

# GIFTS, BENEFITS & HOSPITALITY POLICY

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## 1. Purpose

When we perform our public duties, it's vital that our decision-making is impartial. This helps to maintain the public's trust in our organisation and prevent corruption.

Sometimes, when offering or receiving gifts, benefits and hospitality, employees encounter difficult situations where they're not sure if they're doing the right thing. This policy sets out how our organisation and its employees respond to offers of gifts, benefits and hospitality and the provision of gifts, benefits and hospitality.

## 2. Scope

This Policy applies to all South East Water and Iota workplace participants (directors, employees, fixed term workers, students, contractors, consultants and labour hire employees required as part of their contract or through agreement, notification or instruction to comply with this policy), who provide or are offered gifts, benefits or hospitality as a result of their role with South East Water.

For ease of reading, the term 'employee' is used to cover anyone the policy applies to, as set out above, regardless of their employment or engagement status.

## 3. Definitions

For purposes of this Policy, unless otherwise stated, the following definitions shall apply.

Business associate	An individual or body that South East Water has, or plans to establish, some form of business relationship with, or who may seek commercial or other advantage.
Benefits	Preferential treatment, privileged access, favours or some other advantage offered. For example, invitations to sporting, cultural or social events, access to discounts, information, products or services, or the promise of a new job.
Bribe	An offer of money or other inducement made with the intent to corruptly influence a person in the performance of their duties. Bribery or attempted bribery of a public official is a criminal offence.
Business benefit	The provision or acceptance of a gift, benefit or hospitality that contributes towards meeting legitimate business objectives or purpose of the organisation, public sector or State.
Common courtesy	Polite, basic and modest and does not raise a conflict of interest. A cup of coffee, modest working lunch at another organisation's premises or a café do not exceed common courtesy and do not need to be disclosed under this policy.
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, our conflict of interest policy will also apply.
Direct or indirect	An offer that is made directly to a recipient, or indirectly via a relative or close associate, including: a member of immediate family (spouse, partner, child, grandchild, parent, sibling, etc.); a regular member of their household (whether or not they are related); or another close associate (friend, associate, other relative, etc.).
Gifts	<p>Items or services that are free, discounted, or would generally be seen by the public as a gift. For example, items such as vouchers, gift cards, artwork, chocolates or flowers; services such as car repair.</p> <p>The monetary value of a gift is the estimated monetary value of the item if it were not being provided either free or discounted. Gift cards and vouchers must be treated the same as money under the minimum accountabilities.</p>
Hospitality	The friendly reception and entertainment of guests, ranges from light refreshment at a business meeting to expensive restaurant meals and sponsored travel and accommodation.
Legitimate business reason	Further the conduct of official business or other legitimate goals of South East Water, the public sector or the State.
Non-token offer	The offer is worth \$50 or more.
Offer	Anything of monetary or other value that is offered to an individual as a result of their role with South East Water. It includes gifts, benefits and hospitality that exceed common courtesy.
Official gifts and items	Sometimes accepted or given on behalf of SEW as part of business with official delegates or representatives of a community group, organisation, or government. Official gifts and items include: official gifts or official items (items with cultural, ceremonial, religious, historic, or other significance)
Pecuniary	Of, or relating to money or monetary value.
Public register	The official record of information made public from the internal register published online.
Internal Register	The official record of all declarable offers of gifts, benefits and hospitality made to our employees or South East Water, whether accepted or declined. The full title is 'Register of gifts, benefits and hospitality – declarable offers'.

Reportable offer	An offer exceeding token value or is of cultural, ceremonial, historic or other significance. Such an offer is reportable, whether accepted or not, and registered on the Gifts, Benefits and Hospitality Register. Receipt of ceremonial gifts should be recorded on the register but does not need to be published online.
Responsible person	Person whom the individual notifies of any offers received; notifies of suspected bribery attempts; and seeks advice from about the Policy and how to comply. Employees notify their line manager, board members notify the board chair and the board chair notifies the deputy chair.
Token offer	An offer worth less than \$50 offered, to an individual, as a courtesy and/or of inconsequential or trivial value and does not create an actual, perceived or potential conflict of interest. A token offer that is not prohibited may be accepted and retained by the individual without approval or declaring the offer on the register.
Value	The estimated or actual value in Australian dollars.

