



ELTHAM HIGH SCHOOL

POLICY DOCUMENT

Gifts, Benefits and Hospitality

INTRODUCTION

This policy will guide members of the school community when considering whether to accept or offer, gifts, benefits and hospitality.

PHILOSOPHY

Eltham High School acknowledges that the giving and receiving of gifts and hospitality are commonplace in everyday life. Gifts may be offered to say thank you for good service, a special achievement, or to celebrate an important event. Hospitality may be provided to welcome guests, facilitate relationships or to celebrate achievements.

The School acknowledges that there are limited circumstances in which gifts may be accepted on an individual basis by School Council members or school staff.

POLICY STATEMENT

The Gifts, Benefits and Hospitality policy at Eltham High School establishes a process for ensuring that all staff and school council members are advised of the policy requirements.

The community expects high standards of integrity and impartiality from school employees and school councillors. These individuals must not accept or make offers of gifts, benefits or hospitality that influences, or give the impression to influence, any decision unfairly. Whenever Department employees, school council employees or school councillors accept or offer gifts and hospitality they must always act fairly and objectively and maintain public trust by being honest, open and transparent.

GUIDELINES

What are Gifts, Benefits and Hospitality?

Gifts are free or discounted items. These include items of high value (eg artwork, jewellery, or expensive pens), low value (eg bunch of flowers) and consumables (e.g. a box of chocolates).

Benefits include preferential treatment, privileged access, favours or other advantage offered to, or accessed by an individual. They may include invitations to sporting, cultural or social events, access to discounts and loyalty/reward programs such as 'Fly Buys'.

Hospitality is the friendly reception and treatment of guests. It is hospitable to offer light refreshments in the course of a business meeting or as part of a conference program or to celebrate achievements. Hospitality may range from light refreshments at a business meeting to restaurant meals and sponsored travel and accommodation.

Accepting gifts, benefits and hospitality

When accepting gifts, benefits or hospitality, school employees and school councillors must:

- not solicit gifts, benefits or hospitality,
- refuse all offers of gifts, benefits or hospitality that could be reasonably perceived as undermining the integrity and impartiality of the school or themselves,
- refuse all offers of gifts, benefits or hospitality from people or organisations about which they are likely to make decisions i.e. tender processes, purchasing, licensing or regulations etc,
- refuse all offers of gifts, benefits or hospitality from organisations whose primary purpose is to lobby Ministers, Members of Parliament or agencies,
- refuse all offers which seem excessive,
- refuse all offers of money or items easily converted to money,
- refuse bribes and report bribery attempts to their management/principal,
- seek advice from their manager/principal or other appropriate delegate if unsure about how to respond to an offer of a gift, benefit or hospitality of more than nominal value.

Recording Gifts, benefits and hospitality

- Acceptance of token gifts such as a box of chocolates does not need to be formally registered.
- Offers (whether accepted or declined) of a gift, benefit or hospitality valued at \$50 or more (Non Token value) must be declared on the School's GBH Register.
- Offers from a parent, carer, guardian or student intended to express appreciation of the person's contribution to the education of a student or students, in which case non-token includes any offer more than \$100
- The Gift Register is monitored by the principal and annually reviewed by school council.

Keeping gifts

- Gifts worth \$500 or more must be surrendered to the school under all circumstances. Recipients may purchase a gift worth more than \$500 from the school with the School Council's approval, provided that no other public entity (e.g. Museums Victoria) has expressed interest in retaining the gift.

For further detail see Attachment A – Valuation and Disposal of Gifts

- Official gifts, namely gifts intended for the School or the Department rather than the individual recipient(s) remain the property of the school and/or Department.

Take the GIFT test

The GIFT test is a good reminder of what to think about when deciding whether to accept or decline a gift, benefit or hospitality.

G	Giver	Who is providing the gift, benefit or hospitality and what is their relationship to me? Does my role require me to select contractors, awards grants or determine policies? Could the person or organisation benefit from a decision I make?
I	Influence	Are they seeking to influence my decisions or actions? Has the gift, benefit or hospitality been offered to me publicly or privately? Is it a courtesy, a token of appreciation or highly valuable? Does its timing coincide with a decision I am about to make?
F	Favour	Are they seeking a favour in return for the gift, benefit or hospitality? Has the gift, benefit or hospitality been offered honestly? Has the person or organisation made several offers over the last 12 months? Would accepting it create an obligation to return a favour?
T	Trust	Would accepting the gift, benefit or hospitality diminish public trust? How would I feel if the gift, benefit or hospitality became public knowledge? What would my colleagues, family, friends or associates think?

