

DOCUMENT INFORMATION

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1 Purpose

This policy states Coliban Water's position on:

- responding to offers of gifts, benefits and hospitality; and
- providing gifts, benefits and hospitality.

This policy is intended to support individuals and Coliban Water to avoid conflicts of interest and maintain high levels of integrity and public trust.

Coliban Water has issued this policy to support behaviour consistent with the Code of Conduct for Victorian Public Sector Employees and the Code of Conduct for Directors of Victorian Public Entities. All employees are required under clause 1.2 of the employees' Code to comply with this policy. Clause 1.2 of the directors' code also recognises the importance of this policy.

2 Scope

This policy applies to all workplace participants. For the purpose of this policy, this comprises: executives, Board Directors, employees, contractors and consultants and any individuals or groups undertaking activity for or on the behalf of Coliban Water.

3 Policy Statement

This policy has been developed in accordance with the requirements outlined in the minimum accountabilities for the management of gifts, benefits and hospitality issued by the Victorian Public Sector Commission. As well as being incorporated into the provisions of this policy, the minimum requirements are listed in Schedule A.

Coliban Water is committed to and will uphold the following principles in applying this policy:

Impartiality – workplace participants have a duty to place the public interest above their private interests when carrying out their official functions. They will not accept gifts, benefits or hospitality that could raise a reasonable perception of, or actual, bias or preferential treatment. Workplace participants do not accept offers from those about whom they are likely to make business decisions.

Accountability – workplace participants are accountable for:

- declaring all non-token offers of gifts, benefits and hospitality;
- declining non-token offers of gifts, benefits and hospitality, or where an exception applies under this policy, seeking approval to accept the offer; and
- the responsible provision of gifts, benefits and hospitality.

Workplace participants with direct reports are accountable for overseeing management of their direct reports' acceptance or refusal of non-token gifts, benefits and hospitality, modelling good practice and promoting awareness of gifts, benefits and hospitality policies and processes.

Integrity – workplace participants strive to earn and sustain public trust through providing or responding to offers of gifts, benefits and hospitality in a manner that is consistent with community expectations. Workplace participants will refuse any offer that may lead to an actual, perceived or potential conflict of interest.

Risk-based approach – Coliban Water, through its policies, processes and Audit Committee, will ensure gifts, benefits and hospitality risks are appropriately assessed and managed. Workplace participants with direct reports will ensure they are aware of the risks inherent in their team's work and functions and monitor the risks to which their direct reports are exposed.



4 Definitions

Business associate

An individual or body that the public sector organisation has, or plans to establish, some form of business relationship with, or who may seek commercial or other advantage by offering gifts, benefits or hospitality.

Benefits

Benefits include preferential treatment, privileged access, favours or other advantage offered to an individual. They may include invitations to sporting, cultural or social events, access to discounts and loyalty programs and promises of a new job.

The value of benefits may be difficult to define in dollars, but as they are valued by the individual, they may be used to influence the individual's behaviour.

Bribe

A 'bribe' is an offer of money or other inducement made with the intention to corruptly influence a workplace participant in the performance of their duties. Bribery or attempted bribery of a public official is a criminal offence

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.

Conflict of interest

Conflicts may be:

Actual: There is a real conflict between a workplace participant's public duties and private interests.

Potential: A workplace participant has private interests that could conflict 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.

Perceived: The public or a third party could reasonably form the view that a workplace participant's private interests could improperly influence their decisions or actions, now or in the future.

Gifts

Gifts are free or discounted items or services 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), consumables (e.g. chocolates) and services (e.g. painting and repairs). Fundraising by public sector organisations that is consistent with relevant legislation and any government policy is not prohibited under the minimum accountabilities.

Hospitality

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.



Legitimate business benefit

A gift, benefit or hospitality may have a legitimate business benefit if it furthers the conduct of official business or other legitimate goals of the public sector organisation, the public sector or the State.

Public official

Public official has the same meaning as section 4 of the *Public Administration Act 2004* and includes, public sector employees, statutory office holders and directors of public entities.

Public register

A public register is a record, preferably digital, of a subset of the information contained in a register, for publication as required by the minimum accountabilities. Guidance regarding the information that should be published is provided in the *Victorian Public Sector Commission Policy Guide*.

