Gifts, Benefits and Hospitality Policy

Governance, Risk and Compliance

1. Purpose

This policy sets out how Melbourne Park Trustees and employees, as public sector directors and employees, **must** conduct themselves when:

- Receiving offers of gifts, benefits and hospitality.
- Providing gifts, benefits and hospitality.

This policy is designed to meet the minimum accountabilities issued by the Victorian Public Sector Commission (VPSC) for the management of gifts, benefits and hospitality. These minimum accountabilities are **binding** on Melbourne Park Trustees and employees, under the Instructions supporting the Standing Directions 2018.

2. Scope

The policy applies to all:

- Trustees; and
- Employees (including contractors performing Melbourne Park roles);

This policy only applies where gifts, benefits or hospitality are offered, received or provided as a result of a Trustee's role or an employee's employment with Melbourne Park. As a general approach this policy applies when the offer:

- Was received in performing your role with Melbourne Park.
- Refers to your role or title at Melbourne Park.
- Refers to other Trustees or employees at Melbourne Park.
- Was sent to a Melbourne Park office address or email.

3. Scope Exclusion (Official Business Events)

Invitations to Official Business Events (OBEs) are explicitly excluded from the scope of the Gifts, Benefits, and Hospitality Policy.

This is due to the fact that Melbourne Park operates commercially within the sports, entertainment and venues sector, and as such, it is standard and expected business practice that Trustees and employees (due to their role and duties with Melbourne Park) will attend OBEs for the benefit of Melbourne Park.

An invitation to an OBE includes an invitation to an event (including but not limited to, sporting events, concerts, festivals, galas, conferences or official hospitality), where:

1. The person / organisation issuing the invitation has a direct business interest in the event; and
2. The individual who received the invitation has a role that performs duties that relate to the event; and
3. Attendance at the event will provide a legitimate business benefit to Melbourne Park.

Accordingly, when you receive an invitation to an event, you should first apply Melbourne Park's Attendance at Official Business Events Policy. If there is any doubt as to whether this policy applies, the requirement is to disclose under this policy.

4. Policy Statement

At Melbourne Park we encourage you to help us develop a culture of **'thanks is enough'**. Our aim is to move to a culture in which gifts, benefits and hospitality are not accepted or provided, even if they are permitted under this policy.

Accordingly, the default position for Trustees and employees is that gifts, benefits and hospitality in relation to their role at Melbourne Park should be declined. However, in certain circumstances, as detailed in this policy, it may be appropriate to accept such offers.

In principle and through following this policy, Melbourne Park requires all Trustees and employees to:

- Demonstrate the highest standards of integrity and avoid all situations which may give rise to actual, potential or perceived conflicts of interest.
- Maintain public trust by being honest, open and transparent.

Trustee or employee family members and other personal contacts may also be offered gifts, benefits or hospitality either directly or through the Trustee or employee as a result of their role or employment. If this is the case, the same principles and guidelines as outlined in this document must be applied.

5. Roles and Responsibilities

Table 1A: Management Roles and Responsibilities

Role	Responsibilities
Employees	Comply with the VPSC's minimum accountabilities and this policy when you: • receive offers of gifts, benefits or hospitality; and • provide gifts, benefits or hospitality. If unsure what to do, check with your manager.
Managers	As an employee, managers 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 and foster a culture of integrity.
Executive Assistant to the CEO	As an employee, the Executive Assistant to the CEO must also: • assist in coordinating the flow of CEO and Trustee gift, benefit or hospitality declarations to the Head of Risk and Compliance for inclusion in the Internal Register.
Head of Risk and Compliance	As an employee and manager, the Head of Risk and Compliance must also: • administer and provide guidance on this policy. • maintain and review the Internal Register. • develop and coordinate reporting to the FAR Committee and publishing of the annual Public Register.
Executives Reporting Directly to the CEO	As employees and managers, executives reporting directly to the CEO must also: • act as the Responsible Person for employees within their reporting line. • communicate this policy to employees and business associates to ensure that it is widely understood.
Director of People and Culture	As an employee, manager and executive reporting directly to the CEO, the Director of People and Culture must also: • establish and maintain a register for gifts provided to Trustees and employees by Melbourne Park. • establish a system to manage and authorise, if appropriate, the purchase of small gifts in recognition and support of Melbourne Park employees and Trustees.
Deputy CEO	As an employee, manager and executive reporting directly to the CEO, the Deputy CEO must also: • oversee the administration of this policy. • oversee and review the Internal Register.

