

# Gifts, Benefits and Hospitality

## Compliance Policy



### Purpose

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This policy provides a framework for managing the risks associated with Arts Centre Melbourne (ACM) giving and receiving offers of gifts, benefits and hospitality (GBH).

The framework has been developed in accordance with requirements outlined in the *Minimum Accountabilities for managing gifts, benefits and hospitality* issued by the Victorian Public Sector Commission (VPSC) in October 2016 and the Code of Conduct for Victorian Public Sector employees (the Code).

***Note: VPSC minimum accountabilities require ACM and other public sector organisations to publish on their web site all non-token\* offers of gifts, benefits or hospitality received, irrespective of whether or not they are accepted or declined.***

*\*Non-token is defined as an offer valued over \$50.*

### Scope and Exclusions

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The policy applies to all persons employed or engaged by ACM including Team Members, Trustees, Foundation Members, Contractors and Consultants.

The following activities are specifically excluded from the scope of this policy:

- a) Offers of gifts, benefits or hospitality received by you in a private capacity unrelated to your role or responsibilities at Arts Centre Melbourne. This includes attendance by you at a particular event as a family member's guest.
- b) Invitations to attend "Official Business Events" as defined in Attachment A: Definitions.
- c) Invitations to State Government functions or events that are directly related to Hospitality offered by state government public sector organisations are not required to be recorded where it is offered as part of official business and where the reason for attendance is consistent with the organisation's functions and objectives, and within the official's role.
- d) Complimentary Tickets offered to:
  - i. "Rehearsal Performances" as defined in this policy; or
  - ii. Performances at ACM issued in accordance with the Complimentary Tickets Policy, including House Seat ticket offers and opening night invitations.
- e) Discounts or benefits offered to ACM team members by external parties as a result of a contracted partnership arrangement.
- f) Hospitality that is purely internal and only involving ACM team members (Refer Expenses Policy for guidance).

## Policy: Receiving Gifts, Benefits and Hospitality

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### 1. Key Principles

#### 1.1 Impartiality and integrity

Offers of gifts, benefits or hospitality are not to be accepted unless there is a legitimate and compelling business or public interest reason to do so and it can be demonstrated that acceptance will not give rise to an actual, potential or perceived conflict of interest.

In this context, gifts of a token value may sometimes be accepted on behalf of ACM for cultural, historic or diplomatic reasons. Approval of any acceptance is required in each instance.

#### 1.2 Accountability

Individuals to whom this policy applies (“you”) must:

- a) Not seek or solicit gifts, benefits or hospitality for yourself or others.
- b) Refuse all offers of gifts, benefits and hospitality that:
  - i. Are money, items used in a similar way to money, or items easily converted to money (other than tickets received in line with this policy framework);
  - ii. Are non-token offers without a legitimate business benefit;
  - iii. Could be reasonably perceived to be an inducement for you to act or conduct yourself in a particular way either now or in the future;
  - iv. Are offers by individuals or organisations that you are currently engaging with or likely to be making decisions about in future in relation to tender processes, procurement, enforcement, licensing or regulation;
  - v. Are work –related offers to an immediate family member that could give rise to an actual, potential or perceived conflict of interest;
  - vi. Could be perceived as an endorsement of a company or product;
  - vii. Involve sponsored or funded travel and accommodation except in limited circumstances (refer to Section 1.3 below);
  - viii. Are repeated token offers of gifts, benefits or hospitality from a single source that may give rise to an actual, potential or perceived conflict of interest; or
  - ix. Represent actual or attempted bribery. Bribery is an offence under the Crimes Act and any such occurrences must be reported to the Chief Executive Officer (CEO) and to Victoria Police or the ‘Independent Broad-Based Anti-Corruption Commission (IBAC)’.
- c) Receive approval to accept all non-token offers of gifts, benefits and hospitality and declare all offers received to Strategic Planning and Governance for review and reporting purposes.
- d) Consider whether cumulative offers from a single source are appropriate.

