if accepting it could reasonably be seen as advantaging a supplier or sponsor in a future procurement.

### 3. Receiving gifts, benefits, hospitality (in personal capacity – outside of a work setting)

- 3.1 It is normal for employees to receive offers of gifts, benefits and hospitality in their personal life which has no connection to their work. These offers can be accepted, provided the employee believes on reasonable grounds the offers are made in a personal capacity. An employee should follow this policy in a professional capacity if they are unsure whether an offer is being made in a personal capacity or because of their role with VIT.

### 4. Receiving gifts, benefits, hospitality (offers made to VIT)

- 4.1 Sometimes offers are made to VIT itself (e.g. offers of equipment). In deciding whether to accept such an offer, VIT will consider whether the offer is within the offers to refuse, specifically
- a. the people or organisation making the offer
  - b. the nature and circumstances of the offer, and
  - c. the level of public benefit if the offer is accepted.
- 4.2 The VIT must reject any offer that is not consistent with community expectations.

#### Offers from another public sector organisation

- 4.3 In the course of work as a VIT employee, a non-token gift, benefit or hospitality from a Victorian government department or another Victorian public sector organisation office may be offered. If this occurs, the offer can be accepted. The non-token offer must be declared, regardless of whether it is accepted or not.

### 5. Declining Gifts, Benefits and Hospitality

- 5.1 In most cases where the offer should or must be refused, employees should decline it at the time the offer is made. Sometimes this can be difficult if
- a. the offer may have been delivered to VIT via mail
  - b. declining the offer may cause offence or even be unsafe in the moment for the employee who has been offered it.

#### Gifts

- 5.2 Gifts are most commonly difficult to decline. In the case of gifts, declare the offer as normal and advise the appropriate manager or delegate you were unable to decline the offer in the moment, but you have not accepted it. The VIT will dispose of the gift, and an explanation and rejection will be sent to the offeror where appropriate.

#### Benefits and hospitality

- 5.3 In the case of benefits and hospitality, it is very unusual for a situation to arise where an offer cannot be declined. The most obvious, but still extremely unlikely, scenario is that refusing would offend the offeror in a way that would make the employee feel unsafe. In such cases, declare the acceptance of the offer as soon as possible and the reasons for doing so. The VIT will take action to ensure our staff are not placed in such situations in the future.

#### Token Offers

- 5.4 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. Token offers 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.

- 5.5 While 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.
- 5.6 If token offers are often made by the same person or organisation, considering the collective total value of the offers over a 12-month period, or there is the perception that it may influence the recipient, it may make the offer non-token.
- 5.7 VIT employees must refuse all offers (except for token hospitality, such as beverages or sandwiches over a lunchtime meeting or invitations to free seminars on legitimate business topics) if they are
  - a. made by a current or prospective supplier
  - b. made during a procurement or tender process by a person or organisation involved in the process, and
  - c. made by a candidate to a VIT employee who is looking after the recruitment process of the advertised role and/or is the Hiring Manager.

### Non-token offers

- 5.8 A 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 valued over \$50 are considered non-token offers.
- 5.9 During the course of carrying out their duties or obligations for or on behalf of VIT, employees will
  - a. not seek or solicit gifts, benefits or hospitality for themselves or others
  - b. refuse all offers of gifts, benefits or hospitality that
    - i. are money, items used in a similar way to money, or items easily converted to money (e.g. vouchers)
    - ii. give rise to an actual, potential or perceived conflict of interest
    - iii. may adversely affect or undermine their standing as an associated individual or entity
    - iv. may adversely affect VIT's standing or reputation in the community
    - v. extend to family, relatives or friends.
  - c. refuse non-token offers without a legitimate business benefit and declare all non-token gifts, benefits and hospitality (whether accepted or declined) in accordance with this policy, and
  - d. refuse any bribes or inducements – associated individuals and entities must report any attempts to induce or bribe them to the CEO or the VIT Council Chairperson.

### Official Gifts

- 5.10 Official gifts and official items (for example, a culturally significant gift from an official delegation) are an exception to the usual 'thanks but no thanks' approach. Regardless of its monetary value, an official gift or official item
  - a. must be declared
  - b. will be recorded in the internal register
  - c. will not usually be published in the online public register
  - d. belongs to VIT, not an employee.

