

Gifts, Benefits & Hospitality (GBH) Policy

Document Control Information	
Issuing area	VIDA Integrity
For enquires contact	Anna Moffitt
Approver	Director-General
Effective date	25 November 2024
Next review date	25 November 2026
Version	2.0
File reference number	DOC/25/107915

CONTENTS

Part A – Overview and definitions.....	3
Part B – Receiving Offers of Gifts, Benefits & Hospitality (GBH)	5
Part C – Provision of Gifts, Benefits or Hospitality (GBH)	11
Part D – Alleged Breaches.....	13
Attachment 1: Policy Definitions.....	14
Attachment 2: Roles & Responsibilities.....	16
Attachment 3: Supporting Information	20

CM9 REFERENCE	VERSION NUMBER	ISSUE DATE	STATUS
DOC/24/146979	1.0	25/11/2024	FINAL ENDORSED BY EXECUTIVE COMMITTEE and APPROVED BY DG
DOC/25/107915	2.0	1/12/2025	UPDATED PART C – Section 7 Previous ' VIDA guidelines relating to the provision of GBH ' is now a requirement where compliance is not optional. Also note new requirement for DG's approval if provisioning is expected to exceed \$50 per staff.

Part A – Overview and definitions

1. Purpose

When we perform our public duties, the community and our stakeholders expect that our decision making is impartial and we will act without being influenced. This helps to assure public trust in our organisation, maintain our reputation and to prevent misconduct, fraud and corruption.

This policy outlines Victorian Infrastructure Delivery Authority (VIDA)'s expected behaviour and accountabilities of its employees when:

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

It is based on the [minimum accountabilities](#) set out by the Victorian Public Sector Commission (VPSC) and reinforces adherence to the [Code of Conduct for Victorian Public Sector Employees](#) (the Code) and the Public Sector Values and Employment Principles specified in the *Public Administration Act 2004 (Vic)* (the Act).

Consistent with the Department of Transport and Planning (DTP), VIDA's default position when offered gifts, benefits and hospitality is to politely say "no thank you" and hold the position that "thanks is enough".

2. Scope & Application

Coverage

The policy applies to:

- employees of VIDA
- contractors, consultants and agency hires required as part of their contract to comply with this policy
- other workplace participants including (but not limited to) independent members of advisory groups, graduates and trainees on placement, cadets and work experience students.

For ease of reading, in this policy we use the term 'VIDA staff' to cover anyone the policy applies to, as set out above, regardless of their employment or engagement status.

Any queries in relation to the application of this policy and the associated processes are to be directed to VIDA Integrity (vida-integrity@vida.vic.gov.au).

The definitions associated with terms used throughout this policy are contained in [Attachment 1](#).

Key things you must do

When you are doing work for our organisation, no matter what that work is, you must act with integrity and impartiality consistent with the [Code of Conduct for Victorian Public Sector Employees](#). This includes placing the public interest above your private interests.

This does not just help your workplace. It protects you if you are accused of wrongdoing and helps you to navigate difficult situations.

Employees

As an employee, you must comply with this policy when you:

- are offered gifts, benefits or hospitality
- provide gifts, benefits or hospitality

Managers

If you are a manager with direct reports, you must also:

- be aware of the gifts, benefits and hospitality risks inherent in your direct reports' roles
- oversee your direct reports' compliance with this policy
- promote awareness and give advice
- model good practice.

Seek advice

If unsure what to do, check with your project's FCCOs or with vida-integrity@vida.vic.gov.au

For further understanding of the roles and responsibilities relating to this policy, refer to [Attachment 2](#).

Part B – Receiving Offers of Gifts, Benefits & Hospitality (GBH)

You must comply with the minimum accountabilities when responding to all offers of GBH (token or non-token), including offers that are considered Official Business Events (OBE).

3. Minimum Accountabilities

Do not solicit offers

You must not solicit any gift, benefit or hospitality that could reasonably be seen as connected with your employment.

