

# DJSIR Policy

## Gifts, Benefits and Hospitality

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## Key points

- The department's default position is to politely decline offers of gifts, benefits and hospitality (GBH).
- In those very rare instances where we may consider acceptance of GBH, you must obtain prior written approval from your manager.
- You must record all offers valued at \$50 or more on the internal register.

## Policy statement

This policy complies with the minimum GBH accountabilities set by the Victorian Public Sector Commission (VPSC). It reinforces the VPSC's *Code of Conduct for Victorian Public Sector Employees* (Code of Conduct) which requires us to act with integrity, impartiality and accountability.

## Scope

This policy applies to:

- employees and executive officers
- officers and officeholders
- contractors, consultants and agency on-hire staff
- volunteers, interns, trainees, cadets and work-experience students.

In this policy we use the term 'employee' to cover anyone the policy applies to, regardless of their employment or engagement status.

## Key definitions

This policy uses the following key definitions.

The term ...	refers to ...	For example ...
gift	a free or discounted item or service (anything that would be generally seen by the public as a present).	vouchers money chocolate flowers.
benefit	a favour, advantage or other type of preferential treatment.	tickets to sporting or social events access to discounts the promise of a new job.
hospitality	the friendly reception and entertainment of guests.	<ul style="list-style-type: none"><li>• restaurant or café dining</li><li>• sponsored travel and accommodation.</li></ul>

As employees, we make and receive 2 types of offers.

The term ...	refers to anything with an actual or estimated value of ...
token offer	less than \$50.
non-token offer	\$50 or more.

## Requirements and responsibilities

When you are doing work for the department, you must act with integrity and impartiality. This includes placing the public interest above your private interests.

If you are an ...	you must ...
employee	<ul style="list-style-type: none"><li>• comply with this policy when receiving or providing GBH</li><li>• not solicit GBH for yourself or others</li><li>• politely decline offers, except for very rare instances where you may consider acceptance</li><li>• obtain your manager's approval before accepting any non-token offer</li><li>• record all non-token offers on the internal register, even if you decline them.</li></ul>
employee with direct reports	<ul style="list-style-type: none"><li>• identify and understand the risks inherent to your direct reports' roles</li><li>• oversee your direct reports' compliance with this policy</li><li>• assess and approve offers (both received and made) in line with this policy</li><li>• model good practice, promote awareness of this policy and give sound advice.</li></ul>

Seek advice from your manager or the Integrity Services Unit if you need help with any aspect of this policy.

## Responding to offers of gifts, benefits and hospitality

### Process overview

Your default response to offers should be to politely decline. There are very limited circumstances where it is appropriate to consider accepting an offer.

The following table summarises how we manage and report offers.

Step	Token offer	Non-token offer
1. <a href="#">Estimate the offer's value.</a>	Yes.	Yes.

2. <a href="#">Politely decline the offer</a> , unless an exception exists.	Yes.	Yes.
3. In the very rare instance where you wish to consider acceptance, <a href="#">apply the Integrity Test</a> to determine if you can accept the offer.	Yes – you must conduct Part A of the Integrity Test. If the offer relates to an event, you must also conduct Part C.	Yes – you must conduct Part A and Part B of the Integrity Test. If the offer relates to an event, you must also conduct Part C.
4. If Step 3 applies and the offer passes the Integrity Test, <a href="#">obtain your manager's approval</a> before accepting it.	No.	Yes – you must obtain approval from your manager before accepting it (or, in the case of certain gifts or on-the-spot hospitality, within 5 business days).
5. <a href="#">Record the offer on the internal register</a> .	No.	Yes – you must declare the offer as soon as practicable.
6. If you accepted a gift, manage its ownership.	You may retain the gift, provided it is modest.	No – you cannot retain the gift. You always accept non-token gifts on behalf of the department.

The following sections discuss each of the above steps in further detail.

## Step 1: Estimating an offer's value

You must accurately estimate an offer's value.

If you cannot easily establish an offer's actual value, you should err on the side of overestimation.