Register

A register is a record, preferably digital, of all declared gifts, benefits and hospitality. Guidance regarding the information that should be recorded is provided in the Policy Guide.

Token offer

A token offer is a gift, benefit or hospitality that is of inconsequential or trivial value to both the person making the offer and the recipient (such as basic courtesy) and that is also likely to be perceived by the wider community to be of inconsequential or trivial value.

Non-token offer

A non-token offer is a gift, benefit or hospitality that is not a token offer.

5 Management of offers of gifts, benefits and hospitality

This section sets out the process for accepting, declining and recording offers of gifts, benefits and hospitality.

5.1 Conflict of interest and reputational risks

When deciding whether to accept an offer, workplace participants should first consider if the offer could be perceived as influencing them in performing their duties, or lead to reputational damage. The more valuable the offer, the more likely that a conflict of interest or reputational risk exists.



Figure 1. GIFT test

This table is a useful tool when considering how to respond to a gift offer.

G	Giver	Who is offering the gift, benefit or hospitality and what is their relationship to me? Does my role require me to select contractors, award grants, regulate industries or determine government policies? Could the person or organisation benefit from a decision I make?
1	Influence	Are they seeking to gain an advantage or influence my decisions or actions? 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? Does its timing coincide with a decision I am about to make or my endorsement of a product or service?
F	Favour	Are they seeking a favour in return for the gift, benefit or hospitality? Has the gift, benefit or hospitality been offered honestly? Has the person or organisation made several offers over the last 12 months? Would accepting it create an obligation to return a favour?
Т	Trust	Would accepting the gift, benefit or hospitality diminish public trust? How would the public view acceptance of this gift, benefit or hospitality? What would my colleagues, family, friends or associates think?

5.2 Requirement for refusing offers (prohibited offers)

Workplace participants should consider the GIFT test at Figure 1 and the requirements below to help decide whether to refuse an offer. The following gift offers are prohibited and must be refused:

- likely to influence them, or be perceived to influence them, in the course of their duties of that raise an actual, potential or perceived conflict of interest;
- could bring them, Coliban Water or the public sector into disrepute, for example, the offer is inconsistent with community expectations;
- made by a person or organisation about which they will likely make or influence a decision (this
 also applies to processes involving grants, sponsorship, regulation, enforcement or licensing),
 particularly offers:
 - made by a current or prospective supplier;
 - made by a person or organisation with a business relationship with Coliban Water
 - made during a procurement or tender process by a person or organisation involved in the process;
- likely to be a bribe or inducement to make a decision or act in a particular way;
- that extend to their relatives or friends;
- of money, or used in a similar way to money, or something easily converted to money;
- where, in relation to hospitality and events, Coliban Water will already be sufficiently represented to meet its business needs;
- where acceptance could be perceived as endorsement of a product or service, or acceptance would unfairly advantage the sponsor in future procurement decisions;
- made by a person or organisation with a primary purpose to lobby Ministers, Members of Parliament or public sector organisations; or
- made in secret.



If a workplace participant considers they have been offered a bribe or inducement, the offer must be reported to the Manager Director or the Executive General Manager, Strategy and Governance (who should report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anticorruption Commission).

5.3 Token offers

A token offer is an offer of a gift, benefit or hospitality that is of inconsequential or trivial value to both the person making the offer and the workplace participant and that is also likely to be perceived by the wider community to be of inconsequential or trivial value. It may include promotional items such as pens and note pads, and modest hospitality that would be considered a basic courtesy, such as light refreshments during a meeting.

Consistent with the VPSC's minimum accountabilities, Coliban Water have adopted the position that all offers worth \$50 or less are likely to be able to be considered token offers.

Workplace participants may generally accept and retain token offers without approval or declaring the offer, as long as the offer is not prohibited, including that it does not create a conflict of interest or lead to reputational damage.

5.4 Non-token offers

Workplace participants can only accept non-token offers if the gift is not a prohibited offer and in particular, the offer does not raise an actual, potential or perceived conflict of interest or have the potential to bring the workplace participant, Coliban Water or the public sector into disrepute. In addition, there must be is a legitimate business reason for acceptance, that is, the offer is made in the course of the workplace participant's official duties, relates to their responsibilities and has a benefit to Coliban Water, the public sector or the State.

