



# Gifts Benefits and Hospitality

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## 1. Purpose

This policy and procedure outlines the Independent Broad-based Anti-corruption Commission’s (IBAC) position on IBAC Officers responding to offers of gifts, benefits and hospitality (GBH) and providing GBH. The aim of this policy and procedure is to support IBAC Officers avoid conflicts of interest, maintain integrity and public trust via the transparent management of any offers, gifts benefits and hospitality.

## 2. Context

The [Public Administration Act 2004 \(Vic\)](#) establishes the public sector values and the Victorian Public Sector Commission (VPSC) Code of conduct for Victorian public sector employees of Special Bodies (**the Code**) promotes adherence to those values. In accordance with clause 1.2 of the Code, all IBAC Officers **must** comply with this policy and procedure. This policy and procedure aligns with the VPSC [Gifts, Benefits and Hospitality Policy Guide](#), and includes the VPSC minimum accountabilities for managing GBH. These accountabilities are binding under the [Instructions supporting the Standing Directions 2018 under the Financial Management Act 1994](#).

This policy and procedure applies to all IBAC Officers. For the purpose of this policy and procedure, the term ‘IBAC Officers’ will refer to all workforce participants including contractors, consultants, individuals or groups undertaking work for on behalf of the IBAC.

## 3. Roles and Responsibilities

Table 1 describes the key roles and responsibilities for this policy and procedure.

**Table 1: Roles and responsibilities**

Role	Responsibility
Audit and Risk Management Committee (ARMC)	<ul style="list-style-type: none"> <li>annual review of the administration and control of GBH policy, processes and register</li> <li>provides and considers recommendations for improvements.</li> </ul>
Chief Executive Officer (CEO)	<ul style="list-style-type: none"> <li>ensure compliance with this policy and procedure</li> <li>ensure IBAC policies and processes for the effective management of GBH are established, implemented and reviewed addressing the minimum requirements and accountabilities as prescribed in the <a href="#">VPSC GBH guide</a>.</li> </ul>
Director Strategy & Risk and IBAC GBH Registrar	<ul style="list-style-type: none"> <li>facilitate compliance with this policy and procedure including regularly reminding staff of their obligations related to this policy and providing advice about this policy</li> <li>publish IBAC’s GBH policy and register (current and previous financial year) on IBAC’s public website</li> <li>provide training on GBH</li> <li>report breaches of this policy to the CEO and the ARMC</li> <li>manage breaches of this policy.</li> </ul>

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IBAC Officers with direct reports	<ul style="list-style-type: none"> <li>oversee management of their direct reports' acceptance or refusal of non-token GBH</li> <li>model good practice</li> <li>promote awareness of GBH policies and processes</li> <li>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.</li> </ul>
IBAC Officers	<ul style="list-style-type: none"> <li>comply with this policy</li> </ul>

## 4. Policy statement

As IBAC Officers the practical and transparent management of any offers of gifts, benefits and hospitality will demonstrate to the Victorian community IBAC's integrity, impartiality, and accountability. The processes outlined in table 2, table 3 and table 4 demonstrate IBAC's decision making in relation GBH to be free from favouritism, influence, and conflicts of interest (COI).

### 4.1 Procedure for responding to GBH offers

Table 2 details the procedural steps that must be taken into account by all IBAC Officers when responding to GBH offers.

**Table 2: Responding to GBH offers**

Element	Requirement
Considering offers	<ul style="list-style-type: none"> <li>IBAC Officers consider the VPSC GIFT test (<b>Appendix A</b>) when assessing whether to accept GBH to determine if the offer could be perceived as influencing them in performing their duties or lead to reputational damage.</li> </ul>
Accepting offers	<ul style="list-style-type: none"> <li><b>token offers:</b> IBAC Officers may accept token offers of GBH without prior approval</li> <li><b>ceremonial gifts:</b> ceremonial gifts are the property of IBAC, irrespective of value, and are accepted by individuals on behalf of IBAC.</li> <li><b>non-token offers:</b> by exception, a non-token offer can be accepted if:                             <ul style="list-style-type: none"> <li>it does not raise an actual, potential or perceived COI or have the potential to bring the IBAC Officer, IBAC or the public sector into disrepute</li> <li>there is a legitimate business reason for acceptance, or</li> <li>it is offered during the IBAC officer's official duties, relates to the IBAC officer's responsibilities, and has a benefit to IBAC, the public sector or the State</li> </ul> </li> <li><b>invitations to attend educational events:</b> an invitation to an educational event (including from a current supplier) that includes a modest hospitality component may be accepted if the main purpose of the event is educational and the hospitality offered is modest and inconsequential to the main event.</li> <li><b>invitations to present at educational events:</b> IBAC Officers invited to present/facilitate at a conference/other event and offered complimentary registration and/or hospitality may accept, subject to prior approval, unless</li> </ul>