## 6. Applying for ownership of gifts

### Official gifts

- 6.1** Exceptions to 5.10 apply If an official item was given to a specific employee in recognition of their work or contribution. It may only be retained if all the following requirements are met
- a.** it is the express wish of the giver
  - b.** it benefits VIT's relationship with the giver
  - c.** it is appropriate given the significance and value of the item
  - d.** it would be consistent with community expectations
  - e.** it is unlikely to bring the employee or VIT into disrepute, and
  - f.** the manager or, depending on the gift, an appropriately senior delegate, gives written approval.

The gift cannot be retained unless it meets all the above requirements.

### Non-token gifts

- 6.2** Usually, a non-token gift belongs to VIT. However, if the gift was given to a specific employee in recognition of their work or contribution, the employee may retain it provided that
- a.** it is not an official gift
  - b.** it is unlikely to bring the employee or VIT into disrepute
  - c.** it would be consistent with community expectations
  - d.** the manager or appropriate delegate has given written approval.
- 6.3** If approval cannot be obtained prior to accepting an offer, retrospective approval can be obtained in limited circumstances within five business days. Examples include
- a.** if it was reasonable to be unaware the gift was non-token, e.g. a wrapped gift
  - b.** if it would have caused serious offence to refuse, except for official gifts or items where this is not usually a sufficient reason.

## 7. Declaration of Gifts, Benefits or Hospitality

- 7.1** Employees must declare any gifts, benefits or hospitality (token and non-token) offered or received during the course of carrying out their duties or obligations for or on behalf of VIT in accordance with this policy. These must be declared to the relevant person outlined below.
- 7.2** The relevant person will ensure the gift, benefit or hospitality is recorded on the Gifts, Benefits and Hospitality Register and will advise the course of action to be taken by the employee regarding the declared gift, benefit or hospitality.
- 7.3** Where possible, employees should seek approval from the relevant person prior to accepting any gift, benefit or hospitality or refuse the offer. All gifts, benefits and hospitality must be declared (whether accepted or not) within five days of the offer being made.
- 7.4** If an associated individual or entity is offered or receives hospitality while performing duties for VIT, they must complete a [Gift, Benefit or Hospitality Declaration Form](#) within five working days and submit it to the relevant person listed below.



Individual or entity who received gift, benefit or hospitality	Relevant person if token offer valued less than \$50	Relevant person if non-token offer valued more than \$50	Relevant person if hospitality valued less than \$50	Relevant person if hospitality valued more than \$50
VIT Council Chairperson	VIT Council	VIT Council	VIT Council	VIT Council
VIT Council member	VIT Council Chairperson	VIT Council Chairperson	VIT Council Chairperson	VIT Council Chairperson
VIT sub-committee member	VIT Council Chairperson	VIT Council Chairperson	VIT Council Chairperson	VIT Council Chairperson
Hearing panel members	VIT Council Chairperson	VIT Council Chairperson	VIT Council Chairperson	VIT Council Chairperson
CEO	-	-	VIT Council Chairperson	VIT Council Chairperson
VIT employees and contractors	-	-	Relevant Director	CEO
Consultants, auditors and individuals or entities undertaking activities or providing services for or on behalf of VIT	-	-	Relevant Director	CEO

### Multi-employee declarations

- 7.5** At times, VIT may issue a non-token declaration on behalf of all or some of its employees. If this happens, the relevant employees will be notified, as it means they don't need to make an individual declaration of a non-token offer.
- 7.6** This may be a multi-employee refusal or multi-employee acceptance, depending on the offer.
- 7.7** Employees are still responsible for declaring any actual, potential or perceived conflicts of interest they might have in relation to the offer.
- 7.8** If a number of employees receive a non-token offer to attend a learning opportunity, VIT will issue a multi-employee declaration, and employees will be notified they will be covered by this declaration if they attend.
- 7.9** Employees still have an obligation to raise and manage any conflicts of interest they believe the offer may create for them.

### Exceptions to Declarations

- 7.10** Employees may receive generic non-token offers, such as emails promoting discounted seminars or webinars. These offers often appear personalised, even when sent to large groups.

- 7.11** A generic non-token offer does not need to be declared if it was refused. If it was accepted, the usual restrictions apply as to whether it can be done.
- 7.12** If an employee receives an email and is unsure if it is a generic offer, they should talk to their manager to determine if it needs to be declared. Some useful questions to ask when unsure are
- a.** do I have a relationship with the person who sent the email?
  - b.** do I have a relationship with the organisation who sent the email?
  - c.** is the offer related to my work or the work of my area of the organisation?

If the answer to all the above is 'no', then it is likely a generic offer.

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

- 8.1** When deciding whether to provide gifts, benefits or hospitality, or the type of gift, benefit or hospitality to provide, individuals must ensure
- a.** any gift, benefit or hospitality must fulfill a legitimate business purpose by either furthering the conduct of official business or supporting other legitimate organisational goals, the overall public sector or the State. e.g. welcoming guests, facilitating the development of business relationships and outcomes or celebrating achievements
  - b.** it does not raise an actual, potential or perceived conflict of interest
  - c.** any costs are proportionate to the benefits obtained for VIT's statutory objectives and would be considered reasonable in terms of community expectations
  - d.** it would be considered reasonable and consistent with community expectations, e.g. a workshop with mandatory attendance for employees including catering to provide lunch for attendees is a legitimate business reason for our organisation to provide hospitality – it does not raise a conflict of interest, it is proportionate in costs, and it is consistent with community expectations.

### **Considerations while providing gifts, benefits and hospitality (costs, appropriateness and documentation)**

- 8.2** Employees 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
- a.** will the cost of providing the gift, benefit or hospitality be proportionate to the potential benefits?
  - b.** is an external venue necessary or does the organisation have facilities to host the event?
  - c.** is the proposed catering or hospitality proportionate to the number of attendees?
  - d.** does the size of the event and number of attendees align with intended outcomes?
  - e.** will providing the gift, benefit or hospitality be viewed by the public as excessive?
- 8.3** Before providing an official gift or item, make reasonable enquiries to ensure it will be appropriate to do so. For example, before providing a ceremonial gift to an official representative of an Aboriginal or Torres Strait Islander group, reasonable enquiries could include making enquiries with
- a.** the group that the person represents
  - b.** an organisation such as the Victorian Aboriginal Heritage Council or the local Registered Aboriginal Party (RAP) or Traditional Owner Organisation.
- 8.4** Records relating to the provision of hospitality, such as approval forms and records relating to procurement and expenditure, must be retained in accordance with their requirements under the *Financial Management Act 1994*.

## 9. Internal events

9.1 At internal events, approved protocols must be complied with. These relate to

- a. alcohol
- b. financial expenditure and approval
- c. catering for employees and for office functions
- d. reward and recognition programs
- e. recording and reporting.

## 10. Conduct during hospitality

Consistent with [minimum accountability 7](#), an employee participating in hospitality in their public sector role must

- a. demonstrate professionalism in their conduct
- b. uphold their duty of care to other participants.

## 11. Breaches of Policy

### Reporting breaches or alleged breaches

- 11.1 If an employee may have breached this policy, the manager must be notified in writing immediately. This enables an assessment to be completed to determine how best to mitigate the risk. This may include the return of the gift.
- 11.2 The VIT encourages any person who suspects that an associated individual or entity that may have or about to breach this policy to make a notification to their manager, CEO or the VIT Council Chairperson. The CEO or VIT Council Chairperson will investigate the allegation and take appropriate action.
- 11.3 Any person who suspects that an associated individual or entity may have engaged in corrupt conduct may also make a protected disclosure to IBAC. Refer the Public Interest Disclosure Policy.

### Response to breaches or alleged breaches

- 11.4 While responding to reports of breaches or alleged breaches, VIT's approach will be to
  - a. actively support and protect employees who speak up in good faith. This includes taking decisive action, and if required, possible disciplinary action, against anyone who discriminates against or victimises an employee who speaks up in good faith
  - b. respond in a constructive manner to the information provided consistent with the Act, the Code, this policy and any other obligations that apply
  - c. respond fairly, reasonably and proportionately
  - d. take no action (in some instances); in others, the matter will be dealt with through
    - i. an informal basis, e.g. through education or counselling
    - ii. a performance management process or similar
    - iii. formal counselling
    - iv. formal warning
    - v. if other methods are not appropriate, through a misconduct process.