In addition, please note that the following [minimum values](#) apply:

- all official gifts and items (i.e. items with cultural, ceremonial, religious, historical, social or other significance that honour an important business relationship or milestone) – \$50 or higher
- all meal offers – \$50 or higher
- all meal or event offers where guests could drink alcohol (even if you will not consume any) – \$100 or higher.

## Step 2: Politely declining an offer

Our default position is to politely decline offers.

However, there are rare instances where immediate declination is not possible, such as:

- wrapped gifts, which are difficult for us to value and politely decline in the moment
- mailed gifts, which are impossible for us to politely decline in the moment.

In these instances, you should withdraw your acceptance after the fact.

If it is ...	you should ...
possible to withdraw acceptance	politely return the gift or reject the invitation as soon as possible.
impossible to withdraw acceptance	seek advice on available options e.g. donate the gift to the department's social club or a local charity; report the offer to your manager or the Integrity Services Unit to ensure its effective management.

As a department, we will work with external stakeholders to understand this policy and its intent by discouraging offers, especially repeat offers.

When declining an offer, you should, wherever possible, look to politely remind the offeror of the department's default position.

Please contact your manager or the Integrity Services Unit if you need help:

- declining an offer (either before or after the fact)
- communicating with external stakeholders about this policy.

### Step 3: Applying the Integrity Test to an offer

If you wish to consider accepting an offer, you must apply the Integrity Test.

Offers you may consider for acceptance include:

- official gifts or items provided as part of cultural or community practices (e.g. a commemorative plaque)
- [sponsored travel or accommodation](#), if you are presenting at a conference on the department's behalf.

#### Integrity Test: Part A

##### Mandatory questions for all token and non-token offers

If you answer YES to any of these questions, you must decline the offer

1. Have you been offered money (e.g. stipends), something that functions like money (e.g. gift cards), or something that is easily exchanged into money?

2. Could accepting the offer give rise to an actual, potential or perceived conflict of interest?

3. Is there a risk that accepting the offer could undermine the public's trust in the department, the Victorian Government, or your ability to do your job impartially?

*Note: Generally, the higher the offer's value, the greater the risk of reputational damage.*

4. Would accepting the offer be at odds with the community's expectations?

5. Is there a risk that the public could perceive the offer as a bribe or inducement?

*Note: You must report such offers to your manager, the Integrity Services Unit or the [Independent Broad-based Anti-corruption Commission](#) (IBAC).*

6. Are you likely to make or influence a decision (e.g. relating to procurement, grants, sponsorships, other funding agreements or recruitment) about the offeror in the foreseeable future? Have you made or influenced such decisions in the recent past?

*Note: You must always decline offers from anyone involved in an active procurement process, as well as current suppliers.*

7. Is it likely that the offeror is trying to negotiate or advance their position with the department?

8. Could the public perceive your acceptance as a form of endorsement?

9. Is it likely that someone made the offer on behalf of a third party in an attempt to influence you?

10. Would accepting the offer make you feel uncomfortable? Would you feel awkward having to justify your acceptance to the Secretary, an auditor, or the public?

If the offer passes **Part A**, proceed to:

- **Part B** for all non-token offers; **then**
- **Part C** for all offers to events.

### Integrity Test: Part B

#### Mandatory assessment for all non-token offers

If you do not have a legitimate business reason, you **must** decline the offer (even if it passes Part A)

To be considered for acceptance, a non-token offer **must**:

- further the objectives of the department, the public sector or the Victorian Government
- further the conduct of official business or goals of our organisation, consistent with community expectations
- directly relate to your role and responsibilities.

The below may, in some circumstances, constitute legitimate business reasons for the purposes of this policy.

Reason	Description
Leveraging business connections	<p>You accept an offer to:</p> <ul style="list-style-type: none"><li>• create or explore opportunities for the department with respect to trade, investment and collaboration; and/or</li><li>• further existing relationships with important stakeholders that play a pivotal role in achieving the department's strategic objectives.</li></ul> <p>You must be able to explicitly link the offer to your team's workplan and priorities.</p>
Acquiring essential knowledge	<p>You accept an offer to learn more about a key sector, event or technical field that is directly relevant to your role. You must be able to explicitly link the offer to your workplan and priorities.</p>

**'Networking' and 'maintaining stakeholder relationships' are not legitimate business reasons to accept an offer.**

If the offer passes **Part A** and **Part B**, proceed to **Part C** for all offers to events (if applicable).