Offers you must refuse (@ Integrity Test)

You must always refuse a gift, benefit or hospitality (token or non-token) if any of the following apply:

i Money or similar

You must refuse the offer if it is money, used in a similar way to money, or easily converted to money (e.g. a gift voucher)

ii Conflict of interest

You must refuse the offer if it gives rise to a conflict of interest (actual, potential or perceived). This means you must refuse the offer if it could influence, or reasonably be seen to influence, how you perform your public duties.

Example:

A supplier offers to host and pay for a lunch for your team to celebrate the conclusion of a project. While it may appear reasonable to accept considering the supplier is already working with the agency, it is not an offer which should be accepted.

iii Public trust

You must refuse the offer if it could compromise the public's trust that you will perform your public duties in an impartial manner or the public's trust in the impartiality of your organisation or the public sector.

iv Community expectations

You must refuse the offer if it is not consistent with community expectations.

v Bribes

You must refuse the offer if it could reasonably be seen as a bribe or other inducement. Report the offer to the head of your public sector organisation or their delegate (who should report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-corruption Commission).

vi Legitimate business reason – non token offers

Even if the offer complies with all the other requirements above, you must refuse a non-token offer unless there is a *legitimate business reason* to accept it. The offer must further the conduct of official business or other legitimate goals of your organisation, the public sector or the State.

Example:

You are required to meet with a supplier to conduct business. The supplier invites you to meet them at a corporate box during a sporting event (at no cost to you but as a cost to the supplier). There is no legitimate business reason for the meeting to take place in this way. You must refuse and declare the offer.

vii Additional offers that must also be refused

- **Repeat offers** that cause a conflict of interest or where their combined effect can lead to the reasonable perception that they could influence you.
- **Offers from a person, group or organisation you are likely to make or influence a decision about in the foreseeable future** except where offer is for token hospitality i.e. basic courtesy such as sandwiches over a lunchtime meeting or a learning opportunity such as a free webinar available to all attendees where content is relevant to your work duties and has a *legitimate business reason/benefit*.
- **Offers from lobbyists** whose primary purpose is to lobby Ministers, Members of Parliament or public sector agencies.
- **Offers that are endorsements** i.e. accepting the offer could reasonably be seen as endorsing a product or service.
- **Offers that advantage a supplier or sponsor** i.e. accepting could reasonably be seen as advantaging a supplier or sponsor in a future procurement.
- **Offers where there is already sufficient attendees/representation** i.e. VIDA will already be sufficiently represented to meet its business needs.
- **Offers that will benefit you in your private capacity** including the accumulation of loyalty points. See DTP's Travel Policy for information on Frequent Flyer points and lounge memberships.
- **Offers that you feel will be in breach of your obligations under the VPS Code.**

Use the **VPSC 'GIFT' Test** to help assess whether to accept or refuse a particular gift, benefit or hospitality.

Declare / register all offers

VIDA's position is for **all offers (token or non-token)** to be declared/registered on the VIDA GBH/OBE Portal using the **VIDA GBH_OBE online form** except where the offer is considered a generic offer that you refuse.

You must:

- declare all offers whether you accept or refuse it, within 5 days of the offer (except where considered a generic offer that you refuse)
- always refuse the offer unless it complies with the **Integrity Test**, and you have approval from your line management in which case you must still document a *legitimate business reason* for accepting.

Exceptions to declaration rule – generic offers that are refused

In the course of your public duties you may receive generic offers of non-token gifts or benefits. For example:

- emails targeting our employees with offers to attend a seminar or webinar at a discount rate
- SPAM email.

You do not need to declare a generic non-token offer if you refuse it.

If you want to accept it, the usual restrictions in the **Integrity Test** apply as to whether you can do so.

Targeted email blasts

Often, generic offers may appear personalised by being addressed to you directly or using AI tools that can quickly and believably personalise the body of emails whilst still sending them to many people.

If you receive an email and you are unsure if it is a generic offer, talk to your FCCO or VIA Integrity. Some useful questions to ask when unsure are:

- Do I have a relationship with the person or organisation who sent the email?
- Is the offer related to my work or the work of my area of the organisation?

If the answer to all of the above is 'No' then it is likely a generic offer.