## 4. Policy statement

In applying the policy, South East Water is committed to and will uphold the principles outlined in the minimum accountabilities for the management of gifts, benefits and hospitality issued by the Victorian Public Sector Commission. These are binding on our organisation. This policy is based on the VPSC [minimum accountabilities](#).

### 4.1 Responsibilities

When you're doing work for South East Water, no matter what that work is, you must act with integrity and impartiality consistent with our Code of Conduct and the Code of Conduct for Victorian public sector employees.

#### 'Thanks is enough'

We encourage you to help us develop a culture of 'thanks is enough'. Our aim is to move to a culture in which offers are not accepted even if they are permitted under this policy.

As an employee, you must comply with this policy when you are offered or provide gifts, benefits or hospitality. If unsure what to do, seek advice from your manager or the Risk Assurance and Quality team.

#### Manager responsibility

If you're a manager with direct reports, you 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.

#### Managing Director - Minimum accountability

As a public sector body head, the Managing Director must fulfill their obligations under the minimum accountabilities.

- model good practice and foster a culture of integrity.
- establish, implement and review organisational policies and processes for the effective management of gifts, benefits and hospitality.
- ensure the policy comprehensively addresses the minimum accountabilities.
- ensure that the requirements in the Policy are at least as strong as those in the minimum accountabilities.

## 4.2 Receiving offers - Minimum accountability

You must comply with the minimum accountabilities when responding to all offers of gifts, benefits or hospitality (token or non-token), including offers from other public sector organisations.

### 4.2.1 Do not solicit offers

Consistent with the minimum accountabilities, you must not solicit any gift, benefit or hospitality, for yourself or others, if the offer could reasonably be seen as connected to your employment.

### 4.2.2 Offers you must refuse - Integrity test

Consistent with the minimum accountabilities, you must always refuse a gift, benefit or hospitality (token or non-token), if any of the following apply.

- **Legitimate business reason (non-token offers)** - Even if the offer complies with all the other requirements below, you must refuse a non-token offer unless there is a legitimate business reason to accept it.
- **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 will perform your public duties in an impartial manner or the public's trust in the impartiality of South East Water or the public sector.
- **Non-token offer without a legitimate business reason** - You must refuse a non-token offer unless there is a legitimate business reason to accept. It must further the conduct of official business or other legitimate goals of our organisation, the public sector or the State.
- **Community expectations** - You must refuse the offer if it is not consistent with community expectations.
- **Bribes** - You must refuse the offer if it could reasonably be seen as a bribe or other inducement.
- **Repeat offers that cause a conflict of interest** - Repeat offers are multiple offers from the same person, group or organisation. Their combined effect can sometimes lead to the perception that they could influence you. Refuse the offer if it is a repeat offer (token or non-token) that could reasonably be seen as adding up to a conflict of interest.
- **Decisions you are likely to make or influence** - Refuse the offer if it is from a person, group or organisation you're likely to make or influence a decision about in the foreseeable future. This could reasonably be seen as a conflict of interest. The only exception is that you can accept an offer if it is token hospitality (common courtesy) or a learning opportunity, such as a webinar, and all of the following apply:
  - it is relevant to your work duties
  - it has a legitimate business reason (benefit)
  - it is free for all attendees
  - the covering or discounting of additional costs (travel, accommodation) is not included in the offer
  - it is consistent with community expectations
- **Offers by suppliers or contractors** - Accepting offers from suppliers for free or discounted development opportunities that they were not engaged to provide should be refused. Staff may only accept development opportunities from suppliers where there is a legitimate business reason, attendance meets

community expectations and any risk of conflict of interest can be appropriately managed.