Authorised persons as defined in this Policy also have the following additional responsibilities:

- d) To oversee the acceptance or refusal of non-token GBH offers by their team members and ensure approval to accept a particular offer is provided **prior to the offer being accepted**.

- e) Note the risks of accepting or declining non-token GBH offers in their business unit's risk register and manage these accordingly.
- f) Establish and communicate ACM's gifts, benefits and hospitality policy position to contractors, consultants and other business associates, including key stakeholders through procurement documents, service contracts or other communication. Managers should also outline to them the potential consequences for an ACM team member acting contrary to this policy.
- g) Establish and communicate ACM's gifts, benefits and hospitality policy position to sponsors and donors and inform them that any non-token offers will be recorded on a public register.

### 1.3 Cumulative offers

There is no cap on cumulative offers from the same source in a 12 month period, but team members must remain aware of potential conflicts of interest of accepting multiple offers from the same source and ensure there is a legitimate business benefit for all GBH.

If you are unsure about how to respond to an offer of a gift, a benefit or hospitality please seek advice from your Manager, Director or Executive or from the Strategic Planning and Governance team.

### 1.4 Sponsored Travel

Sponsored travel must not be accepted, except in the following limited circumstances:

- a) To attend a conference or seminar as a speaker or panel member; or
- b) For team members with Programming responsibility who may be permitted to accept supported travel which is budget relieving and creates the opportunity for them to critically assess performances which they are considering Programming.

In all cases, sponsored travel can only be accepted where it does not give rise to an actual, potential or perceived conflict of interest.

## **2. Governance and Oversight**

- 2.1 The Strategic Planning and Governance team maintains a GBH Register, which captures all offers of GBH received by ACM team members.
- 2.2 The GBH Register is reviewed regularly and risk assessed by the Director, Strategic Planning and Governance to ensure transparent reporting of GBH, and that there is no evidence of attempts to improperly influence the decisions or actions of ACM team members.
- 2.3 The GBH Register is provided to the Executive team and the Risk Management and Audit Committee on a quarterly basis.
- 2.4 The Executive team is required to provide the Risk Management and Audit Committee with written confirmation on an annual basis attesting to the completeness of the GBH Register.
- 2.5 The CEO is required to make an annual attestation to the Public Sector Standards Commissioner regarding the operation, review, promulgation and scrutiny of this policy.
- 2.6 ACM is required to publish the GBH Register on its website.
  - a) Individual names of recipients will not be published on the public register.

- b) Declined offers are to be recorded and included in the public register - however, the public register is not required to name the person/ organisation making the offer nor the receiver - the granter type of organisation offering is sufficient (e.g. ACM Partner, Current Supplier, Donor, Industry Associate, Potential Supplier, Presenter.)
- c) Generic 'spam' invitations to events (e.g. via email) that are declined do not need to be declared.
- d) Ceremonial gifts are recorded on the gift register but not published.

### **Policy: Providing Gifts, Benefits and Hospitality Funded by ACM**

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#### **3. When is it appropriate to provide gifts, benefits or hospitality funded by ACM?**

- 3.1 ACM team members may only provide GBH which is funded by ACM when all the below criteria are met:
- a) It is in the best interests of ACM, furthering the conduct of official business or other legitimate ACM goals, or promoting and supporting government policy objectives and priorities;
  - b) It does not give rise to an actual, potential or perceived conflict of interest;
  - c) It has a direct relationship to the performance of your role and is not of a private nature;
  - d) The overall cost would be considered reasonable in terms of community expectations and proportionate to the benefits accruing to ACM;
  - e) The overall cost is within approved budget limits and duly authorised;
  - f) Individuals demonstrate professionalism in their conduct, and uphold their obligation to extend a duty of care to other participants.
- 3.2 In accordance with 3.1c) above, ACM may provide token gifts to team members, Trustees and Foundation Members in the following circumstances:
- a) To recognise significant work-related achievements, in accordance with the Reward and Recognition Program; and
  - b) To celebrate length of service and/or retirements.
- Non work-related events or milestones such as birthdays, marriages or the birth of children are considered private, and gifts or hospitality used to celebrate such events should not be funded by ACM.
- 3.3 In accordance with 3.1 e) above, and under ACM's Delegations Policy, ACM team members with financial delegation must not approve expenditure on GBH that could be deemed to deliver a personal benefit to that delegation holder.
- 3.4 Where ACM-funded hospitality is provided, ACM venues should be used wherever possible to minimise costs.