Limited circumstances for accepting a GBH – *legitimate business reason*

There are limited circumstances considered as *legitimate business reason* for accepting a GBH – these are:

- **Protocol (or Ceremonial) gifts** - Gifting of items to VIDA staff by third parties may be done as part of the culture and practices of communities and governments. Staff must be sensitive to those cultures and practices and be prepared to accept ceremonial or protocol gifts in a courteous and appreciative manner. Ceremonial or protocol gifts are usually provided when conducting business with official delegates or representatives from another organisation, community or foreign government, and the exchange of these types of gifts in these circumstances is a practice that should be anticipated.
- **Certain acceptable thank-you gifts** – limited to token gifts such as a bottle of wine, box of chocolates, branded conference merchandise such as pens, notepads or water bottles etc typically offered to VIDA staff approved to speak or present at a conference or seminar. These offers are often done in public and may be accepted as a matter of courtesy.
- **Token coffee or tea or light refreshments** provided at business meetings where their provision is a **basic courtesy and/or incidental**.

- Where there are **strong business reasons in the public interest** to accept.

These are examples of how to record the *legitimate business reason* in enough detail:

Unacceptable

- *'Networking'*
- *'Maintaining stakeholder relationships'*

Acceptable

- *'I presented to a visiting international delegation. The delegation presented me with a cultural item which, consistent with our organisation's policy on official gifts and items, I accepted on behalf of the organisation.'*
- *'I was invited to a roundtable discussion by one of our stakeholders, who supplies x services to my organisation and more broadly to other organisations in the public sector. The round table session, attended by industry partners, is on a topic that is relevant to my role. The round table session was followed by hospitality.'*

Preapproval required for any acceptances

VIDA's default position is for approval from line management to be obtained prior to any acceptance and evidence of approval is required to be included as part of registration.

- Approval from **a member of your project office's Executive Leadership Team** is required prior to acceptance of any **non-token offers**.
- Token offers may be pre-approved by line manager.

Retrospective approval

If you cannot obtain prior approval to accepting an offer, in limited circumstances you can obtain retrospective approval. Apply within 5 business days. For example:

- if it was reasonable to be unaware the gift was non-token – such as a wrapped gift
- if it would have caused serious offence to refuse – but remember, except for official gifts or items, this is not usually sufficient reason.

4. Other types of offers

Offers made in a personal capacity – are exempt from this GBH Policy

It is normal to receive offers of GBH in your personal life that are unconnected to your work.

You can accept these offers, provided you believe on reasonable grounds that the offers are made in a personal capacity. These do not require to be declared.

If you are unsure whether an offer is being made to you in a personal capacity or because of your role with our organisation, apply the **Integrity Test**, consider the **GIFT** questions and follow this policy as you would in your professional capacity.

Offers to attend Official Business Events (OBE) – are exempt from this GBH Policy

OBEs are generally anticipated to be offers to events of an official nature or, directly related to your role at VIDA or, a learning opportunity. The offerors hosting these events are typically government departments, public entities or other public sector organisations, industry, peak or professional associations or academic institutions or research bodies.

Attendance at these events is not subject to the GBH policy but is subject to the VIDA Attendance at Official Business Events (OBE) Policy. There are strict criteria for Acceptance to attend an OBE. For further information, please see the **VIDA OBE Policy**.

Non-token offers of uncertain origin – should be refused and declared

If you receive an offer via a work colleague and you believe they may be offering on behalf of a third party with the possible intention of influencing you:

- refuse the offer and declare it, and
- report it to your FCCO or VIDA Integrity, as it may need to be referred on to an integrity body or the police.

Offers to our organisation – acceptance may be discretionary following scrutiny

Sometimes offers are made to VIDA itself. For example, offers of equipment or benefit like discounts or free tickets.

In deciding whether to accept such an offer, VIDA will take into account:

- whether the offer passes the [Integrity Test](#)
- in particular, will carefully scrutinise:
 - the people or organisation making the offer
 - the nature and circumstances of the offer
 - the level of public benefit if the offer is accepted.