### Consequences of breaching this policy

- 11.5 A finding of misconduct may amount to a breach of the code of conduct. Serious misconduct can result in termination of employment. If a criminal offence may have occurred, the Victorian

or Federal Police may investigate and prosecute.

- 11.6** Any contracted individuals or entities who fail to report a gift, benefit or hospitality in accordance with this policy may be subject to contract re-negotiation, including termination.
- 11.7** Any VIT Council members who fail to comply with this policy may be reported to the Minister for appropriate action. This may include a referral to the Governor in Council who may at any time remove a member from office.
- 11.8** Any sub-committee member or hearing panel member who fails to comply with this policy may be reported to the VIT Council for appropriate action. This may include a decision to remove the person from their position.

## **12. Documentation and records**

### **Gift, Benefit or Hospitality Register**

- 12.1** The Corporate Legal Counsel maintains an internal register of non-token gifts, benefits and hospitality offered to employees. This is stored in ECM.
- 12.2** The Gift, Benefit or Hospitality Register must record sufficient information to
  - a.** effectively monitor, assess and report on the minimum accountabilities
  - b.** meet the information requirements for the public register.

### **Publicly available documents**

- 12.3** Publicly available information on VIT's website includes the public register of reportable gift offers received and VIT's Gifts, Benefits and Hospitality Policy.
- 12.4** The public register must at a minimum contain the following reportable information
  - a.** all non-token offers, whether they were accepted or not
  - b.** the date each non-token offer was made
  - c.** the position of the recipient
  - d.** the position and organisation of the person making each offer
  - e.** where possible, whether the offeror is a business associate of the organisation
  - f.** a description of each offer and its value
  - g.** whether the offer was accepted or declined.
  - h.** if accepted, the business reason for doing so.
- 12.5** The public register will cover the current and previous financial year – it will be published within four months of each new financial year.

### **Reporting**

- 12.6** The Audit, Risk Management and Finance (ARMF) Committee will oversee the register and inspect and review it on an annual basis.
- 12.7** The CEO (or delegate) will also provide the ARMF Committee with a report on the administration and control of the Gifts, Benefits and Hospitality Policy, processes and register.
- 12.8** The report will also include an analysis of the gifts, benefits and hospitality risks (including repeat offers), risk mitigation measures, and any proposed improvements to the policy or the procedure.
- 12.9** The ARMF Committee will report its findings and recommendations (if any) to the VIT Council.

## Definitions

Term	Definition
Actual conflict of interest	Situations where there is a real conflict between an associated individual or entity's duties or obligations to VIT, and their other public duties or private interests.
Associated individual or entity	All VIT Council members, VIT sub-committee members, hearing panel members, VIT employees, contractors, consultants, auditors, and any other individuals or entities undertaking activities or providing services for or on behalf of VIT.
Benefits	Benefits include preferential treatment, privileged access, favours or other advantages offered to an associated individual or entity. This may include invitations to sporting, cultural or social events, access to discounts and loyalty programs and promise of a new job. The value of benefits may be difficult to define in dollars, but could be used to influence the associated individual or entity's behaviour.
Business Associate	An individual, group or organisation that VIT has or plans to have a business relationship with or may seek commercial or other advantage.
Ceremonial gifts	Official gifts are part of cultural and government traditions in both Australian communities and overseas. Ceremonial gifts are usually provided when engaging with official delegates or representatives from other organisations, communities or foreign governments.
Common courtesy	<p>A small gesture of kindness or politeness that is reasonable or appropriate in the circumstances. A common courtesy may be</p> <ul style="list-style-type: none"> <li>• a cup of coffee or tea offered during a meeting</li> <li>• a modest lunch or snack, such as sandwiches, provided during a lengthy conference or meeting</li> <li>• modest materials provided at a conference, such as copies of presentation materials, a writing pad and pen of nominal value.</li> </ul> <p>A common courtesy is not considered a gift and therefore does not need to be declared under this policy.</p>
Conflict of interest	Where an associated individual or entity has other public duties or private interests that could improperly influence, or be seen to influence, the performance of their duties or obligations for or on behalf of VIT. A conflict of interest can be actual, potential or perceived.

Term	Definition
Co-regulator	<p>An individual or entity who is also responsible for regulating and enforcing laws or standards against duty holders. The VIT's co-regulators include, but are not necessarily limited to</p> <ul style="list-style-type: none"> <li>• Australasian Teacher Regulatory Authorities</li> <li>• national regulators, e.g. Tertiary Education Quality and Standards Agency (TEQSA) and the Australian Children's Education and Care Quality Authority (ACECQA)</li> <li>• Department of Education (DE) – Quality Assessment and Regulation Division</li> <li>• Department of Justice and Community Safety Victoria – Working with Children Check Unit</li> <li>• Commission for Children and Young People (CCYP)</li> <li>• Victorian Registration and Qualifications Authority (VRQA).</li> </ul>
Duty holder	<p>An individual or entity who has a duty or legal obligation to VIT. The VIT's duty holders include, but are not necessarily limited to</p> <ul style="list-style-type: none"> <li>• members of the teaching profession</li> <li>• initial teacher education (ITE) providers</li> <li>• employers of the teaching profession.</li> </ul>
Gifts	<p>Free or heavily discounted goods or services offered 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), consumables (e.g. chocolates) and services (e.g. painting and repairs). Gifts do not include common courtesies.</p>
Hospitality	<p>The friendly reception and treatment of guests. This can range from offers of refreshments at business meetings, expensive meals and drinks at restaurants, or sponsored travel and accommodation.</p>
Legitimate business benefit	<p>A gift, benefit or hospitality may have a legitimate business benefit if it furthers the conduct of the official business of VIT.</p>
Non-token offer	<p>A gift, benefit or hospitality that is, or may be perceived to be, of more than inconsequential value. All offers valued over \$50 are considered non-token offers.</p>
Official gifts and items	<p>Sometimes accepted or given on behalf of VIT as part of business with official delegates or representatives of a community group, organisation, or government. Official gifts and items could include cultural, ceremonial, religious, historic, or other significance.</p>
Perceived conflict of interest	<p>Situations where the public could form the view that an associated individual or entity's other public duties or private interests could improperly influence the performance of their duties or obligations for or on behalf of VIT now or in the future.</p>

Term	Definition
Potential conflict of interest	Situations where an associated individual or entity has other public duties or private interests that could conflict with their duties or obligations to VIT. This refers to circumstances where it is foreseeable that a conflict may arise in the future and steps should be taken now to mitigate that future risk.
Private interests	<p>Interests of an individual or entity that are separate from their role with VIT. These can be financial or non-financial interests and may include family members, close friends and associates. Private interests that have the potential to create an actual, potential or perceived conflict of interest include the following</p> <ul style="list-style-type: none"> <li>• relationships – personal or family (past and present) that may influence activities or decisions for VIT</li> <li>• financial and economic – personal (e.g. real estate, shares, debts, assets, businesses etc.), family (e.g. family trusts, family-owned businesses etc.), and benefits (e.g. concessions, discounts, gifts or hospitality)</li> <li>• other employment – paid or unpaid work, including voluntary roles or affiliations with for-profit or non-profit entities, sporting bodies, clubs and associations</li> <li>• previous employment or contracts, or engagement</li> <li>• future employment prospects or plans</li> <li>• other public duties – membership of entities (private or public), boards or committees that may conflict with current duties or responsibilities</li> <li>• personal interests, beliefs, or strong views – obligations to professional, community, ethnic, or religious groups</li> <li>• participation in political activity.</li> </ul>
Public register	A subset of information on the Gifts, Benefits and Hospitality Register that is published in accordance with this policy.
Relevant person	The persons or entities who are specified in sections 7.4 of this policy, and who are responsible for assessing and making decisions about the declaration of gifts, benefits or hospitality in accordance with this policy.
Sponsored travel	An offer to fund (wholly, or in part) an associated individual or entity's travel and other work-related costs. This includes sponsored transport, accommodation, meals, conferences and industry tours.
Token offer	A gift, benefit or hospitality that is of inconsequential or trivial value to the person or entity making the offer, and the recipient. All offers valued under \$50 are considered token offers.

