



GIFTS AND HOSPITALITY POLICY

PURPOSE

This policy will establish clear guidelines for the acceptance of gifts or hospitality by Bethany Kindergarten Services (BKS) 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

VALUES

BKS 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.

SCOPE

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

BACKGROUND AND LEGISLATION

Background

BKS 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 BKS 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 BKS employees accept gifts and hospitality they must always act fairly and objectively and maintain trust by being honest, open and transparent.

DEFINITIONS

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.

SOURCES AND RELATED POLICIES

Service Policies

- Code of Conduct
- BKS Values

PROCEDURES

Guidelines

BKS 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. Employees:

- Should not seek, solicit, or use their position with BKS 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 BKS 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 the BKS Executive Manager 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

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

The following principles apply to BKS 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 BKS relationship, then it may be received, but must be reported to the Executive Manager.
- It may be determined that BKS retain or appropriately dispose of the gift or instruct that any gift may not be received or retained either generally or from specific persons or organisations.

Acceptance of Hospitality

BKS 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 BKS interest at which a meal or refreshments are served
- Attendances as a representative of BKS at promotional events, meetings or activities where there is value or benefits for BKS.

If however, acceptance of the hospitality is likely to create the impression that an attempt is being made to compromise the impartiality of BKS or an employee, or could be perceived as a Conflict of Interest, then 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 (Refer Attachment 1) and the responsible Executive 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, BKS will:

- 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 BKS on 27 October 2015 and last update on 1 July 2017.

REVIEW DATE: 1 JULY 2019

