



GIFTS, BENEFITS & HOSPITALITY

Policy 2026

PURPOSE

This policy sets out the obligations of Baden Powell College personnel (including employees, School Council members, contractors, consultants and volunteers where applicable) when making or receiving offers of gifts, benefits or hospitality. The policy aligns with the Department of Education's Gifts, Benefits and Hospitality Policy and supports the College's commitment to integrity, impartiality, accountability and maintaining public trust.

The objectives of this policy are to:

- distinguish modest tokens of appreciation or hospitality from inducements, conflicts of interest or non-token offers without a legitimate business benefit.
- ensure gifts, benefits and hospitality are managed in accordance with community expectations and Department requirements.
- support staff and School Council members to identify and appropriately manage actual, potential or perceived conflicts of interest.
- maintain public confidence in the integrity and transparency of decision making at Baden Powell College.

SUMMARY

- Baden Powell College adopts the Department's "Thanks is Enough" approach. Staff should politely decline offers from suppliers or organisations where acceptance could create an actual, potential or perceived conflict of interest.
- All personnel must comply with the Minimum Accountabilities outlined in the Department's Gifts, Benefits and Hospitality Policy.
- Personnel must not seek or solicit gifts, benefits or hospitality for themselves or others.
- Personnel must refuse any offer that creates an actual, potential or perceived conflict of interest.
- Personnel must refuse any non-token offer that does not have a legitimate business benefit.
- Personnel must refuse offers from suppliers, prospective suppliers or organisations about whom they are likely to make or influence business decisions.
- Cash, cash equivalents or items easily converted to cash must never be accepted.
- All non-token offers (valued at \$50 or more) must be declared in the Department's Gifts, Benefits and Hospitality Registry System within 5 days, whether accepted or declined.
- Gifts of Appreciation from students, parents or carers provided to members of the Teaching Service with an estimated value greater than \$50.00 must be declared, regardless of whether accepted or declined.
- Authorised Delegates must approve any proposed acceptance of non-token offers within 10 days, where possible prior to acceptance.
- School Council will review the Gifts, Benefits and Hospitality Register at least annually.
- The Department publishes an annual de-identified Gifts, Benefits and Hospitality Register report.

DETAILS

The Department-wide Gifts, Benefits and Hospitality Policy contributes to the management of conflicts of interest and supports the maintenance of high standards of integrity and public trust. Personnel are expected to exercise sound judgement and ensure that acceptance or provision of any gift, benefit or hospitality can withstand public scrutiny. Requirement to Refuse Offers of Gifts, Benefits and Hospitality. Personnel must consider both the GIFT Test and the requirements below before accepting any offer.

GIFT Test

Before accepting an offer, personnel should ask:

G – Giver

- Who is providing the gift, benefit or hospitality?
- What is their relationship to me or the College?

I – Influence

- Are they seeking to influence my decisions or actions?

F – Favour

- Are they expecting a favour or preferential treatment in return?

T – Trust

- Would accepting the offer diminish public trust in my integrity or the integrity of Baden Powell College?

If the answer to any of these questions raises concern, the offer must be declined.

Personnel must refuse offers that:

- are likely to influence, or be perceived to influence, official duties
- create an actual, potential or perceived conflict of interest
- may bring the College, Department or Victorian Public Sector into disrepute
- are made by a current or prospective supplier, tenderer or organisation about which personnel are likely to make business decisions
- are offered during procurement, tender or purchasing processes
- constitute a bribe or inducement
- extend to relatives or friends
- consist of money, cash equivalents or items easily converted to money
- exceed what is reasonably required to meet legitimate business needs
- could be perceived as endorsing a product or service
- are offered by organisations whose primary purpose is lobbying Ministers, Members of Parliament or public sector agencies
- are made in secret.

Any suspected bribe or inducement must immediately be reported to the Principal (or relevant Authorised Delegate) who will take action in accordance with Department policy.

Thanks is Enough

The preferred response to offers from suppliers and organisations with whom the College conducts business is to politely decline by saying: "Thank you, but thanks is enough."

Minimum Accountabilities

Personnel must:

1. not seek or solicit gifts, benefits or hospitality for themselves or others
2. refuse offers that:
 - are non-token offers without a legitimate business benefit
 - create an actual, potential or perceived conflict of interest
 - extend to relatives or friends

- are from individuals or organisations about whom they are likely to make business decisions
 - consist of money or cash equivalents
 - may adversely affect their standing as a public official or bring the College or Department into disrepute
 - originate from organisations whose primary purpose is lobbying Ministers, Members of Parliament or public sector agencies
3. refuse all bribes or inducements and immediately report them
 4. declare all accepted ceremonial gifts and all non-token offers (accepted or declined) within five days through the Department Registry System

Authorised Delegates must:

1. assess declarations and determine whether proposed acceptance is appropriate
2. approve or decline declarations within ten days where possible before acceptance
3. monitor compliance with this policy
4. provide guidance where required
5. report suspected criminal or corrupt conduct in accordance with Department requirements.

When to Declare Offers

The following must be declared in the Department Registry System:

- all non-token offers (accepted or declined)
- all accepted ceremonial gifts.

Declarations must be completed within five days of receiving the offer.

Gifts of Appreciation

Students, parents and carers may choose to express appreciation to members of the Teaching Service.

The following applies:

- Gifts of Appreciation differ from gifts offered by suppliers or businesses.
- The total value of a class or group gift determines whether it is token or non-token.
- Non-cash vouchers provided as Gifts of Appreciation may be accepted where appropriate.
- Gifts valued at more than \$50.00 must be declared and approval sought through the Registry System.

Related Policies

- Department of Education Gifts, Benefits and Hospitality Policy
- Conflict of Interest Policy
- Code of Conduct
- Procurement Policy
- Public Administration Act 2004
- Victorian Public Sector Code of Conduct
- School Council Code of Conduct

EVALUATION:

This policy will be reviewed as part of the school's three year review cycle