

# Gifts, Benefits and Hospitality (and Procedures)

**Category: Governance**

<b>Contact officer</b>	Governance Officer
<b>Contact division</b>	Office of the Chief Operating Officer
<b>Policy owner</b>	Chief Operating Officer
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**Definitions:**

Benefits	<p>Preferential treatment, privileged access, favours or other advantage offered to an individual. This may include invitations to sporting, cultural or social events, access to discounts and loyalty programs, and promises of a new job.</p> <p>The value of benefits may be difficult to define in dollars, but as they are valued by the individual, they may be used to influence the individual's behaviour.</p>
Business associate	<p>An external individual or entity which the organisation has, or plans to establish, some form of business relationship, or who may seek commercial or other advantage by offering gifts, benefits or hospitality.</p>
Ceremonial gifts	<p>Ceremonial gifts are official gifts provided as part of the culture and practices of communities and government, within Australia or internationally. Ceremonial gifts are usually provided when conducting business with official delegates or representatives from another organisation, community or foreign government.</p> <p>Ceremonial gifts are the property of the public sector organisation, irrespective of value, and should be accepted by individuals on behalf of the public sector organisation. The receipt of ceremonial gifts should be recorded on the register but does not need to be published online.</p>

Conflicts of interest	<p>A <u>real conflict</u> between an employee's public duties and private interests.</p> <p>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.</p> <p>The public or a third party could reasonably <u>form the view</u> that an employee's private interests could improperly influence their decisions or actions, now or in the future.</p>
Gifts	<p>Free or discounted items or services and any item or service that would generally be seen by the public as a gift. These include items of high value (e.g. artwork, jewellery, or expensive pens), low value (e.g. small bunch of flowers), consumables (e.g. chocolates) and services (eg painting and repairs). Fundraising by public sector organisations that is consistent with relevant legislation and any government policy is not prohibited under the minimum accountabilities.</p>
Hospitality	<p>The friendly reception and entertainment of guests. Hospitality may range from light refreshments at a business meeting to expensive restaurant meals and sponsored travel and accommodation.</p>
Legitimate business benefit	<p>A gift, benefit or hospitality may have a legitimate business benefit if it furthers the conduct of official business or other legitimate goals of the organisation, the public sector or the State.</p>
Public official	<p>As defined under s 4 of the <i>Public Administration Act 2004</i>. Public officials include:</p> <ul style="list-style-type: none"> <li>• public sector employees</li> <li>• statutory office holders</li> <li>• directors of public entities.</li> </ul>
Gifts Benefits and Hospitality Register	<p>A record, preferably electronic, of all declarable gifts, benefits and hospitality. It records the date an offer was made and by whom, the nature of the offer, its estimated value, the raising of any actual, potential or perceived conflicts of interest or reputational risks and how the offer was managed. For accepted offers, it details the business reason for acceptance and the officer approving the acceptance.</p>
Public register	<p>A public register is a record, preferably digital, of a subset of the information contained in a register, for publication as required by the minimum accountabilities. Guidance regarding the information that should be published is provided in the Policy Guide.</p>
Register	<p>A register is a record, preferably digital, of all declarable gifts, benefits and hospitality. Guidance regarding the information that should be recorded is provided in the Policy Guide.</p>

Token offer	<p>A token offer is a gift, benefit or hospitality that is of inconsequential or trivial value to both the person making the offer and the recipient (such as basic courtesy).</p> <p>The minimum accountabilities state that token offers cannot be worth more than \$50.</p>
Non-token offer	<p>A non-token offer is a gift, benefit or hospitality 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. All offers worth more than \$50 are non-token offers and must be recorded on a gift, benefit and hospitality register.</p>
Supplier	<p>Company or individual that supplies goods or services to the public sector organisation or could reasonably be expected to seek to supply goods or services to the public sector organisation. This is consistent with the definition adopted by the Victorian Government Purchasing Board in its Supplier Code of Conduct.</p>

### Roles and responsibilities:

Commissioner	<ul style="list-style-type: none"> <li>maintain, model and foster the highest standards of ethical behaviour to comply with the Code of Conduct for Victorian Public Sector agencies; and</li> <li>support staff understanding and compliance with this policy</li> </ul>
Labour Hire Authority Audit and Risk Committee	<ul style="list-style-type: none"> <li>oversee the overall approach towards integrity controls including the effectiveness of this policy</li> <li>receive reports of Gifts, Benefits and Hospitality at least annually</li> <li>support the management as appropriate.</li> </ul>
COO	<ul style="list-style-type: none"> <li>responsible to the Audit and Risk Committee for the development, implementation management of the Authority's compliance and integrity obligations;</li> <li>ensure that a Gifts, Benefits and Hospitality policy is established, implemented and maintained;</li> <li>ensure that the Register is publicly available on the Authority's website</li> <li>promote active disclosure culture at the Authority.</li> </ul>
Governance Officer	<ul style="list-style-type: none"> <li>responsible for the day to day implementation of this Policy</li> <li>provide reporting on GBH to the Audit and Risk Committee, Leadership Team, and employees.</li> <li>provide a process to record and preserve any evidence discovered during an investigation; and</li> <li>together with the HR Business Partner, People and Culture, develop and perform fraud and corruption awareness training.</li> </ul>
All staff	<ul style="list-style-type: none"> <li>be accountable for actions and requirements outlined in the Policy under section 3.1.</li> </ul>

## 1. Purpose

This policy states the position of the Labour Hire Authority (LHA) on:

- responding to offers of gifts, benefits and hospitality
- providing gifts, benefits and hospitality.

This policy is intended to support individuals and the LHA to avoid conflicts of interest and to maintain high levels of integrity and public trust.

The LHA has issued this policy to support behaviour consistent with the *Code of Conduct for Victorian Public Sector Employees*, which is binding under s 61 of the *Public Administration Act 2004* (Public Administration Act). All employees are required under clause 1.2 of the code to comply with this policy.

## 2. Application / scope

This policy applies to all LHA workplace participants, including employees, contractors,<sup>1</sup> consultants and any individuals or groups undertaking activity for or on behalf of the LHA (collectively called 'employees' in this policy).

## 3. Policy principles / contents

This policy has been developed in accordance with requirements outlined in the binding *Minimum accountabilities for managing gifts, benefits and hospitality* (Appendix A) issued by the Victorian Public Sector Commission (VPSC).

The LHA is committed to and will uphold the following principles in applying this policy.

Employees have a duty to place the public interest above their private interests when carrying out their official functions. They will not accept gifts, benefits or hospitality that could raise a reasonable perception of, or actual, bias or preferential treatment. Employees do not accept offers from those about whom they are likely to make business decisions.

### 3.1 Accountability

All employees are accountable for:

- not engaging in the soliciting of gifts, benefits and hospitality for themselves or others
- declaring all non-token offers of gifts, benefits and hospitality
- declining all non-token offers of gifts, benefits and hospitality, or where an exception applies under this policy, seeking pre-approval to accept the offer
- the responsible provision of gifts, benefits and hospitality.

Employees with direct reports are accountable for:

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<sup>1</sup> Note clause 1.4 of the *Code of Conduct for Victorian Public Sector Employees* (Code) which provides that public sector employers are to require contractors and consultants to comply with the code and relevant policies and procedures in certain circumstances. Contractors and consultants are only bound by the Code if explicitly required by their contract for services.

- overseeing management of their direct reports' acceptance or refusal of non-token gifts, benefits and hospitality
- modelling good practice and promoting awareness of gifts, benefits and hospitality policies and processes.

### **3.2 Integrity**

Employees strive to earn and sustain public trust through providing or responding to offers of gifts, benefits and hospitality in a manner that is consistent with community expectations. Individuals will refuse any offer that may lead to an actual, perceived or potential conflict of interest.

### **3.3 Risk-based approach**

The LHA through its policies, processes and audit committee, will ensure gifts, benefits and hospitality risks are appropriately assessed and managed. Employees with direct reports will 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.

## **4. Minimum accountabilities**

Under the *Instructions supporting the Standing Directions of the Minister for Finance 2016*, the VPSC has set binding minimum accountabilities for the appropriate management of gifts, benefits and hospitality. These can be found at Appendix A.

## **5. Management of offers of gifts, benefits and hospitality**

This section sets out the process for accepting, declining and recording offers of gifts, benefits and hospitality. Any exceptions to this process must have the prior written approval a member of the Executive team.

### **5.1 Conflict of interest and reputational risks**

When deciding whether to accept an offer, employees should first consider if the offer could be perceived as influencing them in performing their duties or lead to reputational damage. The more valuable the offer, the more likely that a conflict of interest or reputational risk exists.

**G Giver** **Who is providing the gift, benefit or hospitality and what is their relationship to me?**  
Does my role require me to select suppliers, award grants, regulate industries or determine government policies? Could the person or organisation benefit from a decision I make?

**I Influence** **Are they seeking to gain an advantage or influence my decisions or actions?**  
Has the gift, benefit or hospitality been offered to me publicly or privately? Is it a courtesy or a token of appreciation or a valuable non-token offer? Does its timing coincide with a decision I am about to make?

**F Favour** **Are they seeking a favour in return for the gift, benefit or hospitality?**  
Has the gift, benefit or hospitality been offered honestly? Has the person or organisation made several offers over the last 12 months?  
Would accepting it create an obligation to return a favour?

**T Trust** **Would accepting the gift, benefit or hospitality diminish public trust?**  
How would the public view acceptance of this gift, benefit or hospitality? What would my colleagues, family, friends or associates think?

## 5.2 Requirements for refusing offers

Employees should consider the GIFT test at Figure 1 and the requirements below to help decide whether to refuse an offer. Individuals are to refuse offers:

- likely to influence them, or be perceived to influence them, in the course of their duties or that raise an actual, potential or perceived conflict of interest
- could bring them, the LHA or the public sector into disrepute
- made by a person or organisation about which they will likely make or influence a decision (this also applies to processes involving grants, sponsorship, regulation, enforcement or licensing), particularly offers:
  - made by a current or prospective supplier
  - made during a procurement or tender process by a person or organisation involved in the process
- likely to be a bribe or inducement to make a decision or act in a particular way
- that extend to their relatives or friends
- of money, or used in a similar way to money, or something easily converted to money
- where, in relation to hospitality and events, the organisation will already be sufficiently represented to meet its business needs (generally this will be no more than three employees)
- where acceptance could be perceived as endorsement of a product or service, or acceptance would unfairly advantage the sponsor in future procurement decisions
- made by a person or organisation with a primary purpose to lobby Ministers, Members of Parliament or public sector organisations, or
- made in secret.

If an individual considers they have been offered a bribe or inducement, the offer must be reported to the Commissioner or General Counsel (who should report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-corruption Commission).

### 5.3 Token offers

A token offer is an offer of a gift, benefit or hospitality that is of inconsequential or trivial value to both the person making the offer and the individual. It may include promotional items such as pens and note pads, and modest hospitality which would be considered a basic courtesy, such as light refreshments offered during a meeting.

The minimum accountabilities state that token offers cannot be worth more than \$50.

Individuals may accept token offers of gifts, benefits and hospitality without prior approval or declaring the offer on LHA's Gifts, Benefits and Hospitality (GBH) register as long as the offer does not create a conflict of interest or lead to reputational damage.

LHA employees **must refuse** all offers (except for token hospitality, such as beverages or sandwiches over a lunchtime meeting or invitations to free seminars on legitimate business topics):

- made by a current or prospective supplier
- made during a procurement or tender process by a person or organisation involved in the process
- made by a person or organisation the LHA employee will likely make a decision under the *Labour Hire Licensing Act 2018*
- made by a person the LHA employee will likely make a decision involving recruitment.

### 5.4 Non-token offers

Individuals can only accept non-token offers if they have a legitimate business benefit. All accepted non-token offers must be approved in writing by the employee's manager or organisational delegate, recorded in the gifts, benefits and hospitality register and be consistent with the following requirements:

- it does not raise an actual, potential or perceived conflict of interest or have the potential to bring the individual, the LHA or the public sector into disrepute; and
- there is a legitimate business reason for acceptance. It is offered in the course of the individual's official duties, relates to the individual's responsibilities and has a benefit to the LHA, public sector or the State.

Individuals may be offered a gift or hospitality where there is no opportunity to seek written approval from their manager prior to accepting. For example, they may be offered a wrapped gift that they later identify as being a non-token gift. In these cases, the individual must seek approval from their manager within five business days.

Where the gift would likely bring you or the LHA into disrepute, the LHA should return the gift. If it represents a conflict of interest for you, the LHA should either return the gift or transfer ownership to the LHA to mitigate this risk.

LHA employees **must refuse** all non-token offers:

- likely to influence them, or be perceived to influence them, in the course of their duties or raise an actual, potential or perceived conflict of interest
- by a person or organisation about which they will likely make a decision (also applies to processes involving grants, sponsorship, regulation, enforcement or licensing)
- likely to be a bribe or inducement to make a decision or act in a particular way
- that extend to their relatives or friends
- with no legitimate business benefit
- of money, or used in a similar way to money, or something easily converted to money

- where, in relation to hospitality and events, the organisation will already be sufficiently represented to meet its business needs where acceptance could be perceived as endorsement of a product or service, acceptance would unfairly advantage the sponsor in future procurement decisions
- made in secret.

If an employee considers they have been offered a bribe or inducement, the offer must be reported to the Commissioner or General Counsel. Any criminal or corrupt conduct will be reported to the Independent Broad-based Anti-corruption Commission and Victoria Police.

### 5.5 Recording non-token offers of gifts, benefits and hospitality

All non-token offers, whether accepted or declined, must be recorded in the LHA’s gifts, benefits and hospitality register. The business reason for accepting the non-token offer must be recorded in the register with sufficient detail to link the acceptance to the individual’s work functions and benefit to the LHA, public sector or State.

Employees should consider the following examples of acceptable and unacceptable levels of detail to be included in the LHA’s register when recording the business reason:

<b>Unacceptable:</b>	<p>“Networking”</p> <p>“Maintaining stakeholder relationships”</p>
<b>Acceptable:</b>	<p>“Employee is responsible for evaluating and reporting outcomes of the LHA’s sponsorship of Event A. Employee attended Event A in an official capacity and reported back to the LHA on the event.”</p> <p>“Employee presented to a visiting international delegation. The delegation presented the employee with a cultural item worth an estimated \$200. Declining the gift would have caused offence. The Gift was accepted, written prior approval was subsequently obtained for the gift, which became property of the LHA.”</p>

Access to the register is restricted to relevant persons within the LHA.

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

The public register will contain a subset of the information detailed in the LHA’s internal register.

### 5.6 Ownership of gifts offered to employees

Non-token gifts with a legitimate business benefit that have been accepted by an employee for their work or contribution may be retained by the employee where their manager or organisational delegate has provided prior written approval. Employees must transfer to the LHA official gifts or any gift of cultural significance or significant value (over \$50).

## **5.7 Repeat offers**

Receiving multiple offers (token or non-token) from the same person or organisation can generate a stronger perception that the person or organisation could influence you. Employees should refuse repeat offers from the same source if they create a conflict of interest or may lead to reputational damage.

## **5.8 Ceremonial gifts**

Ceremonial gifts are official gifts provided as part of the culture and practices of communities and government, within Australia or internationally. Ceremonial gifts are the property of the organisation, irrespective of value, and should be accepted by individuals on behalf of the LHA. The receipt of ceremonial gifts should be recorded on the LHA's register but this information does not need to be published online.

## **5.9 Hospitality provided by Victorian Public Sector organisations**

Victorian public sector (VPS) organisations may provide hospitality to stakeholders, as part of their functions. When offered hospitality by a VPS organisation, employees should consider the requirements of the minimum accountabilities.

Accepted hospitality offered by a VPS organisation as part of official business does not need to be declared or reported, where the reason for the employee's attendance is consistent with the LHA's functions and objectives and with the employee's role.

# **6. Management of the provision of gifts, benefits and hospitality**

This section sets out the requirements for providing gifts, benefits and hospitality.

## **6.1 Requirements for providing gifts, benefits and hospitality**

Gifts, benefits and hospitality may be provided when welcoming guests, to facilitate the development of business relationships, to further public sector business outcomes and to celebrate achievements.

When deciding whether to provide gifts, benefits or hospitality, or the type of gift, benefit or hospitality to provide, individuals must ensure:

- any gift, benefit or hospitality is provided for a business reason that furthers the conduct of official business or other legitimate organisational goals, or promotes and supports government policy objectives and priorities
- that any costs are proportionate to the benefits obtained for the State, and would be considered reasonable in terms of community expectations (the 'HOST' test at Figure 2 is a good reminder of what to think about in making this assessment), and
- it does not raise an actual, potential or perceived conflict of interest.

**Figure 2. HOST test**

<b>H</b>	<b>Hospitality</b>	<b>To whom is the gift or hospitality being provided?</b> Will recipients be external business partners, or individuals of the host organisation?
<b>O</b>	<b>Objectives</b>	<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>	<b>Spend</b>	<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>	<b>Trust</b>	<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?

## 6.2 Containing costs

Employees should contain costs involved in the provision of gifts, benefits and hospitality wherever possible and should comply with the financial probity and efficient use of resources guidance outlined in the *Code of Conduct for Victorian Public Sector Employees*, or the *Code of Conduct for Directors of Public Entities*. The following questions may be useful to assist employees to decide the type of gift, benefit or hospitality to provide.

- Will the cost of providing the gift, benefit or hospitality be proportionate to the potential benefits?
- Is an external venue necessary or does the organisation have facilities to host the event?
- Is the proposed catering or hospitality proportionate to the number of attendees?
- Does the size of the event and number of attendees align with intended outcomes?
- Is the gift symbolic, rather than financial, in value?
- Will providing the gift, benefit or hospitality be viewed by the public as excessive?

Records relating to the provision of hospitality, such as approval forms and records relating to procurement and expenditure, must be retained in accordance with their requirements under the *Financial Management Act 1994*.

## 7. Related policy, legislation and other documents

This policy should be read in conjunction with other LHA integrity policies and guidance (and policies under development) including:

- Conflict of Interest Policy
- Fraud, Corruption Control Framework
- Misconduct Policy.

Other related policies and guidance include:

- Financial Code of Practice

- Procurement and Contract Management Toolkit
- Risk Management Policy and Framework
- *Code of conduct for Victorian Public Sector Employees 2015*
- *Code of conduct for Directors of Victorian Public Entities 2016*
- VPSC's Gifts, benefits and hospitality policy framework
- VPSC's Managing Conflicts of Interest: A Guide to Policy Development and Implementation
- *Standing Directions of the Minister for Finance 2016* (under the Financial Management Act 1994)

Relevant legislation includes:

- *Independent Broad-based Anti-Corruption Commission Act 2011*
- *Financial Management Act 1994*
- *Public Administration Act 2004*
- *Protected Disclosure Act 2012.*

## 8. Breaches

Disciplinary action consistent with the relevant industrial instrument and legislation, including dismissal, may be taken where an employee fails to adhere to this policy. This includes where an employee fails to avoid wherever possible or to identify, declare and manage a conflict of interest related to gifts, benefits and hospitality in accordance with the LHA's Conflict of Interest policy.

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

- breaches of the binding Code of Conduct for Victorian Public Sector Employees, such as sections of the code covering conflict of interest (section 3.7), public trust (section 3.9) and gifts and benefits (section 4.2)
- individuals making improper use of their position.

For further information on managing breaches of this policy, please contact General Counsel. The LHA will communicate its policy on the offering and provision of gifts, benefits and hospitality to contractors, consultants and other business associates. Those identified as acting inconsistently with this policy may be subject to contract re-negotiation, including termination.

### Speak up

Employees who consider that a gifts, benefits and hospitality or conflict of interest within the Authority may not have been declared or is not being appropriately managed should speak up and notify their manager or General Counsel.

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

### Contacts for further information

A conflict of interest resulting from the acceptance of a gift, benefit or hospitality is not always clear to those who have them. Employees who are unsure about accepting a gift, benefit or hospitality, or the application of this policy, should ask their manager or Chief Operating Officer for advice.

## Appendix A: Victorian Public Sector Minimum Accountabilities

### Public officials offered gifts, benefits and hospitality:

1. Do not, for themselves or others, seek or solicit gifts, benefits and hospitality.
2. Refuse all offers of gifts, benefits and hospitality that:
  - are money, items used in a similar way to money, or items easily converted to money
  - give rise to an actual, potential or perceived conflict of interest
  - may adversely affect their standing as a public official or which may bring their public sector employer or the public sector into disrepute
  - are non-token offers without a legitimate business benefit
3. Declare all non-token offers (valued at \$50 or more) of gifts, benefits and hospitality (whether accepted or declined) on their organisation's register, and seek written prior approval from their manager or organisational delegate to accept any non-token offer
4. Refuse bribes or inducements and report inducements and bribery attempts to the head of the public sector organisation or their delegate (who should report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-Corruption Commission).

### Public officials providing gifts, benefits and hospitality:

5. Ensure that any gift, benefit and hospitality 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
6. Ensure that any costs are proportionate to the benefits obtained for the State and would be considered reasonable in terms of community expectations
7. Ensure that when hospitality is provided, individuals demonstrate professionalism in their conduct and uphold their obligation to extend a duty of care to other participants.

### Heads of public sector organisations:

8. Establish, implement and review organisational policies and processes for the effective management of gifts, benefits and hospitality that comprehensively address these minimum accountabilities
9. Establish and maintain a register for gifts, benefits and hospitality offered to public officials that, at a minimum, records sufficient information to effectively monitor, assess and report on these minimum accountabilities
10. Communicate and make clear within the organisation that a breach of the gifts, benefits and hospitality policies or processes may constitute a breach of binding codes of conduct and may constitute criminal or corrupt conduct, and may result in disciplinary action
11. Establish and communicate a clear policy position to business associates on the offering of gifts, benefits and hospitality to employees, including possible consequences for a business associate acting contrary to the organisation's policy position (this must take into consideration any Whole of Victorian Government supplier codes of conduct)
12. Report at least annually to the organisation's audit committee on the administration and quality control of its gifts, benefits and hospitality policy, processes and register including analysis of the organisation's gifts, benefits and hospitality risks (including repeat offers from the same source and offers from business associates), risk mitigation measures and any proposed improvements
13. Publish the organisation's gifts, benefits and hospitality policy and register on the organisation's public website which should cover the current and the previous financial year end
14. Establish, implement and review organisational policies and processes for the effective management of gifts, benefits and hospitality that comprehensively address these minimum accountabilities.

## Appendix B: Gifts, Benefits and Hospitality Declaration Form

This declaration form supports the LHA's Gifts, Benefits and Hospitality Policy. Employees must declare all non-token offers of gifts, benefits and hospitality (whether accepted or declined) using this form and seek written prior approval from their manager or the Chief Operating Officer to accept any non-token offer.

Individual to complete			
<b>Name</b>		<b>Declaration date</b>	
<b>Position title</b>		<b>Contact number</b>	
<b>Branch</b>		<b>Division</b>	
Details of the gift benefit or hospitality			
1. Date offered			
2. Describe the gift, benefit or hospitality offered			
3. Estimated or actual value			
4. Offered by (name of individual/organisation making the offer)			
5. Is the person or entity making the offer a business associate of the organisation (Y/N)? If yes, describe the relationship between them and the organisation. If no, describe the relationship between you and the person or organisation making the offer.			
6. Reason for making the offer			
7. Would accepting the offer: a) create an actual potential or perceived conflict of interest exist (Y/N); or b) bring you, the organisation or the public sector into disrepute (Y/N)?  (If either is answered YES, then the offer must be declined in accordance with the minimum accountabilities)	Detail of conflict of interest:		
8. Is there a legitimate business benefit to the organisation, public sector or State for accepting the offer, i.e. does it meet the following?	Detail of business benefit:		



