**GIFTS AND BENEFITS POLICY**

**PREAMBLE**

St Vincent’s College is a Mary Aikenhead Ministry in the tradition of the Sisters of Charity. We are called to develop in each member of our community a contemporary understanding and application of the charism of Mary Aikenhead and the spirituality of the Sisters of Charity, and the Mary Aikenhead Ministries’ mission, vision and values of justice, love, compassion and hope.

The philosophy that underpins the receipt and giving of gifts at the College is informed by the charism of Mary Aikenhead Ministries, Ignatian Spirituality and the Mission Statement of the College.

**RATIONALE**

The purpose of this Policy is to provide a framework to enable St Vincent’s College Board and Staff to act with good stewardship when: affirming efforts of members of the community in fulfilling the Mission of the College when giving and receiving Gifts and Benefits; responding to times of hardship and challenge; and celebrating significant moments of Community members’ lives. The policy provides a framework of accountability for Board members and Staff, in the course of their official duties, to ensure that funds received in fees, funding, grants and donations are used appropriately to fund the progress the objectives of the College. Accordingly College Board Directors and staff must recognise and avoid any situations which may affect their integrity and objectivity by being cautious of undue benefits or preferential treatment in the course of their tenure as Board Directors or employees of the College.

This Policy applies to all St Vincent’s College Board Directors and Staff in giving or receiving Gifts and Benefits in connection with their time at the College.

**PUBLIC ACCOUNTABILITY**

As a not for profit entity under the *Education Act 1990 (NSW)* St Vincent’s College Board Directors and staff make decisions that are fair, unbiased and not affected by profit, self-interest and personal gain. Board Directors and staff will not accept any gift or benefit in the course of their work, where there is a real or perceived risk of undue influence on the beneficiary and/or advantage being gained by the giver. Under no circumstances will Federal or State government grants be used to purchase any gift offered by the College.

A Register of Gifts and Benefits is maintained by the Business Office and is accessible upon request.

1. **ACCEPTING GIFTS AND BENEFITS**

College Board Directors and Staff must never solicit gifts or benefits or accept bribes. College Board Directors and Staff must consider the following key factors when deciding whether a gift or benefit may be accepted:

- the *value* of the gift or benefit and
- the *intention* of the donor in offering the gift or benefit.
**Value**

Generally, a gift or benefit that is valued at $100 or less may be accepted by staff and is not required to be recorded.

If the value of the gift is greater than $100, College Board Directors or staff being offered the gift or benefit must decide in consultation with the Chair of Board/Head of Department whether or not to accept the gift or benefit. If the gift or benefit is accepted, it must be declared in writing in accordance with Section 3 Register of Gifts and Benefits of this document.

Where gifts are surrendered or not delivered to their recipient, the Principal will hold these gifts in a ‘gift pool’ to aggregate and re-gift for suitable purposes.

**Exceptions for Gifts below the Threshold:**

College Board Directors and Staff may be offered a series of small gifts or benefits from the same donor within a short timeframe, each of which is of minimal value, but in total exceeds the nominal value of $100. Where it is reasonable to perceive that this is an attempt to compromise staff and or obtain favours for the donor, through “serial giving”, then the gift or benefit must not be accepted. An example includes a supplier forwarding a gift voucher of an amount of the recordable limit in this Policy to the purchasing College Board Director or staff member, with the regular monthly invoice. Regardless of the value of the gift or benefit College Board Director or staff must consider the intention of the donor in offering the gift or benefit.

**Intention**

College Board Directors and Staff must never accept gifts or benefits that are intended to improperly influence their decision making. These are gifts and benefits of influence and have the potential to compromise staff and undermine their impartiality. Sometimes, the intention of the donor may not be clear or obvious. In these circumstances, if the likely perception is that the gift could improperly influence the decision making by staff, the gift must not be accepted. Examples of gifts and benefits of influence include:

- a parent offers a donation to the College to purchase sporting equipment on the condition their child is selected for the sports team;
- a parent offers a teacher a sum of money before end of year exams;
- an applicant for Recognition of Prior Learning offers a gift to an assessor;

College Board Directors and Staff may accept gifts or benefits that are offered as gratitude or appreciation for conduct of a specific task or exemplary performance of duty. While College Board Directors and Staff should not require additional rewards for performing their duties, it may be inappropriate to refuse gifts of gratitude when they are offered. These examples of gifts of gratitude fall under the $100 limit outlined above and could include:

- a modest bottle of wine given to a staff member for giving a presentation at a conference or to a community group;
- a box of chocolates and flowers from graduating students or Tutor groups, or on the occasion of the teacher’s birthday;
- parting gifts from students to a teacher on the last day of the school year.
Staff may accept token gifts that are given in a business situation when representing the College. They are usually products that are mass produced and not given as a personal gift but are usually available freely to everyone.

Staff may accept ceremonial gifts given officially from one agency to another during or at the end of official business. They are usually an expression of gratitude and a gift to the agency rather than an individual. Examples of ceremonial gifts include plaques or souvenirs given by overseas delegations to commemorate a visit.

Gifts and benefits offered to family members of College Board Directors and staff may be perceived as attempting to influence the behaviour of the staff member and therefore must not be accepted.

**Hospitality at Work Related Functions**

Hospitality is a type of benefit offered to College Board Directors and staff and specifically relates to the friendly treatment of College Board Directors and staff in the course of a business meeting or conference. It can range from light refreshments at a business meeting to restaurant meals and sponsored travel and accommodation.

Accepting hospitality from individuals and organisations that have or are seeking a business relationship with the College may be perceived as an attempt to create an obligation on College Board Directors and staff and win favourable treatment for the donor.

**2. Register of Gifts and Benefits**

A Register of Gifts and Benefits is maintained by the Business Office to record all gifts and benefits with a value greater than the nominal amount of $100. This register records gifts and benefits accepted by all College Board Directors and staff.

Additionally, the Principal and Executive Team must identify positions that are responsible for high risk activities that attract greater public scrutiny. These activities include but are not limited to:

- procurement and competitive tender processes including tender evaluations;
- regulatory activities such as inspections and assessments of service providers;
- purchase or sale of College assets;
- contractual relationships with the private sector;
- College placement; and
- assessment of recognition of prior learning.

It is appropriate to include all gifts and benefits of any value accepted by staff involved in the above activities in the Register of Gifts and Benefits. Given the nature of the role of Business Manager, the Business Manager automatically falls into this category.

All gifts accepted by College Board Directors and staff must be declared in writing to the Business Manager using the Gifts and Benefits Declaration Form (Attachment 1). All completed forms must be forwarded to the Business Manager. If the Business Manager receive a gift, his/her declaration form must be signed by the Principal.

The Business Office will regularly review the Register of Gifts and Benefits to ensure that all gifts and benefits accepted have been properly managed. The Register of Gifts and Benefits will be provided quarterly to the Board.
3. **GIVING OF GIFTS**

The use of St Vincent’s College funds to purchase gifts for SVC staff, students or external parties can occur under the following circumstances only:

- Floral arrangement’s or a donation in the College name upon the death of an employee’s/student family member or relative
- Congratulations / thank you gifts, example:
  - Staff example - birth/adoption of a child
  - Student example receiving a high achievement / state / global award
  - External party example – reaching an anniversary milestone
  - Lunches & dinners
- Retirement and resignation accolades

All gifts the College purchase for staff, students and external parties must be approved before purchase by completing the attached – **Gift Giving Approval Form** (Attachment 2).

Authority for approval of gifts is per below:

- HOD/HOH: up to $25
- Executive: up to $150
- Principal: up to $1000
- Board / Chairman: >$1000

**Please Note:**
- the above amounts exclude delivery charges, eg: in the case of flowers.
- Lunches and dinners are those other than organised for approved College meetings that are catered by College catering;
- Application of the approval limits for dinners/lunches is on a per-head basis and includes beverages if funded by the College.

**REVIEW** This policy statement was approved in July 2015 and is to be reviewed in 2018.
GIFTS AND BENEFITS DECLARATION FORM

ATTACHMENT 1
To be completed by person accepting the gift or benefit:

RECIPIENT DETAILS
Name:

Position: Dept

Relationship to donor:

DETAILS OF THE GIFT OR BENEFIT
Gift/benefit offered by: Date received: _____/_____/________

Estimated value ($):

Description of gift/benefit:

Signature: __________________________ Email: ______________________

To be completed by person approving the acceptance of the gift/benefit:

APPROVAL TO ACCEPT GIFT
Reason(s) for accepting gift/benefit:

(Include details of benefit(s) to the College)

Decision on what will
happen with the gift/benefit:

Name of approving staff: ___________________ Position: ________________

(Include details of benefit(s) to the College)

_____________________________ Date: ____________________

Signature:
GIFT GIVING APPROVAL FORM

ATTACHMENT 2

To be completed by staff member purchasing the gift:

RECIPIENT DETAILS

Name:

Relationship to College:

DETAILS OF THE GIFT OR BENEFIT

Gift offered by: _

Date: _________/_________/_________ Gift Value ($):

Description of gift/

Signature: __________________________ Email: __________________________

To be completed by person approving the gift giving:

APPROVAL TO GIVE GIFT

(include reason for giving gift


Approved by:

______________________________ Position: __________________

Signature: __________________________ Date: __________________