



33/311 Spencer Street,
Docklands VIC 3008

Phone: 0427 188 402

Email: contact@policeveteransvic.org.au

Gifts, Benefits & Entertainment Policy Version 1.1



1. Purpose

This policy provides guidance and direction to members, volunteers, employees and Board members on the receipt of gifts, benefits or entertainment in the conduct of their duties and responsibilities at Police Veterans Victoria, including reporting requirements.

2. Scope

This policy applies to members, volunteers, employees and Board members. It does not apply to gifts and donations made to Police Veterans Victoria as an organisation, but rather to circumstances where individuals may receive gifts, benefits or entertainment that could be perceived as a personal benefit.

This policy is approved by the Board who have governance oversight of its implementation and periodic review. The CEO is responsible for implementation of this policy.

3. Definitions

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).
Benefits	include preferential treatment, privileged access, favours or other advantage offered to an individual. They include invitations to sporting, cultural, entertainment or social events, access to discounts and loyalty programs, upgrades to flights, and promises of a new job.
Entertainment	is the friendly reception and entertainment of guests. Entertainment may range from light refreshment at a business meeting to expensive restaurant meals and sponsored travel and accommodation.
Token value	<p>is an offer of a gift, benefit or entertainment that is offered as a courtesy or is of inconsequential or minimum value to both the person making the offer and the individual.</p> <p>Whilst the primary determinant of a token offer is that it would not reasonably be perceived as influencing an individual or raising an actual, potential or perceived conflict of interest, it cannot be \$50 or more in value. Consecutive or accumulative offers from the one source more than \$50 are not considered token and the reporting requirements in respect of this policy applies.</p>

4. Policy Statement

Board members, employees and volunteers will from time to time, be offered gifts, benefits and entertainment whilst undertaking duties on behalf of Police Veterans Victoria. In all circumstances everyone must consider the appropriateness of any gifts, benefits and entertainment being offered in line with the expectations of the Police Veterans Victoria Code of Conduct relating to impartiality, integrity and accountability.

Board members, employees and volunteers who are also sworn or unsworn members of Victoria Police must also ensure they comply with Victoria Police policies and procedures pertaining to gifts and entertainment and remain cognisant if they are representing Police Veterans Victoria in an “on duty” or “off duty” capacity.

If there is any doubt or concern that any gift, benefit or entertainment is provided with some expectation of influence or other reciprocal benefit then polite non acceptance is the best option.

5. Actions to be taken by Individuals

To ensure compliance with this policy it is expected that Board members, employees and volunteers will:

- not solicit gifts, benefits or entertainment
- refuse all offers of gifts, benefits or entertainment that could be reasonably perceived as undermining the integrity and impartiality of Police Veterans Victoria or themselves
- refuse all offers of gifts, benefits or entertainment from people or organisations about whom they are likely to make decisions involving tender processes, procurement, policy development and the like unless being accepted on behalf of Police Veterans Victoria, refuse all offers of money or items easily converted to money such as shares refuse bribes and report bribery to the Chair and CEO or their delegate and Victoria Police

6. Conflicts of Interest

In respect of offers of gifts, or entertainment Board members, employees and volunteers should consider the following with regards to conflicts of interest and decision-making:

- duty to Police Veterans Victoria and board/private interest – do I have private interests or other responsibilities that may conflict, or be perceived to conflict with my duty to Police Veterans Victoria
- potentialities – are there possible benefits for me now, or in the future, that have the potential to cast doubt on my objectivity in this situation?
- perception – remembering that perception is important in maintaining integrity, how will others perceive my involvement in this situation or potential loss of objectivity.
- proportionality – does my involvement in this situation appear fair and reasonable when taken in context?
- promises – have I made any promises or commitments in relation to this matter? Do I stand to gain or lose from the proposed action/decision?

7. Governance and Reporting

Any Board member, employee or volunteer who has received a gift, benefit or entertainment (other than a token gift, benefit or entertainment) is required to record the event on the Police Veterans Victoria Gifts & Entertainment Register. The CEO will prepare an annual return for the Board.

Any breaches of this policy will be reviewed and addressed by the CEO, in relation to employees. In the case of volunteers and Board members, the breach will be reviewed and addressed by the Board via the Chair or their delegate.

8. Document Governance

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9. Version Control

Version No	Prepared by	Release Date	Key Changes
1.0	David McGowan	4 November 2020	Initial document
1.1	Jim Hilliard	28 June 2022	Rebranding only