

Gifts, Benefits and Hospitality Policy

Section 1 - Purpose

(1) This policy outlines the responsibilities of staff to avoid conflicts of interest and uphold high standards of integrity and trust when offering or receiving gifts, benefits or hospitality.

Section 2 - Overview

(2) Offering or receiving gifts, benefits or hospitality can be a normal part of a modern working environment. However, it can also give rise to concerns about bribery, corruption or conflicts of interest.

(3) This policy outlines RMIT's position on providing and responding to offers of gifts, benefits and hospitality.

Section 3 - Scope

(4) This policy applies to all employees and affiliates of RMIT University and its controlled entities (known as the RMIT Group). For this policy, all employees and affiliates are referred to as "staff".

(5) This policy applies to all instances of:

- a. gifts, benefits or hospitality offered to or by staff or their immediate family members, which can be reasonably attributed to the staff's official duties or association with RMIT, regardless of whether they are accepted or declined
- b. gifts of appreciation received by staff from students
- c. gifts or hospitality at externally hosted events
- d. externally funded travel or conference tickets not covered by the [Travel Procedure - Staff](#)
- e. prizes, awards, grants or cash awarded for personal use.

(6) For the purpose of this policy, and its related guideline and schedule, the below are out of scope:

- a. gifts, benefits or hospitality provided by RMIT to its staff. Gifts, benefits or hospitality of this nature are subject to the [Business Expenses Policy](#) and may be subject to fringe benefits tax (FBT) as per the [Taxation Procedure](#)
- b. gifts, benefits or hospitality exchanged between staff members in a personal capacity
- c. [philanthropic](#) gifts or donations governed by the [Philanthropy and Fundraising Policy](#)
- d. RMIT funded [travel](#) arrangements approved through the RMIT travel portal
- e. gifts, meals, entertainment and sponsorship covered by the [Business Expenses Policy Schedule 1 - Allowable Expense Guidance](#)
- f. honorariums and other payments for activities such as thesis examination, peer review, or one-off seminars or presentations
- g. prizes, awards and grants awarded for education or research activities.

Section 4 - Policy

(7) All staff have a duty to act in the best interests of RMIT at all times and with the highest degree of professional independence and integrity. This duty extends to the responsible provision and receipt of gifts, benefits and hospitality.

(8) Staff may offer and accept reasonable gifts and hospitality of the kind ordinarily given in the normal course of business, provided there is a legitimate business or cultural reason (including for example, relationship development and formalisation for Aboriginal and Torres Strait Islander communities). Such gifts, benefits or hospitality should be modest and in line with local customs and cultural protocols.

(9) Dealings with current and prospective suppliers must be appropriate and for the benefit of the RMIT Group rather than provide personal benefits to staff.

(10) A gift, benefit, or hospitality is unacceptable if:

- a. it is solicited or asked for under any circumstances
- b. it is offered to secure a material benefit for the party offering it
- c. it would constitute a probity breach, especially where the offer is from a supplier trying to win or maintain business opportunities with RMIT
- d. it may cause staff to act, or be perceived to have acted, in a preferential or biased manner
- e. doing so would compromise RMIT's reputation or impartiality
- f. it could reasonably be seen as a bribe
- g. it breaches the law or the recipient's own rules for receiving gifts, benefits or hospitality
- h. it may lead to an actual, potential or perceived conflict of interest as per the [Conflict of Interest Policy](#)
- i. it is cash, used in a similar way to cash, or is easily converted to cash (except in very limited circumstances relating to cultural gift giving traditions, such as Lunar New Year, and provided it meets the requirements under clause 8)
- j. it is from a foreign entity in circumstances which may create a foreign interference risk. For foreign interference management at RMIT, please refer to the [Foreign Interference Management Portal](#).

Responsibilities

(11) All staff are required to:

- a. declare all gifts, benefits or hospitality in accordance with this policy and the conditions and disclosure requirements in [Schedule 1](#) using the [Gifts, Benefits and Hospitality Declaration Form](#)
- b. decline offers of gifts, benefits and hospitality that are unacceptable under clause (10) of this policy
- c. ensure the responsible provision of gifts, benefits and hospitality (if giving a gift, benefit or hospitality).

(12) Staff unsure about whether a gift, benefit or hospitality meets the criteria set out in this policy should consult their line manager or the [Central Compliance](#) team.

(13) Managers with direct reports are responsible for overseeing the acceptance or refusal of gifts, benefits and hospitality by their staff, promoting awareness and compliance with this policy, and modelling good practice.

(14) The Chief Officer Procurement is responsible for:

- a. ensuring staff involved in procurement decisions and RMIT suppliers are aware of and comply with this policy
- b. monitoring supplier and staff involved in procurement decisions behaviour and compliance with probity and

conflict of interest requirements

- c. reporting breaches under this policy related to procurement initiatives to the University Secretary and Academic Registrar via the [Central Compliance](#) team for assurance and quality purposes.

(15) The Vice President, People and Culture is responsible for:

- a. the investigation and management of conduct matters arising from alleged or actual breaches of this policy, in accordance with the [Code of Conduct](#) and [Workplace Behaviour Policy](#)
- b. reporting breaches under this policy that are handled by the People team to the University Secretary and Academic Registrar via the [Central Compliance](#) team for assurance and quality purposes.

(16) The University Secretary and Academic Registrar is responsible for:

- a. approving the threshold values, conditions and disclosure requirements for gifts, benefits and hospitality prescribed in [Schedule 1](#)
- b. maintaining a register of gifts, benefits and hospitality declared via the [Gifts, Benefits and Hospitality Declaration Form](#)
- c. approving procedural exemptions under this policy
- d. reporting breaches received from the Vice President, People and Culture and the Chief Officer Procurement to the Chief Operating Officer
- e. referring behaviour or conduct that potentially constitutes or involves criminal behaviour, such as offering or accepting a bribe, to the relevant integrity or law enforcement agencies.

Gifts, Benefits and Hospitality Declaration

(17) RMIT collects and holds personal information in the Gifts, Benefits and Hospitality Declaration form for internal use to ensure compliance with this policy. Declarable gifts, benefits and hospitality may include personal information of donors and recipients external to RMIT and will be managed in accordance with the RMIT [Privacy Policy](#).

Section 5 - Compliance

(18) Where a manager or staff suspects or becomes aware of a gift, benefit or hospitality that has been accepted or provided in breach of this policy, they must contact [People Connect](#) as soon as practical.

(19) Breaches of this policy may result in disciplinary action, including termination of employment.

(20) A staff member may be directed to return any gift that has been accepted in breach of this policy.

Section 6 - Subordinate Policy Documents

(21) This policy includes the following schedule(s):

- a. [Gifts, Benefits and Hospitality Policy Schedule 1](#)
- b. [Gifts, Benefits and Hospitality Guideline](#).

Section 7 - Definitions

Affiliates	Include (but are not limited to) contractors, consultants, conjoint, adjunct, emeritus, honorary and visiting appointees, office holders of an RMIT entity, members of any RMIT committee, volunteers or any other person appointed or engaged by RMIT to perform duties or functions on its behalf.
Benefits	Include preferential treatment, privileged access, favours or other advantage. For example: 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.
Conflict of Interest	Arises when a person's personal or external interests, duties or obligations conflict or are inconsistent or incompatible with their duties or responsibilities to RMIT. It may be financial or nonfinancial. See Conflict of Interest Policy .
Cultural Protocols	Principles and practices that guide the behaviour of a cultural group. For Aboriginal and Torres Strait Islander Peoples, for example, these protocols include historic and current customs, practices, traditional lore and codes that are part of Aboriginal and Torres Strait Islander cultural observances.
Gifts	Are free or discounted items or services and any item or service that would generally be seen by the public as a gift. This includes gifts to immediate family of a staff, where there is a clear link with the employee's official duties. Examples include items of high value (e.g. expensive pens), low value (e.g. small bunch of flowers), consumables (e.g. chocolates, or wine), or services (e.g. repairs, places in education courses), or the transfer or loan of money (including gift cards) or property.
Gifts, Benefits and Hospitality Declaration Form	Is an internal electronic record of a declarable gift, benefit and hospitality offered and received by RMIT staff. It records the date an offer was made, the donor or recipient, the nature of the offer, its estimated value and how the offer was managed. For accepted offers, it details the reason for acceptance and the Manager approving the acceptance.
Gift of Appreciation	Are gifts that are generally given to express gratitude or thanks, such as flowers, chocolates, a bottle of wine and the like, in appreciation of performing a specific task or for performing duties in an exemplary manner.
Hospitality	Is the friendly reception and entertainment of guests. Examples include, luncheons, dinners, invitations to corporate hospitality, planned or impromptu light refreshments at a business meeting, expensive restaurant meals and sponsored travel and accommodation. The value of hospitality is calculated on a per head amount.
Indigenous Community Members	Includes persons who identify as being a member of an Indigenous community in Australia or overseas.
Legitimate business reason	Gifts, benefits or hospitality that furthers the conduct of official RMIT business or other legitimate goals aligned with its institutional purpose.
Modest	An offer of a gift, benefit or hospitality that is made as a courtesy or is of inconsequential or trivial value to both the person making the offer and the recipient.
Philanthropic gift	Has the following characteristics: 1. there is a transfer of money or property to RMIT for its own benefit or of its students 2. it is made voluntarily, 3. it does not provide a "material benefit" to the donor, and 4. it is motivated by philanthropic intent, and generosity, on the part of the donor. See Philanthropy and Fundraising Policy .

Status and Details

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Policy Owner	Brooke Griffin Chief of Staff to the Vice-Chancellor
Policy Author	Connie Merlino University Secretary and Academic Registrar
Enquiries Contact	Central Compliance

Glossary Terms and Definitions

"RMIT Group" - RMIT University and its controlled entities (RMIT Europe, RMIT Online, RMIT Vietnam, RMIT University Pathways)