Before accepting non-token offers, workplace participants should seek the approval of their line manager or the Executive General Manager, Strategy and Governance. In some cases, workplace participants may be offered a non-token gift or hospitality where there is no opportunity to seek approval prior to accepting. For example, they may be offered a wrapped gift that they later identify as being a non-token gift. In such cases, workplace participants must seek approval with their manager or the Executive General Manager, Strategy and Governance as soon as is practicable after accepting the gift.

Where the gift would likely bring the workplace participant or Coliban Water into disrepute, the gift should be returned. If it represents a conflict of interest for the workplace participant, Coliban Water should either return the gift or transfer ownership to the organisation to mitigate this risk.

5.5 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 should remain the property of the organisation, irrespective of value, and are to be accepted on behalf of Coliban Water. The receipt of ceremonial gifts should be recorded on Coliban Water's register but this information does not need to be published online.

5.6 Ownership of gifts offered to workplace participants

Except for ceremonial gifts (see clause 5.5) and gifts of significant value, workplace participants may retain ownership of non-token gift offers that are not prohibited and that have a legitimate business benefit as long as they have the approval of their manager or the Executive General Manager, Strategy and Governance.



5.7 Recording non-token offers of gifts, benefits and hospitality

All non-token offers, whether accepted or declined, must be declared and recorded in Coliban Water's gifts, benefits and hospitality register. The business reason for accepting the non-token offer must be recorded in the register with sufficient detail to link the acceptance to the workplace participant's work functions and benefit to Coliban Water, the public sector or State.

Workplace participants should consider the following examples of acceptable and unacceptable levels of detail to be included in the register when recording the business reason:

Unacceptable

- "Networking"
- "Maintaining stakeholder relationships"

Acceptable

- "I am responsible for evaluating and reporting on the outcomes of Coliban Water's sponsorship of Event A. I attended Event A in an official capacity and reported back to Coliban Water on the event."
- "I presented to a visiting international delegation. The delegation presented me with a cultural item worth an estimated \$200. Declining the gift would have caused offence. The gift was accepted on behalf of Coliban Water."

Gift offers are to be declared using the Gifts, Benefits, and Hospitality Declaration Form shown at Appendix 1. This is an online form accessed through the intranet. Once workplace participants have completed Part A of the form, they are required to nominate a manager to complete Part B of the form – this might be their line manager or the Executive General Manager, Strategy and Governance.

The information captured in the declaration form is used to populate Coliban Water's Gifts, Benefits and Hospitality register. Access to the Gifts, Benefits and Hospitality register is restricted to relevant persons with Coliban Water.

The Managing Director will provide a report to the Audit Committee at least annually on the administration and quality control of the gifts, benefits and hospitality policy, processes and register. The report will include analysis of Coliban Water's gifts, benefits and hospitality risks (including multiple offers from the same source and offers from business associates), risk mitigation measures and any proposed improvements.

For transparency and to meet the VPSC's accountabilities, a subset of the information contained in the gifts, benefits and hospitality register will be published on Coliban Water's website annually. Registers for both the most recent and the previous financial year must be reported on the website.

5.8 Repeat offers

Receiving multiple offers (token or non-token) from the same person or organisation can generate a stronger perception that the person or organisation could influence you. Workplace participants should refuse repeat offers from the same source if they create a conflict of interest or may lead to reputational damage.

5.9 Hospitality provided by Victorian public sector organisations

Victorian public sector organisations may provide hospitality to stakeholders, as part of their functions. Before accepting hospitality provided by a Victorian public sector organisation, workplace participants should consider the requirements related to prohibited offers.

Offers of hospitality by a Victorian public sector organisation that is not a prohibited offer and where the reason for the workplace participant's attendance at the function is consistent with Coliban



Water's functions and objectives and also with their role do not need to be declared or reported as a gift, benefit or hospitality.

5.10 Official business events

An official business event is an event hosted by an organisation where it is in the public interest for a workplace participant to attend. These invitations are different to gifts, benefits and hospitality offers (including instances of hospitality provided by Victorian public sector organisations – clause 5.9) and include seminars, conferences and working lunches.