	• oversee reporting to the FAR Committee and Trust, and the publishing of the annual Public Register.
Chief Executive Officer (CEO)	As an employee and manager, the CEO (as a public sector body head), in line with the minimum accountabilities Part D must also: • act as the Responsible Person for executives reporting directly to them. • establish, implement and review Melbourne Park's policies for the effective management of gifts, benefits and hospitality. • communicate this policy to employees and business associates to ensure that it is widely understood. • report at least annually to the FAR Committee on the administration and quality control of the gifts, benefits and hospitality policy, processes and internal register. • ensure that an official Internal Register of non-token gifts, benefits and hospitality offered to employees is established and maintained. • ensure that Melbourne Park's Gifts, Benefits and Hospitality Policy and Public Register of reportable offers received is made available to the public. • report directly to the Trust Chair for approval of any gifts, benefits and hospitality offered. • actively support reporting to police or IBAC of any attempted bribe.

Table 1B: Trust Roles and Responsibilities

Role	Responsibilities
Trustees	Comply with the minimum accountabilities and this policy, when you: • receive offers of gifts, benefits or hospitality • provide gifts, benefits or hospitality.
Trust Chair	As a Trustee, the Trust Chair must also: • act as the Responsible Person to the CEO and Trustees. • actively support reporting to police or IBAC of any attempted bribe.
FAR Committee Chair	As a Trustee, the FAR Committee Chair must also: • act as the Responsible Person to the Trust Chair.
Finance, Audit and Risk (FAR) Committee	Responsibilities of the FAR Committee include: • endorse and oversee the application of this policy. • review the Internal Register for accuracy and completeness. • review the administration and quality control of the Internal Register. • annually approve the Public Register for upload to Melbourne Park's website.
Trust	Responsibilities of the Trust include: • review and approve this policy. • obtain feedback from the FAR Committee on the design and operating effectiveness of the gifts, benefits and hospitality internal control system. •

6. Receiving Offers of Gifts, Benefits and Hospitality

6.1 Minimum Accountabilities – Receiving

When you receive offers of gifts, benefits, or hospitality, remember that you are **bound** by the VPSC's minimum accountabilities, Part B.

Minimum Accountability 1 – Do Not Solicit Offers

You **must not** solicit (seek) any gift, benefit or hospitality, for yourself or others, if the offer could reasonably be seen as connected to your role at Melbourne Park.
This includes a requirement that you should not knowingly enter, or accept prizes from, corporate raffles or lotteries

which may be conducted in connection with Melbourne Park business activities. This is due is to the fact that this could be seen or reasonably be perceived as soliciting (seeking) a gift, benefit or hospitality.

Minimum Accountability 2 – Offers you Must Refuse

You **must always refuse** a gift, benefit or hospitality (token or non-token), if any of the following '**Integrity Tests (Receiving)**' are failed.

Table 2: Integrity Tests (Receiving)

Test	Description
Money or similar	You must refuse the offer if it is money, used in a similar way to money, or easily converted to money.
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.
Public Trust	You must refuse the offer if it could compromise the public's trust that you'll perform your job in an impartial manner or the public's trust in the impartiality of Melbourne Park or the public sector.
Community expectations	You must refuse the offer (token or non-token) if it is not consistent with community expectations.
Bribe	You must refuse the offer if it could reasonably be seen as a bribe or other inducement. Should a Trustee or employee believe that they have been offered a bribe or inducement, or are about to be, they must immediately advise the Deputy CEO, CEO or Trust Chair as appropriate or report the matter directly to the Independent Broad-based Anti-corruption Commission (IBAC) if the matter is a Public Interest Disclosure in accordance with the Public Interest Disclosure Policy. As required, they will work with you and Melbourne Park to report any criminal or corrupt conduct to Victoria Police or to the IBAC.
Legitimate business reason (non-token offers only (i.e. $50 or more))	You must refuse a non-token offer (i.e. $50 or more) unless there is a legitimate business reason to accept. It must further the conduct of official business or other legitimate goals of Melbourne Park, the public sector or the State.

