Gifts, Benefits and Hospitality Policy

Section 1 - Summary

(1) This Policy states Victoria University's (VU) position on:

a. responding to offers of gifts, benefits and hospitality; and,
b. providing gifts, benefits and hospitality.

(2) This Policy is intended to support staff and VU to avoid conflicts of interest and maintain high levels of integrity and public trust, and should be read in conjunction with the Appropriate Workplace Behaviour Policy, Fraud and Corruption Control Policy, and Financial Code of Conduct Policy.

Section 2 - Accountability

Key Decision Making Powers under the Policy

(Delegated) Power	Role
Approve exceptions to rules regarding the payment of farewell or other special event gifts to Staff.	Vice-Chancellor's Group

Section 3 - Scope

(3) This Policy applies to all Staff. For the purpose of this Policy, this includes:

a. all employees of the University, on all domestic and offshore locations, including student residences, and while engaged in all work-related activities such as conferences and work-sponsored social occasions;
b. all contractors and consultants performing work on University sites or on behalf of the University;
c. visiting academics, honorary, adjunct and exchange staff;
d. the Council and its committees;
e. any volunteer in the workplace and study environment.

Section 4 - Policy Statement

(4) VU Staff are expected to behave honestly and with integrity at all times in line with the Appropriate Workplace Behaviour Policy.

(5) This Policy has been informed by the Gifts, Benefits and Hospitality Policy Guide issued by the Victorian Public Sector Commission.

(6) VU is committed to and will uphold the following principles in applying this Policy:

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a. Public interest: Staff members have a duty to place the public interest above their private interests when carrying out their official functions. Staff members must:
    i. not accept gifts, benefits or hospitality that could raise a perception of, or actual, bias or preferential treatment.
    ii. not accept offers from those about whom they are likely to make business decisions.
b. Accountability: Staff members are accountable for:
    i. Declaring all reportable offers of gifts, benefits and hospitality;
    ii. Responsibly providing gifts, benefits and hospitality;
    iii. Monitoring the total of cumulative offers over a 12 month period;
c. Staff members with direct reports are accountable for modelling good practice and promoting awareness of the Gifts, Benefits and Hospitality Policy and Procedure;
d. Risk-based approach: VU, through its policies, processes; Vice-Chancellor's Group; and Audit and Risk Committee, will ensure gifts, benefits and hospitality risks are appropriately assessed and managed. Staff members with direct reports will 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.

Staff Responsibilities

(7) VU has set minimum responsibilities for the appropriate management of gifts, benefit and hospitality.

VU Staff offered gifts, benefits and hospitality

(8) VU Staff are required to comply with the following:

a. Do not, for themselves or others, seek or solicit gifts, benefits and hospitality.
b. Refuse all offers of gifts, benefits and hospitality that:
    i. are money, items used in a similar way to money, or items easily converted to money;
    ii. give rise to an actual, potential or perceived conflict of interest or be perceived as undermining the integrity or impartiality of the University or the Staff member;
    iii. may adversely affect their standing as a Staff member or which may bring VU into disrepute; or
    iv. are reportable offers without a legitimate business benefit.
c. Declare all reportable offers of gifts, benefits and hospitality (valued at $200 or more OR cumulative offers from the same source over a 12 month period) via the Reportable Gifts, Benefits or Hospitality form (whether accepted or declined).
d. Refuse bribes or inducements and report inducements and bribery attempts to the Vice-Chancellor via their Vice-Chancellor's Group member.
e. Refuse all offers of gifts and benefits, and offers of more than modest hospitality made by people or organisations about whom the Staff member, or the University, is likely to make decisions in the near future. Decisions can include, but are not limited to, matters relating to:
    i. Awarding of tenders;
    ii. Procurement;
    iii. Enforcement or Disciplinary action;
    iv. Admission;
    v. Enrolment;
    vi. Academic Progress;
    vii. Recruitment / employment; and
    viii. Non-financial agreements and MOUs.

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VU Staff providing gifts, benefits and hospitality

(9) VU Staff are required to comply with the following:

a. Ensure that any gift, benefit and hospitality is provided for a business purpose in that it furthers the conduct of official business or other legitimate organisational goals, or promotes and supports University policy objectives and priorities.
b. Ensure that any costs are proportionate to the benefits obtained for the University, and would be considered reasonable in terms of community expectations.
c. Ensure that when hospitality is provided, Staff members demonstrate professionalism in their conduct
d. Ensure that any gift, benefit or hospitality offered by VU or any representative of the University to an international delegate or body is not capable of being construed as a bribe, and complies with the OECD Convention on Combating Bribery of Foreign Public Officials, the UN Convention against Corruption and any relevant national laws in the country of origin of the delegate.

Leadership of the Vice-Chancellor and Vice-Chancellor's Executive Group

(10) The Vice-Chancellor, and Vice-Chancellor's group members must:

a. Establish and maintain a Register that, at a minimum, records sufficient information to effectively monitor, assess and report on the minimum responsibilities.
b. Communicate and make clear within the University that a breach of the Policy or Procedure may constitute a breach of other relevant university policies and may amount to constitute criminal or corrupt conduct, resulting in possible disciplinary action.
c. Report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-corruption Commission.

Breaches of Policy

(11) There will be consequences for breaches of the Policy and Procedure, including but not limited to possible disciplinary action.

Section 5 - Procedures

(12) Gifts, Benefits and Hospitality Procedure

Section 6 - HESF/ASQA/ESOS Alignment

(13) HESF: 6.1 Corporate Governance; 6.2 Corporate Monitoring and Accountability

(14) Outcome Standards for NVR Registered Training Organisations 2025: Standard 4.1 Leadership and Accountability; 4.3 Risk Management. Compliance Standards for NVR Registered Training Organisations and FPP Requirements 2025: Standard 20 Compliance with Laws.

Section 7 - Definitions

(15) Business Associate: an external individual or entity which VU has, or plans to establish, some form of business relationship, or who may seek commercial or other advantage from VU by offering gifts, benefits or hospitality.

(16) Benefits

(17) Conflicts of Interest:

a. Actual conflict of interest: There is a real conflict between an employee's University duties and private interests.
b. Potential conflict of interest: a Staff member has private interests that could conflict with their University duties. This refers to circumstances where it is foreseeable that a conflict may arise in future and steps should be taken now to mitigate that future risk.
c. Perceived conflict of interest: the public or a third party could form the view that a Staff member's private interests could improperly influence their decisions or actions, now or in the future.

(18) Gifts

(19) Hospitality

(20) Legitimate Business Benefit: gifts, benefits and hospitality accepted or provided for a business purpose, in that it furthers the conduct of official business or other legitimate goals of the University.

(21) Register: is a record of all declarable gifts, benefits and hospitality. It records the date a reportable offer was made and by whom, the nature of the reportable offer, its estimated value, the raising of any actual, potential or perceived conflicts of interest or reputational risks and how the reportable offer was managed. For accepted reportable offers, it details the business reason for acceptance.

(22) Staff

(23) Non-Reportable Offer: is an offer of a gift, benefit or hospitality that is offered as a courtesy or is of inconsequential or trivial value to both the person making the offer and the Staff member. Whilst the primary determinant of a non-reportable offer is that it would not be reasonably perceived within or outside VU as influencing a Staff member or raising an actual, potential or perceived conflict of interest, it cannot be worth more than $200 (including cumulative offers from the same source over a 12 month period).

(24) Reportable 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 worth more than $200 (including cumulative offers from the same source over a 12 month period), are reportable offers and must be recorded on the Gift, Benefit and Hospitality register.

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Status and Details

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Accountable Officer	Trish Roberts Chief Financial Officer trish.roberts@vu.edu.au
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Glossary Terms and Definitions

"Gifts" - Gifts are free or discounted items and any item 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) and consumables (e.g. chocolates).

"Hospitality" - is the friendly reception and entertainment of guests. Hospitality may range from light refreshments at a business meeting to restaurant meals and sponsored travel and accommodation.

"Staff" - Staff means: - all employees of the University, on all domestic and offshore locations, including student residences, and while engaged in all work-related activities such as conferences and work-sponsored social occasions; - all contractors and consultants performing work on University sites or on behalf of the University; - visiting academics, honorary, adjunct and exchange staff; - the Council and its committees; and - any volunteer in the workplace and study environment.

"Benefit" - A benefit includes any right, privilege, service or facility.

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