### Integrity Test: Part C

#### Additional mandatory questions for all offers to events

*In performing our public duties, our decision-making must be impartial. To maintain the public's trust in our organisation and prevent corruption, if you answer YES to any of these questions, you **must** decline the offer (even it passes Parts A and B).*

1. If you decline the offer, will the department be sufficiently represented at the event?

*Note: Representation is directly linked to Executive Officers' role and responsibilities*

2. Is the event an end-of-year celebration or party, or a comparable / similar event?



3. Can this engagement with the offeror (or other attendees) occur in a standard business setting?

*Note: Location and nature of the engagement must be consistent with community expectations.*

4. Can the department purchase its own tickets instead?

### Further information to consider before accepting an offer

Even if an offer passes the Integrity Test, you should think twice before accepting it. Remember – ‘thanks, but no thanks’ is appropriate in most circumstances.

### Guests

If your invitation allows you to bring a guest (and it is appropriate to do so, which it very rarely is), they must be a fellow employee. This employee must:

- perform work directly relevant to the event
- comply with this policy (including applying the Integrity Test, obtaining approval and recording the offer).

We strongly suggest that the Integrity Director is consulted if you are considering taking a guest to an event that constitutes GBH.

There are very rare exceptions to this rule for senior executives, i.e. the Secretary or a Deputy Secretary, attending official functions. The Integrity Director should be consulted where senior executives would like to discuss a guest accompanying them to a particular event.

### Conferences

You can accept free or discounted travel or accommodation to a conference or similar event if you are giving an official presentation (or similar) on the department’s behalf. Such offers must:

- come directly from the conference’s organiser or sponsor; and
- align with the community’s expectations for public sector employees.

If you are attending a conference (as either a participant or presenter), you:

- cannot accept stipends or daily allowances
- should be wary of attending ‘tack-on’ events (which may not be ticketed), such as networking or opening nights.

## Step 4: Obtaining approval to accept a non-token offer

In very limited circumstances, you can consider accepting a non-token offer if it passes the Integrity Test and your manager gives their approval.

You should obtain ...	by ...
prior approval from your manager as the standard practice	emailing your manager the details of the offer, including: <ul style="list-style-type: none"><li>• how it passes the Integrity Test</li><li>• why it benefits the department.</li></ul>
retrospective approval from your manager <u>if prior approval is not possible</u> (e.g. in the case of certain gifts or on-the-spot hospitality)	recording the offer and your reason for acceptance on the internal register, then submitting it to your manager for review via the system's automatic workflow.

## Step 5: Recording a non-token offer on the internal register

You must formally record all non-token offers – both accepted and declined – on the internal register. When recording a non-token offer, you must:

- provide an accurate description of the GBH
- enter a reasonable estimate of its value (noting our [minimum amounts](#)).

For accepted offers, you must also:

- attest to having conducted the Integrity Test
- explain the business reason for acceptance (see **Part B** of the Integrity Test) and how it links to your work plan and priorities
- upload evidence (e.g. a copy of the ticket) to support your entry.

If you record an accepted offer on the internal register ...	your manager will receive ...
after obtaining approval from your manager (as is the standard)	a notification and link to the entry.
before obtaining approval from your manager	a notification and link to review the entry.

### Joint offers

If multiple employees receive the same offer, each employee must comply with this policy by individually:

- conducting the Integrity Test (if considering acceptance)
- obtaining managerial approval (if applicable)
- recording the offer on the department's internal register (if applicable).

## Managing generic offers of gifts, benefits and hospitality

You may receive generic offers of non-token gifts and benefits, such as:

- emails giving you discounted access to a seminar or webinar
- targeted email blasts (e.g. 'personalised' emails about upcoming events sent to newsletter subscribers – note that some entities may use generative artificial intelligence to make their emails appear unique)
- spam emails.

If you answer 'no' to all the following questions, you have likely received a generic offer:

- Do I have a relationship with the person or organisation that sent the email?
- Does the offer relate to my work – or that of my area – within the department?