Conflict of Interest – Further Considerations

In line with the minimum accountabilities, you must decline any offer that gives rise to an actual, potential or perceived conflict of interest. This means that you must decline an offer if it could influence, or reasonably be seen to influence, how you perform your public duties. The following types of offers of gifts, benefits or hospitality increase the probity risk to Melbourne Park and therefore, in most instances, these types of offers should be declined:

- From prospective or current suppliers, during the strategising, planning, go-to-market or assessment phase of a tender process.
- From any person or organisation with whom you have a personal relationship or personal interest.
- From any person or organisation with whom you or Melbourne Park are likely to make a major decision.
- Repeat and frequent offers of gifts, benefits and hospitality.
- Significant and uncommercial offers of gifts, benefits and hospitality.
- If accepting the offer could reasonably be seen as endorsing a product or service.
- If Melbourne Park will already be sufficiently represented to meet its business needs.

If there is any doubt, you should consult the Risk & Compliance team.

Conflicts of interest must be managed / declared in accordance with Melbourne Park's Conflict of Interest Policy.

6.2 Offers that you may Receive as a Melbourne Park Trustee or Employee

As a Melbourne Park Trustee or Employee, you could receive four (4) types of offers of gifts, benefits or hospitality.

Diagram 1: Types of Offers Received by Melbourne Park Trustees and Employees

6.2.1 Official Gifts and Items

Trustees and employees can accept official gifts and official items (items with cultural, ceremonial, religious, historic, or other significance) on behalf of Melbourne Park. Official gifts and official items are an exception to our usual 'thanks is enough' approach.

Official gifts and official items are treated separately to other types of gifts because:

- They are owned by Melbourne Park, irrespective of value, and are unlikely to create a conflict of interest; and
- Refusing official gifts and official items may cause offence or embarrassment to Melbourne Park, the party or community who offered the gift.

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

- Must be declared
- Will be recorded in the Internal Register
- **Will not** be published in the online Public Register
- Belongs to Melbourne Park, not you.

6.2.2 Token Offers

Regardless of the nature of the offer, if you receive a token offer (value less than $50):

- You can only accept the offer if it passes the 'Integrity Tests (Receiving)', with the exception of the 'legitimate business reason' test.
- You do not need to declare the offer.
- You do not need approval from your manager to accept.
- You are the owner of the gift, benefit or hospitality (except for Official Gifts and items).
- However, remember, 'thanks is enough'. Do you need to accept?

6.2.3 Unsolicited Gifts (Non-Token i.e. $50 or more)

Whilst Melbourne Park actively discourages the provision of gifts from business associates, given the nature of the industry in which Melbourne Park operates, it is not uncommon for gifts to be delivered to employees or Melbourne Park without the prior knowledge of the employee or Melbourne Park. This includes gifts that have been delivered to Melbourne Park via mail or imparted on an employee without the opportunity to decline.
When this occurs, if the gift or benefit is non-token ($50 or more):

Assess the Context

- You must assess whether the gift or benefit provided passes the 'Integrity Tests (Receiving)'. Depending on the outcome of the test, the employee or Trustee will either:
  - Seek retrospective approval from their Responsible Person to **accept** the gift on behalf of Melbourne Park (you must comply with the decision made by their Responsible Person); or
  - **Return** the gift to the provider, provided that it would not cause undue offence or harm business relations; or
  - **Dispose** of the gift in an appropriate manner (i.e. donating it).

Declare the Offer

- You must declare the non-token gift or benefit **even if you return or dispose of it** (see 'Declaring Non-Token Offers').

6.2.4 All Other Offers of Gifts, Benefits or Hospitality (Non-Token i.e. $50 or more)

For all other offers of gifts, benefits or hospitality received in your role as a Melbourne Park Trustee or employee, the default response is to role model a culture of 'thanks is enough' by politely saying 'no'. However, in some circumstances there may be a legitimate business reason in accepting the non-token offer.
If you receive a non-token offer ($50 or more):

Assess the Context

- You must assess whether the offer of gifts, benefits or hospitality passes the 'Integrity Tests (Receiving)'. Depending on the outcome of the test, the employee or Melbourne Park will either:
  - Seek approval from their Responsible Person to **accept** the gift on behalf of Melbourne Park (you must comply with the decision made by their Responsible Person); or
  - **Decline** the offer at the time that the offer is made to you. This is unless there are exceptional circumstances where you feel unsafe to decline to offer, or it will cause significant offence to the offeror (unlikely in most situations).