#### **4. Approval**

- 4.1 Normal procurement procedures apply in respect of the provision of GBH (including entertainment). Refer to the Procurement Policy for details of procurement thresholds or seek advice from the Strategic Planning and Governance team.

#### **5. Hospitality Expenditure and Fringe Benefits Tax**

- 5.1 Fringe Benefits Tax (FBT) is payable on various hospitality and entertainment expenditure, and can add significant additional cost on top of the original expenditure and so must be considered when providing GBH.

- 5.2 All records related to the provision of hospitality must be provided to the Finance team for filing.
- 5.3 The Director, Finance will undertake a quarterly review of hospitality expenditure to ensure compliance with the relevant policies.

## **Policy Breaches**

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### **6. Non-compliance with this Policy**

- 6.1 Non-compliance with this policy will be treated as a breach of the Code of Conduct for Victorian Public Sector Employees and may constitute criminal or corrupt conduct.
- 6.2 Any instance of non-compliance with this policy that constitutes a bribe is an offence under the *Crimes Act 1958*.

### **7. Reporting and Investigation of Breaches**

- 7.1 Any suspected or actual breaches of this policy should be reported in the first instance to the relevant Senior Manager.
- 7.2 If an ACM team member isn't comfortable reporting a breach to the relevant Senior Manager, they can report confidentially to the Director, Strategic Planning and Governance. In circumstances where external reporting is more appropriate, a disclosure can be made to IBAC. Please refer to ACM's *Protected Disclosure Guidelines* for further guidance.
- 7.3 All breaches of this policy will be investigated in accordance with the Compliance Management Policy and Procedure, and disciplinary action (including termination of employment) may be taken depending on the circumstances and seriousness of the breach.

## Roles and Responsibilities

Role	Responsibility
Chief Executive Officer (CEO)	<ul style="list-style-type: none"> <li>- Provide an annual attestation to the Public Sector Standard Commissioner on the operation, review, promulgation and scrutiny of appropriate gifts, benefits and hospitality policies and processes within ACM</li> <li>- Ensure the details of all non-token offers of gifts, benefits and hospitality are declared and advised to the Strategic Planning and Governance team for inclusion on the GBH Register (or OBE Register where the OBE exclusion applies).</li> </ul>
Senior Managers, Directors and Executive Directors ("Authorised Persons")	<ul style="list-style-type: none"> <li>- Ensure the details of all non-token offers of gifts, benefits and hospitality are declared and advised to the Strategic Planning and Governance team for inclusion on the GBH Register (or OBE Register where the OBE exclusion applies).</li> <li>- Ensure all members of your team understand and comply with this policy.</li> <li>- Utilise the GBH-OBE Declaration Form to undertake a risk assessment when deciding whether offers of gifts, benefits and hospitality made to direct reports can be accepted.</li> <li>- Ensure gifts, benefits and hospitality expenditure you approve is reasonable and meets the objectives of the business.</li> <li>- Ensure gifts, benefits and hospitality accepted by direct reports is reasonable and does not constitute a conflict of interest or compromise their integrity.</li> <li>- Formally communicate ACM's gifts, benefits and hospitality policy position to contractors, consultants and other business associates, including key stakeholders through procurement documents, service contracts and other communication.</li> <li>- Formally communicate ACM's gifts, benefits and hospitality policy position to sponsors and donors and advise them that any non-token offers will be recorded on a public register.</li> <li>- Include the risks and controls associated with offers of gifts, benefits and hospitality in your business unit's risk register and monitor them accordingly.</li> </ul>
Director, Strategic Planning and Governance	<ul style="list-style-type: none"> <li>- Periodically review the GBH and OBE Registers from an organisation wide perspective.</li> <li>- Perform a quarterly review of compliance with the Gifts, Benefits and Hospitality Policy, and report details to the Risk Management and Audit Committee.</li> <li>- Ensure Trustees and Foundation Members are aware of their responsibilities under this policy.</li> <li>- Ensure periodic training is provided to team members on the Gifts, Benefits and Hospitality Policy.</li> </ul>
Director, Finance	<ul style="list-style-type: none"> <li>- Ensure that gifts, benefits and hospitality expenditure is recorded and reported in accordance with whole of government financial management, accountability and reporting requirements.</li> <li>- Perform a quarterly review of gifts, benefits and hospitality expenditure to ensure it complies with this policy.</li> </ul>