- **Endorsement** - Refuse the offer if accepting it could reasonably be seen as endorsing a product or service.
- **Advantage to a supplier or sponsor** - Refuse the offer if accepting it could reasonably be seen as advantaging a supplier or sponsor in a future procurement.
- **Sufficient attendees** - For hospitality and events, refuse the offer if South East Water will be sufficiently represented to meet its business needs or, as is the case for all other offers, if it does not comply with other elements of the 'Offers you must refuse - integrity test'.
- **Your own judgement** - Refuse the offer if you feel that accepting it would breach your obligations under the Code of conduct for Victorian public sector employees.

#### 4.2.3 Declare all non-token offers

If you receive a non-token offer (valued at \$50 or more), you must:

- declare the offer in writing to your manager, even if you refuse it
- always refuse the offer unless it complies with 'Offers you must refuse - integrity test' and you have approval as set out in this policy.

The offer and outcome will be recorded on the internal and public register.

### 4.3 Provision of gifts, benefits and hospitality - Minimum accountability

These minimum accountabilities relate to providing gifts, benefits and hospitality on behalf of our organisation. They also apply when making any offer of a gift, benefit or hospitality, including an offer to another Victorian public sector organisation.

#### 4.3.1 Business purpose

You must ensure that any gift, benefit and hospitality (token or non-token) you provide on behalf of South East Water is provided for a business purpose, in that it:

- furthers the conduct of official business or other legitimate organisational goals, or
- promotes and supports government policy objectives and priorities.

#### 4.3.2 Cost and community expectations

You must ensure that the cost of providing a gift, benefit or hospitality is:

- proportionate to the benefits obtained for the State
- would be considered reasonable in terms of community expectations.

#### 4.3.3 Conflicts of interest

You must ensure that you do not provide a gift, benefit or hospitality unless:

- no conflict of interest exists (actual, potential or perceived), or
- you declare a conflict and SEW develops a management plan that explicitly allows you to provide it.

#### 4.3.4 Behaviour

You must ensure that when hospitality is provided, participants demonstrate professionalism in their conduct and uphold their obligation to extend a duty of care to other participants. If you are a participant who is accepting hospitality, you must also comply with these standards.

### 4.4 Communicating to employees - Minimum accountability

South East Water ensures that the policy and related processes are communicated effectively to employees by:

- publishing the Policy and related processes on the intranet and public website
- including information on Gifts, Benefits and Hospitality in mandatory compliance training



- requiring all employees to undertake annual Code of Conduct and Conflict of Interest refresher training.

#### 4.5 Communicating to business associates - Minimum accountability

South East Water will ensure that a clear policy position is established and communicated to business associates on the offering of gifts, benefits and hospitality to employees, including the possible repercussions for a business associate acting contrary to the organisation's policy position. The information provided includes:

- what constitutes a gift, benefit or hospitality
- South East Water's policy
- that South East Water discourages the making of offers
- any whole of Victorian Government supplier codes of conduct.

#### 4.6 Reports to audit committee - Minimum accountability

The Finance, Assurance and Risk Management Committee will receive a report at least annually on the administration and control of the gifts, benefits and hospitality policy, processes and register. The report will include analysis of offer risks (including multiple offers from the same source and offers from business associates), risk mitigation measures and any proposed improvements.

#### 4.7 Internal register - Minimum accountability

South East Water maintains an internal register of non-token gifts, benefits and hospitality offered to employees.

Access to the internal register is restricted to the Risk, Assurance & Quality Group. Certain information from the internal register is published online in the public register, consistent with VPSC guidance on gifts, benefits and hospitality.

#### 4.8 Publishing the policy and register - Minimum accountability

A copy of the previous financial year and current register will be published on the South East Water website every six months. The public register will contain a subset of the information detailed in the internal register. South East Water provides the following documents to the public via the public website:

- the Gifts, Benefit and Hospitality Policy; and
- the public register of reportable gift offers received.