Declare the Offer

- You must declare the offer **even if you decline it** (see 'Declaring Non-Token Offers').

Exceptions to Declaring an Offer

Generic Offers:

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; or SPAM email.

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

Multi-Employee Declarations:

Sometimes, Melbourne Park will issue a non-token declaration on behalf of all or some of our employees. If this happens, we will let the relevant employees know, as it means they don't need to make an individual declaration of a non-token offer. This can be a multi-employee refusal or multi-employee acceptance, depending on the offer. These declarations will be issued by a relevant member of the executive team or the CEO. Employees are still responsible for declaring any actual, potential or perceived conflicts of interest that they might have in relation to the offer.

6.3 Declaring Non-Token Offers (i.e. $50 or more)

Declaration Expectations

To ensure the integrity of the gifts, benefits and hospitality management system, all non-token offers should be declared in a timely manner:

- **For Unsolicited Gifts or Benefits:** You must retrospectively complete and lodge a properly completed Gifts, Benefits and Hospitality Declaration Form within **7 days** of receiving the gift or benefit and submit the form to your Responsible Person for assessment / decision.

- **For Non-Token Offers of Gifts, Benefits or Hospitality:** You must complete and lodge a properly completed Gifts, Benefits and Hospitality Declaration Form within **14 days** of the offer and submit the form to your Responsible Person for assessment / decision.

Employees
To declare an offer, you are required to submit a Gifts, Benefits or Hospitality Declaration Form via ParkNet.

CEO and Trustees
To declare an offer, you are required to email a Gifts, Benefits or Hospitality Declaration Form (see **Appendix C**) to your Responsible Person, for assessment (CC'ing in the Executive Assistant (EA) to the CEO). When you require a copy of the form, please contact the EA to the CEO.

6.4 Applying for Ownership of a Non-Token Offer

Usually, a non-token gift, benefit or hospitality belongs to Melbourne Park. However, if the gift, benefit or hospitality was given to you specifically in recognition of your work or contribution, you may retain it provided that:

- It passes the 'Integrity Tests (Receiving)'.
- It is not an official gift or item (refer to 'Official Gifts and Items')
- It is unlikely to bring you or Melbourne Park into disrepute
- It would be consistent with community expectations, and
- Your Responsible Person gives written approval.

7. Providing Gifts, Benefits and Hospitality

7.1 Minimum Accountabilities – Providing

When providing gifts, benefits, or hospitality, remember that you are **bound** by the VPSC's minimum accountabilities, Part C.

Minimum Accountability 4, 5 & 6 – Business Purpose, Cost & Community Expectations, Conflict of Interest
You must not provide gifts, benefits or hospitality if any of the following '**Integrity Tests (Providing)**' are failed.

Table 3: Integrity Tests (Providing)

Test	Description
Business reason	Ensure it is for a business reason. There must be a legitimate business benefit that furthers the conduct of official business or other legitimate goals of Melbourne Park, the public sector or the State. Some examples of legitimate business reasons are to: • welcome guests • facilitate the development of business relationships and outcomes • celebrate achievements.
No conflict of interest	Ensure it does not raise a conflict of interest (actual, potential or perceived).
Proportionate costs	Ensure that any costs incurred are proportionate to the benefits obtained for the State.
Consistent with community expectations	Ensure that the event would be considered reasonable and consistent with community expectations.

7.2 Providing Gifts, Benefits or Hospitality to External Parties

Gifts
There are limited circumstances in which gifts may be offered to an external party:

- Gifts may be provided for the purposes of making guests feel welcome and to provide a reminder of their visit - the customary "exchange of gifts". In this circumstance, the gift would be considered an 'official gift or item' and they should only be symbolic rather than financial, in value. Before providing an official gift or item, make reasonable enquiries to ensure it will be appropriate to do so.

- Regular clients and service providers may also receive a gift of value in recognition of their ongoing support of Melbourne Park or to recognise a special occasion. The cost of providing gifts of this nature will be approved by an appropriate delegate and will typically be in terms of an approved budget.

