

## Logan City Council

### Gifts, Benefits and Hospitality Procedure

Logan City Council  
2020

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# 1 Procedure Objective

This Procedure:

- provides guidance to Councillors and Council employees who are offered gifts, benefits or hospitality in connection with their duties while representing Council or as a result of a Council activity;
- ensures Councillors and Council employees uphold the Local Government Act Principles in particular:
  - (a) transparent and effective processes, and decision-making in the public interest; and
  - (b) good governance of, and by, local government; and
  - (c) ethical and legal behaviour of Councillors and local government employees.

This Procedure applies in relation to any gifts and benefits received by Councillors or Council employees from external parties and is intended to highlight the legal and ethical issues that should be taken into account in deciding whether to accept a gift or benefit.

This does not apply to electoral gifts to Councillors as defined in the *Local Government Electoral Act 2011*.

# 2 Value guidelines

## 2.1 Gifts or benefits

Gifts or benefits of \$100 or less are considered nominal unless cumulative amount exceeds that value from the same donor during any 12 month period. Gifts or benefits over the value of \$100 are considered significant.

## 2.2 Hospitality

Hospitality of \$160 or less is considered nominal unless cumulative amount exceeds that value from the same donor during any 12 month period. Hospitality over the value of \$160 is considered significant.

# 3 Guiding principles

## 3.1 Gifts, benefits and hospitality received

Sometimes people who deal with Logan City Council wish to express appreciation for services or assistance given by a Councillor or a Council employee or wish to demonstrate good faith in a business relationship by giving some form of gift or benefit.

In some circumstances the giving of a gift, benefit or hospitality has the potential to compromise a person by creating a sense of obligation and thereby affecting impartiality. Councillors and Council employees should always be mindful of their obligation to maintain public confidence in Council.

As a general guide, if a Councillor or Council employee is offered a gift, benefit or hospitality he/she should put themselves in the position of the person offering the gift, benefit or hospitality and consider why the gift, benefit or hospitality is being given and whether acceptance is appropriate.

Each type of gift, benefit or hospitality carries with it different risks that should be considered when deciding whether or not acceptance is appropriate. Lower risk gifts are those intended as a token of appreciation or memento, or a ceremonial or official gift from one organisation to another.

It is important to consider the following:

- Relevant legislation
- Why the offer of a gift or benefit was made:
  - Was the gift intended to ingratiate the giver with the receiver for future influence?
  - Was it gratitude for a service that has been completed (so no scope for future influence)?
- The value and type of the gift or benefit (with higher value gifts/benefits warranting increased scrutiny);
- The sensitivity of the role of the recipient or the relationship of the parties (eg is the recipient a decision-maker as relevant to the giver);
- Whether the giving of the gift is being done publicly (more transparent) or in private; and
- The likely public perception of acceptance.

If unsure, Councillors and employees should decline the offer of gifts and benefits courteously by explaining that acceptance would be against Council policy.

### **3.2 Three categories of gifts, benefits or hospitality received**

Gifts, benefits and hospitality received are broken into three (3) categories for consideration:

- Gifts or benefits of token or nominal value (\$100 or less) or hospitality of token or nominal value (\$160 or less);
- Gifts or benefits of value (over \$100) or hospitality of value (over \$160);
- Gifts, benefits and hospitality NEVER to be accepted.

#### **3.2.1 Gifts, benefits or hospitality of token or nominal values**

For the purpose of this Policy and Procedure, a gift, benefit or hospitality of nominal value includes (but is not limited to):

- Gifts or benefits of a nominal value (\$100 or less) or hospitality of a nominal value (\$160 or less) that are infrequently offered.
- Gifts of single bottles of reasonably priced alcohol or flowers as acknowledgement for giving a presentation or being a guest speaker.
- Free meals and/or beverages of a modest nature provided to Councillors or Council employees who are formally representing Council and the meal/beverage is not provided within the registration costs of the activity/event/travel.
- Refreshments of a modest nature provided at a conference where a Councillor or Council employee is a guest speaker or is attending with the prior approval of the executive.
- Marketing or corporate mementos such as ties, scarves, pens, coasters, tie pins, diaries or chocolates.
- Invitations to appropriate out of hours functions or social events organised by groups such as council committees and community organisations that Councillors or Council employees attend in their role of representing the City of Logan.

For Council employees - care must be taken concerning the cumulative nature of gifts, benefits or hospitality from the same donor during any 12 month period. Should the amount exceed a total value of \$100 for gifts or benefits or \$160 for hospitality, then those items are considered items of value.

For Councillors - the cumulative nature of gifts, benefits or hospitality from the same donor is considered to be from the first day a Councillor is officially sworn into office until the last day of elected representation following the retirement/defeat of the said Councillor, regardless of the number of terms that the Councillor serves.

NB: While one-off gifts, benefits or hospitality of token or nominal value are not required to be recorded on Council's Gifts and Benefits Register Disclosure Form, it is of paramount importance that all Councillors and Council employees who regularly attend community meetings/functions/events keep a personal record of attendance at all events where gifts, benefits or hospitality are offered to ensure that the cumulative effect can be recognised and recorded on the appropriate form.

### **3.2.2 Gifts, benefits or hospitality of value**

For the purpose of this Policy and Procedure, a gift, benefit or hospitality of more than nominal or token value includes (but is not limited to):

- Invitations to a corporate box at a sporting event or other entertainment
- Free or discounted tickets to major sporting or community events, corporate hospitality at a corporate facility at a major sporting event, products for personal use, the frequent use of facilities such as gyms, use of holidays homes, travel or vehicles, free training excursions, gift hampers or vouchers.
- Payment by suppliers for Councillors or Council employees to attend training seminars, conferences or other promotional or educational activities.
- Free or subsidised meals and/or beverages provided by a potential supplier or contractor.
- Free or subsidised meals and/or beverages provided infrequently and/or reciprocally, that have been arranged primarily for, or in connection with, discussion of official business.

Gifts, benefits or hospitality of value offered and/or accepted by a Councillor or Council employee are to be recorded on the Gifts, Benefits and Hospitality Declaration Form (DM: 13552358).

In deciding whether to accept a gift, benefit or hospitality consideration should be given to whether refusal, in the circumstances could be discourteous or cause offence to a person offering the gift, benefit or hospitality.

Care should be taken in handling circumstances where there are cultural differences. In some circumstances it is recognised that declining a gift, benefit or hospitality may be difficult, inappropriate or offensive.

However, the overriding concern in considering whether to accept a gift, benefit or hospitality is whether the gift, benefit or hospitality is likely, or could reasonably be perceived, to affect the independent and impartial performance of duties.

### **3.2.3 Gifts, benefits or hospitality which are NEVER to be accepted or given**

For the purpose of this Policy and Procedure, gifts, benefits or hospitality that are considered totally inappropriate and should never be accepted include (but are not limited to):

- Money, regardless of the amount.
- Any item which may be readily converted into cash (eg shares).
- Access to confidential information.
- Promise of a new job.
- Preferential treatment (may include reciprocal favours given in return for a service provided by Council).

- Disposition of property or bequest, not necessarily land, can include goods and chattels (furniture, vehicles, tools etc) by one person to another without payment.

All gifts, benefits or hospitality offered of a prohibited nature, as outlined above, are to be recorded on the Gifts, Benefits and Hospitality Declaration Form (DM: 13552358).

Where you decide to decline a gift, benefit or hospitality (except where it is a bribe or other potentially corrupt conduct) you should politely thank the person for the offer and explain what your obligations are under this Policy and Procedure.

Where uncertainty exists as to what action to take regarding the offer of a gift, benefit or hospitality regardless of the occasion or purpose, refer to the Gift, Benefit or Hospitality Decision Making Guide (DM: 13345633) to help you decide.

### **3.2.4 What is NOT a gift, benefit or hospitality for the purposes of this Policy and Procedure**

For the purpose of this Policy and Procedure, a gift or benefit is not:

- Any product or service that genuinely has no connection to your role as a Councillor or Council employee;
- Any product or service that is given to a Councillor or Council employee by the Council or another Council official (except a contractor) as an award, any other form of recognition or to celebrate an occasion;
- Any discounted product or service if the discount is reasonable and generally available or capable of being negotiated by others not connected with Council and acceptance of the product or service will not compromise the Council or be seen to compromise the Council;
- Any discounted product or service if the discount is offered to staff generally (such as through a staff social club) and the arrangements will not compromise the Council or be seen to compromise the Council and the arrangements have the approval of the Chief Executive Officer;
- Any product or service received in relation to your membership of any industrial or professional organisation, club or other association or body;
- Any product or service received by a relative or associate from someone connected to Council if you genuinely did not know about it.

### **3.3 Soliciting gifts, benefits or hospitality**

Soliciting gifts, benefits or hospitality is strictly prohibited under any circumstances. If a Councillor or Council employee becomes aware of a situation of soliciting gifts, benefits or hospitality, they must report it to the Chief Executive Officer immediately.

### **3.4 Bribery**

Acceptance of money or any other gifts perceived as bribery is strictly prohibited under any circumstances and must be reported to the Chief Executive Officer immediately.

An offer of money perceived as bribery must be reported immediately to the Chief Executive Officer.

The Chief Executive Officer must notify the Crime and Corruption Commission of any offer of money as soon as practicable after the offer has been made.

### **3.5 Official gifts received by a Councillor or Council employee**

There are occasions when a Councillor or Council employee is involved in a conference or social, cultural, community or industry event where official gifts are presented or exchanged. Where it would appear not to be polite or inappropriate to decline the offer, it is reasonable for official representatives of Council to accept this gift on behalf of Council.

All such gifts are considered the property of Council, not the individual, and are to be handed to the Integrity & Information Program as soon as possible after receipt of the item.

The Councillor or Council employee is required to complete a Gifts, Benefits and Hospitality Declaration Form to accompany the item when handed to the Integrity & Information Program.

If the gift is of an appropriate size and nature, it will be placed on display in one of Council's display cases in a public area of a Council building.

Should the gift not be suitable for display or following an extended period of display in the display case, the gift will be relocated to a suitable location within Council's facilities until such time as a decision is made, following consultation with the Chief Executive Officer, to dispose of the item. Disposal of the item is to be in accordance with current policies and procedures.

There are occasions when Council may wish to present a gift to a person visiting Council in an official capacity. This may include guest speakers at conferences, courses, seminars or workshops that Council has organised or visiting delegations whether intrastate, interstate or overseas.

Council has a range of appropriate gifts which are available to be ordered. The gift must be for official purposes and the requesting officer must be able to identify the benefit for Council and the public in giving the gift.

Prior approval must be given by:

- \* requests from Council employees are to be approved by the relevant Director;
- \* requests from councillors are to be approved by the Mayor and the CEO;
- \* requests from the CEO are to be approved by the Mayor;
- \* requests from the Mayor are to be approved by the CEO.

The costs associated with the purchase of gifts are to be met by the relevant branch. Gifts from the Mayor and Councillors are to be met from the Corporate Governance Branch.

### **3.6 Acceptance of sponsorship benefits or community memberships**

There may be occasions when Council is offered entry tickets as a result of sponsoring an event or entering into an agreement with a third party.

Councillors may also be offered free yearly membership to community facilities eg turf clubs, showgrounds, motorsport precincts.

The acceptance and use of these tickets or memberships by Councillors or Council employees would create a perceived conflict of interest and would not be viewed favourably by members of the public. Regardless of the intent, public perception is the key consideration when accepting any benefits of this nature.

Therefore, Logan City Council will maintain a zero gift and benefit position for all sponsorship benefits/community memberships to ensure that an unambiguous position can be communicated clearly to the community.

Whilst Council's priority position regarding the use of event tickets remains at zero, it is acknowledged that there may be occasions where the use of tickets is unavoidable. The Chief Executive Officer will be responsible for the management of any tickets.

It should be noted that Councillors are still entitled to attend events in their official capacity, however this attendance is to be by invitation not by the provision of free tickets.

All interactions (verbal and written) with event organisers should clearly and politely outline Council's position regarding the acceptance of free tickets or memberships.

### **3.7 Guests accompanying a Councillor or Council employee at an official function**

If a Councillor or Council employee receives an invitation to attend an event in their official capacity and the invitation includes a guest/guests, the Councillor or Council employee may have a guest accompany them as appropriate.

At certain events, the accepted custom or practise may require the attendance of partners. Where there is a cost to Council for the purchase of tickets, it will be limited to the Mayor and Chief Executive Officer. Should they be unable to attend, it is appropriate for the Mayor or Chief Executive Officer to nominate a suitable substitute Councillor or Director to represent the city.

In circumstances where the invitation is only for the Councillor or Council employee and they wish to take a guest/guests, it is the responsibility of the Councillor or Council employee to personally organise an additional ticket/s to the event and make payment from their own private funds prior to the event. Expenditure will not be incurred for attendance of a guest accompanying a Councillor or Council employee at any official function unless outlined above.

Should Council receive an invoice from an event organiser for the attendance of a guest at an official function because payment was NOT made by the Councillor or Council employee, the cost of the ticket will be recovered from the Councillor or Council employee.

## **4 Declaring an offer of a gift, benefit or hospitality**

### **4.1 What must be declared?**

All gifts or benefits of more than \$100 value and all hospitality of more than \$160 value received or declined must be declared on a Gifts, Benefits and Hospitality Declaration Form, completed in accordance with the relevant table below. Nominal gifts or benefits must be declared where the cumulative value of the gifts or benefits from the same source over any 12 month period (for Council employees) or during the term in office (for Councillors) equals \$100 or more.

Nominal hospitality must be declared where the cumulative value of the hospitality from the same source over any 12 month period (for Council employees) or during the term in office (for Councillors) equals \$160 or more.

### **4.2 When must it be declared?**

Wherever possible, the gift, benefit or hospitality should be declared prior to acceptance.

### **4.3 What must be recorded on the Gifts, Benefits and Hospitality Declaration Form?**

The business reason for accepting the non-token offer must be recorded in the Gifts, Benefits and Hospitality Declaration Form with sufficient detail to link the acceptance to the individual's work functions and benefit to Council.

Councillors and Council employees should therefore consider the following examples of acceptable and unacceptable levels of detail to be included in Gifts, Benefits and Hospitality Declaration Form when recording the business reason for accepting or declining the offer:

Unacceptable level of detail	<p>“Networking”</p> <p>“Maintaining stakeholder relationships”</p>
Acceptable level of detail	<p>“I am responsible for evaluating and reporting on the outcomes of the Council’s sponsorship of Event A. I attended Event A in an official capacity and reported back to Council on the event.”</p> <p>“The Mayor and CEO were invited to an event within Logan City as representatives of the Council.”</p> <p>“I presented a gift to a visiting international delegation on behalf of the Council. The delegation presented me with a cultural item worth an estimated \$200. Declining the gift would have caused offence. The gift was therefore accepted on behalf of Council.”</p>

#### 4.4 Process for declaration of all offers of a gift, benefit or hospitality

The process for declaration of all offers of gifts, benefits or hospitality by all Councillors and Council employees is as follows:

Value	Roles and Responsibilities
Nominal gifts or benefits (\$100 or less)	<p>Councillors and Council employees may generally accept nominal gifts or benefits without declaring the offer, as long as the offer:</p> <ul style="list-style-type: none"> <li>• does not create a conflict of interest or lead to reputational damage to the individual or Council; and</li> <li>• is not one of multiple token offers where the cumulative value of the token offers over any 12 month period (for Council employees) or the term in office (for Councillors) equals \$100 or more.</li> </ul>
Nominal hospitality (\$160 or less)	<p>Councillors and Council employees may generally accept nominal hospitality without declaring the offer, as long as the offer:</p> <ul style="list-style-type: none"> <li>• does not create a conflict of interest or lead to reputational damage to the individual or Council; and</li> </ul> <p>is not one of multiple token offers where the cumulative value of the token offers over any 12 month period (for Council employees) or the term in office (for Councillors) equals \$160 or more.</p>
Gifts or benefits of value (\$100 or more) Hospitality of value (\$160 or more)	<p>Councillor or Council employee receiving gift, benefit or hospitality:</p> <ul style="list-style-type: none"> <li>• Surrender the gift, benefit or hospitality to Council (if possible)</li> <li>• Complete the Gift, Benefits &amp; Hospitality Declaration Form and if applicable, indicate whether you wish to purchase the gift or request to retain it for personal use</li> <li>• Send an email to Finance Branch at <a href="mailto:FBT@logan.qld.gov.au">FBT@logan.qld.gov.au</a> to ask whether there are any fringe benefit tax implications for the gift. Finance Branch will send you an email in response setting out any FBT implications</li> <li>• If you are requesting to retain the gift, benefit or hospitality for personal use, you must complete the Conflict of Interest Declaration Assessment Form (DM: 6317609)</li> <li>• Provide the Conflict of Interest Declaration Assessment Form to your Branch Manager for countersigning*</li> </ul>

Value	Roles and Responsibilities
	<ul style="list-style-type: none"> <li>• Provide the Gifts, Benefits and Hospitality Declaration Form, FBT email and if applicable, the Conflict of Interest Declaration Assessment Form, to the Integrity &amp; Information Program for assessment</li> </ul> <p>Integrity &amp; Information Program</p> <ul style="list-style-type: none"> <li>• Receive the Gifts, Benefits and Hospitality Declaration Form and determine compliance with the policy and legislation</li> <li>• Where the person wishes to purchase the gift, benefit or hospitality, assess this against Council's Disposal of Council Property Policy (DM: 5962250)</li> <li>• Where the gift, benefit or hospitality is being retained for personal use, assess the Conflict of Interest Declaration Assessment Form</li> <li>• Provide a recommendation regarding the Gifts, Benefits and Hospitality Declaration, and if applicable, the Conflict of Interest Declaration to the relevant Director or CEO</li> <li>• Update the Gifts, Benefits and Hospitality Register and if applicable, the Conflict of Interest Register</li> </ul> <p>*For gifts received by the CEO, the Mayor will sign the Conflict of Interest Declaration Assessment Form. For gifts received by the Mayor, Councillors or a Director, the CEO will sign the Conflict of Interest Declaration Assessment Form. For gifts received by a Manager, the relevant Director will sign the Conflict of Interest Declaration Assessment Form.</p> <p>Directors or CEO</p> <ul style="list-style-type: none"> <li>• Make a decision regarding the Gifts, Benefits and Hospitality Declaration, and if applicable, the Conflict of Interest Declaration to the relevant Director or CEO</li> <li>• Provide the decision to the Information and Integrity Program for updating of the registers</li> </ul>

The Gifts, Benefits and Hospitality Register is subject to regular review by an independent officer as well as internal and external audit.

## 5 Requesting to purchase a gift, benefit or hospitality, or requesting to retain it for personal use

All offers of gifts, benefits or hospitality made to Councillors and Council employees in the course of their official duty are the property of Council and must be immediately surrendered to Council.

### 5.1 Requesting to purchase the gift, benefit or hospitality

If a Councillor or Council employee wishes to request to purchase the gift, benefit or hospitality from Council, they must indicate this on the Gift, Benefits & Hospitality Declaration Form. Requesting to purchase a gift, benefit or hospitality will not trigger a conflict of interest, and no Conflict of Interest Declaration Assessment Form will need to be completed.

The Councillor or Council employee will also need to send an email to Finance Branch at [FBT@logan.qld.gov.au](mailto:FBT@logan.qld.gov.au) to ask whether there are any fringe benefit tax implications for the gift.

Finance Branch will provide an email in response setting out any FBT implications. That email must also be submitted with the Gift, Benefits & Hospitality Declaration Form.

A request to purchase a gift, benefit or hospitality will not be considered until both documents have been submitted.

A request to purchase a gift, benefit or hospitality will be assessed by the Integrity & Information Program in consultation with the Administration Branch in accordance with Council's Disposal of Council Property Policy (DM: 5962250). The Integrity and Information Program will provide a recommendation to the relevant Director or CEO. The relevant Director or CEO will decide the request. There is no guarantee that a request to purchase a gift, benefit or hospitality will be approved.

Ceremonial, cultural or official gifts cannot be purchased under any circumstances.

## **5.2 Requesting to retain the gift, benefit or hospitality for personal use**

If a Councillor or Council employee wishes to request to retain the gift, benefit or hospitality for personal use, they must indicate this on the Gift, Benefits & Hospitality Declaration Form. Requesting to purchase a gift, benefit or hospitality will trigger a conflict of interest, and a Conflict of Interest Declaration Assessment Form must be completed and submitted with the Gift, Benefits & Hospitality Declaration Form.

The Councillor or Council employee will also need to send an email to Finance Branch at [FBT@logan.qld.gov.au](mailto:FBT@logan.qld.gov.au) to ask whether there are any fringe benefit tax implications for the gift. Finance Branch will provide an email in response setting out any FBT implications. That email must also be submitted with the Gift, Benefits & Hospitality Declaration Form.

A request to retain a gift, benefit or hospitality for personal use will not be considered until all three documents have been submitted.

All requests to retain a gift, benefit or hospitality for personal use will be assessed by the Integrity & Information Program in consultation with and the CEO (for a request by the Mayor, Councillors, Directors or Office of the CEO employees), the Mayor (for requests by the CEO) or the relevant Director and Manager (for Council employees). The Integrity and Information program will make a recommendation on the request. In most cases where a Council employee wishes to retain a gift, benefit or hospitality for personal use, conditions will need to be imposed to address any perceived, potential or actual conflict of interest that may arise. This will be discussed with the Branch Manager and Council employee.

Requests will be determined by:

- the CEO for requests by the Mayor, Councillors, Directors or Office of the CEO employees;
- the Mayor for requests by the CEO; or
- Directors for requests by Council employees.

## **6 Register of Interests – Councillors, CEO and Senior Executives**

Chapter 8, Part 5 of the *Local Government Regulation 2012* requires Council to keep a Register of Interests for all Councillors, the Chief Executive Officer and all Senior Executive employees.

The register of interests of each of the following persons must contain the financial and non-financial particulars set out in Schedule 5 of the *Local Government Regulation 2012*. This includes details of:

- each gift, or all gifts totalling more than \$500 given to them by a donor. For the purposes of the Register of Interests, a gift is defined in Schedule 5 Section 12 of the *Local Government Regulation 2012*; and

- each sponsored hospitality benefit. For the purposes of the Register of Interests, a sponsored hospitality benefit is defined in Schedule 5 Section 13 of the *Local Government Regulation 2012*.

## 7 Roles and Responsibilities

The Chief Executive Officer has designated the following roles and responsibilities for managing administrative action complaints within Council:

Role	Responsibilities
<b>Mayor</b>	<ul style="list-style-type: none"> <li>▪ provide a decision regarding the Gift, Benefit or Hospitality for the CEO</li> </ul>
<b>Councillors</b>	<ul style="list-style-type: none"> <li>▪ Be aware of and comply with the Gifts, Benefits and Hospitality Policy and this Procedure;</li> <li>▪ Consider the purpose and value of a gift, benefit or hospitality before making a decision to accept it;</li> <li>▪ Consider the perception of an impartial observer regarding the offer of a gift, benefit or hospitality;</li> <li>▪ Report suspected breaches of policy in an appropriate manner.</li> </ul>
<b>CEO</b>	<ul style="list-style-type: none"> <li>▪ provide a decision regarding the Gift, Benefit or Hospitality for the Mayor, Councillors, Directors or Office of the CEO employees</li> </ul>
<b>Directors</b>	<ul style="list-style-type: none"> <li>▪ provide a decision regarding the Gift, Benefit or Hospitality for Council employees</li> </ul>
<b>All Council employees</b>	<ul style="list-style-type: none"> <li>▪ Be aware of and comply with the Gifts, Benefits and Hospitality Policy and this Procedure;</li> <li>▪ Consider the purpose and value of a gift, benefit or hospitality before making a decision to accept it;</li> <li>▪ Consider the perception of an impartial observer regarding the offer of a gift, benefit or hospitality;</li> <li>▪ Report suspected breaches of policy in an appropriate manner.</li> </ul>
<b>Managers</b>	<ul style="list-style-type: none"> <li>▪ Encourage reporting of gifts by Council employees</li> </ul>
<b>Integrity &amp; Information Program</b>	<ul style="list-style-type: none"> <li>▪ maintain the Gifts, Benefits and Hospitality Register;</li> <li>▪ assess all Gifts, Benefits and Hospitality Declarations;</li> <li>▪ provide a recommendation regarding the Gift, Benefit or Hospitality;</li> <li>▪ provide a decision in relation to any associated conflict of interest;</li> <li>▪ providing Gifts, Benefits and Hospitality training for the organisation.</li> </ul>

## 8 Breaches of the Gifts, Benefits and Hospitality Policy or Procedure

Disciplinary action consistent with Council's Code of Conduct, the Code of Conduct for Councillors in Queensland and relevant legislation, may be taken where an individual fails to adhere to the Gifts, Benefits and Hospitality Policy and this procedure. This includes where an individual fails to identify, declare and manage a conflict of interest related to gifts, benefits and hospitality.

## 9 Definitions

Definitions for terms used within the Procedure can be found in the Gifts, Benefits and Hospitality Policy (DM: 13315254).