#### 4.9 Declining offers

In most cases where the offer should or must be refused, you should decline it at the time the offer is made. If you are unable to decline a gift, declare it as normal and make it clear to your manager, or the appropriate delegate, that you were unable to decline the offer in the moment, but you have not accepted it. The organisation will dispose of the gift and an explanation and rejection will be sent to the offeror where appropriate.

In the case of benefits and hospitality, it is very unusual for a situation to arise where you cannot decline an offer.

Use the following GIFT questions to help assess whether to accept or refuse a particular gift, benefit or hospitality. GIFT is an acronym that stands for: giver, influence, favour and trust.

<b>Giver</b>	Who is providing the offer and what is their relationship to me? 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>Influence</b>	Are they seeking to gain an advantage or influence my decisions or actions?

	Has the offer 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>Favour</b>	Are they seeking a favour in return for the offer? Has the offer 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>Trust</b>	Would accepting the offer diminish public trust? How would the public view acceptance of this gift offer? What would my colleagues, family, friends or associates think?

#### 4.10 Token offers

If you receive a token offer (value less than \$50):

- you can only accept the offer if it passes the 'Offers you must refuse - Integrity test'
- remember, 'thanks is enough'. Do you need to accept?
- you do not need to declare the offer.
- you do not need a legitimate business reason to accept.
- you do not need approval from your manager to accept.
- you are the owner of the gift, benefit or hospitality.

#### 4.11 Non-token offers

If you receive a non-token offer (value \$50 or more):

- you must declare the offer even if you refuse it.
- remember, thanks is enough. Even if you have a legitimate business reason, do you need to accept?
- you can accept the offer if it passes the 'Offers you must refuse – Integrity test'.
- you must have prior approval in writing from your manager or delegate to accept.
- if you accept the offer you do so on behalf of our organisation. It is not usually yours to keep. Refer to 7.3 for further information.
- the offer and outcome are recorded in the internal register. Certain information may also be published in the online public register.

##### 4.11.1 Declaring non-token offers

All non-token offers, whether accepted or declined, must be recorded in the register

#### 4.12 Applying for ownership of a non-token gift

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

- it is not an 'official gift'
- it is unlikely to bring you or the organisation into disrepute
- it would be consistent with community expectations, and
- your manager or appropriate delegate gives written approval.

#### 4.13 Retrospective approval

If you cannot obtain approval prior to accepting an offer, in limited circumstances you can obtain retrospective approval provided you apply within 5 business days. This may happen if the gift was wrapped, delivered to South East Water or you were concerned it would have caused serious offence to refuse the gift.

#### 4.14 Offers made in a personal capacity

It is normal to receive offers of gifts, benefits and hospitality in your personal life that are unconnected to your work. You can accept these offers, provided you believe on reasonable grounds that the offers are made in a personal capacity.



If you are unsure whether an offer is being made to you in a personal capacity or because of your role with our organisation, apply the 'Offers you must refuse - Integrity test', consider the GIFT questions and follow this policy as you would in your professional capacity.

## 4.15 Non-token offer from another public sector organisation

### 4.15.1 Non-token offer from a government department

In the course of your work as an employee of South East Water, you might be offered a non-token gift, benefit or hospitality by a Victorian government department, administrative office or the VPSC. If this occurs:

- you can accept the offer if it complies with the 'Offers you must refuse - integrity test'
- you need to declare the non-token offer.

However, if the offer does not meet the "Offers you must refuse - integrity test" it must be refused and declared.

### 4.15.2 Non-token offer from public entity or other public sector organisation

In the course of your work, you might be offered a non-token gift, benefit or hospitality by another Victorian public sector organisation, such as a public entity. For example, you may be offered free tickets to an event where our organisation has helped to organise or otherwise actively supports the event or the organisation. If this occurs:

- you can accept the offer if it complies with the 'Offers you must refuse - integrity test'
- regardless of whether you accept the non-token offer, you must declare it.