VIDA must reject any offer that is not consistent with community expectations.

Donations or gifts given on our organisation's behalf – should be discouraged

Sometimes an individual or business that has a relationship with our organisation may seek to donate or gift to a third party, like a charity, in our name or on our behalf. Often this happens without seeking prior approval from our organisation or giving us any opportunity to accept or refuse the gift or donation.

There are reputational risks associated with any donation or gift made on our behalf, even where this is well meaning.

For example, it can be seen as preferencing one charitable organisation over another and can impact the perception of and trust in the Victorian Government as a whole.

There are other risks associated with allowing a commercial partner to donate or gift in this manner, including the impact that this may have on future procurement or work activities.

Our organisation expects that everyone who works with us is made aware of our expectations around donations made in our name.

While there is no opportunity to refuse the donation or gift once made, the commercial partner should be informed that no gift or donation should be made on our organisation's behalf in future without a formal offer and approval.

Where a gift or donation has been made without prior approval, that gift or donation should be listed on the gifts, benefits and hospitality register, noting that there was no opportunity to accept or refuse.

5. Official gifts and items – what you must do

If you accept the following you do so on behalf of VIDA:

- official gift
- official item (item with cultural, ceremonial, religious, historic, or other significance).

Official gifts and official items (for example a culturally significant gift from an official delegation) are an exception to our usual 'thanks but no thanks' approach.

Regardless of its monetary value, an official gift or official item:

- must be declared
- will be recorded in the internal register
- will not usually be published in the online public register
- belongs to our organisation, not you.

Applying for ownership of an official item

If an official item was given to you specifically in recognition of your work or contribution, you may retain it provided that:

- It is the express wish of the giver
- It benefits our organisation's relationship with the giver
- It is appropriate given the significance and value of the item
- It would be consistent with community expectations
- It is unlikely to bring you or our organisation into disrepute, and
- Your manager or, depending on the gift, an appropriately senior delegate gives written approval.

Part C – Provision of Gifts, Benefits or Hospitality (GBH)

6. Minimum accountabilities

When providing a GBH on behalf of VIDA, you must ensure all of the following:

Business purpose

There must be a business purpose, in that it:

- furthers the conduct of official business or other legitimate organisational goals, or
- promotes and supports government policy objectives and priorities.

Some examples of *legitimate business reasons* are to:

- welcome guests
- facilitate the development of business relationships and outcomes e.g. VIDA sponsored workshop, panel presentation or VIDA networking function
- celebrate achievements e.g. launch or opening /conclusion of a major infrastructure project or a whole of VIDA or VIDA project office celebration.

No conflicts of interest

Ensure it does not raise a conflict of interest (actual, potential or perceived).

Proportionate costs & meeting community expectations

Ensure that any costs incurred are proportionate to the benefits obtained for the State and that the event or provision of GBH would be considered reasonable and consistent with community expectations.

Example:

Our organisation is running a workshop for all staff, with mandatory attendance. It is an all day event and our organisation has organised catering to provide lunch for all attendees. This 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.

Conduct during hospitality

If you participate in hospitality in your public sector role you must:

- demonstrate professionalism in your conduct
- uphold your duty of care to other participants.

If you are a participant who is accepting hospitality, you must also comply with these standards.

Use the [VPSC 'HOST' Test](#) to help assess whether to provide a particular GBH or event.

7. Processes you must follow when providing GBH

Refer to the [VIDA requirements relating to the provision of GBH](#) – e.g. cost guidelines and who needs to approve.

Note that any provisioning of gifts, benefits or hospitality to staff should not exceed \$50 per head. **Director-General's approval is required where costs are expected to exceed \$50 per staff.**

The procurement relating to the provision of GBH must follow the VIDA Procurement Framework including your project office's required forms.

Part D – Alleged Breaches

8. Dealing with an alleged breach

If you may have breached this policy notify your manager in writing immediately. This enables us to assess how best to mitigate the risk – for example, we may arrange to return the gift.

VIDA's response

VIDA will respond to alleged breaches of this policy consistent with the Act, the Code, this policy and any other obligations that apply.

