

POL-121

# Gifts, benefits and hospitality policy

<b>Version</b>	1.0
<b>Date approved</b>	24 June 2026
<b>Approved by</b>	Board
<b>Accountable officer</b>	Executive Director Corporate Services
<b>Next review</b>	24 June 2029
<b>Policy applies to</b>	<input type="checkbox"/> Board <input checked="" type="checkbox"/> Employees <input checked="" type="checkbox"/> Contractors <input type="checkbox"/> Volunteers

POL-121

# Gifts, benefits and hospitality policy

<b>Policy statement</b>	<b>Parks Victoria seeks to earn and sustain public trust of a high level, and meet community expectations. We avoid gifts and excessive hospitality to protect public confidence in the integrity and impartiality of our decision-making.</b>
<b>Purpose</b>	<p>This policy is based on the Victorian Public Sector Commission's (VPSC) <i>Minimum accountabilities for gifts, benefits and hospitality</i>. It sets behavioural standards and expectations for how Parks Victoria employees:</p> <ul style="list-style-type: none"><li>• respond to offers of gifts, benefits and hospitality; and</li><li>• provide gifts, benefits and hospitality.</li></ul>
<b>Scope</b>	<p>This policy applies to</p> <ul style="list-style-type: none"><li>• employees of Parks Victoria; and</li><li>• contractors and labour hire employees whose contract requires them to comply with this policy.</li></ul> <p>For ease of reading, the term 'employee' covers all of the above, regardless of their employment or engagement status.</p> <p>This policy does not apply to Board members. The Board Governance Handbook addresses the principles and processes for offers of gifts, benefits and hospitality made to Board members.</p>
<b>Operating principles</b>	<p><b>Public interest:</b> employees have a duty to place the public interest above their private interests when carrying out their official functions.</p> <p><b>Integrity:</b> employees seek to earn and sustain public trust by providing or responding to offers of gifts, benefits and hospitality in a manner that is consistent with community expectations.</p> <p><b>Impartiality:</b> employees do not accept gifts, benefits or hospitality that could lead to an actual, perceived or potential conflict of interest, bias or preferential treatment. Employees do not accept offers from those about whom they are likely to make business decisions.</p> <p><b>Accountability:</b> employees are responsible for ensuring their conduct meets the required standards of integrity. This includes declaring, declining and providing gift</p>

# OFFICIAL

offers in accordance with this policy. Employees with direct reports are accountable for modelling good practice, promoting awareness of gifts, benefits and hospitality policies and procedures, and monitoring their team's adherence to these.

**Risk-based approach:** Parks Victoria, through its policies, processes and audit and risk committee, ensures gifts, benefits and hospitality risks are appropriately assessed and managed. Managers 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.

## Definitions

---

<b>Benefit</b>	Preferential treatment, privileged access, favours, or other advantage offered to an individual. Benefits may include invitations to sporting, cultural or social events, access to discounts and loyalty programs and promises of a new job. The dollar value of benefits may be difficult to quantify, but as they are valued by the individual, they may be used to influence the individual's behaviour.
<b>Bribe</b>	An offer of money or other inducement made with the intention to corruptly influence an employee in the performance of their duties. Bribery or attempted bribery of a public official is a criminal offence.
<b>Business associate</b>	An individual, group or organisation that Parks Victoria has, or plans to have, a business relationship with, or who may seek commercial or other advantage by offering gifts, benefits or hospitality.
<b>Conflict of interest</b>	<p><b>Actual conflict:</b> There is a real conflict between an employee's public duties and private interests.</p> <p><b>Potential conflict:</b> An employee has private interests that could conflict with their public duties. It is foreseeable that a conflict may arise in future and steps should be taken now to mitigate that risk.</p> <p><b>Perceived conflict:</b> The public or a third party could reasonably form the view that an employee's private interests may improperly influence their decisions or actions, now or in the future.</p>
<b>Gift</b>	Free or discounted item/service, or any item/service that would generally be seen by the public as a gift. These include items of high value (e.g. artwork, jewellery, expensive pens), low value (e.g. bunch of flowers), consumables (e.g. chocolates, wine) and services (e.g. painting, repairs). Fundraising by public sector organisations or employees that is consistent with relevant legislation, government policy and codes of conduct is not prohibited under the minimum accountabilities.

