



Gifts, Benefits & Hospitality Procedure

December 2025

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1. Procedure Statement

Key points

The default position is *'thanks is enough'* - politely decline any non-token offers of gifts, benefits and hospitality (GBH). MAP Co persons should be mindful of any perception that the provision of GBH is excessive or inappropriate.

All non-token offers (i.e. valued at \$50 or greater) whether accepted or declined must be registered on the internal GBH Register. A subset of this information will then be published on the public register on MAP Co's website.

1.1 Purpose

The purpose of this *Gifts, Benefits & Hospitality (GBH) Procedure* is to set out the process of the Melbourne Arts Precinct Corporation (MAP Co) for responding and providing offers of GBH.

This procedure is intended to support individuals and MAP Co to avoid conflicts of interest and to maintain high levels of integrity and trust.

1.2 Scope

This procedure applies to all workplace participants, including executives, board members, employees, contractors, consultants and any individuals or groups undertaking activities for or on behalf of MAP Co. This builds upon the Victorian Public Sector Commission (VPSC) minimum accountability for the management of GBH [available here](#).

2. Definitions

Term	Definition
Benefits	Benefits are preferential treatment, privileged access, favours or other advantages offered. They include invitations to sporting, cultural or social events, access to discounts and loyalty programs and promises of a new job.
Business Associate	Business associate means an external individual or entity that MAP Co has, or plans to establish, some form of business relationship with, or who may seek commercial or other advantage by offering GBH.
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 usually provided when conducting business with official delegates or representatives from another organisation, community or foreign government.

<p>Conflict of Interest</p>	<p>Conflicts of interest may be:</p> <ul style="list-style-type: none"> (a) Actual: There is a real and current conflict between your private interests and performing your role for or on behalf of MAP Co. (b) Potential: Your private interests could conflict with your current or future duties for or on behalf of MAP Co. This refers to circumstances where it is foreseeable that a conflict may arise in the future and steps should be taken now to mitigate that future risk. (c) Perceived: The public or a third party could reasonably form the view that your private interests could improperly influence your decisions or actions for or on behalf of MAP Co, now or in the future.
<p>Internal Register</p>	<p>The official record of all declarable offers of gifts, benefits and hospitality made to our employees or organisation whether accepted or declined.</p>
<p>Gifts</p>	<p>Gifts are free or discounted items 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) and consumables (e.g. chocolates). Fundraising by public sector organisations that is consistent with relevant legislation and any government policy is not prohibited under the minimum accountabilities.</p>
<p>Hospitality</p>	<p>Hospitality is 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>
<p>Legitimate Business Benefit</p>	<p>Legitimate business benefits are GBH accepted or provided that furthers the conduct of official business or other legitimate goals of MAP Co, the public sector or the State.</p>
<p>Non-token Offer</p>	<p>A non-token offer is a GBH that is, or may be perceived by the recipient, the person making the offer or by the wider community, to be of more than inconsequential value. All offers worth more than \$50 are non-token offers and must be declared and recorded on the GBH Register.</p>
<p>Public Register</p>	<p>The official record of information made public from our organisation’s internal register, to be published on the MAP Co website.</p>

Responsible Person	<p>The Responsible Person is the relevant person, set out in the table below, that you must:</p> <ul style="list-style-type: none"> (a) notify about receiving non-token offers of GBH (by completing and submitting a GBH Form); and (b) provide your completed GBH Forms to, for the approval and acceptance of GBH offers; and (c) seek advice from in relation to offers of GBH, and the provision of GBH. <table border="1" data-bbox="472 526 1364 694"> <thead> <tr> <th>Role</th> <th>Responsible person</th> </tr> </thead> <tbody> <tr> <td><i>MAP Co employee:</i></td> <td><i>Your MAP Co Manager</i></td> </tr> <tr> <td><i>CEO:</i></td> <td><i>MAP Co Board Chairperson</i></td> </tr> <tr> <td><i>MAP Co Board member:</i></td> <td><i>MAP Co Board Chairperson</i></td> </tr> <tr> <td><i>MAP Co Board Chairperson:</i></td> <td><i>Deputy Chairperson</i></td> </tr> </tbody> </table>	Role	Responsible person	<i>MAP Co employee:</i>	<i>Your MAP Co Manager</i>	<i>CEO:</i>	<i>MAP Co Board Chairperson</i>	<i>MAP Co Board member:</i>	<i>MAP Co Board Chairperson</i>	<i>MAP Co Board Chairperson:</i>	<i>Deputy Chairperson</i>
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Official Business Events	<p>OBEs are invitations to events, that are relevant to core business activities, and where:</p> <ul style="list-style-type: none"> • the person / organisation issuing the invitation, or being invited, has a direct business interest with the agency; and • the agency person accepting the invitation or hosting the event has a role that relates directly to the event and / or industry within which the event is occurring; and • attendance at or hosting the event will not create an actual, potential or perceived conflict of interest that cannot be managed; and • attendance at or hosting the event will provide for at least one of the following outcomes – business leveraging, stakeholder engagement, sector knowledge or professional knowledge. 										
Token Offer	<p>A token offer is a GBH that is of inconsequential or trivial value to both the person making the offer and the recipient (such as basic courtesy). Token offers are not worth more than \$50.</p>										