We will take a graduated approach. Our response will be fair, reasonable and proportionate. In some instances, no action will be taken. In others, we will deal with the matter:

- on an informal basis, for example, through education or counselling
- through a performance management process or similar, or
- if other methods are not appropriate, through a misconduct process.

A finding of misconduct may amount to a breach of the code of conduct. Serious misconduct can result in termination of employment.

Contractors may be subject to contract renegotiation or termination.

If a criminal offence may have occurred, the Victorian or Federal Police may investigate and prosecute.

9. Speak up

We encourage you to speak up if you believe a breach of this policy:

- has happened
- is happening
- might be about to happen.

You can do so by notifying your manager, your project's FCCO or VIDA Integrity.

IBAC and the Victorian Ombudsman

Alternatively, if you believe corrupt or improper conduct is occurring, you can make a complaint directly to the [Independent Broad-based Anti-corruption Commission \(IBAC\)](#) or the [Victorian Ombudsman](#).

Sometimes this can occur on a whistle-blower basis as a public interest disclosure.

How VIDA must respond

VIDA must always:

- actively support and protect employees who speak up in good faith
- take decisive action, including possible disciplinary action, against anyone who discriminates against or victimises an employee who speaks up in good faith
- respond in a constructive manner to the information provided.

Attachment 1: Policy Definitions

The below table lists the terms specific to this policy only.

Term	Definition
Benefits	Preferential treatment, favours or other advantage. For example, invitations to sporting, cultural or social events, access to discounts, special memberships or the promise of a new job.
Business associate	An individual, group or organisation that VIDA has, or plans to have, a business relationship with or who may seek commercial or other advantage.
Conflict of Interest (COI)	A conflict of interest exists if you have a private interest that could influence, or reasonably be seen to influence, how you perform in your public duties. The conflict can be actual, potential or perceived. For more information, see the Conflict of Interest (COI) Policy.pdf (sharepoint.com) .
Declare	Has the same meaning as 'register' i.e. you must <i>declare</i> all offers also means you must <i>register</i> all offers. These terms are used interchangeably for the purpose of this policy.
Generic offers	These tend to be emails targeting staff with offers to attend a seminar or webinar or SPAM type emails. These do not need to be declared if you decline.
Gifts	Items or services that are free, discounted, or would generally be seen by the public as a gift. For example, items such as vouchers, gift cards, artwork, chocolates or flowers; services such as car repair; or free tickets to attend a paid event. Remember that gift cards and vouchers must be treated the same as money under the minimum accountabilities and cannot be accepted.
Hospitality	The friendly reception and entertainment of guests. Ranges from light refreshments at a business meeting to expensive restaurant meals and sponsored travel and accommodation.
Legitimate business reason	Furtheres the conduct of official business or other legitimate goals of VIDA, the public sector or the State.
Non-token offer	An offer that is, or may be perceived to be by the recipient, the person making the offer or by the wider community, of more than inconsequential value. All offers worth \$50 or more are non-token offers and must be declared on VIDA's GBH/OBE Register whether accepted or declined, except if they are 'generic offers' you decline. Approval from a member of your project office's Executive Leadership Team is required prior to acceptance of any non-token offers.
Official Business Event (OBE)	OBEs are generally anticipated to be offers to events of an official nature or, directly related to your role at VIDA or, a learning opportunity. The <u>offerors hosting these events</u> are typically government departments,

**Know**

- Values
- Obligations
- Policies

**Avoid**

- Conflicts of Interest
- Gifts & benefits

**Report**

- Integrity breaches
- Fraud
- Corruption

public entities or other public sector organisations, industry, peak or professional associations or academic institutions or research bodies.

Attendance at these events is not subject to the GBH Policy but is subject to the VIDA OBE Policy. There is a narrow definition as to what generally constitutes an OBE with strict criteria for their acceptance applying. For further information, see the [VIDA OBE Policy](#).