Official business events need to have a tangible connection to an workplace participant's role and be directly related to Coliban Water's work.

Most official business events fall under five categories:

- *funded service delivery* opportunities to observe the delivery of programs funded by state government grants
- stakeholder engagement opportunities to develop networks with people interested in the similar activities
- sector knowledge opportunities to develop a deeper knowledge of the industry and to improve government programs
- business leveraging opportunities to network with partners interested in investment and collaboration
- professional knowledge opportunities to maintain knowledge relating to a qualification (e.g. CPD points), build expertise in a technical field or become acquainted with industry changes.

In addition to those five categories, there are situations where it is in the public interest for the public service to be represented in some capacity. Those include:

- state functions attending an event or function hosted by the Government or the Governor
- accompanying the Minister supporting a government spokesperson (including Ministers and Parliamentary Secretaries) in the execution of their duties
- *government events* attending a function organised and hosted by another government agency or public sector entity
- *industry stakeholders* attending an event hosted by industry or community stakeholders where attendance provides a legitimate business benefit.

Workplace participants can attend an official business event when:

- the invitation was extended by the event host rather than a third party
- the event is directly related to their official duties
- it is for a business purpose consistent with Coliban Water's functions and objectives
- it is in the public interest and the best interests of Coliban Water to be represented at the event
- the activities and level of hospitality at the event is consistent with community expectations
- there is no conflict of interest (real, potential or perceived) for the workplace participant to attend
- attending the event will not bring the workplace participant, Coliban Water, or the public service into disrepute



• the host does not have an interest in any business decision the workplace participant is likely to make or influence as part of their official duties.

Before an official business event invitation is accepted, workplace participants should consider:

- whether the workplace participant is the most appropriate person to attend
- the number of people from Coliban Water attending
- what the workplace participant's purpose to attend is to present, develop work skills or purely out of interest
- whether the offer is for an official business event or is a gift.

Events that provide a personal benefit or are limited to providing hospitality and serve no business purpose can be regarded as an official business event only if non-attendance would bring Coliban Water into disrepute.

Workplace participants are required to declare invitations to attend official business events using the Official business events attendance declaration form (see Appendix 2). This is an online form accessed through the intranet. This form is designed to assist workplace participants decide whether the offer should be accepted.

Invititations to events that do not meet the rules for an Official Business Event need to be declared using the Gifts, Benefits and Hospitality declaration form.

6 Management of the provision of gifts, benefits and hospitality

This section sets out the requirements for providing gifts, benefits and hospitality.

Figure 2. HOST test

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

6.1 Requirements for providing gifts, benefits and hospitality

Gifts, benefits and hospitality may be provided when welcoming guests, to facilitate the development of business relationships, further public sector business outcomes and to celebrate achievements.



When deciding whether to provide gifts, benefits or hospitality or the type of gift, benefit or hospitality to provide, workplace participants must ensure:

- any gift, benefit or hospitality is provided for a business reason that furthers the conduct of
 official business or other legitimate organisational goals, or promotes and supports
 government policy objectives and priorities;
- that any costs are proportionate to the benefits obtained for the State, and would be considered reasonable in terms of community expectations (the 'HOST' test at Figure 2 is a good reminder of what to think about in making this assessment); and
- it does not raise an actual, potential or perceived conflict of interest.

6.2 Containing costs

Workplace participants should contain costs involved with providing gifts, benefits and hospitality wherever possible, and should comply with the financial probity and efficient use of resources guidance outlined in the Code of Conduct for Victorian Public Sector Employees and the Code of Conduct for Directors of Public Entities. The following questions may be useful to assist workplace participants to decide on the type of gift, benefit or hospitality to provide:

- Will the cost of providing the gift, benefit or hospitality be proportionate to the potential benefits?
- Is an external venue necessary or does the organisation have facilities to host the event?
- Is the proposed catering or hospitality proportionate to the number of attendees?
- Does the size of the event and number of attendees align with intended outcomes?
- Is the gift symbolic, rather than financial, in value?
- Will providing the gift, benefit or hospitality be viewed by the public as excessive?