3. Receiving offers of GBH

3.1 Do not solicit offers

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

3.2 Integrity test

a) Money or similar

You must refuse the offer if it is money, used in a similar way to money, or easily converted to money.

b) 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 duties and make decisions.

c) Public Trust

You must refuse the offer if it could compromise the public’s trust that you’ll perform your job in an impartial manner or the public’s trust in the impartiality of your organisation or the public sector.

d) 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.

e) Community expectations

You must refuse the offer (token or non-token) if it is not consistent with community expectations.

f) Bribe

You must refuse the offer if it could reasonably be seen as a bribe or other inducement. Report the offer to the Director, Policy Strategy and Governance. They will report relevant conduct to [Victoria Police](#) or the [Independent Broad-based Anti-corruption Commission](#).

g) 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

h) Offers by suppliers or contractors

Accepting offers from suppliers for free or discounted development opportunities that they were not engaged to provide will not pass the integrity test in some circumstances. 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.

i) Endorsement

Refuse the offer if accepting it could reasonably be seen as endorsing a product or service.

j) 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.

k) 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](#). This is a broad test that you can use to protect yourself if you are still unsure about accepting an offer. If you’re uncertain, you can seek advice from your manager.

3.3 Guide- whether to accept or refuse

You can use the following GIFT questions to help assess whether to accept or refuse a particular gift, benefit or hospitality.

G	Giver	<ol style="list-style-type: none"> 1. Who is providing the GBH and what is their relationship to me? 2. Does my role require me to select suppliers, award grants, regulate industries or determine government policies? 3. Could the person or organisation benefit from a decision I make?
I	Influence	<ol style="list-style-type: none"> 4. Are they seeking to gain an advantage or influence my decisions or actions? 5. Has the GBH been offered to me publicly or privately? 6. Is it a courtesy or a token of appreciation or a valuable non-token offer? 7. Does its timing coincide with a decision I am about to make?
F	Favour	<ol style="list-style-type: none"> 8. Are they seeking a favour in return for the GBH? 9. Has the GBH been offered honestly? 10. Has the person or organisation made several offers over the last 12 months? 11. Would accepting it create an obligation to return a favour?
T	Trust	<ol style="list-style-type: none"> 12. Would accepting the GBH diminish public trust? 13. How would the public view acceptance of this GBH? 14. What would my colleagues, family, friends or associates think?

3.4 Token offers- what you must do

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

- You can only accept the offer if it passes the ‘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.

1.3 Non-Token Offers- what you must do

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 ‘**integrity test**’.
- As part of the integrity test, you must have a **legitimate business reason** to accept.
- You must have 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.
- The offer and outcome are recorded in the internal register. Certain information may also be published in the online public register.

3.5 How to declare an offer

You must declare a non-token offer, **whether accepted or declined**.

To declare a non-token offer:

- Use the declaration form available on the [Wiki](#).
- If you accept the offer, record the business reason on the form in enough detail to link it with your duties and the benefit to our organisation, the public sector or the State.
- Submit the form to your manager, who will arrange for the offer and outcome to be recorded in the internal register.

3.6 Internal and Public Register

The PSG team maintains MAP Co's internal GBH Register and transfers the relevant details from your declaration onto the GBH Register.

A subset of the internal register's details will be included in the public register, consistent with VPSC guidance. The public register must be published on the MAP Co website annually.

MAP Co's Finance & Audit Committee (FAC) will receive a report at least annually on the administration and quality control of the GBH register and declaration process and will endorse the public register before publishing.

3.7 Ownership of gifts offered to individuals

If you accept a non-token offer of GBH, you accept this offer on behalf of MAP Co. Ownership of the gift remains with MAP Co until the Responsible Person approves the retention of the gift.

You must transfer to MAP Co, official gifts or any gift of cultural significance or significant value.

If a gift is of cultural, historic or other significance it will be offered to an appropriate public institution, such as the Melbourne Museum or the National Gallery of Victoria. Consideration will be given to donating other reportable gifts, or the proceeds from their sale to a non-profit organisation.

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 our organisation into disrepute
- it would be consistent with community expectations, and
- your manager or appropriate delegate gives written approval.

3.8 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 integrity test, consider the GIFT questions and follow this policy as you would in your professional capacity.