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<b>Role</b>	<b>Responsibility</b>
ACM Team Members, Trustees and Foundation Members	<ul style="list-style-type: none"> <li>- Adhere to the requirements of this policy including timely completion of GBH-OBE Declaration forms as outlined in this policy.</li> <li>- Ensure the details of all non-token offers of gifts, benefits and hospitality are declared and advised to the Strategic Planning and Governance team for inclusion on the GBH Register (or OBE Register where the OBE exclusion applies).</li> </ul>
Trustees and Foundation Members	<ul style="list-style-type: none"> <li>- Adhere to the requirements of this policy including timely declaration of all non-token offers of gifts, benefits and hospitality using the Trustee GBH Declaration Form</li> </ul>
Strategic Planning and Governance	<ul style="list-style-type: none"> <li>- Record the declaration form details in the GBH Register (or OBE Register where the OBE exclusion applies).</li> <li>- Publish the GBH Register on the ACM website and update it periodically.</li> <li>- Maintain the OBE Register.</li> </ul>
Risk Management and Audit Committee	<ul style="list-style-type: none"> <li>- Review the GBH Register at quarterly meetings.</li> <li>- Approve this policy and review annually.</li> </ul>

## Attachment A – Definitions

Key Term	Definition
<b>ACM</b>	The Victorian Arts Centre Trust trading as Arts Centre Melbourne
<b>ACM Team Members</b>	An individual who is: <ul style="list-style-type: none"> <li>a) employed directly by ACM</li> <li>b) indirectly employed through ACM (including by way of a consultancy, agreement or contract) such as through funds administered by ACM</li> <li>c) a Temporary Employee</li> </ul>
<b>Authorised Persons</b>	Senior Manager (Band 5 or above), Director, Executive Director or Chief Executive Officer.
<b>Chief Executive Officer (CEO)</b>	The Chief Executive Officer of Arts Centre Melbourne.
<b>Benefits</b>	Include 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. While its value may sometimes be difficult to quantify in dollars, it may be highly valued by the intended recipient and therefore used to influence their behaviour.
<b>Bribes</b>	Money or other inducements given or promised to ACM team members, Trustees and Foundation Members to corruptly influence the performance of their role.
<b>Business Associate</b>	An external individual or entity with whom ACM has established, or plans to establish, some form of business relationship. This party may seek commercial or other advantages from ACM by offering gifts, benefits or hospitality.
<b>Ceremonial Gifts</b>	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.  Ceremonial gifts are the property of the organisation, irrespective of value, and should be accepted by individuals on behalf of the organisation. The receipt of ceremonial gifts should be recorded on the register but does not need to be published.
<b>Conflicts of Interest</b>	Occur when an ACM team member's private interests conflict with their public duty. ACM team members, Trustees and Foundation Members have a duty to always resolve a conflict - this may mean that they decline a gift or transfer the gift to their employer's ownership if this is identified as being in the public interest. Conflicts of interest may be actual, potential or perceived as defined below.
<b><i>Actual conflict of interest</i></b>	There is a <u>real conflict</u> between an individual's public duties and private interests.
<b><i>Potential Conflict of Interest</i></b>	An individual 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.
<b><i>Perceived Conflict of Interest</i></b>	The public or a third party could <u>form a view</u> that an individual's private interests could improperly influence their decisions or actions, now or in the future.