Official gifts and items	Official gifts and items include: • official gifts • official items (items with cultural, ceremonial, religious, historic, or other significance) Sometimes these may be accepted or given on behalf of VIDA as part of business with official delegates or representatives of a community group, organisation, or government.
Internal register (@VIDA GBH/OBE Portal)	The official record of all declarable offers of GBH (or OBEs) made to VIDA staff or VIDA, whether accepted or declined.
Public register	The record of information made public via DTP's official register, which is published online. The minimum accountabilities describe what must be included on the public register.
Repeat offers	Receiving multiple offers (token or non-token) from the same person or organisation can generate a perception that the person or organisation could influence you. Individuals should refuse repeat offers from the same source.
Token offer	Offer that is of inconsequential or trivial value to both the person making the offer and the recipient (such as basic courtesy). The minimum accountabilities state that token offers cannot be worth more than \$50. VIDA requires all token GBH offers to be registered whether accepted or declined, except if they are offers of 'basic courtesy' (such as tea or sandwich accepted at a work meeting) or 'generic offers' you decline.

Attachment 2: Roles & Responsibilities

Responsible party	Responsibilities
VIDA staff	Ensure your personal interests do not influence and could not reasonably be perceived to influence you in your official role.
	Do not seek or solicit GBH for yourself or others.
	Politely say "no thank you" to offers of GBH and hold the position that "thanks is enough".
	Only accept offers that pass the Integrity Test and you have a <i>legitimate business reason</i> to accept.
	Refuse all offers of GBH that:
	• Is money or similar, used in a similar way to money, or easily converted to money. • Gives rise to a conflict of interest (actual, potential or perceived). • Could compromise the public's trust that you will perform your duties impartially. • Is not consistent with community expectations (The Newspaper Test) • Could reasonably be seen as a bribe or other inducement (you must report criminal or corrupt conduct). • Comes from a person or organisation that repeatedly offers GBH, a lobbyist, or is seeking endorsement • Would advantage a supplier, vendor, program partner or sponsor • Sufficient attendees from VIDA are already attending the offered event • Offer contributes to the personal accumulation of loyalty points or other private benefits.
	Even if it is not any of the above, you cannot accept without a <i>legitimate business reason</i> .
	Declare all GBH offers (token & non-token) whether accepted or declined, using VIDA GBH_OBE online form
	Seek written approval from a member of your project office's Executive Leadership Team prior to acceptance of any non-token offers . Token offers may be approved by your line manager.
	Report any breaches or compliance concerns regarding this policy to your FCCO or VIDA Integrity.
	Ensure that any GBH provided for a business reason furthers the conduct of official business or other legitimate organisational goals or promotes and supports government policy objectives and priorities.
	Ensure that any costs are proportionate to the benefits obtained for the State and would be considered reasonable in terms of community expectations.

Ensure that when hospitality is provided, individuals demonstrate professionalism in their conduct and uphold their obligation to extend that duty of care to other participants.

Managers	Ensure VIDA staff are aware of this policy and particularly, the Minimum Accountabilities relating to acceptance of a GBH and provision of a GBH, and that support and guidance is provided to VIDA staff to comply.
	Ensure all GBH offers (token & non-token) whether accepted or declined are being declared by VIDA staff using VIDA GBH_OBE online form
	When reviewing a VIDA staff's GBH declaration, ensure: - only offers that pass the Integrity Test with a <i>legitimate business reason</i>, are being accepted. - all information in the online form have been provided/answered correctly, and that a <i>legitimate business reason</i> is clearly articulated with enough detail for those which have been accepted. This review must be done before providing your final approval. If information is missing, or the decision made is not consistent with this policy, the form should be sent back to the declarant for changes. (To the extent the policy may have been breached, assist VIDA staff to assess how best to mitigate the risk – for example, consider arranging to return the gift). Remember that non-token offers require approval from a member of your project office's Executive Leadership Team prior to acceptance. Token offers may be approved by line manager.
	When approached by a VIDA staff member seeking written approval to provide GBH, ensure that the provision meets the Minimum Accountabilities.
	Remember that certain types of GBH provision require particular consideration and approval per the VIDA requirements relating to the provision of GBH .
Fraud & Corruption Control Officers (FCCOs)	Assist VIDA staff and managers to comply with VIDA's GBH Policy by providing information or advice.
	Undertake compliance checks of the declarations for their project office on a periodic basis - ensuring declaration forms are complete, including evidence of manager approval, and where applicable, that the appropriate decision was made.
Director-General	Model good practice and foster a culture of integrity.
	Establish, implement and review VIDA policies and processes for the effective management of GBH that comprehensively address the minimum accountabilities as set out by the VPSC.
	You must ensure that the requirements of VIDA's GBH Policy are at least as strong as those in the minimum accountabilities.
	When a VIDA staff member speaks up in good faith, ensure that VIDA's policy and procedures require VIDA to: actively support and protect VIDA staff who speak up in good faith about a possible breach of the policy