## Relevant legislation and policy

- [\*Education and Training Reform Act 2006\*](#)
- [\*Public Administration Act 2004\*](#)
- [\*Financial Management Act 1994\*](#)
- [\*VIT Conflict of Interest Policy\*](#)
- [\*VIT Public Interest Disclosure Policy\*](#)
- [\*Code of conduct for Victorian public sector employees\*](#)
- [\*Standing Directions of the Minister for Finance 2018\*](#)
- [\*Department of Treasury and Finance, Instructions supporting the Standing Directions 2018 under the \*Financial Management Act 1994\*, issued June 2016 \(revised 7 December 2018\)\*](#)
- [\*Guidance on gifts, benefits and hospitality from the Victorian Public Sector Commission\*](#)

## Appendices

Appendix	Document name	Document code
1	GIFT Test	
2	HOST Test	



## Appendix 1 – GIFT Test

<b>G</b>	<b>Giver</b>	<ul style="list-style-type: none"> <li>• Who is providing the gift, benefit or hospitality and what is their relationship to me?</li> <li>• Does my role require me to select suppliers, award grants, regulate industries or determine government policies?</li> <li>• Could the person, group or organisation benefit from a decision I make?</li> </ul>
<b>I</b>	<b>Influence</b>	<ul style="list-style-type: none"> <li>• Are they seeking to gain an advantage or influence my decisions or actions?</li> <li>• Has the gift, benefit or hospitality been offered to me publicly or privately?</li> <li>• Is it a basic courtesy or token of appreciation or is it a non-token offer?</li> <li>• Does its timing coincide with a decision I'll be making in the foreseeable future?</li> </ul>
<b>F</b>	<b>Favour</b>	<ul style="list-style-type: none"> <li>• Are they seeking a favour in return for the gift, benefit or hospitality?</li> <li>• Has the gift, benefit or hospitality been offered honestly?</li> <li>• Has the person, group or organisation made several offers over the last 12 months?</li> <li>• Would accepting create an obligation, or feeling of obligation, to return a favour?</li> </ul>
<b>T</b>	<b>Trust</b>	<ul style="list-style-type: none"> <li>• Would accepting the gift, benefit or hospitality diminish public trust?</li> <li>• How would the public view acceptance of this gift, benefit or hospitality?</li> <li>• What would my colleagues, family, friends or associates think?</li> </ul>

## Appendix 2 – HOST Test

<b>H</b>	<b>Hospitality</b>	<ul style="list-style-type: none"> <li>• To whom is the gift or hospitality being provided to?</li> <li>• Will recipients be external business associates, our employees, or a mixture of both?</li> </ul>
<b>O</b>	<b>Objectives</b>	<ul style="list-style-type: none"> <li>• What is the business reason for providing the hospitality?</li> <li>• Will it further the conduct of official business?</li> <li>• Will it promote and support government policy objectives and priorities?</li> <li>• Will it contribute to staff wellbeing and workplace satisfaction?</li> </ul>
<b>S</b>	<b>Spend</b>	<ul style="list-style-type: none"> <li>• Will the cost be proportionate to the benefits obtained?</li> <li>• What type of hospitality will be provided?</li> <li>• Will the hospitality be modest or expensive?</li> <li>• If alcohol is to be provided, why? Would it be a courtesy or an indulgence?</li> <li>• Is an external venue necessary or can our organisation host the event?</li> <li>• Is the catering or hospitality proportionate to the number of attendees?</li> <li>• Does the size of the event and number of attendees align with the intended outcomes?</li> <li>• If a gift is to be given, is it symbolic rather than financial in value?</li> </ul>
<b>T</b>	<b>Trust</b>	<ul style="list-style-type: none"> <li>• Will public trust be enhanced or diminished?</li> <li>• Will the gift, benefit or hospitality be proportionate to public expectations or seen as excessive?</li> <li>• Is there a conflict of interest?</li> <li>• Could you publicly explain the rationale for providing the gift, benefit or hospitality?</li> <li>• Will the event be conducted in a manner which upholds the reputation of the public sector?</li> </ul>

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