



GIFTS AND HOSPITALITY POLICY

Version 2

PURPOSE

This policy will establish clear guidelines for the acceptance of gifts or hospitality by Geelong Kindergarten Association (GKA) employees to avoid any potential conflicts of interest.

This policy will act as a guide to all employees as to what they need to do when considering whether to accept gifts or hospitality.

POLICY STATEMENT

1. VALUES

The Geelong Kindergarten Association is committed to:

- Providing clear boundaries as to when gifts and hospitality may and may not be accepted.
- Implementing strategies that effectively minimise or eradicate the likelihood of conflict of interest in regard to the acceptance of gifts and hospitality.

2. SCOPE

This policy applies to the Approved Provider, Nominated Supervisor, Certified Supervisor, educators. Staff, students on placement, volunteers, parents/guardians, children and others attending the programs and activities of a GKA service.

3. BACKGROUND AND LEGISLATION

Background

GKA recognize that there is a duty of care to provide a safe working environment for its employees, in this regard protecting them from compromising situations. Importantly the giving of gifts can involve a conflict of interest or the perception of a conflict of interest which is inappropriate.

The purpose of this policy is not to endorse nor encourage the exchange of gifts and hospitality. Instead the policy aims to ensure such exchanges are limited to appropriate circumstances and are undertaken in an ethical manner that will not compromise the reputation of GKA or its employees.

The policy will further enforce that individuals must not accept gifts or hospitality that influence, or give the impression to influence any decisions unfairly. Whenever GKA employees accept gifts and hospitality they must always act fairly and objectively and maintain trust by being honest, open and transparent.

4. DEFINITIONS

The terms defined in this section relate specifically to this policy. For commonly used terms e.g. Approved Provider, Nominated Supervisor, Regulatory Authority etc. refer to the *General Definitions* section of this policy.

Gifts - Free or heavily discounted items, intangible benefits or hospitality exceeding common courtesy. They are unsolicited and meant to convey a feeling of goodwill on behalf of the giver and where there is no expectation of favours or repayment. Some examples of these types of gifts could include:

- Clothes
- Products
- Tickets
- Trinkets (ties, scarves, coasters, tie pins)
- Flowers
- Single bottles of reasonably priced wine
- Food e.g. chocolates and cakes

With a value of greater than \$100.

Hospitality - is the provision of food or beverages, travel, accommodation or entertainment offered to convey goodwill on behalf of the giver for which there is no expectation of favours or repayment. Hospitality is a form of Gift but for the purpose of this policy is dealt with separately.

Bribe – Money, reward or service offered to procure action, decision, or preferential treatment in favour of the giver or another person.

Conflict of Interest - Any private or personal interest, which could prejudicially influence, or be perceived to influence, a person in the performance of his or her public or professional duties.

Cash - Money or vouchers which are readily convertible.

5. SOURCES AND RELATED POLICIES

Sources

- Staff Induction Manual

Service policies

- Code of Conduct
- GKA Values

PROCEDURES

Guidelines

GKA is committed to being open and transparent in its operations to ensure that it minimises the risk of being placed in a compromising position. As a guide, the following principles should be followed in regard to the acceptance of gifts and hospitality:

- Should not seek, solicit, or use their position with GKA to obtain gifts or benefits from external individuals.
- Must not accept gifts or hospitality that influence, or give the impression to influence any decision unfairly. Whenever a GKA employee accepts gifts or hospitality they must always act fairly and objectively.
- Refuse all offers of gifts or hospitality from people or organisations about which they are likely to make decisions.
- Seek advice from their manager/supervisor or other appropriate delegate if unsure about how to respond to an offer of a gift or hospitality of more than nominal value.
- Report any incidences where a Bribe and/or cash is offered.

Acceptance of Gifts

GKA employees must not solicit gifts or hospitality. Offers of money must not be accepted.

The following principles apply to GKA employees in relation to the acceptance of Gifts or Hospitality.

- 'Gifts' that are of an infrequent nature and that are unsolicited may be accepted.
- If a Gift or Hospitality cannot be declined or returned, or if refusal has the potential to damage a GKA relationship, then it may be received, but must be reported immediately.
- It may be determined that GKA retain or appropriately dispose of Gift or instruct that any Gift may not be received or retained either generally or from specific persons or organisations.

Acceptance of Hospitality

GKA employees, in the normal course of their duties will from time to time receive invitations of hospitality to attend various functions and events. Where such hospitality is only modest in nature and provides an opportunity to network or undertake business of common purpose, it may be appropriate to accept such invitations. Where practical approval should be obtained prior to attendance.

Examples:

- A business meeting to discuss matters of GKA interest at which a meal or refreshments are served
- Attendances as a representative of GKA at promotional events, meetings or activities where there is value or benefits for GKA.

If however, acceptance of the hospitality is likely to create the impression that an attempt is being made to compromise the impartiality of GKA or an employee, or could be perceived as a Conflict of Interest, than the offer of hospitality should be politely declined. Any hospitality estimated to be in excess of \$100 must be reported in the same manner as a gift.

Approval and Reporting

Details of gifts or hospitality whose value exceeds \$100 shall be detailed in the Register of Gifts and Hospitality on Attachment 1 and the responsible Kindergarten Services Manager or other appropriate delegate shall determine the most appropriate treatment method for the Gift or Benefit.

EVALUATION

In order to assess whether the values and purposes of the policy have been achieved, GKA will:

- regularly seek feedback from everyone affected by the policy regarding its effectiveness
- monitor the implementation, compliance, complaints and incidents in relation to this policy
- keep the policy up to date with current legislation, research, policy and best practice
- revise the policy and procedures as part of the service's policy review cycle, or as required
- Implement a reporting system in regards to Gifts and Hospitality received and declined.

ATTACHMENTS

- Attachment 1: Register of Gifts and Hospitality

AUTHORISATION

This policy was adopted by the Geelong Kindergarten Association on 27 October 2015

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REVIEW DATE: 31ST AUGUST 2017