- take decisive action, including possible disciplinary action, against anyone who discriminates against or victimises a VIDA staff who speaks up in good faith
- respond in a constructive manner to the information provided.

Communicate this policy and related process effectively to VIDA staff, including communicating that a breach of the GBH Policy may constitute a breach of binding codes of conduct and, where appropriate, may result in disciplinary action. In some circumstances, a breach may constitute criminal or corrupt conduct.

Ensure that a clear policy position is established and communicated to business associates on the offering of GBH to VIDA staff, including the possible repercussions for a business associate acting contrary to VIDA's policy position.

The information provided to (potential) business associates should include:

- what constitutes a GBH
- VIDA's GBH Policy
- that VIDA discourages the making of offers
- any whole of Victorian Government supplier codes of conduct.

Report at least annually to VIDA's Program Assurance, Risk & Integrity Committee (PARIC) on the administration and quality control of VIDA's GBH Policy, processes and internal register. This report must include a copy of the internal register, analysis of VIDA's GBH risks (including repeat offers from the same source and offers from business associates), risk mitigation measures and any proposed improvements.

Ensure that an official internal register of GBH is established and maintained.

At a minimum, the register must record sufficient information to:

- effectively monitor, assess and report on the minimum accountabilities,
- meet the information requirements for the public register.

Ensure that the following documents are available to the public:

- VIDA's GBH Policy by publishing on the BigBuild website.
- The public register of reportable gift offers received (via DTP's external website).

The public register should cover the previous financial year and be published within four months of each new financial year.

The public register must at a minimum contain the following reportable information:

- all non-token offers, whether they were accepted or not
- the date each non-token offer was made
- the position of the recipient
- the position and organisation of the person making each offer
- where possible, whether the offeror is a business associate of the organisation
- a description of each offer and its value
- whether the offer was accepted or declined.



	• if accepted, the business reason for doing so.
VIDA Integrity	Prepare, review at least annually and amend this policy as required.
	Maintain forms, resources and registers used in the administration of GBH management and reporting procedures.
	Conduct quality assurance reviews of incoming declarations, ensuring declaration forms are complete, including evidence of manager approval, and where applicable, that the appropriate decision was made.
	Provide information and advice to VIDA staff to assist their understanding of GBH and appropriate decision making of an offer.
	Undertake analysis and reporting of the GBH entries to PARIC.
	Prepare the GBH entries for publication on the DTP's website by 30 August each year.

Attachment 3: Supporting Information

VIDA staff should also familiarise themselves and comply with the following information which supports and informs this policy.

Record type	Record name
VIDA policies	<u>Conflict of Interest (COI) Policy</u>
	<u>Attendance at Official Business Event (OBE) Policy</u>
Other VIDA resources	<u>VIDA GBH_OBE online form</u>
	<u>Responding to Offers of GBH flowchart</u>
	<u>Common scenarios of offers – GBH & OBE</u>
	<u>VIDA requirements relating to the provision of GBH</u>
Other external resources	<u>Code of Conduct for Victorian Public Sector Employees.</u>
	<u>VPS Enterprise Agreement 2024</u>
	<u>VPSC Minimum Accountabilities for GBH</u>
	<u>VPSC 'GIFT' Test</u>
	<u>VPSC 'HOST' Test</u>