Benefits and Hospitality

Benefits and hospitality should only be for the purpose of welcoming guests, facilitating the development of current and future business relationships, and celebrating achievements. All benefits to external parties must always be in the interest and in line with Melbourne Park's purpose as outlined in the *Melbourne and Olympic Parks Act 1985*.
In all instances, gifts, benefits or hospitality provided to external parties must pass the 'Integrity Tests – Providing'.

7.3 Providing Gifts, Benefits or Hospitality to Employees or Trustees

Gifts

As a general rule, Melbourne Park does not provide gifts to employees or Trustees, however the following exceptions apply, where small gifts may be purchased in recognition and support of Melbourne Park employees and Trustees, including their:

- achievements
- service to Melbourne Park;
- life milestones;
- serious illness or injury;
- bereavements related to close family members.

The Director of People and Culture is responsible for overseeing Melbourne Park's system to, where appropriate, purchase small gifts in recognition and support of employees and Trustees. Therefore, all requests to purchase gifts for employees and Trustees should be directed to the Director of People and Culture for assessment and authorisation. The Director of People and Culture will establish and maintain a register of gifts provided to Trustees and employees by Melbourne Park.

Benefits and Hospitality

The following rules apply to the provision of benefits and hospitality to employees or Trustees of Melbourne Park:

- Each department when setting and obtaining approval for their annual budget is permitted to budget for an amount communicated within the budget guidelines, for team building functions.
- Unbudgeted departmental level entertainment expenditure should be authorised by the Deputy CEO or CEO.

- Hospitality may be provided to Melbourne Park employees as part of a larger team event (i.e. a training course, workshop, planning day seminar or conference).
- The People and Culture function will budget for larger employee functions and seek approval for planned expenditure from the CEO. Employee functions are to provide a forum for communication, recognise outstanding achievements or promoting particular behaviours.

For the policy on attending events in a Melbourne Park venue refer to the Employee Ticketing Policy.
In all instances, gifts, benefits or hospitality provided to employees or Trustees must pass the 'Integrity Tests – Providing'.

Fringe Benefits Tax

Expenditure for the direct benefit an employee(s) obtains can be subject to Fringe Benefits Tax (FBT). This can include; gifts, functions (Christmas, Farewell) and entertainment of clients where an employee is present.
As required, you should consult with Melbourne Park's Finance function to understand and FBT implications.

8. Conduct During Hospitality

Regardless of whether you are providing or receiving hospitality, consistent with minimum accountability 7, if you participate in hospitality in your public sector role you must demonstrate professionalism in your conduct and uphold your duty of care to other participants, ensuring that all participants also display this conduct.

9. Responsibility

It is the responsibility of each Trustee and employee to read and understand this policy. If an individual believes that there is an exceptional reason for operating outside this policy, formal and documented approval from the Deputy CEO, CEO or Trust Chair is required prior to undertaking the activity.

10. Dealing with Alleged Breaches

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.
Melbourne Park 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.

11. Speak Up

We encourage you to speak up if you believe there is a breach of this policy. You can do so by notifying your manager, your executive, the Head of Risk and Compliance or the Deputy CEO.

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 may be a public interest disclosure, in which case, the Public Interest Disclosure Policy should be followed.

How Melbourne Park will respond
Melbourne Park will 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.

12. Exercising Judgement

In some cases, there may be a need to exercise judgment. Seeking advice can help to establish the acceptability of the gift or benefit. If in any doubt, it is recommended the Trustee or employee seek advice from the Head of Risk and Compliance, the Deputy CEO, the CEO or Trust Chair as appropriate.

13. Compliance and Standards

13.1 Regulatory Standards

This policy seeks to provide a uniform approach to ensure compliance with all relevant laws and regulations, and with applicable industry, government and organisational standards or policies and procedures including but not limited to:

- Victorian Public Sector Commission Gifts, Benefits & Hospitality Guidance
- Victorian Public Sector Commission Gifts, Benefits & Hospitality Minimum Accountabilities
- Financial Management Act 1994
- Standing Direction 3.4.11 of the Minister for Finance
- Crimes Act 1958
- Public Administration Act 2004
- Code of Conduct for Victorian Public Sector Employees
- Code of Conduct for Directors of Victorian Public Entities
- Melbourne and Olympic Parks Act 1985

13.2 Reporting Obligations

In line with the minimum accountabilities, Melbourne Park will publish its Gifts, Benefits and Hospitality Policy and Public Register on its' website including records from the current and previous financial year. The Public Register will be published within four months of each new financial year.

The Head of Risk and Compliance and Deputy CEO will also report annually to the FAR Committee on the administration and quality control on Melbourne Park's Gifts, Benefits and Hospitality Policy. This report will include an analysis of any gifts, benefits and hospitality risks (including repeat offers from the same source and offers from business associates), risk mitigation measures and any proposed improvements to the Gifts, Benefits and Hospitality Policy.

14. Further Information

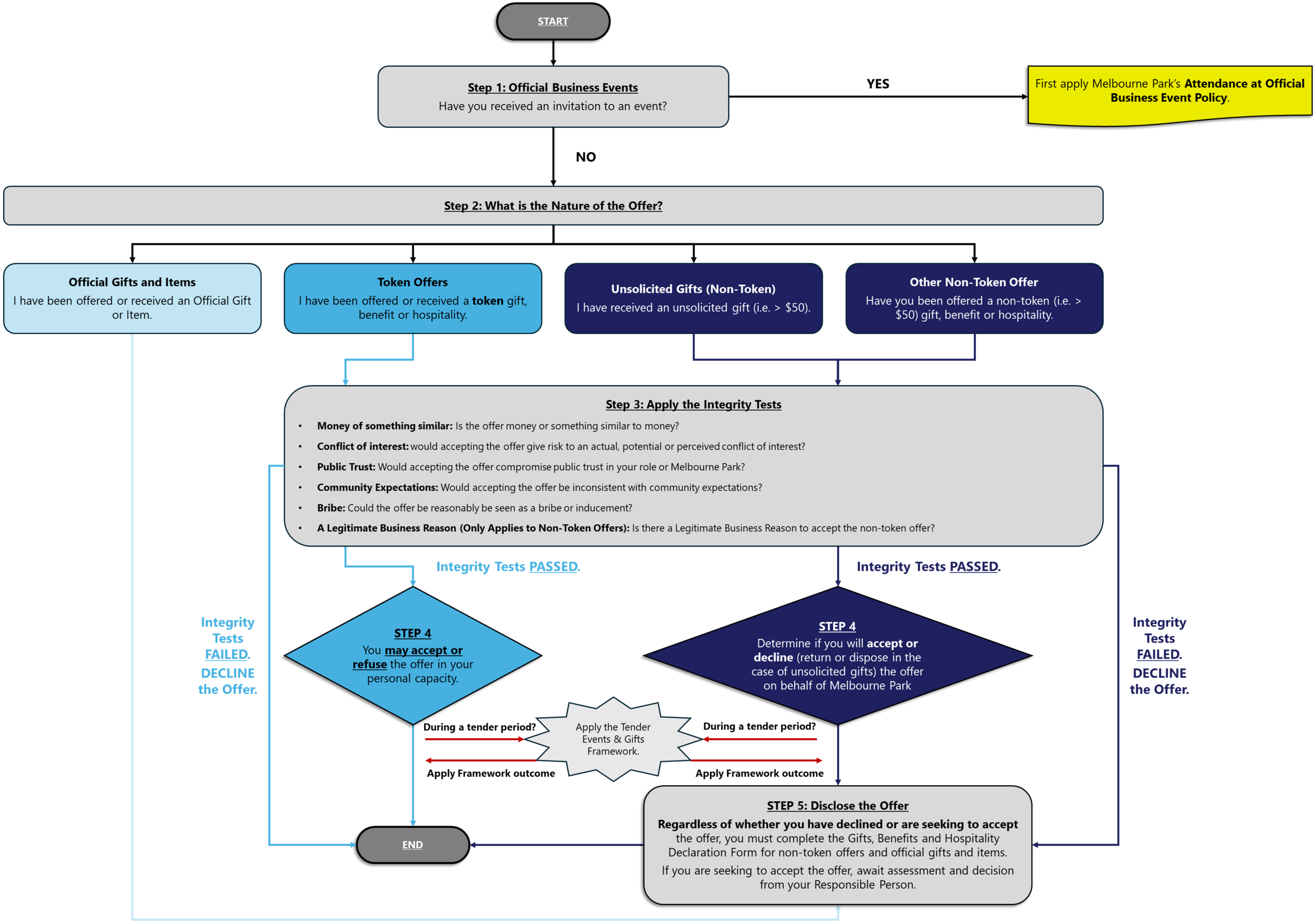
- Gifts, Benefits and Hospitality Declaration Form
- Attendance at Official Business Events Policy
- Conflict of Interest Policy
- Code of Conduct Policy
- Employee Ticketing Policy
- Public Interest Disclosure Policy