You do not need to register a generic, non-token offer if you decline it. Should you wish to accept such an offer, you must apply the Integrity Test and comply with this policy.

If you need help with a generic offer, talk to your manager or the Integrity Services Unit.

## Offers not considered gifts, benefits or hospitality under this policy

### Offers made to you in a personal capacity

You may receive offers that are unconnected to your work. If you wish to accept such an offer, you must:


- ensure it was made to you as a private citizen
- consider whether it gives rise to a conflict of interest
- ensure it could not be seen to influence your official actions or decisions.

If you need advice about accepting such offers, talk to your manager or the Integrity Services Unit.

### Certain fundraising activities

Fundraising as a private citizen does not breach the minimum accountabilities. This includes:

- raising awareness of, or contributing to, an online fundraiser
- selling chocolates for your child's school
- participating in third-party fundraisers e.g. a sausage sizzle for your local football club.



You cannot use departmental resources to carry out or contribute to any private fundraising activity. You should also ensure that you consider and comply with the department's [Outside Activities policy](#).

### Invitations to official business events

Official business events (OBEs) are core activities of the department. Attending an OBE is permitted when it is directly related to the core functions of your employment. OBEs do not constitute GBH as attending them is part of doing your job.

For an event to qualify as an OBE, it must not reasonably:

- give rise to a conflict of interest
- undermine the public's trust in the department or the Victorian Government
- be at odds with community expectations.

In addition, you must be invited and/or attending as a formal representative of the department or the Victorian Government – for example:

- You have an official role at the event.
- You are a relationship manager, and attending the event is directly related to, and necessary to fulfil, your core responsibilities in that role.
- You are coordinating tickets for an event or exhibition, and you must attend to properly discharge your obligations in that role.
- The Minister has requested support at the event.
- The department is hosting the event and you are the appropriate departmental representative.
- You are required to attend the event to acquit a funded activity.
- Your attendance is otherwise consistent with your employment – i.e. an impartial third party would expect you to attend as a representative of the department.

Common examples of events that may qualify as OBEs include attending:

- a function at the request of a Minister to help the Minister fulfil their obligations
- a significant state event hosted by the head of one of the department's public entities (for the Secretary or a Deputy Secretary only, and offers cannot be delegated)
- a department-funded event to monitor it in line with acquittal obligations
- to observe the delivery of a grant-related activity.

Common examples of events that would not normally qualify as OBEs include attending:

- a corporate lunch for networking or similar purposes
- a concert at a venue managed by one of the department's public entities
- an event where there is already sufficient department representation.

Further OBE examples are included at Appendix B.

### Guest attendance

As a default, you should not take a guest to an OBE. However, if it is necessary to take a guest, they must be a fellow employee who:

- is of sufficient seniority to represent the department in a formal capacity
- is in a role that directly relates to the event or the industry in which the event is occurring
- should be attending the event with you – i.e. it is an event where more than one department representative is required.

There are very limited circumstances for senior executives where it is permissible to take a guest who is not an employee, e.g. a state reception. You should contact the Integrity Director for advice in these circumstances.

### Maintaining a local register of invitations

The department does not maintain a central OBE register.

Each Group is encouraged to:

- develop formal rules for recording invitations to, and approving attendance at OBEs
- maintain a local register of invitations to OBEs.

Please contact the Integrity Services Unit for assistance establishing your local register and settings.

## Providing gifts, benefits and hospitality

### Requirements for token and non-token offers

We sometimes provide GBH to:

- welcome significant guests
- celebrate important milestones and work-related achievements
- further the development of important business relationships and public sector outcomes.