7 Breaches

Disciplinary action consistent with relevant industrial instruments and legislation, including dismissal, may be taken where a workplace participant fails to adhere to this policy. This includes where a workplace participant fails to avoid wherever possible or identify, declare and manage a conflict of interest related to gifts, benefits and hospitality in accordance with Coliban Water's Conflict of Interest Policy.

Actions inconsistent with this policy may constitute misconduct under the *Public Administration Act* 2004, which includes:

- breaches of the binding Code of Conduct for Victorian Public Sector Employees and Code of Conduct for Directors of Public Entities, such as sections of the codes covering conflict of interest, public trust and gifts and benefits; and
- workplace participants making improper use of their position.

For further information on managing breaches of this policy, please contact the Executive General Manager, Strategy and Governance.

Coliban Water will communicate its policy on the offering and provision of gifts, benefits and hospitality to contractors, consultants and other business associates. Those identified as acting inconsistently with this policy may be subject to contract re-negotiation, including termination.



8 Speak up

Workplace participants who consider that gifts, benefits and hospitality or conflicts of interest within Coliban Water may not have been declared or are not being appropriately managed should speak up and notify their manager or the Executive General Manager, Strategy & Governance. Workplace participants who believe they have observed corrupt conduct in their colleagues may also make a public interest disclosure directly to the Independent Based-based Anti-corruption Commission (IBAC). For more information refer to Coliban Water's Public Interest Disclosure Procedure.

Coliban Water will take decisive action, including possible disciplinary action, against individuals who discriminate against or victimise those who speak up in good faith.

9 Contacts for further information

A conflict of interest resulting from the acceptance of a gift, benefit or hospitality is not always clear to those who have them. Workplace participants who are unsure about accepting a gift, benefit or hospitality, or the application of this policy, should ask their manager or the Executive General Manager, Strategy and Governance for advice.

10 Human Rights Statement

It is considered that this policy does not impact negatively on any rights identified in the Charter of Human Rights Act (2006). Coliban Water is committed to consultation and cooperation between management and employees. Coliban Water will formally involve the Employee Consultative Committee in any workplace change that may affect employees.



Schedule A – Minimum accountabilities

Workplace participants offered gifts, benefits and hospitality:

- 1. Do not, for themselves or others, seek or solicit gifts, benefits and hospitality.
- 2. Refuse all offers of gifts, benefits and hospitality that:
- are money, items used in a similar way to money, or items easily converted to money
- give rise to an actual, potential or perceived conflict of interest;
- may adversely affect their standing as a public official or which may bring their public sector employer or the public sector into disrepute; or
- are non-token offers without a legitimate business benefit.
- 3. Declare all non-token offers (valued at \$50 or more) of gifts, benefits and hospitality (whether accepted or declined) on their organisation's register, and seek written approval from their manager or organisational delegate to accept any non-token offer.
- 4. Refuse bribes or inducements and report inducements and bribery attempts to the head of the public sector organisation or their delegate (who should report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-corruption Commission).

Workplace participants providing gifts, benefits and hospitality:

- 5. Ensure that any gift, benefit and hospitality is provided for a business purpose in that it furthers the conduct of official business or other legitimate organisational goals, or promotes and supports government policy objectives and priorities.
- 6. Ensure that any costs are proportionate to the benefits obtained for the State, and would be considered reasonable in terms of community expectations.
- 7. Ensure that when hospitality is provided, individuals demonstrate professionalism in their conduct, and uphold their obligation to extend a duty of care to other participants.

Heads of public sector organisations:

- 8. Establish, implement and review organisational policies and processes for the effective management of gifts, benefits and hospitality that comprehensively address these minimum accountabilities.
- 9. Establish and maintain a register for gifts, benefits and hospitality offered to public officials that, at a minimum, records sufficient information to effectively monitor, assess and report on these minimum accountabilities.
- 10. Communicate and make clear within the organisation that a breach of the gifts, benefits and hospitality policies or processes may constitute a breach of binding codes of conduct and may constitute criminal or corrupt conduct, and may result in disciplinary action.
- 11. Establish and communicate a clear policy position to business associates on the offering of gifts, benefits and hospitality to employees, including possible consequences for a business associate acting contrary to the organisation's policy position. This must take into consideration any whole of Victorian Government supplier codes of conduct.
- 12. Report at least annually to the organisation's audit committee on the administration and quality control of its gifts, benefits and hospitality policy, processes and register. This report must include analysis of the organisation's gifts, benefits and hospitality risks (including repeat offers from the same source and offers from business associates), risk mitigation measures and any proposed improvements.