Appendix A – Definitions

For consistency, the following definitions are used:

Term	Definition
Benefit	Preferential treatment, friendly reception, privileged access, favours or other advantage. It includes invitations to events, access to discounts and loyalty programs, offers to pay expenses (such as sponsored travel or accommodation) that are beyond common courtesy or practise at business meetings.
Business associate	An individual, group or organisation that a public sector organisation has, or plans to have, a business relationship with or who may seek commercial or other advantage.
Conflict of interest	A conflict of interest exists if you have a private interest that could influence, or reasonably be seen to influence, how you perform your public duties. The conflict can be actual, potential or perceived. If a conflict of interest exists, Melbourne Park's Conflict of Interest Policy will also apply.
Event	Includes, but is not limited to, concerts, sporting events, festivals, forums, galas, conferences and hospitality provided in an official capacity.
Gifts	Items or services that are free, discounted or would generally be seen by the public as a gift. It may be enduring such as a work of art, or consumables such as a box of chocolates or bottle of wine. The monetary value of a gift is the estimated monetary value of the item if it were not being provided either free or discounted.
Hospitality	The friendly reception and entertainment of guests. Ranges from light refreshment at a business meeting to expensive restaurant meals.
Internal Register	The official record of all declarable offers of gifts, benefits and hospitality made to our employees, Trustees or Melbourne Park, whether accepted or declined.
Legitimate business reason	Furthers the conduct of official business or other legitimate goals of Melbourne Park, the public sector or the State.
Non-token offer	The offer is worth $50 or more.
Official business event (OBE)	Is an event that an employee or Trustee is invited to attend in the course of their official duties and the attendance at which will provide opportunities for improved business leveraging, stakeholder engagement, sector knowledge and/or professional knowledge.
Official gifts and items	Official gifts and items include: • official gifts • official items (items with cultural, ceremonial, religious, historic, or other significance) Sometimes accepted or given on behalf of Melbourne Park as part of business with official delegates or representatives of a community group, organisation, or government.
Public Register	The official record of information made public from Melbourne Park's Internal Register. It is published online at https://melbournepark.com.au/about/
Responsible Person	The person to whom employees or Trustees must declare offers of gifts and benefits. For employees this is their executive that reports directly to the CEO, for executives that report directly to the CEO, it is the CEO, for the CEO and Trustees it is the Trust Chair, for the Trust Chair, it is the FAR Committee Chair.
Token offer	The offer is worth less than $50.

Appendix B – Responding to Offers of Gifts, Benefits or Hospitality Flowchart



Appendix C – Trustee and CEO Declaration Form

This Gifts, Benefits or Hospitality Declaration Form is designed to be used by Trustees or the CEO when declaring a non-token offer (i.e. $50 or more), regardless of whether you are seeking to accept or decline the offer.
Trustees and the CEO can request a copy of this form from the Executive Assistant (EA) to the CEO. Once you have filled out the form, please email the form to your Responsible Person for decision (ensuring to CC in the EA to the CEO).

Fields marked in **BLUE** will be published on Melbourne Park's public register.

Trustee or CEO to complete	
1. Declaration date	
2. Name (recipient)	
3. Position (e.g. Trustee)	
Details of the gift, benefit or hospitality	
4. Date offered	
5. Describe the gift, benefit or hospitality offered	
6. Estimated or actual value	
7. Name of person (donor) making the offer	
8. Position of person making the offer *(Published only if the offer is accepted)*	
9. Name of organisation making the offer *(Published only if the offer is accepted)*	
10. Type of organisation; for example: sporting organisation; conference organisation; or lobbying firm. *(Published instead of name of organisation for declined offers)*	
11. Is the offer an official or ceremonial gift provided when conducting business with official delegates or representatives? *(**If yes**, please provide details)*	(Yes / No) [Please Explain]
12. Is the offer an unsolicited gift that was provided to you without your knowledge? *(**If yes**, please provide details)*	(Yes / No) [Please Explain]
13. I wish to accept the offer *(Please circle / highlight answer)*	**YES / NO**
*(**ONLY if you wish to accept the offer**)* 14. I am satisfied that this offer passes the 'Integrity Tests', i.e. it: a) is not money or something similar to money; **and** b) does not raise an actual, potential or perceived conflict of interest for the individual or myself; **and** c) will not bring myself, Melbourne Park or the public sector into disrepute; **and** d) is consistent with community expectations; **and** e) will provide a clear business benefit to Melbourne Park, the public sector or the State; **and**	(Yes / No) [Please Explain]
Signature:	Date:

Trust Chair (or Chair of the FAR Committee for the Trust Chair) to complete	
1. Name	
2. Position	Trust Chair (or FAR Committee Chair)
Complete if Trustee or CEO declined offer	
3. I have reviewed this declaration form and submitted it for inclusion in Melbourne Park's gifts, benefits and hospitality register	Signature: Date:

Trust Chair (or Chair of the FAR Committee for the Trust Chair) to complete	
Complete if individual wishes to accept the offer	
4. I have reviewed this declaration form and, confirm that, to my knowledge, accepting this offer passes the 'Integrity Tests', i.e. it: a) is not money or something similar to money; **and** b) does not raise an actual, potential or perceived conflict of interest for the individual or myself; **and** c) will not bring the individual, myself, Melbourne Park or the public sector into disrepute; **and** d) is consistent with community expectations; **and** e) will provide a clear business benefit to Melbourne Park, the public sector or the State; **and**	Signature: Date:
5. Record the decision about ownership of the gift; for example did the Trustee / CEO: a) transfer ownership of the gift to Melbourne Park; b) accept an official or ceremonial gift on behalf of Melbourne Park; c) retain the gift; d) return the gift to the donor; or e) donate the gift to charity?	

Appendix D – Helpful Guidance on Responding to Offers

You can use the following **GIFT** questions to help assess whether to accept or refuse a particular offer of a gift, benefit or hospitality.

Term	Guidance
Giver	• Who is providing the gift, benefit or hospitality and what is their relationship to me? • Does my role require me to select suppliers, award grants, regulate industries or determine government policies?
Influence	• Could the person, group or organisation benefit from a decision I make? • Are they seeking to gain an advantage or influence my decisions or actions? • Has the gift, benefit or hospitality been offered to me publicly or privately? • Is it a basic courtesy or token of appreciation or is it a non-token offer? • Does its timing coincide with a decision I'll be making in the foreseeable future?
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, group or organisation made several offers over the last 12 months? • Would accepting create an obligation, or feeling of obligation, to return a favour?
Trust	• Would accepting the gift, benefit or hospitality diminish public trust? • How would the public view acceptance of this gift, benefit or hospitality? • What would my colleagues, family, friends or associates think?

Appendix E – Helpful Guidance on Providing

You can use the following **HOST** questions to help you assess if providing a particular gift, benefit or hospitality would comply with the 'Integrity Test – Providing' above.

Term	Guidance
Hospitality	• To whom is the gift, benefit or hospitality being provided? • Will recipients be external business associates, our employees, or a mixture of both?
Objectives	• What is the business reason for providing the hospitality? • Will it further the conduct of official business? • Will it promote and support government policy objectives and priorities? • Will it contribute to staff wellbeing and workplace satisfaction?
Spend	• Will the cost be proportionate to the benefits obtained? • What type of hospitality will be provided? • Will the hospitality be modest or expensive? • If alcohol is to be provided, why? Would it be a courtesy or an indulgence? • Is an external venue necessary or can our organisation host the event? • Is the catering or hospitality proportionate to the number of attendees? • Does the size of the event and number of attendees align with the intended outcomes? • If a gift is to be given, is it symbolic rather than financial in value?
Trust	• Will public trust be enhanced or diminished? • Will the gift, benefit or hospitality be proportionate to public expectations or seen as excessive? • Is there a conflict of interest? • Could you publicly explain the rationale for providing the gift, benefit or hospitality? • Will the event be conducted in a manner which upholds the reputation of the public sector? • Have records in relation to the gift or hospitality been kept in accordance with reporting and recording procedures?