---

# OFFICIAL

---

<b>Hospitality</b>	The friendly reception and entertainment of guests. Ranges from basic courtesy (e.g. light refreshments at a business meeting) to expensive restaurant meals and sponsored travel and accommodation. Hospitality that exceeds common courtesy may be a gift.
<b>Legitimate business reason</b>	Furthers the conduct of official business or other legitimate goals of Parks Victoria, the public sector or the State of Victoria. Networking and maintaining stakeholder relationships are not legitimate business reasons.
<b>Non-token offer</b>	The 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. Any offer worth \$50 or more is a non-token offer and must be recorded on the Gifts, Benefits and Hospitality Register.
<b>Official gifts and items</b>	Sometimes accepted or given on behalf of our organisation as part of business with official delegates or representatives of a community group, organisation, or government. Official gifts and items (such as those with cultural, ceremonial, religious, historic or other significance) are declared and recorded regardless of their value and regardless of whether they were accepted or refused.
<b>Token offer</b>	<p>A gift, benefit or hospitality that is offered as a courtesy or is of inconsequential value to both the person making the offer and the recipient.</p> <p>While the primary determinant of a token offer is that it does not raise an actual, potential or perceived conflict of interest, the total combined value of offers to the employee from the same source over a 12-month period must be less than \$50.</p>

---

## Receiving offers

### **Soliciting is not permitted**

Employees must not seek any gift, benefit or hospitality for themselves or others, if the offer could reasonably be seen as connected to their employment.

### **Thanks is enough**

Parks Victoria's default position is to politely decline all offers, even if they are permitted under this policy: 'thanks is enough'. Employees should decline the offer at the time it is made, wherever possible.

# OFFICIAL

## Integrity test

If any of the following conditions exists, any offer (token or non-token) does not satisfy the integrity test and must be declined:

- The offer is **money**, used in a similar way to money, or is easily converted to money (e.g. gift cards, vouchers, shares);
- Accepting the offer would give rise to a **conflict of interest** (actual, potential or perceived);
- Accepting the offer would undermine **public trust** in the integrity and impartiality of Parks Victoria and its employees;
- The offer is inconsistent with **community expectations**; and
- The offer would reasonably be seen as a **bribe** or other inducement.

Additionally, for non-token offers (valued at \$50 or more) there must be a legitimate business reason to accept the offer.

## Offers that may be considered for acceptance

Provided they meet the integrity test, offers that may be accepted include:

- an official gift, such as a culturally significant item from an official delegation;
- a token gift, benefit or hospitality;
- a thank-you gift such as a small item given to speaker at a conference;
- an offer made or sponsored by a State government agency; and
- a learning opportunity that is relevant to the employee's work duties.

## Events and travel

### Conferences and familiarisation tours

Gift offers in relation to conferences or familiarisation tours (e.g. sponsored attendance, participation, travel or accommodation) must be declined unless prior written approval has been obtained from the relevant approver, and there is clear justification, e.g. the invitation is from a government department or (depending on the circumstances) a peak body, or the event is funded by a government department.

### Official business events

An official business event is an event hosted by an external organisation that meets the following criteria:

- it is in the public interest and/or there is a legitimate business reason for Parks Victoria to be represented at the event; and
- the event is directly related to Parks Victoria's work; and
- the event has a tangible connection to the invited employee's role.

If one or more of these criteria is not met, it is a gift/hospitality.

Most official business events fall under five categories:

- funded service delivery – to observe the delivery of programs funded by government grants;
- stakeholder engagement – to develop networks with people interested in Parks Victoria's activities;
- sector knowledge – to deepen knowledge of the industry and improve government programs;

# OFFICIAL

- business leveraging – to network with partners interested in investment and collaboration; and
- professional knowledge – to maintain knowledge relating to a qualification (e.g. continuing professional development points), build expertise in a technical field or become acquainted with industry changes.

Examples of official business include state functions, accompanying the Minister, government events and industry stakeholder events. They may also include working lunches and seminars. An offer to attend an official business event must be declined if attending would bring Parks Victoria into disrepute.

## Declarations

Token offers do not need to be declared.

All non-token offers received must be declared within 10 business days. Exceptions include:

- Spam and generic marketing offers do not need to be declared if they are refused.
- An offer made in a personal capacity, or that is otherwise unconnected to the employee's work at Parks Victoria, does not need to be declared or approved.

Advice should be sought from the Legal, Risk and Assurance team if there is uncertainty.

## Accepted gifts

Token gifts may be accepted (provided they meet the integrity test) without requiring approval. The recipient is the owner of the gift, benefit or hospitality.

All non-token gifts of \$50 or more that have been accepted become the property of Parks Victoria. The relevant approver decides whether the gift should be returned, disposed of, or transferred to the employee.

## Approvals and disclosures

The below table summarises the actions required under different scenarios.

Scenario	Authorisation required	Disclosure
Token gift offer declined	No	No
Token gift offer accepted	No	Yes
Non-token gift offer received	Noted by line manager	Yes
Non-token gift offer accepted	Approved by CEO	Yes

## Record-keeping and reporting

Details of all declarable offers of gifts, benefits and hospitality will be maintained in an **internal register**. A **public register** will be published on Parks Victoria's website in accordance with the Standing Directions 2018 under the *Financial Management Act 1994*.

A report is tabled at the Audit and Risk Committee at least annually regarding Parks Victoria's administration and quality control of its gift, benefits and hospitality policy, processes and internal register; relevant risks, mitigation strategies and proposed improvement measures.

# OFFICIAL

## Providing offers

### Integrity test – providing offers

When offering a gift, benefit or hospitality on behalf of Parks Victoria, employees must ensure that:

- it is for a **legitimate business reason**; and
- the **cost** is proportionate to the benefits obtained and reasonable in terms of **community expectations**; and
- it does not create a **conflict of interest** (actual, potential or perceived);
- participants in hospitality demonstrate professional standards of **behaviour** and extend a duty of care to other participants; and
- the offer complies with Parks Victoria’s financial delegations and other relevant rules, which include the permitted uses of public money.

## Promoting compliance with this policy

### Culture of integrity

Parks Victoria employees are expected to foster a culture of integrity by adhering to governance policies and procedures, and modelling good practice through their own behaviour.

Parks Victoria must ensure this policy and associated procedure are appropriately communicated to employees and easily accessible. Any employee who is uncertain about how to comply with this policy should seek advice from their line manager or the Legal, Risk and Assurance team.

Parks Victoria must make suppliers aware of its policy in relation to gifts, benefits and hospitality, and that breaching it may result in their contract being terminated.

## Responsibilities

### Board

Approves this policy and ensures its periodic review

### Audit and Risk Committee

Reviews the Gifts, Benefits and Hospitality Register at least annually  
Assesses actions taken to address any patterns of repeated and/or prohibited offers  
Recommends any changes to this policy for Board approval

### Chief Executive Officer

Ensures that the gifts, benefits and hospitality policy and procedure are consistent with legislative obligations  
Ensures that employees are aware of and comply with this policy

### Line managers

Ensure that team members are aware of and comply with this policy

### Employees

Inform themselves of their obligations and comply with them

# OFFICIAL

---

<b>Legal, Risk and Assurance team</b>	Administers systems and processes to manage the receipt or provision of gifts, benefits and hospitality Advises on the operation of this policy Investigates potential breaches
---------------------------------------	---

---

<b>Office of CEO</b>	Supports Board members to meet their obligations under the Board Governance Handbook
----------------------	--

---

## Breaches

Employees are encouraged to speak up immediately if they believe they or someone else might have breached or be about to breach this policy.

Concerns may be reported to the line manager, Legal, Risk and Assurance team or whistleblower Stopline. Reports of suspected criminal or corrupt conduct may be made directly to the Independent Broad-based Anti-corruption Commission (IBAC) or the Victorian Ombudsman.

Parks Victoria deals with alleged breaches in a fair, reasonable and proportionate manner. Depending on the circumstances, responses may include informal counselling, performance management or misconduct processes. Serious misconduct may result in termination of employment or, in the case of a suppliers, termination of their contract.

Disciplinary action may be taken against anyone who discriminates against or victimises an individual who speaks up in good faith.

## Related references

Parks Victoria policies, procedures, guidelines and forms:

- PRO-121 Gifts, benefits and hospitality procedure
- C-0143 Gifts, benefits and hospitality declaration form
- POL-120 Values and ethics policy
- POL-115 Code of conduct policy
- PRO-123 Conflict of interest declaration and management procedure
- Board Governance Handbook

External policies and guidance:

- *Code of Conduct for Directors of Victorian Public Entities*
- *Code of Conduct for Victorian Public-Sector Employees*
- *VPSC's Minimum accountabilities for managing gifts, benefits and hospitality*

Legislation:

- *Financial Management Act 1994*
- Standing Directions 2018 under the *Financial Management Act 1994*
- *Public Administration Act 2004*

## Document history

Version	Date approved	Issue comment	Version author
0.1	27 March 2026	First draft	Manager, Integrity and Assurance
0.2	13 April 2026	Edited and endorsed	Director, Legal, Risk and Assurance
0.3	21 April 2026	Token gifts do not need to be declared	Senior Executive Committee
0.4	13 May 2026	Endorsed	Audit and Risk Committee
1.0	24 June 2026	Approved	Board