Any offer we make must ...	This means we must ...
have a legitimate business reason.	ensure the offer: <ul style="list-style-type: none"><li>• furthers the department's organisational goals</li><li>• supports the Victorian Government's policy objectives.</li></ul>

not present an unmanageable conflict of interest.	identify, declare and effectively manage any actual, potential or perceived conflicts of interest relating to the offer.
<ul style="list-style-type: none"> <li>be proportionate to the benefits obtained for the department and the Victorian Government</li> <li>align with community expectations for public sector employees.</li> </ul>	<ul style="list-style-type: none"> <li>ensure the offer's cost does not exceed the value or significance of its intended outcomes</li> <li>maximise cost effectiveness and efficiency</li> <li>prioritise public sector venues over private venues</li> <li>be confident that we can adequately justify the offer and its cost to the Secretary, an auditor, or the public.</li> </ul>

When providing hospitality, all employees must demonstrate professionalism in their conduct and uphold their obligation to extend a duty of care to other participants.

### Providing offers to employees

When offering ...	you must ...
appreciation gifts	ensure they are appropriate, given the context (no alcohol).
hospitality, such as end-of-year events	contact your Human Resources Business Partner for advice.

You also have an obligation to comply with the [Fringe Benefits Tax guidelines](#), where relevant.

### Providing offers to external stakeholders

When offering ...	you must ...
official gifts or items	make reasonable enquiries to ensure it is appropriate to do so.
hospitality	<ul style="list-style-type: none"> <li>ensure that any event involving the service of alcohol: <ul style="list-style-type: none"> <li>provides drinks as a courtesy, not as an indulgence</li> <li>does not exceed 2 hours in duration</li> <li>does not cater for more than 2 standard drinks per person</li> <li>is held at a time that limits the risk of employees returning to work</li> </ul> </li> <li>apply the <a href="#">Event Attendance Hosting Protocol</a>, where relevant.</li> </ul>

### Obtaining approval to provide gifts, benefits and hospitality

When providing GBH to employees or external stakeholders, we must comply with the [Procurement policy](#) and [procedure](#), as well as other related documents, such as the [Good Food policy](#).

This includes obtaining written approval in advance from the appropriate financial delegate via:

- email for lower cost offers purchased using a corporate card or claimed as an expense
- a procurement brief or event brief for higher cost offers.

We must also exclude tips and gratuities from hospitality expenditure.

## Governance arrangements

The ...	is responsible for ...
Secretary	<ul style="list-style-type: none"><li>• ensuring the department fulfils its obligations under the minimum accountabilities, including the creation of relevant policies, procedures and processes</li><li>• modelling good practice and fostering a culture of integrity</li><li>• submitting accepted non-token offers to the Chair of the Audit and Risk Committee for independent review and approval.</li></ul>
the Integrity Services Unit	<ul style="list-style-type: none"><li>• maintaining an internal register of non-token offers received by employees</li><li>• reporting to the Audit and Risk Committee and the Integrity Committee at least annually on the department's administration of this policy and the internal register</li><li>• publishing this policy and the external register (containing reportable offers from the previous financial year) on the public website within 4 months of each new financial year.</li></ul>

## Alleged breaches

If you think you have breached this policy, you must notify your manager in writing immediately. This will enable the Integrity Services Unit to appropriately assess and remedy any potential breaches as soon as possible.

## Speaking up

Speaking up about any wrongdoing that we see – including matters relating to this policy – is key to building a robust integrity culture.

You can report actual or potential policy breaches (past or active), and any other related concerns to:

- your manager or supervisor
- the Integrity Services Unit via:
  - email: [integrity@ecodev.vic.gov.au](mailto:integrity@ecodev.vic.gov.au)

- the online [Speak Up](#) function (which includes the option to report anonymously).

The department will:

- actively support and protect employees who speak up in good faith about potential policy breaches
- take decisive action, including possible disciplinary action, against anyone who discriminates against or victimises an employee who speaks up about potential policy breaches in good faith.

## Making a report to an integrity body

If you believe corrupt or improper conduct has occurred, is occurring or may occur, you can make a complaint directly to [IBAC](#) or the [Victorian Ombudsman](#) under the [Public Interest Disclosures Act 2012 \(Vic\)](#). Such an allegation is known as a Public Interest Disclosure (PID).

For further information about what constitutes a PID, how to make a PID and what protections may apply, please refer to the department's [PID procedure](#).

## How the department will respond

The department will respond to alleged breaches of this policy in a fair, reasonable, constructive and proportionate way that is consistent with the [Public Administration Act 2004 \(Vic\)](#), the VPSC's Code of Conduct, this policy and any other relevant obligations.