### 4.15.3 Offers from an interstate or Commonwealth public sector organisation

Offers from public sector organisations that are part of a different state or part of the Commonwealth public sector should be treated the same as any other organisation that is not a Victorian public sector organisation.

## 4.16 Non-token offers of uncertain origin

If you receive an offer via a work colleague and you believe they may be offering on behalf of a third party with the possible intention of influencing you must:

- refuse the offer and declare it, and
- report it to your manager or the appropriate delegate, as it may need to be referred on to an integrity body or the police.

## 4.17 Exceptions to declaration rule

### 4.17.1 Generic offers that are refused

In the course of your public duties you may receive generic offers of non-token gifts or benefits, such as SPAM email or emails targeting our employees with offers to attend a seminar or webinar at a discount rate. You don't need to declare a generic non-token offer if you refuse it.

If you want to accept it, the usual restrictions in the 'Offers you must refuse - integrity test' apply as to whether you can do so.

### 4.17.2 Targeted email blasts

Often generic offers may appear personalised by being addressed to you directly, or through the use of generative language tools that can personalise emails whilst still sending them to a large number of people.

If you receive an email and you are unsure if it is a generic offer, talk to your manager to determine if you need to declare it. Some useful questions to ask when unsure are:

- do I have a relationship with the person who sent the email?
- do I have a relationship with the organisation who sent the email?
- is the offer related to my work or the work of my area of the organisation?

If the answer to all of the above is 'no' then it is likely a generic offer.

#### 4.17.3 Multi-employee declaration

Sometimes, South East Water will register a non-token declaration on behalf of all or some employees. If this happens, we will let the relevant employees know, to not make individual declarations 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 the Group Manager or General Manager of the particular area.

Employees are still responsible for declaring any actual, potential or perceived conflicts of interest that they might have in relation to the offer.

### 4.18 Official gifts and items

#### 4.18.1 Requirement

If you accept an official gift or official item (item with cultural, ceremonial, religious, historic or other significance), you do so on behalf of the organisation. Official gifts and official items (for example a culturally significant gift from an official delegation) are an exception to our 'Thanks is enough' approach.

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

- must be declared
- will be recorded in the internal register
- belongs to South East Water unless you apply for and are approved as 'Owner' of the official item.

#### 4.18.2 Applying for ownership of an official item

If an official item was given to you specifically in recognition of your work or contribution, you may retain it, provided that:

- it is the express wish of the giver
- it benefits our organisation's relationship with the giver
- it is appropriate given the significance and value of the item
- it would be consistent with community expectations
- it is unlikely to bring you or our organisation into disrepute, and
- your manager or, depending on the gift, an appropriately senior delegate gives written approval.

You cannot retain the gift unless it meets all the above requirements.

### 4.19 Offers to South East Water

Sometimes offers are made to South East Water itself (e.g. offers of equipment). In deciding whether to accept such an offer, South East Water will take into account:

- whether the offer passes the 'Offers you must refuse - integrity test'
- carefully scrutinise:
  - the people or organisation making the offer
  - the nature and circumstances of the offer
  - the level of public benefit if the offer is accepted.

South East Water must reject any offer that is not consistent with community expectations.

#### 4.19.1 Official items

If an offer of an official item is accepted by one of our employees, it becomes the property of South East Water, with some exceptions (see 'Applying for ownership of an official item'). South East Water will decide what to do with each official item that comes into its possession according to the nature of the item and our policies.

#### 4.19.2 Reward and recognition offers

Occasionally an offer is made to provide South East Water with a benefit like discounts, free tickets or equipment for employees. South East Water may decide to accept the offer for reward and recognition purposes, record it in the register, after taking into account:

- the above factors, and
- any other relevant requirements of this policy.

#### 4.19.3 Donations or gifts given on our organisation's behalf

There are reputational risks associated with any donation or gift made on our behalf. It can be seen as preferencing one charitable organisation over another and can impact the perception of and trust in the Victorian Government as a whole. It may also have an impact on future procurement or work activities.

