

1. Purpose

This policy states the position of Stawell Regional Health on:

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

This policy is intended to support individuals and Stawell Regional Health to avoid conflicts of interest and maintain high levels of integrity and public trust.

Stawell Regional Health has issued this policy to support behaviour consistent with the Code of conduct for Victorian public sector employees (the Code). All employees are required under clause 1.2 of the Code to comply with this policy.

2. Principles

This policy 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.

Stawell Regional Health is committed to and will uphold the following principles in applying this policy:

Public interest: individuals 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 perception of, or actual, bias or preferential treatment. Individuals do not accept offers from those about whom they are likely to make business decisions.

Accountability: individuals 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.

Individuals 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.

Risk-based approach: Stawell Regional Health, through its policies, processes and audit committee, will ensure gifts, benefits and hospitality risks are appropriately assessed and managed. Individuals 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.

3. Target Audience

This policy applies to all workplace participants. For the purpose of this policy, this includes: executives, board members, employees, contractors, consultants and any individuals or groups undertaking activity for or on behalf of Stawell Regional Health.

4. Definitions

- Business associate: an external individual or entity which the organisation has, or plans to establish, some form of business relationship, or who may seek commercial or other advantage by offering gifts, benefits or hospitality.
- 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.
- **Conflicts of interest** :
 - Actual conflict of interest: There is a real conflict between an employee's public duties and private interests.
 - Potential conflict of interest: an employee 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 conflict of interest: the public or a third party could form the view that an employee's private interests could improperly influence their decisions or actions, now or in the future.
- **Gifts**: are 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). Fundraising by public sector organisations that is consistent with relevant legislation and any government policy is not prohibited under the minimum accountabilities.
- **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**: gifts, benefits and hospitality accepted or provided for a business purpose, in that it furthers the conduct of official business or other legitimate goals of the organisation, public sector or State.
- **Public official**: has the same meaning as under section 4 of the Public Administration Act 2004. This includes:
 - public sector employees;
 - statutory office holders; and
 - directors of public entities.
- **Register**: is a record, preferably electronic, 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 conflicts of interest or reputational risks and how the offer was managed. For accepted offers, it details the business reason for acceptance and the officer approving the acceptance.
- **Token offer**: is an offer of a gift, benefit or hospitality that is offered as a courtesy or is of inconsequential or trivial value to both the person making the offer and the individual.
 - 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, it cannot be worth more than \$50 (including cumulative offers from the same source over a 12 month period).
- **Non-token offer**: is 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. All offers worth more than \$50 are non-token offers and must be recorded on a gift, benefit and hospitality register (except for specific offers received by a person employed in a Victorian Government school, as defined under 'token offer').

5. Roles & Responsibilities

Public officials offered gifts, benefits and hospitality

- Do not, for themselves or others, seek or solicit gifts, benefits and hospitality.
- 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.
- 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.
- 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).

Public officials providing gifts, benefits and hospitality:

- 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.
- Ensure that any costs are proportionate to the benefits obtained for the State, and would be considered reasonable in terms of community expectations.
- 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:

- Establish, implement and review organisational policies and processes for the effective management of gifts, benefits and hospitality that comprehensively address these minimum accountabilities.
- 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.
- 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.
- 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.
- 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.

- 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. Establish, implement and review organisational policies and processes for the effective management of gifts, benefits and hospitality that comprehensively address these minimum accountabilities.

6. 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. Any exceptions to this process must have the prior written approval of the Chief Executive or their delegate.

6.1. 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 individual. It may include promotional items such as pens and note pads, and modest hospitality which would be considered a basic courtesy, such as light refreshments offered during a meeting.

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 raising an actual, potential or perceived conflict of interest, it cannot be worth more than \$50. If token offers are made often by the same person or organisation, the cumulative value of the offers, or the perception that they may influence the recipient, may result in the offers becoming non-token.

Individuals may accept token offers of gifts, benefits and hospitality without approval or declaring the offer on the Stawell Regional Health register if that token offer is under the value of \$25. This may include a box of chocolates, home-baked goods, or flowers.

Individuals are to refuse all offers (excluding token hospitality, such as sandwiches over a lunchtime meeting):

- made by a current or prospective supplier;
- made during a procurement or tender process by a person or organisation involved in the process.

6.2. Requirement for refusing non-token offers

Individuals should consider the GIFT test at [Table 1](#) and the requirements below to help respond to a non-token offer.

Individuals are to refuse non-token offers:

- likely to influence them, or be perceived to influence them, in the course of their duties or raise an actual, potential or perceived conflict of interest;
- by a person or organisation about which they will likely make a decision (also applies to processes involving grants, sponsorship, regulation, enforcement or licensing);
- likely to be a bribe or inducement to make a decision or act in a particular way;
- that extend to their relatives or friends;
- with no legitimate business benefit;
- of money, or used in a similar way to money, or something easily converted to money;
- where, in relation to hospitality and events, the organisation 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 agencies; and
- made in secret.

If an individual considers they have been offered a bribe or inducement, the offer must be reported to the Chief Executive or their delegate (who should report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-corruption Commission).

Table 1. GIFT test

G	Giver	Who is providing 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?
I	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 endorse 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?
T	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?

6.3. Requirements for accepting non-token offers

There will be some exceptions where there is a legitimate business reason for accepting a non-token offer. All accepted non-token offers **must** be approved in writing Chief Executive or their delegate, recorded in the gifts, benefits and hospitality register and be consistent with the following requirements:

- it does not raise an actual, potential or perceived conflict of interest or have the potential to bring the individual, Stawell Regional Health or the public sector into disrepute (the 'GIFT' test at [Table 1](#) is a good reminder of what to think about in making this assessment); and
- there is a legitimate business reason for acceptance. It is offered in the course of the individual's official duties, relates to the individual's responsibilities and has a benefit to Stawell Regional Health, the public sector or the State.

Individuals may be offered a gift or hospitality where there is no opportunity to seek written approval from their manager prior to accepting. For example, they may be offered a wrapped gift

that they later identify as being a non-token gift. In these cases, the individual must seek approval from their manager within five business days.

6.4. Recording non-token offers of gifts, benefits and hospitality

All non-token offers, whether accepted or declined, must be recorded in Stawell Regional Health's Gifts, Benefits and Hospitality Register ([Appendix 1](#)). The business reason for accepting the non-token offer must be recorded in the register and provide sufficient detail to link the acceptance to the individual's work functions and benefit to Stawell Regional Health, the public sector or State.

Individuals should consider the following examples of acceptable and unacceptable levels of detail to be included in Stawell Regional Health's register when recording the business reason:

Unacceptable: "Networking"

"Maintaining stakeholder relationships"

Acceptable:

"Individual is responsible for evaluating and reporting outcomes of Stawell Regional Health's sponsorship of Event A. Individual attended Event A in an official capacity and reported back to Stawell Regional Health on the event."

"Individual presented to a visiting international delegation. The delegation presented the Individual with a cultural item worth an estimated \$200. Declining the gift would have caused offence. The Gift was accepted, written approval was subsequently obtained for the gift, which became the property of Stawell Regional Health."

The Audit and Risk Management Committee of Stawell Regional Health will receive a report 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 Stawell Regional Health'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.

6.5. Ownership of gifts offered to individuals

Non-token gifts accepted by an individual for their work or contribution may be retained by the individual where their manager or organisational delegate has provided written approval. Employees must transfer to the Stawell Regional Health official gifts or any gift of cultural significance or significant value (over \$50).

7. Management of the provision of gifts, benefits and hospitality

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

7.1. Requirements for providing gifts, benefits and hospitality

Gifts, benefits and hospitality may be provided to welcome guests, 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, individuals must ensure:

- any gift, benefit or hospitality is provided for a business reason in that it 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 [Table 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.

Table 2. HOST test

H	Hospitality	To whom is the gift or hospitality being provided? Will recipients be external business partners, or individuals of the host organisation?
O	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?
T	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?

7.2. Containing costs

Individuals should contain costs involved in the provision of gifts, benefits and hospitality wherever possible. The following questions may be useful to assist individuals to decide 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?
- Will providing the gift, benefit or hospitality be viewed by the public as excessive?

Reference must be made to the following:

- Instrument of delegation must be followed in terms of expenditure
- All organisational policies/processes on financial expenditure and approval processes
- Policies on catering for employees and for Stawell Regional Health functions
- Reward and recognition programs, e.g. Service Awards

- Policy on the provision of alcohol; and
- Requirements regarding recording and reporting on the provision of gifts, benefits and hospitality in accordance with their requirements under the *Financial Management Act 1994*)

8. 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. Individuals who are unsure about the acceptance of a gift, benefit or hospitality, or the application of this policy, should ask their manager or the Chief Executive for advice.

9. Breaches

Disciplinary action consistent with the relevant industrial instrument and legislation, including dismissal, may be taken where an individual fails to adhere to this policy. This includes where an individual fails to avoid wherever possible or identify, declare and manage a conflict of interest related to gifts, benefits and hospitality.

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*, such as sections of the Code covering conflict of interest (section 3.7), public trust (section 3.9) and gifts and benefits (section 4.2); and
- individuals making improper use of their position.
- For further information on managing breaches of this policy, please contact the Chief Executive Officer or their delegate.

The Department 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.

10. Speak up

Individuals who consider that gifts, benefits and hospitality or conflict of interest within Stawell Regional Health may not have been declared or is not being appropriately managed should speak up and notify their manager or the Chief Executive.

Stawell Regional Health will take decisive action, including possible disciplinary action, against individuals who discriminate against or victimise those who Speak Up in good faith.

11. Appendices

- [Appendix 1. Gifts, Benefits and Hospitality Register](#)
- [Appendix 2. Gifts, Benefits and Hospitality Declaration Form](#)
- [Appendix 3. Declaration of Interest and Confidentiality](#)

12. References

- [Victorian Public Sector Commission. Gifts, benefits and hospitality resource suite 2016.](#)
- [Gifts, benefits and hospitality Policy framework October 2016.](#)

- [Minimum accountabilities for the management of gifts, benefits and hospitality](#)
- [Model gifts, benefits and hospitality policy](#)
- [Public Administration Act 2004](#)
- [Code of conduct for Victorian public sector employees 2015](#)
- [Code of conduct for Directors of Victorian public entities 2016](#)

13. Related Documents

[Health Purchasing Compliance Statement](#)

14. Accreditation

15. Contributors

	Name	Position	Service / Program
Lead Reviewer:	Liz McCourt	CEO	SRH
Committee/s:	Audit & Risk Committee		17/11/17
	Board of Management		



Appendix 1. Gifts, Benefits and Hospitality Register

Date offered	Offered to	Description of the gift, benefit or hospitality	Estimated or actual value	Cumulative value of offers made by individual /organisation	Offered by	Is the person or organisation making the offer a business associate of the organisation? (Y/N)	Reason given by offer or for making the offer	If accepted: a) would an actual potential or perceived conflict of interest exist; or b) would it bring the individual, the organisation or the public sector into disrepute?	Is there a legitimate business benefit to the organisation, public sector or State for accepting the offer.	Decision regarding the offer:	Approvals - if offer accepted, state who approved the individual accepting the offer and decision on ownership	Completed by (name and position)



Notes:

- Boxes marked in blue should be included on the public register
- Offered to: includes: individual's name, position, unit/division - Name may be de-identified when published on the organisation's website
- Offered by: includes name of individual/organisation making the offer
- Is the person or organisation making the offer a business associate of the organisation? (Y/N): consider whether their offer is consistent with the organisation's policy
- If accepted a) would an actual potential or perceived conflict of interest exist; or b) would it bring the individual, the organisation or the public sector into disrepute?: If either is answered YES, then the offer must be declined in accordance with the minimum accountabilities
- Is there a legitimate business benefit to the organisation, public sector or State for accepting the offer, i.e. does it meet the following:
 - a) it was offered during the course of the individual's official duties; and
 - b) it relates to the individual's official responsibilities; and
 - c) it has a benefit to the organisation, public sector or StateIf NO then offer must be declined, and if YES then the business benefit must be detailed, in accordance with the minimum accountabilities.
- Decision regarding the offer a) declined or accepted (state which) b) ownership: e.g. state whether individual retained; was transferred to organisation's ownership; returned to offeror etc.
- Approvals - if offer accepted, state who approved the individual accepting the offer and decision on ownership: name, position, unit/division of individual's manager or senior decision-maker who approved acceptance.

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Gifts, Benefits and Hospitality Declaration Form

This declaration form supports Stawell Regional Health's Gifts, benefits and hospitality policy. Employees must declare all non-token offers of gifts, benefits and hospitality (whether accepted or declined) and seek written approval from their manager or organisational delegate to accept any non-token offer.

Individual to complete	
1. Declaration date	
2. Name, position and unit/division	
Details of the gift, benefit or hospitality	
3. Date offered	
4. Describe the gift, benefit or hospitality offered	
5. Estimated or actual value	
6. Offered by (name of individual/organisation making the offer)	
7. Is the person or entity making the offer a business associate of the organisation (Y/N)? If yes, describe the relationship between them and the organisation. If no, describe the relationship between you and the person or organisation making the offer.	
8. Reason for making the offer	
9. Would accepting the offer: a) create an actual potential or perceived conflict of interest exist (Y/N); or b) bring you, the organisation or the public sector into disrepute (Y/N)? (If either is answered YES, then the offer must be declined in accordance with the minimum accountabilities)	<i>Detail of conflict of interest:</i>
10. Is there a legitimate business benefit to the organisation, public sector or State for accepting the offer, i.e. does it meet the following: a) it was offered during the course of the your official duties (Y/N); and b) it relates to your official responsibilities (Y/N); and c) it has a benefit to the organisation, public sector or State (Y/N). (If NO then offer must be declined, and if YES then the business benefit must be detailed, in accordance with the minimum accountabilities).	<i>Detail of business benefit:</i>
11. I accepted the offer YES / NO	<i>Signature</i> <i>Date</i>



Manager to complete	
1. Name, position and unit/division	
2. Relationship to employee	
Complete if individual declined offer	
3. I have reviewed this declaration form and submitted it for inclusion on the organisation's gifts, benefits and hospitality register.	Signature: Date:
Complete if individual accepted offer	
4. I have reviewed this declaration form and, confirm that, to my knowledge, accepting this offer: a) does not raise an actual, potential or perceived conflict of interest for the individual or myself; and b) will not bring the individual, myself, the organisation or the public sector into disrepute; and c) will provide a clear business benefit to the organisation, the public sector or the State.	Signature: Date:
5. Detail decision regarding ownership of tangible offers (e.g. specify whether employee retained gift; transferred to organisation's ownership; returned to offeror; donated to charity etc.)	
<i>Completed form to be submitted for inclusion on the organisation's gifts, benefits and hospitality register.</i>	

DECLARATION OF INTEREST AND CONFIDENTIALITY – Template

How to use this document

As referred to in Policies & Procurement Templates stakeholders should complete the document and have it signed in front of a witness. Copies should be kept on file.

Conflict of Interest

All those who are involved in a procurement process are required to make a full declaration of their interest pecuniary or otherwise in any entity which has the potential to be a supplier/tenderer.

All identified conflicts of interest must be recorded by **Stawell Regional Health** with details of any management action required to prevent any later perception that the conflict was material and influenced any relevant decision.

How to avoid a conflict of interest?

Sometimes you may find that your personal interests make it difficult for you to perform your duties impartially this may happen when there is a reasonable perception that you, your relatives or close associates could benefit personally from decisions that you influence at work. Wherever a conflict of interests occurs, it should always be resolved in favour of public interest.

It is not possible to define all potential types of conflict of interest and if in doubt whether a conflict exists, raise this with **the Chief Procurement Officer (CPO)**. In some circumstances, the appearance of a conflict of interest could itself jeopardise your public integrity. You are required to declare any conflict of interest that arises or is likely to arise and therefore not be involved in any decision-making processes.

Gifts and favours

You should not seek or accept favours or gifts for services performed in connection with your duties as part of the procurement process. This includes gifts in kind, such as free accommodation, travel, entertainment vouchers for you, or members of your family and your close associates. The general principle to be followed is that you should not seek or accept favours or gifts from anyone who could benefit by influencing you.

You must immediately report **any** circumstances where an offer of a benefit or gift is made, regardless of whether it is accepted or not to the CPO. Where a gift is given without your prior knowledge or consent or where a gift is given as a token of goodwill, inform the CPO as soon as possible.

Patronage or favouritism

You must not use your position to obtain a private benefit for someone else. Family or other personal relationships must not improperly influence your decisions.

Procurement/Evaluation Panel Member Guidelines

Outside parties with whom **Stawell Regional Health** has a business relationship may contact panel members as part of the normal day-to-day relationship. It is important that panel members follow the following guidelines throughout the entire process

- No discussion should be held with any potential supplier/tenderer in relation to any aspect of any Invitation to Supply (ITS). These communications should filter through the **Stawell Regional Health** Project Manager.
- No tenderer should receive or be perceived to have received additional information to that which is publicly available.
- Potential suppliers/tenderers should be advised to deal directly with the **Stawell Regional Health** Project Manager in all matters in relation to the procurement process. You should refuse to enter into any correspondence with potential suppliers/tenderers unless authorised to do so by the Project Manager.
- Should any potential supplier/tenderer request a copy of any document, they should be referred to the **Stawell Regional Health** Project Manager.
- Panel members must exercise caution, and must not discuss the procurement process unnecessarily such as during routine business meetings and social activities or with those who do not need to be involved in the process.
- Social invitations made to the panel members by potential suppliers/tenderers organisations are to be declined and reported to the CPO.



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DECLARATION OF INTEREST AND CONFIDENTIALITY

Request Number (if available):	
Request Title:	

I (please print full name)

of (please print organisation details)

Declaration of Interest

By signing this document I declare I have read and fully understand the above information detailed on page 1

- 1. Declare that neither I nor any of my relatives or close associates has any interests, pecuniary or otherwise, other than that mentioned below or described in the attached sheet(s), which could reasonably be construed as having any influence on the proper and objective performance by me of my duties in relation to the above specified Request. Note: Interests to be declared include but are not limited to: affiliations; conference funding; equipment donations; financial assistance; travel assistance; rebates; hospitality; relationships; shares; company ownership; training and development; consultancy services; gifts; and/or sponsorships;**

Declared Interest:

Additional Information attached? Yes / No (Please circle and initial as applicable)

- 2. Agree to truthfully declare, in writing to the CPO or delegate, any changes which may occur that relate to the matters stated in clause 1 of this Declaration, as soon as practicable after I become aware of the same;**

Declaration of Confidentiality

- 3. Agree to keep all information and documents relating to the Request planning, development or evaluation process confidential, and not to disclose or communicate the same to any person or persons except in the course of my duties without the prior written approval of Stawell Regional Health;**
- 4. Agree not to make copies of, or take any extracts of information except as may be necessary and essential for the due and proper performance of my duties;**
- 5. Agree to return all documents, papers and other materials given to me relating to this project to the Project Manager immediately when requested to do so; and**
- 6. Acknowledge that conflicts of interests, breach of confidentiality and unauthorised disclosure are subject to the provisions and penalties contained in the Public Sector Management Act 1994 and The Criminal Code. Unlawful disclosure of official information is a criminal offence punishable by up to 3 years imprisonment.**

This declaration is made by me on the understanding that I have not breached its terms if I am legally required to disclose the information referred to.

Signed:	Dated
Witnessed:	Dated

Conflict of Interest Action – To be completed by Project Manager and authorised by Authorised Officer (Chief Procurement Officer (CPO) or Chief Executive Officer (CEO))

A conflict of interest has been identified and the following recommended action has been taken:

Project Manager

Name:

Signature:

Title:

Date:

Authorised Officer

Name:

Signature:

Title:

Date: