

1 Purpose

This policy sets the standard for managing any gifts, benefits or hospitality offered to or accepted by GRV. Having a *Receipt of Gifts and Hospitality Policy* ensures we maintain the high standards of integrity, impartiality, and responsibility expected of all GRV employees and stakeholders. It allows participants, the community, business associates, and Government to be confident that GRV is both regulating and undertaking business without favouritism, influence, and/or conflicts of interest.

2 Scope

This policy applies to anyone employed or engaged by GRV including all employees, Board Members (including Committee Members), and third-party temporary employees and contractors (**Applicable Persons**).

In addition to this policy, any dealings with gifts, benefits or hospitality offered to or accepted by GRV must be consistent with GRV's values, the Code of Conduct for Victorian Public Sector Employees, Standing Directions of the Minister for Finance, and the *Public Administrations Act 2004*.

3 Definitions

A gift, benefit, or hospitality for the purposes of this Policy includes:

- money or items easily converted to money (e.g., shares);
- discounts, gift cards, vouchers for goods or services;
- tickets to attend or participate in events;
- physical gifts of products or items, including samples;
- payment for food, drink and entertainment or subsidy for such items; and/or
- privileged access, priority, or advantage in obtaining an item or attending an event.

Common sense definitions apply. A benefit, for example, may not be of significant dollar value but it may be of high personal value to the person receiving it. This means that there may still be an actual, potential, or perceived conflict of interest as that benefit may have the ability to influence behaviour.

4 Policy

4.1 Our Commitment and Obligations

Applicable Persons should take the default position of not accepting gifts, benefits, and hospitality – subject to the minor exemptions clarified in this policy.

In particular, Applicable Persons must:

- not solicit (ask for) gifts, benefits or hospitality for themselves or any other person;
- refuse all gifts of money or items used in a similar way to money;
- refuse all offers of gifts, benefits or hospitality from people or organisations about whom they are or are likely to make decisions involving tender processes, procurement, enforcement, licensing, or regulation;

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- refuse all offers of gifts, benefits or hospitality that give rise to any other actual, potential or perceived conflict of interest;
- refuse all offers of gifts, benefits or hospitality that may be perceived as an inducement or bribe for favourable treatment or decisions;
- refuse all offers of gifts, benefits or hospitality that may adversely affect GRV's standing as the regulatory of greyhound racing in Victoria.

4.2 Applying this Policy

All applicable persons in scope of this policy are expected to conduct themselves according to this GRV policy and any associated procedures and guidelines.

GRV employees who fail to comply with this policy and any associated procedures and guidelines may be subject to disciplinary action.

An applicable person may have breached the relevant Code of Conduct and/or the terms of their contract if they:

- Fail to declare a gift or benefit
- Understate the value of a gift or benefit
- Solicit (ask for) a gift or benefit

4.3 Communicating this Policy

All employees, contractors and others affected by our business or undertakings will have access to a copy of this policy through their manager/supervisor and/or the GRV People Hub. New employees will receive a copy as part of their induction.

All updates of this policy and related procedures will be communicated directly to Applicable Persons.

4.4 Reviewing this Policy

Management will review this policy periodically to assess its effectiveness, including monitoring related procedures.

5 Responsibilities

5.1 Acceptance of Benefits, Gifts & Hospitality

The circumstances where GRV employees can accept benefits are infrequent and must be approved in accordance with this policy.

5.1.1 Benefits of nominal value (up to and including \$50).

Provided they are not in breach of the 'Principles/Requirements' section, Applicable Persons may accept and retain without being required to report it, a gift, benefit, or hospitality of nominal value. For example, stationery handed out to everyone attending a conference, or small gifts of appreciation such as a box of chocolates, or modest hospitality that any visitor to the business could expect like tea and coffee or light refreshments.

5.1.2 Benefits of more than nominal value (greater than \$50)

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Where a gift or benefit of greater than nominal value is offered or received without an opportunity to reject its receipt, Applicable Persons are to:

- Declare the Gifts, Benefits and Hospitality within 14 days of the offer or receipt of the gift or benefit being made.
- Submit the physical items received to the General Counsel & General Manager Corporate Services.

5.1.3 Approval

The General Counsel & General Manager Corporate Services will determine whether the Gift or Benefit can be accepted and the treatment of the item. This may include:

- A decision that it is acceptable for the initial recipient to receive the gift or benefit in which case the item or the offer of hospitality approved for the person to accept/participate
- A decision that the gift is not acceptable for the initial recipient to receive in which the case:
 - If the item can be returned, it will be
 - If the items cannot be returned, it will be provided to a charity
 - If the items relate to the acceptance of an offer of hospitality, the initial recipient will be advised

5.2 Declaration of Hospitality

GRV employees in receipt of hospitality, while fulfilling their duties, may be required to make a declaration, considering the following:

Event	Declaration Required	Action	Rationale
Meal paid for by third party (supplier, club etc) during visit, meeting, or business trip	Yes	Submit declaration	Hospitality is not a requirement while undertaking role so must be declared
Catering at Club events registered on the GRV events portal (e.g., Club Cups)	No	Ensure name is listed on Events Portal	Hospitality while undertaking role (host, GRV representative, etc). Note: there may be a mix of GRV paid for tickets or paid for by the Club)
Non-standard events such as VGA night or similar	No	Ensure name is listed on Events portal	The attendance at events such as these are paid for by GRV so it is NOT hospitality from a third party; does not need to be declared
Catering at GRV meetings, including Board, Committees, Employee Events	No	None	Hospitality while undertaking duties – meetings; does not need to be declared

6 Reporting

Applicable persons must report any of the following to their General Manager or the General Counsel & General Manager Corporate Services:

- repeated offers of gifts, benefits and hospitality from a single source, even if these offers are not accepted;
- any offers that may be interpreted as an attempt at inducement or bribery; and/or
- any offers that would amount to criminal or corrupt conduct.

A report detailing the Gifts, Benefits and Hospitality Received will be prepared and reviewed by GRV's Chief Executive Officer every month and tabled every six months to the Audit and Risk Committee.

7 Interaction with other GRV policies

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This Policy should be read in conjunction with other GRV policies, including:

- GRV Health, Safety and Wellbeing Policy
- GRV Employment Policy
- Respect in the Workplace Policy
- GRV Integrity Policy
- GRV Conflict of Interest Policy
- GRV Provision of Gift & Hospitality Policy

8 Related Policies and Documentation:

- Code of Conduct for Victorian Public Sector Employees
- Code of Conduct for Directors of Victorian Public Entities
- GRV Employee Enterprise Agreement
- GRV Stewards and associated employees Enterprise Agreement

9 Related Legislation:

This policy incorporates GRV's obligations under various industrial instruments and relevant legislation including:

- *Public Records Act 1973* (Vic)
- *Financial Management Act 1994* (Vic)
- *Freedom of Information Act 1982* (Vic)
- *Occupational Health and Safety Act 2004* (Vic)
- *Liquor Control Reform Act 1998* (Vic)
- *Charter of Human Rights and Responsibilities Act 2006* (Vic)

If you have any questions or concerns regarding this policy, you can speak up any time.

Have a question or want clarification?

- Speak with your manager, General Manager, People & Culture Business Partner, or email askpc@grv.org.au.

Want to report a concern?

- Speak up using GRV's external reporting service: [further information is available here](#).
- Contact GRV's free and confidential employee assistance program: [further information is available here](#).

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