Our organisation expects that everyone who works with us is made aware of our expectations around donations made in our name. While there is no opportunity to refuse the donation or gift once made, the commercial partner should be informed that no gift or donation should be made on our organisation's behalf in future without a formal offer and approval.

Where a gift or donation has been made without prior approval, that gift or donation should be listed on the gifts, benefits and hospitality register, noting that there was no opportunity to accept or refuse.

### 4.20 Providing to others

#### 4.20.1 Providing to others - Integrity test

When providing a gift, benefit or hospitality on behalf of our organisation, you must ensure all the following:

- **Business reason** - There must be a legitimate business benefit that furthers the conduct of official business or other legitimate goals of our organisation, the public sector or the State.
- **No conflict of interest** - It does not raise a conflict of interest (actual, potential or perceived).
- **Proportionate costs** - Any costs incurred are proportionate to the benefits obtained for the State.
- **Consistent with community expectations** - The event would be considered reasonable and consistent with community expectations.

Use the following HOST prompts to help you assess if providing a particular gift, benefit or hospitality would comply with the 'Providing to others - Integrity test' above

<b>Hospitality</b>	To whom is the offer being provided? Will recipients be external business partners or individuals of the host organisation?
<b>Objectives</b>	For what purpose will hospitality be provided? 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>Spend</b>	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?
<b>Trust</b>	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?

#### 4.20.2 Processes you must follow

South East Water has processes and procedures for providing gifts, benefits and hospitality. For example, for providing hospitality at internal and external focused events, and requirements in relation to alcohol, financial expenditure and approval, catering for employees and for office functions, reward and recognition programs, community grants, and the recording and reporting of these.

#### 4.20.3 Conduct during hospitality

Consistent with section 4.3.4 'Behaviour', 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.

#### 4.20.2 Providing official gifts and items

Before providing an official gift or item, make reasonable enquiries to ensure it will be appropriate to do so.

## 5. Breaches

We respond to alleged breaches of this Policy consistent with relevant industrial instruments and legislation and any other obligations that apply. 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
- 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.

If you think you have breached this policy notify your manager in writing immediately. This enables us to assess how best to mitigate the risk.

## 6. Speak up

We encourage you to speak up if you believe a breach of this policy has happened, is happening, or may be about to happen. You can do so by notifying your manager or the Risk Assurance and Quality team.

If you believe corrupt or improper conduct is occurring, you can make a complaint directly to the Independent Broad-based Anti-corruption Commission (IBAC), the Victorian Ombudsman or [Stopline](#) who provide an independent and confidential helpline to raise

concerns relating to allegations of fraud, corruption or other improper conduct within the workplace.

We 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.

## 7. Advice

If you are unsure about accepting a gift, benefit or hospitality, or the application of this policy you can seek advice from your manager or the Risk, Assurance and Quality team.

## 8. Related policy, legislation and other documents

### Policies

BS 2060 Conflict of Interest Declaration Procedure

BS 1005 Code of Conduct

BS 2049 Entertainment, Hospitality and Expenditure Policy

BS 2725 Gift benefit & hospitality guidance

BS 2570 Gift, Benefit and Hospitality Procedure

BS 2799 Offer Declaration Form

### Legislation

Financial Management Act 1994 (Vic)

Freedom of Information Act 1982 (Vic)

Privacy and Data Protection Act 2014 (Vic)

Public Interest Disclosures Act 2012 (Vic)

Public Administration Act 2004 (Vic)

Water Act 1989 (Vic)

### Resources

[Code of conduct for Directors of Victorian public entities - Directors Code of Conduct](#)

[Code of Conduct for Victorian Public Sector Employees](#)

## 9. Approval

Approved by: South East Water Board of Directors

Approved on: 24 June 2024

Sponsor: Managing Director

Implementation: Compliance Manager

Review date: 24 June 2026