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	<p>the principal organiser is a current or prospective supplier.</p> <ul style="list-style-type: none"> <li>• <b>Victorian Public Sector (VPS) hospitality:</b> when offered hospitality by a VPS organisation, individuals will consider the requirements of the minimum accountabilities.</li> </ul> <p>Refer the <b>minimum accountabilities</b> for further information</p>
Approval of offers to be accepted	<ul style="list-style-type: none"> <li>• prior approval in writing <b>must</b> be obtained from an IBAC Officer’s manager or Director for acceptance of the following: <ul style="list-style-type: none"> <li>○ non-token offers, and/or</li> <li>○ offers of complimentary registration, and/or</li> <li>○ hospitality for presenting or facilitating a conference or other event.</li> </ul> </li> <li>• where IBAC Officers are offered a gift or hospitality where there is no opportunity to seek written approval prior to accepting, the IBAC Officer <b>must</b> seek approval from their manager within five business days.</li> </ul>
Returning accepted offers	<ul style="list-style-type: none"> <li>• gifts must be returned, if: <ul style="list-style-type: none"> <li>○ it was initially accepted to avoid embarrassment to the offeror, or</li> <li>○ on further reflection, it should not have been accepted, or</li> <li>○ when a gift is received without the possibility of refusing it (ie, the gift is sent in the mail).</li> </ul> </li> </ul>
Ownership of accepted offers	<ul style="list-style-type: none"> <li>• IBAC Officers must transfer all official gifts (including any ceremonial gifts) valued at more than \$50 to IBAC</li> <li>• non-token gifts with a legitimate business benefit that an individual accepted for their work or contribution may be retained by the individual, where: <ul style="list-style-type: none"> <li>○ the gift is not likely to bring them or IBAC into disrepute, and</li> <li>○ where their manager or IBAC delegate has provided written approval.</li> </ul> </li> </ul>
Refusing offers	<ul style="list-style-type: none"> <li>• IBAC Officers <b>must</b> refuse all offers (excluding token hospitality provided in the course of work): <ul style="list-style-type: none"> <li>○ made by a current or prospective supplier</li> <li>○ made during a procurement or tender process by a person or organisation involved in the process</li> <li>○ likely to influence them, or be perceived to influence them, in the course of their duties or raise an actual, potential or perceived COI</li> <li>○ could bring them, IBAC or the public sector into disrepute</li> <li>○ made by a person or organisation about which they will likely make a decision (also applies to processes involving grants, sponsorship, regulation or enforcement)</li> <li>○ likely to be a bribe or inducement to make a decision or to act in a particular way</li> <li>○ that extend to their relatives or friends</li> <li>○ with no legitimate business benefit</li> <li>○ of money, or used in a similar way to money, or something easily converted to money</li> </ul> </li> </ul>

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	<ul style="list-style-type: none"> <li>○ where, in relation to hospitality and events, IBAC will already be sufficiently represented to meet its business needs (to be decided on a case-by-case basis)</li> <li>○ where acceptance could be perceived as endorsement of a product or service, or acceptance would unfairly advantage the sponsor in future procurement decisions</li> <li>○ made by a person or organisation with a primary purpose to lobby Ministers, Members of Parliament, or public sector agencies</li> <li>○ made in secret.</li> <li>● IBAC Officers <b>must</b> refuse repeat offers from the same source if:             <ul style="list-style-type: none"> <li>○ they create a COI, or</li> <li>○ may lead to reputational damage as they increase perception that the source could influence an IBAC Officer in their role.</li> </ul> </li> </ul>
<p>Declaring offers</p>	<ul style="list-style-type: none"> <li>● the following offers <b>must</b> be declared:             <ul style="list-style-type: none"> <li>○ all accepted token offers</li> <li>○ all accepted or refused non-token offers</li> <li>○ refused benefits</li> <li>○ refused substantial hospitality</li> <li>○ ceremonial gifts.</li> </ul> </li> <li>● IBAC Officers declare offers by completing a <a href="#">GBH Declaration Form</a> and submitting a signed and finalised form to <a href="mailto:Declarations@ibac.vic.gov.au">Declarations@ibac.vic.gov.au</a></li> <li>● accepted hospitality offered by a VPS organisation as part of official business does not need to be declared, where the reason for the individual’s attendance is consistent with IBAC’s functions and objectives and with the individual’s role.</li> </ul>
<p>Undeclared offers</p>	<ul style="list-style-type: none"> <li>● IBAC Officers who consider that GBH within IBAC may not have been declared or is not being appropriately managed should seek advice from the Director Strategy &amp; Risk</li> <li>● an IBAC Officer’s failure to declare an offer or any reprisal behaviour towards those who speak up in good faith may result in disciplinary action.</li> </ul>
<p>Reporting attempted bribes or inducements</p>	<ul style="list-style-type: none"> <li>● if an IBAC Officer considers they have been offered a bribe or inducement, the offer must be reported to the Director Strategy &amp; Risk immediately, who will report any suspected or alleged criminal or corrupt conduct to Victoria Police</li> <li>● the CEO and the Executive Director Corporate Services are promptly informed of all reported attempted bribes or inducements</li> <li>● the CEO will decide on a case-by-case basis if the Victorian Inspectorate (VI) is to be informed.</li> </ul>

## 4.2 Procedure for providing GBH

Table 3 details the procedural steps that must be considered by all IBAC Officers when providing GBH.

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**Table 3: Providing GBH**

Element	Requirement
Providing GBH	<ul style="list-style-type: none"> <li>• IBAC Officers consider the VPSC HOST test when assessing the cost and benefits of providing GBH (Appendix A)</li> <li>• GBH may be provided to welcome guests, facilitate the development of business relationships, further public sector business outcomes and to celebrate achievements where:                             <ul style="list-style-type: none"> <li>○ 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</li> <li>○ any costs are proportionate to the benefits obtained for the State, and considered reasonable in terms of community expectations</li> <li>○ any GBH provided does not raise an actual, potential or perceived COI.</li> </ul> </li> <li>• IBAC Officers should contain costs involved with providing GBH wherever possible and comply with the financial probity and efficient use of resources guidance outlined in <b>the Code</b></li> <li>• IBAC Officers do not provide alcohol as a gift.</li> </ul>
Providing gifts to staff	<ul style="list-style-type: none"> <li>• IBAC may recognise significant staff achievements and provide token gifts as part of:                             <ul style="list-style-type: none"> <li>○ reward and recognition programs or events</li> <li>○ celebrating length of service milestones and/or retirements.</li> </ul> </li> <li>• token gifts valued at &lt;\$100, such as a card and/or flowers, may be sent to a family member to acknowledge an IBAC Officer’s contribution to the workplace in the event of their death or to an IBAC Officer in the event of serious illness or injury</li> <li>• celebrations of events such as birthdays, marriages or the birth of children will not be funded using public monies.</li> </ul>

### 4.3 General requirements

Table 4 lists the general requirements for administering IBAC’s GBH function.

**Table 4: General requirements**

Element	Requirement
Leadership	<ul style="list-style-type: none"> <li>• The Executive Leadership Team (ELT) sponsors and the Senior Leadership Team (SLT) models behaviour consistent with this policy and will hold themselves and IBAC Officers to account for adherence to it, including taking decisive action in response to breaches.</li> </ul>
Education and training	<ul style="list-style-type: none"> <li>• IBAC incorporates this policy and associated processes into induction training for IBAC Officers.</li> <li>• Director Strategy &amp; Risk supports IBAC Officers in exercising their judgment and provide advice, education and training in:                             <ul style="list-style-type: none"> <li>○ identifying if there is a legitimate business benefit or a conflict of interest in accepting an offer</li> <li>○ understanding when accepting a GBH will bring themselves, IBAC or the</li> </ul> </li> </ul>

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	public sector into disrepute.
Record keeping	<ul style="list-style-type: none"> <li>• IBAC maintains a register of all declarable GBH offered to IBAC Officers</li> <li>• sufficient information and detail are recorded in the register, including the business reason for accepting offers to:             <ul style="list-style-type: none"> <li>○ link the acceptance to the IBAC Officer’s work functions and benefit to the IBAC, public sector or State</li> <li>○ enable the identification of trends and key risks</li> <li>○ form the basis of risk-based monitoring and reporting.</li> </ul> </li> <li>• the following declarations are recorded:             <ul style="list-style-type: none"> <li>○ all token offers and non-token offers, whether accepted or declined</li> <li>○ all accepted ceremonial gifts (not published online).</li> </ul> </li> <li>• the following declarations are not recorded:             <ul style="list-style-type: none"> <li>○ approved offers of free registration/hospitality when IBAC Officers are invited to present/facilitate at a conference/other event.</li> </ul> </li> <li>• IBAC’s GBH policy and register (current and previous financial year) is published on IBAC’s website and the public register contains a subset of the information detailed in IBAC’s internal register</li> <li>• there may be exceptional operational circumstances where a non-token offer is declared but where IBAC cannot enter the name of the supplier on the publicly available register as this could be detrimental to operational matters</li> <li>• these exceptions require CEO endorsement and the ARMC is informed accordingly.</li> </ul>
Monitoring and reporting	<ul style="list-style-type: none"> <li>• the ARMC will receive a report at least annually on the administration and quality control of the GBH policy, processes and register, including an analysis of GBH risks</li> <li>• this report may include multiple offers from the same source and offers from business associates, risk mitigation measures and any proposed improvements.</li> </ul>

## 5. Policy Principles

Table 2 outlines the key principles IBAC is committed to and will uphold in applying this policy and procedure.

**Table 2: Key principles**

Principle	Description
Accountability	<ul style="list-style-type: none"> <li>• IBAC Officers are accountable for:             <ul style="list-style-type: none"> <li>○ declaring all non-token offers of GBH</li> <li>○ declining non-token offers of GBH, or where an exception applies under this policy, seeking approval to accept the offer</li> <li>○ the responsible provision of GBH.</li> </ul> </li> </ul>

Impartiality	<ul style="list-style-type: none"> <li>• IBAC Officers:             <ul style="list-style-type: none"> <li>○ have a duty to place the public interest above their private interests when carrying out their official functions</li> <li>○ will not accept GBH that could raise a perception of, or actual, bias or preferential treatment</li> <li>○ will not accept offers from those whom they are likely to make business decisions about.</li> </ul> </li> </ul>
Integrity	<ul style="list-style-type: none"> <li>• IBAC Officers:             <ul style="list-style-type: none"> <li>○ earn and sustain public trust through providing or responding to offers of GBH in a manner that is consistent with community expectations</li> <li>○ will refuse any offer that may lead to an actual, perceived or potential conflict of interest (COI).</li> </ul> </li> </ul>
Risk-based approach	<ul style="list-style-type: none"> <li>• IBAC, through its policies, processes and ARMC, ensures GBH risks are appropriately assessed and managed</li> </ul>

## 6. Definitions

Table 6: Definitions

Term	Definition
Business associate	<ul style="list-style-type: none"> <li>• an external individual or entity which IBAC has, or plans to establish, some form of business relationship with, or who may seek commercial or other advantage by offering GBH.</li> </ul>
Benefits	<ul style="list-style-type: none"> <li>• preferential treatment, privileged access, favours or other advantage offered to an IBAC Officer, including invitations to sporting, cultural or social events, access to discounts and loyalty programs or promises of a new job.</li> </ul>
Conflicts of interest	<ul style="list-style-type: none"> <li>• <b>Actual conflict of interest:</b> there is a <u>real conflict</u> between an employee’s public duties and private interests</li> <li>• <b>Potential conflict of interest:</b> an employee has private interests that <u>could conflict</u> with their public 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.</li> <li>• <b>Perceived conflict of interest:</b> the public or a third party could <u>form the view</u> that an employee’s private interests could improperly influence their decisions or actions, now or in the future.</li> </ul>
Gifts	<ul style="list-style-type: none"> <li>• free or discounted items and any item that would generally be seen by the public as a gift</li> <li>• includes items of high value (eg, artwork, jewellery, or expensive pens), low value (eg, small bunch of flowers) and consumables (eg, chocolates)</li> <li>• fundraising by public sector organisations that is consistent with relevant legislation and any government policy is not prohibited under the minimum accountabilities.</li> </ul>
Hospitality	<ul style="list-style-type: none"> <li>• the friendly reception and entertainment of guests</li> <li>• hospitality may range from light refreshments at a business meeting to expensive restaurant meals and sponsored travel and accommodation.</li> </ul>