Key Term	Definition
<b>Director</b>	A member of ACM Management who reports directly to an Executive director or the Chief Executive Officer and has responsibility for leading a Business Unit.
<b>Executive Director</b>	A member of the Executive management team and a direct report to the Chief Executive Officer.
<b>Financial delegations</b>	Limit of expenditure an ACM team member is authorised to approve as set out in the <i>Delegations Policy</i> .
<b>Foundation Member</b>	A member of the ACM Foundation.
<b>Fringe Benefits Tax (FBT)</b>	A tax levied by the Australian Taxation Office on most non-cash benefits that an employer provides 'in respect of employment'.
<b>Gifts</b>	Free or discounted items and any item 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). They range in value from token (nominal) to non-token (significant) and may be given for different reasons.
<b>Gifts, Benefits and Hospitality (GBH) Register</b>	An electronic record 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 conflict of interest or reputational risk and how the offer was managed.  For all non-token offers, it details the business reason for acceptance or decline and the Authorised Person approving / declining each offer.
<b>GBH-OBE Declaration Form</b>	Form used to declare offers of non-token gifts, benefits and hospitality. It is located in the Forms and Templates Centre on Centre Stage.
<b>Hospitality</b>	The friendly reception and entertainment of guests. Hospitality activities may include the following situations: Entertaining members of the public, business associates or visitors to promote an initiative or project of ACM, including: <ul style="list-style-type: none"> <li>• business lunches/dinners, drinks and cocktail parties</li> <li>• access to ACM events</li> <li>• accommodation or travel to facilitate the above activities.</li> </ul> The provision of food or beverages by ACM: <ul style="list-style-type: none"> <li>• to a person visiting ACM in an official capacity</li> <li>• for a conference or meeting held by ACM for its Trustees, Foundation Members, ACM team members or other persons</li> <li>• for a seminar, course, workshop or another forum provided by ACM for its team members or other persons</li> <li>• for ACM team members, Trustees and Foundation Members engaged in working lunches and social functions.</li> </ul> Attendance by an ACM team member at a function as part of their official duties is Hospitality, but is treated under the OBE exemption.
<b>Host</b>	Person, office holder or organisation that authorises, organises and pays for an event.

Key Term	Definition
<b>Legitimate business benefit</b>	Gifts, benefits and hospitality accepted or provided for a business or commercial purpose, in that it furthers the conduct of official or commercial business activity, or other legitimate goals of ACM.
<b>Live Performance</b>	Any performance from artforms such as of ballet, comedy, dance, circus, music, opera, theatre or spoken word (or any hybrid thereof).
<b>Senior Manager</b>	An employee at Band 4 or 5 who directs the work of other Arts Centre Melbourne team members within a specific segment or unit of the business.
<b>Official Business Event (OBE)</b>	An event where the reason for attendance is consistent with ACM's functions and objectives and the roles of the team members attending. Such events may occur inside or outside normal business hours and include events where the organiser invites specified ACM team members in recognition of support for the event's conduct, or ongoing or proposed collaboration.
<b>OBE Register</b>	A record maintained of 'Official Business Events' attended by 'Designated Team Members'. This register records any non-token offers of gifts, benefits or hospitality received by a 'Designated Team Member' at any of these events. It also includes details of the acceptance decision, approval from an Authorised Person and the reasons supporting it.
<b>Rehearsal performance</b>	<p>A performance for which tickets are not available for public purchase, and may include a trial or workshop performance, or as dress rehearsal prior to the first public performance. From time to time, team members will be invited to attend a 'Rehearsal Performance' to provide audience feedback subsequent to public performances. Acceptance of these complimentary tickets is consistent with the ACM's functions and objectives to support, partner and collaborate with the broader industry.</p> <p>At the time these tickets are provided they have no commercial value and therefore they are excluded from the requirements of this policy.</p>
<b>RMAC</b>	The Risk Management and Audit Committee, established as a subcommittee of the Victorian Arts Centre Trust under Section 13(3) of the <i>Victorian Arts Centre Trust Act</i> .
<b>State Government functions or events</b>	State Government functions or events that are directly related to Hospitality offered by state government public sector organisations (refer to Scope and Exclusions section).
<b>Token Offer</b>	<p>An offer of a gift, benefit or hospitality that is a courtesy or is of inconsequential or trivial value to both the person making the offer and the recipient.</p> <p>Whilst the primary determinant of a token offer is that it would not be reasonably perceived within or outside the organisation as influencing an individual or raising an actual, potential or perceived conflict of interest, <u>it cannot be worth more than \$50, and the cumulative value of offers from the same source over a 12 month period should be taken into consideration.</u></p> <p>Offers of this nature do not need to be recorded on the GBH Register.</p>
<b>Non-Token Offer</b>	An offer of 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. <u>All offers worth more than \$50 are non-token offers</u> and must be recorded on the GBH Register unless they qualify for an exclusion as per this policy.