3.9 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 MAP Co.

The receipt of ceremonial gifts should be recorded on the internal Register but does not need to be published on the Public Register.

3.10 Hospitality provided by Victorian Public Sector Organisations

Victorian public sector organisations may provide hospitality to stakeholders, as part of their functions. When hospitality is offered to you by another Victorian public sector organisation, you should consider the requirements of the minimum accountabilities (refer to Schedule A).

If you accept hospitality offered by a Victorian public sector organisation as part of official business for MAP Co, this does not need to be declared or reported on the internal Register, where the reason for your attendance is consistent with MAP Co's functions and objectives and your role for or on behalf of MAP Co.

3.11 Multi-employee declaration

Sometimes, our organisation will prepare a non-token declaration on behalf of all or some of our employees (e.g. show tickets made available to all staff). If this happens, we will let the relevant employees know, as it means they don't need to make an individual declaration of a non-token offer. These declarations will be issued by the PSG team.

3.12 Generic offers refused not required to be declared

In the course of your public duties you may receive generic offers of non-token gifts or benefits. For example: 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.

4. Official Business Events

MAP Co staff must consider whether attendance at, or an offer to attend, any event constitutes a registrable benefit or hospitality as a default position. Exemptions to this default position includes attendance at Official Business Events (OBEs).

Some core business activities of the agency involve attending Official Business Events (OBEs). MAP Co staff must keep a record of all OBE invitations received and must declare all OBEs accepted via the GBH form. The relevant outcome (noted above) must be identified via the declaration. Relevant managers must sign and approve declaration forms.

For an offer to qualify as an OBE, the following must be identified:

- the person / organisation issuing the invitation, or being invited, has a direct business interest with the agency; and
- the agency person accepting the invitation or hosting the event has a role that relates directly to the event and / or industry within which the event is occurring; and
- attendance at or hosting the event will not create an actual, potential or perceived conflict of interest that cannot be managed; and

- attendance at or hosting the event will provide for **at least one** of the following outcomes –
 - **business leveraging:** opportunities to advance the State’s interests through networking with third parties interested in trade and investment, and other collaboration opportunities; or
 - **stakeholder engagement:** opportunities to maintain and develop effective relationships and networks with persons and organisations with interest in the agency’s activities; or
 - **sector knowledge:** opportunities to develop and maintain a broad and deep knowledge of industry sectors, to inform the quality of the advice given to the government, and assist to identify opportunities to improve sector outcomes; or
 - **professional knowledge:** opportunities to develop and maintain knowledge relating to a qualification (e.g., CPD points), build expertise or understanding in relation to a technical business-related area (e.g., new approaches in a professional field) or become acquainted with new responsibilities such as legislative changes.

Managers and executives with direct reports are accountable for oversight of their team’s handling of OBE invitations.

5. Providing offers of GBH

5.1 Integrity test

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

a) Business reason

Ensure it is for a 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.

Some examples of legitimate business reasons are to:

- welcome guests
- facilitate the development of business relationships and outcomes
- celebrate achievements.

b) No conflict of interest

Ensure it does not raise a conflict of interest (actual, potential or perceived).

c) Proportionate costs

Ensure that any costs incurred are proportionate to the benefits obtained for the State.

d) Consistent with community expectations

Ensure that the event would be considered reasonable and consistent with community expectations.

5.2 Guide- whether to provide GBH to others

You can use the following HOST questions to help you assess if providing a particular gift, benefit or hospitality would comply with the ‘Integrity test – providing’ above.

H	Hospitality	<ol style="list-style-type: none"> 1. To whom is the gift or hospitality being provided? 2. Will recipients be external business associates, or individuals of the host organisation?
O	Objectives	<ol style="list-style-type: none"> 3. For what purpose will hospitality be provided? 4. Is the hospitality being provided to further the conduct of official business? 5. Will it promote and support government policy objectives and priorities? 6. Will it contribute to staff wellbeing and workplace satisfaction?
S	Spend	<ol style="list-style-type: none"> 7. Will public funds be spent? 8. What type of hospitality will be provided? 9. Will it be modest or expensive, and will alcohol be provided as a courtesy or an indulgence? 10. Will the costs incurred be proportionate to the benefits obtained?
T	Trust	<ol style="list-style-type: none"> 11. Will public trust be enhanced or diminished? 12. Could you publicly explain the rationale for providing the gift or hospitality? 13. Will the event be conducted in a manner which upholds the reputation of the public sector? 14. Have records in relation to the gift or hospitality been kept in accordance with reporting and recording procedures?

6. Responsibilities

Role	Responsibilities
MAP Co Board Chairperson	<ol style="list-style-type: none"> (a) Ensuring that MAP Co Board members are aware of this Procedure. (b) Promoting awareness of and compliance with this Procedure; (c) Reviewing this Procedure at least every 3 years; and (d) Reviewing MAP Co's internal and public register entries at least annually.
Finance & Audit Committee (FAC)	<ol style="list-style-type: none"> (a) Reviewing this Procedure at least every 3 years for Board endorsement. (b) Reviewing MAP Co's internal and public register entries at least annually; and (c) Review a report at least annually on administration and quality control practices of the GBH process.
Chief Executive Officer (CEO)	<ol style="list-style-type: none"> (a) Ensuring that MAP Co persons and MAP Co Board members are aware of this Procedure; (b) Promoting awareness of and compliance with this Procedure; (c) Ensuring that this Procedure is: <ol style="list-style-type: none"> (i) consistent with the minimum accountabilities set out under the Gifts, Benefits and Hospitality Framework issued by the VPSC;

	<ul style="list-style-type: none"> (ii) communicated to Board members and MAP Co persons; (iii) reviewed at least every 3 years ; and (iv) Communicating and making clear that a breach of this procedure may constitute a breach of binding Codes of Conduct, may constitute criminal or corrupt conduct, and may result in disciplinary action.
Policy, Strategy & Governance (PSG) team	<ul style="list-style-type: none"> (a) Advising MAP Co persons on their obligations under this Procedure. (b) Receiving declaration Forms and updating and maintaining MAP Co’s internal Register. (c) Reporting periodically to the relevant Board committee on new entries in the internal Register. (d) Undertaking periodic reviews of the MAP Co’s compliance with this Procedure. (e) Reporting to the relevant Board committee periodically on the outcome of compliance reviews of this Procedure; (f) Publishing this Procedure and the internal Register on MAP Co’s website, as required by legislation; and (g) Ensuring that this Procedure is included in the Internal Audit Plan.
MAP Co employees and MAP Co Board members	<ul style="list-style-type: none"> (a) Comply with this Procedure; and (b) Contribute to a culture of integrity and deal with offers of GBH by placing the public interest above their private interests.
Managers, Financial Delegates and Supervisors	<ul style="list-style-type: none"> (a) Assess declarations of GBH in line with this policy prior to acceptance where possible, and <ul style="list-style-type: none"> o ensure acceptance does not raise an actual, potential or perceived conflict of interest or have the potential to bring the individual, their agency or the public sector into disrepute o ensure there is a legitimate business reason for acceptance, i.e. it is offered in the course of the agency person’s official duties, relates to their responsibilities and has a benefit to the agency, public sector or the State (b) Satisfy themselves that any expenditure for the provision of GBH is in full compliance with this policy, and not approve any claims that do not satisfy policy requirements, including any retrospective claims submitted for reimbursement (c) Seek advice from the Chief Procurement Officer who can consult DJPR Integrity Services should you feel uncertain on decisions in relation to GBH

7. Dealing with an alleged breach

If you may have breached this policy notify your manager in writing immediately. This enables us to assess how best to mitigate the risk – for example, we may arrange to return the gift.

7.1 MAP Co’s response to a breach

Our organisation will respond to alleged breaches of this policy consistent with the Act, the code, this policy and any other obligations that apply.

We will take a graduated approach. 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, for example, through education or counselling
- 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.

7.2 Speak up

Individuals who consider that GBH or conflict of interest within MAP Co may not have been declared or is not being appropriately managed should speak up and notify their manager or a member of the PSG Team.

Alternatively, if you believe corrupt or improper conduct is occurring, you can make a complaint directly to IBAC. Refer to MAP Co’s *Public Interest Disclosures Procedure*.

8. Related Documents

DOCUMENT TYPE	REFERENCES
Legislation	Public Administration Act 2004 (Vic)
Government Policies	VPSC Gifts, benefit and hospitality policy guide Gifts, benefits and hospitality minimum accountabilities <i>(Instructions supporting the Standing Directions)</i> Code of Conduct for Victorian Public Sector Employees Code of Conduct for Directors of Victorian Public Entities
MAP Co Policy & Procedures	<i>Conflict of Interest Policy</i> <i>Public Interest Disclosures Procedure</i> <i>GBH Declaration Form</i> <i>MAP Co internal Register</i>

9. Version Control

VERSION	DATE OF RELEASE	AUTHOR	KEY CHANGES FROM PREVIOUS VERSION
1	April 2022	PSG	N/A
2	November 2022	PSG	Formatting and template update.
3	December 2025	PSG	Template update, substantial content update in alignment with updated VPSC model policy.

10. Review Details

DOCUMENT TYPE	POLICY
Approved By	MAP Co Board

Date Approved	April 2022
Author / Contact	Director, Policy, Strategy & Governance
Lead – Corporate Area	Policy, Strategy & Governance
Review Cycle	3 years
Next Review Date	December 2028