Depending on the circumstances, the department may:

- take no action; or
- deal with the matter by taking disciplinary action:
  - on an informal basis (e.g. through education or counselling)
  - through a formal performance management process
  - through a formal misconduct process (if other methods are not appropriate).

A finding of misconduct may amount to a breach of the VPSC's Code of Conduct and could result in termination per the department's [Management of Misconduct policy](#).

An employee who is directly affected by a decision made or action taken pursuant to this policy may apply for a review of actions under the department's [Review of Actions policy](#).

If the department identifies actual or potential criminal or corrupt conduct, it will take action in accordance with its reporting requirements under the [Fraud and Corruption Control Plan and procedures](#). This may include referring the matter to Victoria Police and notifying oversight bodies, such as IBAC.

## Relevant laws and obligations

The department will administer this policy in accordance with the relevant requirements, including the:



- [\*Public Administration Act 2004 \(Vic\)\*](#)
- [\*Privacy and Data Protection Act 2014 \(Vic\)\*](#)
- [\*Public Records Act 1973 \(Vic\)\*](#)
- [\*Charter of Human Rights and Responsibilities Act 2006 \(Vic\)\*](#).

## More information and advice

If you are unsure about the application of this policy, please contact the Integrity Services Unit via [integrity@ecodev.vic.gov.au](mailto:integrity@ecodev.vic.gov.au) or Corporate Connect.

You can also refer to the following resources:

- [e-Learn modules](#)
- [Integrity Hub](#)
- [Integrity Framework](#)
- [Conflict of Interest policy](#)
- [Outside Activities policy](#)
- [Procurement policy](#)
- [Procurement procedure](#)
- [Good Food policy](#)
- [Fringe Benefits Tax guidelines](#)
- [Event Attendance Hosting Protocol](#)
- [Management of Misconduct policy](#)
- [Review of Actions policy](#)
- [Public Interest Disclosure procedure](#).

## Authorisation

This policy is subject to annual review. It was last reviewed in April 2025.

## Appendix A: GBH case studies

Scenario	Judgement
During a meeting, a current supplier offers you some light refreshments.	You can accept token hospitality from a current supplier during a business meeting.
You present at a conference on the department's behalf. The organiser gives you a modest box of chocolates on stage as a thank you gift.	You can accept the offer on stage to avoid embarrassing the offeror. If the chocolates are of token value, you may retain ownership.
You present at a conference on the department's behalf. The organiser gives you an envelope as a thank you gift. You later realise that the envelope contains a gift voucher to a local bookstore.	You can accept the offer on stage to avoid embarrassing the offeror. However, you must politely return it as soon as possible after the fact because you can never accept money or something that functions like money, including gift vouchers.
A former supplier asks you to a lunch meeting to discuss a product launch and the potential for an early-bird discount for the department.	You must politely decline the offer. Accepting the offer creates a conflict of interest, and the supplier appears to be attempting to advance their position with the department.
You have a good working relationship with the department's vehicle supplier. You offhandedly mention that you are looking for a new personal car. The supplier asks you to visit their showroom for a discount.	You should not have mentioned your personal circumstance. You must politely decline the offer. The supplier is offering you the discount because of your public role. Accepting it creates a conflict of interest that may affect or be seen to affect your current or future decision-making and compromises public trust.
You receive an offer to a major industry event that includes speeches and exhibitors relevant to your work. The offer comes from the event's organiser and the event is free and open to anyone to attend.	You can consider accepting the offer. Although the offer will have a value, you do not need to record it on the internal register as it is free for and open to everyone.
Your colleague in a different Branch helped organise an event funded by the department. The organiser offers them 2 tickets. Your colleague asks you to attend the event as their guest.	You must politely decline the offer. You do not have a legitimate business reason to attend the event because it does not relate to your work.
You attend a conference on the department's behalf. When collecting your nametag, the conference organiser offers you – and every other participant – a small bag containing a branded notebook and pen.	You can consider accepting the offer. While the offer technically constitutes a gift, it is of token value, is not exclusive and is intended to enhance your participation in the conference.