BASIS OF DISCRETION

The School Council has responsibility for the establishment, evaluation and review of school policies. The School Principal has the responsibility to ensure that school policies are implemented effectively.

Minor changes to the policy (changes that will not affect the spirit of the policy) may be made at the discretion of the Principal.

The Policy Review and Evaluation process will recommend any major changes to the policy to School Council



Gifts, Benefits and Hospitality Schools Declaration Form

As part of the State Government, Gifts, Benefits and Hospitality (GBH) Policy Framework, non-token offers must be published on the Department’s or School’s public website. Please ensure your responses are in accordance with the GBH Minimum Accountabilities. This declaration will form part of the Register.

Declarations are to be completed by the Recipient within 14 days of the offer.

Date offered: DD/MM/YY [/ /]

Offered to:

Title/Role:

School:

Offered by:

Title/Role:

Organisation:

Reason offered:

Description of GBH:

Location of GBH or where hospitality occurs:

Estimated value: \$AUD

Non-token offers of \$50 or more¹ must be declared, whether accepted or declined, and approved by the Principal or School Council President.

¹ Except where a person employed under the Education and Training Reform Act 2006 in a Victorian Government school receives an offer from or on behalf of a parent, guardian, carer or student intended to express appreciation of the person’s contribution to the education of a student or students, in which case non-token includes any offer worth more than \$100.

Accepted offers above \$500 are required to be transferred to the School or the Department.

First time offer [] Previous offer(s) within last 12 months by this individual []

Cumulative value of gifts offered by this individual within the last 12 months:

Does this declaration relate to a TRA? If yes, please provide TRA number:

Decision regarding GBH: Declined [] Retained [] Transferred to Department or School []

Is the person or organisation making the offer a business associate of the School? Yes / No

If Yes, describe the relationship between the School and the person / organisation:

.....

Would accepting the offer create an actual, potential or perceived conflict of interest? **Yes / No**

If yes, the offer must be declined.

Would accepting the offer bring you, the School, the Department, or the Public Sector into disrepute? **Yes / No**

If yes, the offer must be declined.

Signature of recipient: Date: /..... /.....

You can attach relevant documentation.

On completion - Please send to School Principal or School Council President as appropriate

Authorised Delegate Decision: Approve: Yes / No

Name: Position:

Signature: Date: /..... /.....

GBH Register updated:

Name: Position:

Signature:

RELATED POLICIES

DET Gifts, Benefits and Hospitality Policy

<http://www.education.vic.gov.au/school/principals/spag/governance/pages/gifts.aspx>

DET Conflict of Interest Policy

<http://www.education.vic.gov.au/hrweb/Documents/Conflict-of-Interest-Framework.pdf>

The Code of Conduct for the Victorian Public Sector Employees

<http://www.education.vic.gov.au/hrweb/employcond/Pages/conduct.aspx>

<http://www.education.vic.gov.au/hrweb/Documents/Changes-Code-of-Conduct-1-June2015.pdf>

School Council Code of Conduct

<http://vpsc.vic.gov.au/html-resources/directors-code-of-conduct-and-guidance-notes/>

RELATED LEGISLATION

Public Administration Act 2004

<http://www.education.vic.gov.au/training/providers/rto/Pages/act.aspx>

REVIEW

This policy should be reviewed every 3 years.

Date Endorsed: 16 / 05 / 2018

Executive Officer

Eltham High School Council

CONSULTATION PROCESS AND WORKING PARTY INFORMATION:

This policy was written by:

Consultation has taken place with the relevant group(s) in the following list:

Group	Consultation ✓
School Operations Committee	Finance
Staff	✓
Students (randomly selected group)	
Parents (randomly selected group)	
Members of the Community	
Other (where relevant please specify)	
Planning and Policy Review Team of Council (Mandatory)	✓
School Council (Mandatory)	✓