<b>Key Term</b>	<b>Definition</b>
<b>Trust</b>	The Victorian Arts Centre Trust.
<b>Trustee</b>	A member of the Trust.
<b>Value</b>	The estimated or actual value of a gift, benefit or hospitality in Australian dollars. It is also the cumulative value of gifts, benefits or hospitality offered by the same individual or organisation within a 12-month period. Where it is difficult to assess value please liaise with the Strategic Planning and Governance team.

**Attachment B – The ‘GIFT’ Test**

The GIFT test is a good reminder of what to think about when deciding whether to accept or decline an offer of a gift, benefit or hospitality. Take the GIFT test and when in doubt ask your Manager or Executive.

<b>G</b>	<b>Giver</b>	<p><b>Who is providing the gift, benefit or hospitality and what is their relationship to me?</b></p> <p>Does my role require me to select contractors, award funding, inspect or audit suppliers or determine organisational priorities?          Could the person or organisation benefit from a decision I make?</p>
<b>I</b>	<b>Influence</b>	<p><b>Are they seeking to gain an advantage or influence my decision or actions?</b></p> <p>Has the gift, benefit or hospitality been offered to me publicly or privately? Is it a courtesy or a token of appreciation or valuable non-token offer?</p> <p>Does its timing coincide with a decision I am about to make or endorse a product or service?</p>
<b>F</b>	<b>Favour</b>	<p><b>Are they seeking a favour in return for the gift, benefit or hospitality?</b></p> <p>Has the gift, benefit or hospitality been offered honestly? Has the person or organisation made several offers over the last 12 months?</p> <p>Would accepting it create an obligation to return a favour?</p>
<b>T</b>	<b>Trust</b>	<p><b>Would accepting the gift, benefit or hospitality diminish public trust?</b></p> <p>How would the public view acceptance of this gift, benefit or hospitality? What would my colleagues, family, friends or associates think?</p>

**Attachment C – The ‘HOST’ Test**

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The HOST test is a good reminder of what to think about when deciding whether to provide gifts, benefits or hospitality to ACM team members, Trustees, Foundation Members or stakeholders. Take the HOST test and when in doubt ask your Manager or Executive.

<b>H</b>	<b>Hospitality</b>	<p><b>To whom is the gift or hospitality being provided?</b></p> <p>Will recipients be external business partners, or individuals of the host organisation?</p>
<b>O</b>	<b>Objectives</b>	<p><b>For what purpose will hospitality be provided?</b></p> <p>Is the hospitality being provided to further the conduct of official business?</p> <p>Will it promote and support government policy objectives and priorities?</p> <p>Will it contribute to staff wellbeing and workplace satisfaction?</p>
<b>S</b>	<b>Spend</b>	<p><b>Will public funds be spent?</b></p> <p>What type of hospitality will be provided?</p> <p>Will it be modest or expensive, and will alcohol be provided as a courtesy or an indulgence?</p> <p>Will the costs incurred be proportionate to the benefits obtained?</p>
<b>T</b>	<b>Trust</b>	<p><b>Will public trust be enhanced or diminished?</b></p> <p>Could you publicly explain the rationale for providing the gift or hospitality?</p> <p>Will the event be conducted in a manner which upholds the reputation of the public sector?</p> <p>Have records in relation to the gift or hospitality been kept in accordance with reporting and recording procedures?</p>

## Supporting Documentation

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### a) Forms and Records Management

Forms or records that are generated by the policy are as follows:

Form	Retention Period	Location
Gifts, Benefits and Hospitality Register	7 years	Centre Stage
Official Business Events Register	7 years	Centre Stage
GBH-OBE Declaration Form	7 years	Strategic Planning and Governance
Expense Claim Form	7 years	Finance
Hospitality Expenditure Form (FBT)	7 years	Finance

### b) Related Policies and Operating Procedures

Policy or Operating Procedure
<ul style="list-style-type: none"> <li>• Delegations Policy</li> <li>• Procurement Policy</li> <li>• Corporate Credit Card Policy</li> <li>• Expenses Policy</li> <li>• Travel Policy</li> <li>• Compliance Management Policy</li> <li>• Reward and Recognition Program</li> <li>• Protected Disclosure Guidelines</li> <li>• Protected Disclosure Guidelines - Summary</li> <li>• Victorian Public Sector Commission's <i>Gifts, Benefits and Hospitality Policy Framework</i> <a href="http://vpsc.vic.gov.au/resources/gifts-benefits-and-hospitality-resource-suite/">http://vpsc.vic.gov.au/resources/gifts-benefits-and-hospitality-resource-suite/</a></li> <li>• Code of Conduct for Victorian Public Sector employees <a href="http://vpsc.vic.gov.au/html-resources/code-of-conduct-for-victorian-public-sector-employees/">http://vpsc.vic.gov.au/html-resources/code-of-conduct-for-victorian-public-sector-employees/</a></li> </ul>

## Governance

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### a) Responsibility

<b>Policy Owner</b>	Chief Executive Officer
<b>Approving Body</b>	Risk Management and Audit Committee

### b) Version Control and Change History

Version Number	Approval Date	Approved by	Amendment
1.0	April 2008	Executive	Policy updated in conjunction with introduction of Corporate Credit Card policy
2.0	May 2010	RMAC	Additional requirements arising from the State Service Authority's review of the Policy Framework.
2.1	January 2012	N/A	Minor amendment – rebranding
3.0	March 2013	RMAC	Additional requirements arising from the State Service Authority's revised <i>Gifts, Benefits and Hospitality Policy Framework</i> . Nominal value reduced from \$150 to \$100.

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3.1	June 2013	N/A	<i>Treasury Officer</i> replaced with <i>Risk and Compliance Coordinator</i>
3.2	August 2013	N/A	Addition of Foundation Governors, annual attestation to now be made by the Chief Executive, written confirmation to be provided to RMAC from all Trustees and Executives regarding the completeness of the gift register.
3.3	June 2014	RMAC	Annual review of policy: simplification and alignment to new Delegations and Complimentary Tickets policies, minor updates.
3.4	June 2015	RMAC	Annual review of policy; updated for currency, update of responsibilities of Director, Strategic Planning and Governance nominal value increased from \$100 to \$150.
4.0	May 2017	RMAC	Review of policy to ensure consistency with the Victorian Public Sector Commission's Gifts, Benefits and Hospitality Policy Framework (revised October 2016). Nominal value now defined as 'Token' and reduced to \$50. 'Official Business Events' concept introduced.
5.0	23 May 2018	RMAC	Review of policy to ensure consistency with the Victorian Public Sector Commission's Gifts, Benefits and Hospitality Policy Framework (revised February 2018). <ul style="list-style-type: none"> <li>• 2.3 Federal, State, Regional or Local Government functions and events are exempt.</li> <li>• Ceremonial Gifts definition added.</li> <li>• OBE Offer Acceptance Process Flowchart – Government events are no longer required to be registered.</li> </ul>
5.1	June 2018	Chief Operating Officer	Minor amendment around scope of Official Events exemption, and amendment of procedure around FBT on tickets.
<b>Post Implementation Review</b>			
Due Date			May 2020