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You manage a significant infrastructure project. The main project proponent asks you to their corporate box at the AFL, along with other project partners. You believe that attending the event presents a good opportunity to discuss the project and create new business connections.

You must politely decline the offer. Accepting it creates a conflict of interest that may affect your decision-making. There is no valid reason for the interaction to occur outside of the office and it does not matter that you intend to have work-related discussions. Networking is not an appropriate reason to accept the offer.

---

You oversee the implementation of a new contract management system. The project partner invites you to an end-of-year event to celebrate project achievements and discuss next year's work.

You must politely decline the offer. We cannot accept offers to end-of-year events under any circumstances.

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You are the relationship manager for a company looking to expand into overseas markets. The company invites you to a lunch hosted by a consulting firm, saying it would be a good opportunity to speak about expansion plans. The Minister will be a keynote speaker at the lunch.

You must politely decline the offer. Although assisting the company is part of your role, the offer could be seen as an attempt to influence you in your official role. Any discussion about expansion should be held in an official setting, and if the lunch is crucial to performing your role, the department should purchase a ticket. The Minister's attendance has no bearing on whether you can accept the offer.

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A Commonwealth government agency is hosting a conference and invites you to speak on behalf of the department about a recent project you spearheaded. They offer you a conference ticket, return flights to Canberra, and an overnight stay at a modest hotel.

You may consider accepting the offer. The offer to speak on behalf of the department came from the event organiser and would reasonably align with community expectations. However, you should ensure you obtain appropriate reporting line approvals and that you comply with the department's [Media and public comment policy](#).

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## Appendix B: OBE case studies

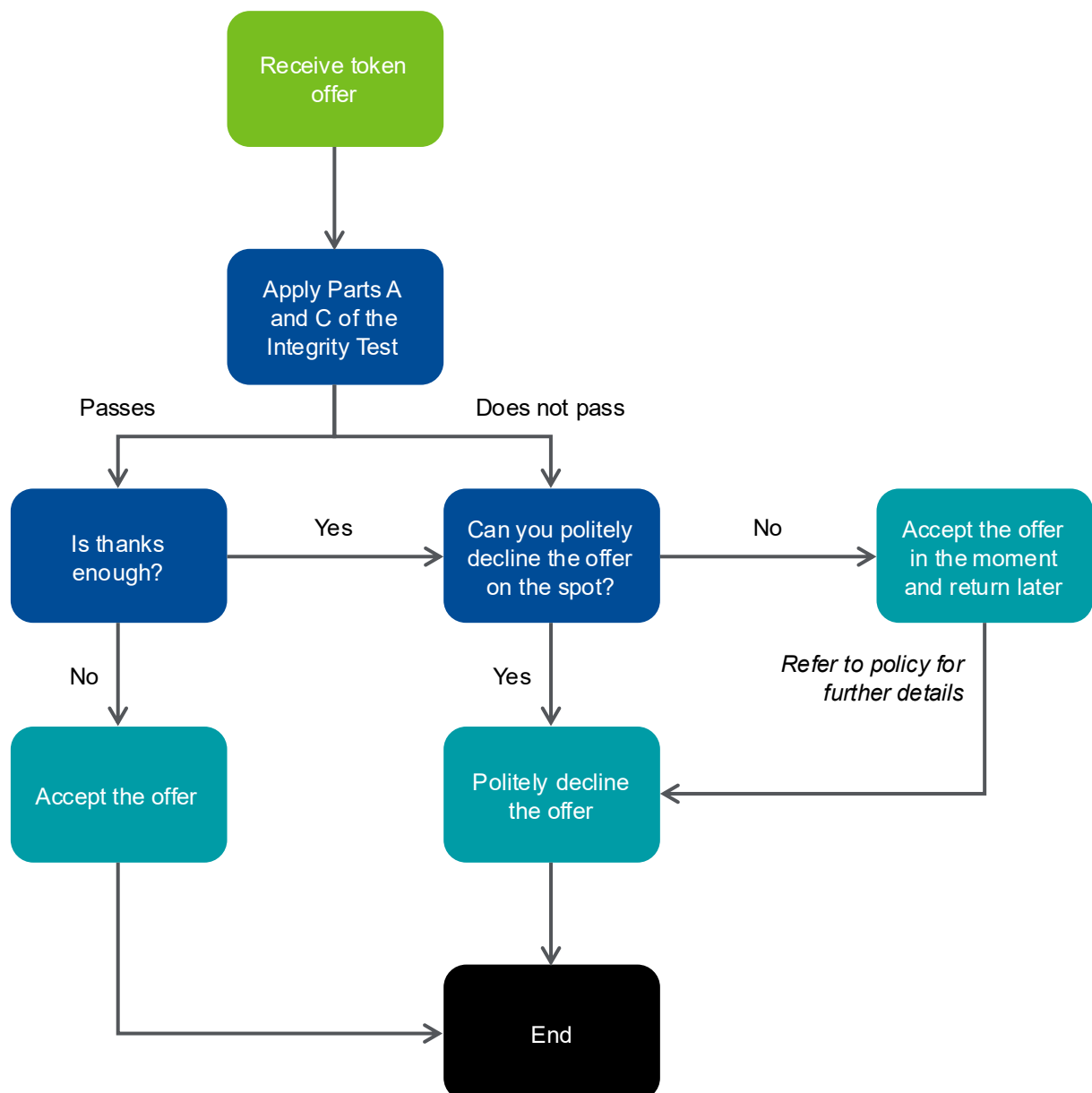
Scenario	Judgement
You receive an offer to attend a major sporting event from the public entity that runs it. You lead the department's relationship with the entity and manage the event's marketing agreements. Understanding the event's operations is critical to your work. The invitation includes a guest, and you know your partner would like to attend.	The event is an OBE for you only. You are the relationship manager, the event is directly related to your role, and attending may be necessary to fulfil your core responsibilities in that role. However, you cannot take your partner, and it is highly unlikely that there would be a need for a second departmental representative to attend.
You are the relationship manager for a public entity which operates a venue that will host a concert for an international artist. The public entity has allocated you a ticket to the show, alongside its own staff.	The event is not an OBE. Despite being the relationship manager, attending the concert is not necessary to fulfil the core responsibilities of your role. You should decline the offer and record it on the internal register.
You receive an offer to attend a business lunch from the event's organiser – the U.S. Embassy in Australia. The purpose of the lunch is to facilitate potential investment opportunities between Australian governments and U.S. companies. You manage the department's relevant interests in the U.S. and are responsible for generating market investment in Victoria.	The event constitutes an OBE. You would be attending as a formal representative of the department, the event is directly related to your role, and attending is necessary to fulfil your core responsibilities in that role.
Your area recently provided grant funding to an artist. A local gallery will be hosting the opening night exhibition, and the artist has offered your area a ticket to attend.	The event is OBE if you are required to attend it to discharge the obligations of your role – for example, to observe the delivery of a grant-related activity.
You are responsible for identifying investment opportunities in overseas markets. As part of a trade show that you attend in your official capacity, an investor group invites you to a function to meet with industry associations, venture capital funds and service providers. The event is open to trade show attendees and modest hospitality is provided.	The event is an OBE. You would be attending as a formal representative of the department, the event is directly related to your role, and attending is necessary to fulfil your core responsibilities in that role.
An industry association invites you to its upcoming awards night. You frequently engage with the association and its members in your official role, but you are not the relationship manager. You are aware that other department staff will be attending the event, including the Deputy Secretary, Executive Director, and the relationship manager.	The event is not an OBE for you. The department will be sufficiently represented by two senior executives and the relationship manager, and attending is not necessary to fulfil the core responsibilities of your role.

You are the relationship manager for a small company and are working with them to gain a foothold in interstate and overseas markets. The company Director invites you to a Chamber of Commerce lunch, saying it would be a good opportunity to develop relationships with similar businesses and potential financiers.

The event is not an OBE. Attending the lunch is not necessary to fulfil the core responsibilities of your role, and networking is never an appropriate reason to accept an offer. You should decline the offer and record it on the internal register.

## Appendix C: High-level process maps

### Token offers



## Non-token offers