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IBAC Officer	<ul style="list-style-type: none"> <li>• IBAC Officers include, as defined under the <i>Independent Broad-based Anti-corruption Commission Act 2011 (Vic)</i> (IBAC Act):             <ul style="list-style-type: none"> <li>○ the Commissioner</li> <li>○ a Deputy Commissioner</li> <li>○ the CEO</li> <li>○ a member of staff employed under section 35(1)</li> <li>○ a person employed or engaged by the IBAC under section 35(2), or</li> <li>○ a person engaged as a consultant under section 36.</li> </ul> </li> <li>• includes ARMC Members</li> </ul>
Legitimate business benefit	<ul style="list-style-type: none"> <li>• GBH accepted or provided for a business purpose, in that it furthers the conduct of official business/legitimate goals of IBAC, the VPS or State.</li> </ul>
Non-token offer	<ul style="list-style-type: none"> <li>• an offer of GBH 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 (&gt;\$50).</li> </ul>
Public official	<ul style="list-style-type: none"> <li>• definition as under section 4 of the <i>Public Administration Act 2004 (Vic)</i></li> <li>• includes public sector employees, statutory office holders and directors of public entities.</li> </ul>
Public register	<ul style="list-style-type: none"> <li>• a digital record of a subset of the information contained in a GBH register, for publication as required by the minimum accountabilities.</li> </ul>
Register	<ul style="list-style-type: none"> <li>• an electronic record of declarable GBH.</li> </ul>
Token offer	<ul style="list-style-type: none"> <li>• a token offer is GBH that is of inconsequential or trivial value (&lt;\$50) to both the person making the offer and the recipient (such as a basic courtesy).</li> </ul>

## 7. Breaches

Any breach of this document must be reported to the Director Strategy & Risk as soon as the breach is discovered.

Actions inconsistent with this policy may constitute misconduct under the *Public Administration Act 2004*, which includes:

- breaches of **the Code**, such as sections of the Code covering COI, public trust and gifts and benefits, and
- IBAC Officers making improper use of their position.

Disciplinary action consistent with the relevant industrial instrument and legislation, including dismissal, may be taken where an IBAC Officer fails to adhere to this policy. This includes where an IBAC Officer fails to avoid wherever possible or identify, declare and manage a COI related to GBH in accordance with the IBAC’s **Conflict of Interest and Declarable Association Policy**.

IBAC will take decisive action, including possible disciplinary action, against IBAC Officers who discriminate against or victimise those who speak up in good faith.

## 8. Supporting information

The following suite of documents support this policy:

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- **Policy** – Conflict of Interest and declaration of private interest – CD/21/40584
- **Policy** – Expenditure – CD/19/36311
- **Policy** – Procurement – CD/18/33003
- **Procedure** – Conflict of interest and declarable association – CD/22/92285
- **Form** – GBH Declaration – CD/16/48482

## 9. Document History

Version	Approval date	Major changes description	Version author
1	10/04/2018	New Policy	Finance
2	11/12/2018	Update references to VPS framework Added Application section Updated policy principles and supporting information section	Finance
3	11/12/2019	Updated to reflect new policy formatting Ownership transitioned to Governance and Risk	Governance and Risk
4	06/03/2020	Clarification added	Governance and Risk
5	22/07/2020	Revised policy	Governance and Risk
6	03/08/2022	Combined policy and procedure	Alicia Ivory, Director Strategy & Risk
7	16/02/2023	Updated document history Updated to reflect new template Updated token offer to <\$50 to align with minimum accountabilities and token gifts for deaths or serious illness of IBAC Officers increased to <\$100	Strategy & Risk

## 10. Authorisation

Date	Name	Signature
16/02/2023	Linda Timothy A/Chief Executive Officer	Approved via email CD/23/32345

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## Appendix A: GIFT Test and HOST Test

### GIFT Test

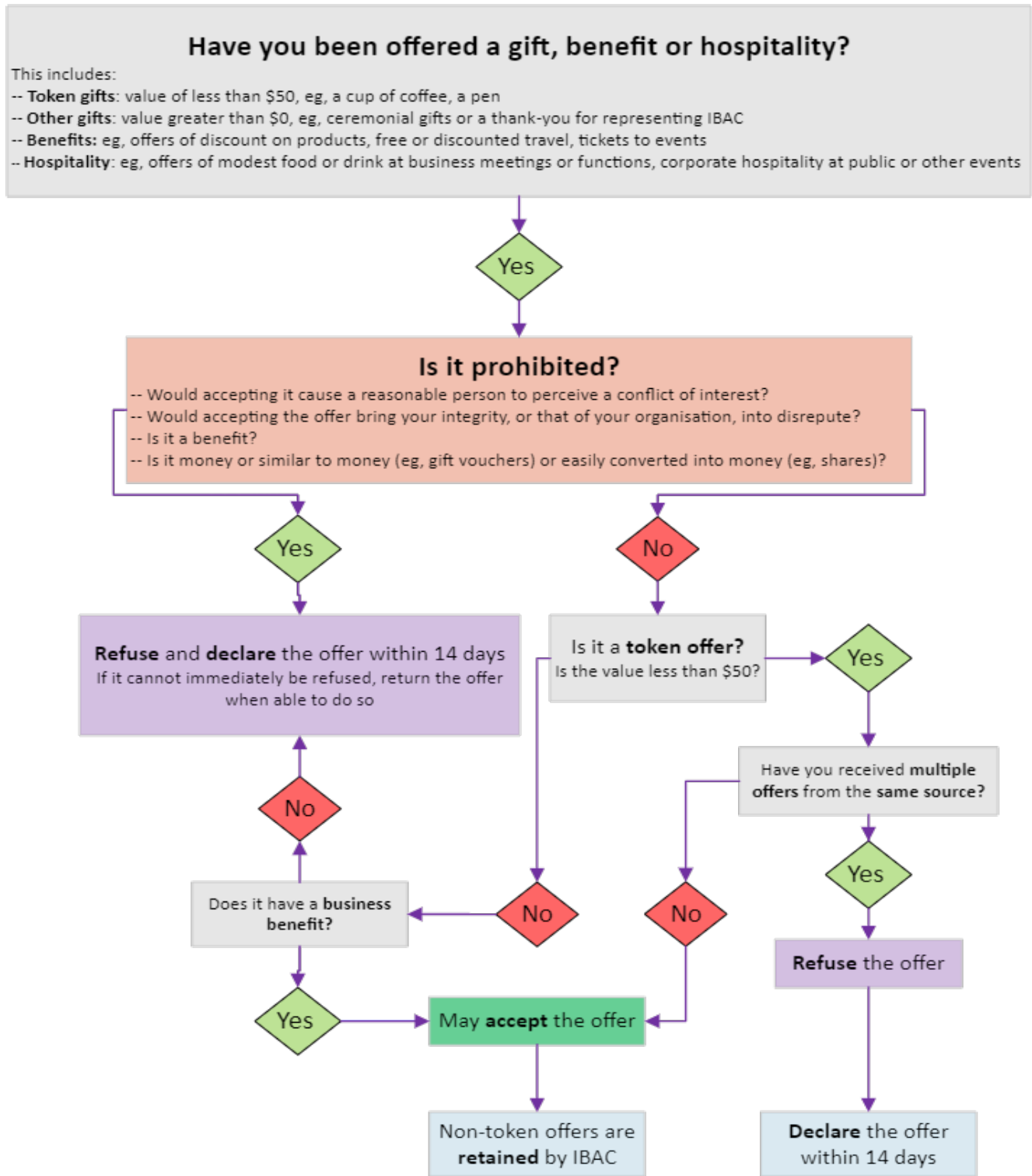
<b>G</b>	Giver	<b>Who is making the offer and what is their relationship to me?</b> Does my role require me to select suppliers, award grants, regulate industries or determine government policies? Could the person or organisation benefit from a decision I make?
<b>I</b>	Influence	<b>Are they seeking to gain an advantage or influence my decisions or actions?</b> Has the GBH been offered to me publicly or privately? Is it a courtesy or a token of appreciation or a valuable non-token offer? Does its timing coincide with a decision I am about to make?
<b>F</b>	Favour	<b>Are they seeking a favour in return for the GBH?</b> Has the GBH 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?
<b>T</b>	Trust	<b>Would accepting the GBH diminish public trust?</b> How would the public view acceptance of this GBH? What would my colleagues, family, friends or associates think?

### HOST Test

<b>H</b>	Host	<b>To whom is the gift or hospitality being provided?</b> Will recipients be external business associates, or individuals of the host organisation?
<b>O</b>	Objectives	<b>For what purpose will hospitality be provided?</b> Is the hospitality being provided to 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?
<b>S</b>	Spend	<b>Will public funds be spent?</b> What type of hospitality will be provided? Will it be modest or expensive, and will alcohol be provided as a courtesy or an indulgence? Will the costs incurred be proportionate to the benefits obtained?
<b>T</b>	Trust	<b>Will public trust be enhanced or diminished?</b> Could you publicly explain the rationale for providing the gift 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?

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## Appendix B: High-level Process



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