13. Publish the organisation's gifts, benefits and hospitality policy and register on the organisation's public website (applies only to organisations with an established website). The published register should cover the current and the previous financial year.



Appendix 1 – Gifts, benefits and hospitality declaration form

Part A – About the offer	
Name of person receiving the offer	
Position of person receiving the offer	
Team or department of the person receiving the offer	
Date gift was offered	
Description of the gift, benefit or hospitality	
Estimated or actual value of the offer	
Name of the person making the offer	
Position of the person making the offer	
Name of the organisation making the offer	
Type of organisation making the offer	Supplier / Prospective tenderer / Industry stakeholder with commercial interest / not for profit stakeholder / strategic partner / other (please specify)
Why is the offer being made?	
Is the offer a prohibited gift (per the requirements in clause 5.2 of the Gifts, Benefits and Hospitality Policy)	
Is there a legitimate business benefit to Coliban Water or the Victorian public sector for accepting the offer? For example:	If yes, then the business benefit must be detailed
Was it offered during your official duties?	
Does it relate to your official responsibilities?	
Does accepting bring any benefit to the agency, public sector or State?	
Is the offer an official gift or a gift of cultural significance (a ceremonial gift) provided when conducting business with official delegates or representatives from another organisation, the community or another government?	If yes, please provide details
Was the offer accepted or declined?	Accepted and retained by the person receiving the offer / Accepted on behalf of the organisation / Accepted and Donated to Charity / Declined
If the gift was accepted and retained by the person receiving the gift, what was the basis of the decision?	Obtained prior approval / To avoid being in breach of the policy through no fault of my own
I declare that the details above are accurate and complete.	Your name:
	Date:



Part B - Manager to complete		
Your position		
Your relationship to the person receiving the offer		
Complete if the offer was declined		
I have reviewed this declaration form and submit it for inclusion on our Gifts, Benefits & Hospitality Register.	Your name:	
	Date:	
Complete if the offer was accepted	I	
I have reviewed this declaration form and submit it for inclusion on our Gifts, Benefits & Hospitality Register. I approve the acceptance of this offer and confirm that, to the best of my knowledge, that accepting this offer:	Your name:	
 does not raise an actual, potential or perceived conflict of interest for the individual or myself; and 		
 will not bring the individual, myself, Coliban Water or the Victorian public sector into disrepute; and 		
will provide a clear and legitimate business benefit to Coliban Water, the public sector or the State.		
	Date:	



Appendix 2 –Official business events attendance declaration form

Workplace participant to complete	
Name of person receiving the invitation	
Position of the person receiving the invitation	
Team or department of the person receiving the invitation	
Date of Invitation	
Name of the event	
Brief description of the event	
Type of event	
Date and time for the event	
Location for the event	
Estimated or actual value of a ticket to the event	
Name of the person extending the invitation	
Position of the person extending the invitation	
Name of the organisation extending the invitation	
Type of organisation extending the invitation	Supplier / Prospective tenderer / Industry stakeholder with commercial interest / not for profit stakeholder / strategic partner / other (please specify)
Is the person or organisation extending the invitation from the organisation hosting or organising the event?	
If no, you must decline the invitation.	
Why is the invitation being extended to you?	
Is attending this event directly related to your official duties?	
If yes, detail how your attendance is relevant to your role.	
If no, you must decline the invitation.	
What business purpose does attending the event serve?	
Does the host have a business interest in any decisions you are likely to make as part of your official duties?	
If yes, you must decline the invitation.	
Would accepting the invitation create an actual, potential or perceived conflict of interest?	
If yes, you must decline the invitation.	
Would accepting the invitation bring you, Coliban Water or the public sector into disrepute?	
If yes, you must decline the invitation.	
Is level of hospitality offered reasonable, proportionate and likely to meet community expectations?	
If no, you must decline the invitation.	



Was the invitation accepted or declined?	
I declare that the details above are accurate and complete.	Your name:
	Date: