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PART A – Overview and Definitions

1. PURPOSE

When we perform our public duties, it's vital that our decision-making is impartial. This helps to maintain the public's trust in Kardinia Park Stadium Trust (KPST) and prevent corruption.

Sometimes, when offering or receiving gifts, benefits and hospitality, employees encounter difficult situations where they're not sure if they're doing the right thing.

This policy sets out how our organisation and its employees:

- respond to offers of gifts, benefits and hospitality
- provide gifts, benefits and hospitality.

2. SCOPE

The policy applies to:

- All KPST employees
- contractors, consultants and labour hire employees required as part of their contract to comply with this policy
- other workplace participants.

For ease of reading, in this policy we use the term 'employee' to cover anyone the policy applies to, as set out above, regardless of their employment or engagement status.

3. MINIMUM ACCOUNTABILITIES

The Victorian Public Sector Commission (VPSC) issues minimum accountabilities for the management of gifts, benefits and hospitality. These are binding on KPST.

This policy is based on the [minimum accountabilities](#)

4. KEY THINGS YOU MUST DO

When you're doing work for KPST, no matter what that work is, you must act with integrity and impartiality consistent with the [Code of conduct](#) (HRPOL001). This includes placing the public interest above your private interests.

This does not just help KPST. It protects you if you are accused of wrongdoing and helps you to navigate difficult situations.

Employees

As an employee, you must comply with this policy when you:

- are offered gifts, benefits or hospitality
- provide gifts, benefits or hospitality.

Seek advice

If unsure what to do, check with your manager or the Senior Manager Governance and Compliance.

Managers

If you're a manager with direct reports, you must also:

- be aware of the gifts, benefits and hospitality risks inherent in your direct reports' roles
- oversee your direct reports' compliance with this policy
- promote awareness and give advice
- model good practice.

Chief Executive Officer

As a public sector body head, the Chief Executive Officer (CEO) must fulfill their obligations under the [minimum accountabilities](#).

5. MOVING TO 'THANKS IS ENOUGH'

We encourage you to help us develop a culture of 'thanks is enough'.

Our aim is to move to a culture in which offers are not accepted even if they are permitted under this policy. We'll be taking steps to help external stakeholders understand our policy and this aim – for example, that we discourage gift offers, especially repeat offers.

6. DEFINITIONS

We use these definitions in the policy.

Benefits	Preferential treatment, favours or other advantage. For example, invitations to sporting, cultural or social events, access to discounts, or the promise of a new job.
Business associate	An individual, group or organisation that our organisation has, or plans to have, a business relationship with or who may seek commercial or other advantage.
Conflict of interest	A conflict of interest exists if you have a private interest that could influence, or reasonably be seen to influence, how you perform your public duties. The conflict can be actual, potential or perceived. If a conflict of interest exists, our Conflict of Interest policy will also apply.
Gifts	Items or services that are free, discounted, or would generally be seen by the public as a gift. For example: items such as vouchers, gift cards, artwork, chocolates or flowers; services such as car repair. The monetary value of a gift is the estimated monetary value of the item if it were not being provided either free or discounted. Remember that gift cards and vouchers must be treated the same as money under the minimum accountabilities.
Hospitality	The friendly reception and entertainment of guests. Ranges from light refreshment at a business meeting to expensive restaurant meals and sponsored travel and accommodation.
Legitimate business reason	Furtheres the conduct of official business or other legitimate goals of our KPST, the public sector or the State.
Non-token offer	The offer is worth \$50 or more.
Official gifts and items	Official gifts and items include: <ul style="list-style-type: none">• official gifts• official items (items with cultural, ceremonial, religious, historic, or other significance) Sometimes accepted or given on behalf of our organisation as part of business with official delegates or representatives of a community group, organisation, or government.

	Official gifts and items are declared and recorded regardless of their value and regardless of whether they were accepted or refused.
Internal register	The official record of all declarable offers of gifts, benefits and hospitality made to KPST or our employees, whether accepted or declined. The full title is 'Register of gifts, benefits and hospitality – declarable offers'.
Public register	The official record of information made public from our organisation's internal register. It is published online.
Token offer	The offer is worth less than \$50.

PART B – Offers to employees

7. DO NOT SOLICIT OFFERS

Consistent with the minimum accountabilities, you must not solicit (seek) any gift, benefit or hospitality, for yourself or others, if the offer could reasonably be seen as connected to your employment.

8. INTEGRITY TEST – OFFERS YOU MUST REFUSE

1. **Money or similar.** You must refuse the offer if it is money, used in a similar way to money, or easily converted to money.
2. **Conflict of interest.** You must refuse the offer if it gives rise to a conflict of interest (actual, potential or perceived). This means you must refuse the offer if it could influence, or reasonably be seen to influence, how you perform your public duties.
3. **Public trust.** You must refuse the offer if it could compromise the public's trust that you'll perform your job in an impartial manner or the public's trust in the impartiality of KPST or the public sector.
4. **Non-token offer without a legitimate business reason.** You must refuse a non-token offer unless there is a legitimate business reason to accept. It must further the conduct of official business or other legitimate goals of KPST, the public sector or the State.
5. **Community expectations.** You must refuse the offer (token or non-token) if it is not consistent with community expectations.
6. **Bribe.** You must refuse the offer if it could reasonably be seen as a bribe or other inducement. Report the offer to the CEO. They will report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-corruption Commission.
7. **Repeat offers that cause a conflict of interest.** Repeat offers are multiple offers from the same person, group or organisation. Their combined effect can sometimes lead to the perception that they could influence you. Refuse the offer if it is a repeat offer (token or non-token) that could reasonably be seen as adding up to a conflict of interest.
8. **Decisions you are likely to make or influence.** Refuse the offer if it is from a person, group or organisation you're likely to make or influence a decision about in the foreseeable future. This could reasonably be seen as a conflict of interest.

The only **exception** is that you can accept an offer if it is:

- token hospitality (a basic courtesy)

Example – Non-token offer without a legitimate business reason

James is required to meet with a supplier to conduct business. The supplier invites James to meet him at a corporate box during a sporting event (at no cost to James but at a cost to the supplier).

There is no legitimate business reason for the meeting to take place in this way.

James must refuse and declare the offer.

Example – Repeat offers that cause a conflict of interest

Rachael is responsible for managing a relationship with one of our suppliers. She often meets with the supplier's representative at a café because it's a convenient place for both parties to meet.

The supplier has offered to pay for Rachael's coffee. It may be appropriate for Rachael to accept the offer a single time or perhaps occasionally. However, the supplier offers every or most times.

It would not be appropriate for Rachael to accept each time or more than occasionally, because it could create the perception of influence. A member of the public could reasonably infer that Rachel expects suppliers to pay for her food and drink when they meet and that this may influence her decision making.

- a learning opportunity, such as a webinar, and all of the following apply:
 - it is relevant to your work duties
 - it has a legitimate business reason (benefit)
 - it is free for all attendees
 - the covering or discounting of additional costs (travel, accommodation) is not included in the offer
 - it is consistent with community expectations.

9. Offers by suppliers or contractors. Accepting offers from suppliers for free or discounted development opportunities that they were not engaged to provide will not pass the integrity test in some circumstances.

Staff may only accept development opportunities from suppliers where there is a legitimate business reason, attendance meets community expectations and any risk of conflict of interest can be appropriately managed.

10. Endorsement. Refuse the offer if accepting it could reasonably be seen as endorsing a product or service.

11. Advantage to a supplier or sponsor. Refuse the offer if accepting it could reasonably be seen as advantaging a supplier or sponsor in a future procurement.

12. Sufficient attendees. For hospitality and events, refuse the offer if our organisation will already be sufficiently represented to meet its business needs or – as is the case for all other offers – if it does not comply with other elements of the integrity test.

13. Your own judgement. Refuse the offer if you feel that accepting it would breach your obligations under the Code of conduct. This is a broad test that you can use to protect yourself if you are still unsure about accepting an offer. If you're uncertain, you can seek advice from your manager or the Senior Manager Governance and Compliance.

DECLINING OFFERS

In most cases where the offer should or must be refused, you should decline it at the time the offer is made to you. Sometimes this can be difficult, for example:

- The offer may have been delivered to our organisation via mail, making declining difficult.
- Declining the offer may cause offence or even be unsafe in the moment for the staff member being offered it
- There may be some other reason why, in the moment, you are unable to decline the offer.

Gifts

This is most common with gifts. In the case of gifts, declare the offer as normal and make it clear to your manager or the appropriate delegate that you were unable to decline the offer in the moment, but you have not accepted it.

Follow-up response

You or our organisation will dispose of the gift and an explanation and rejection will be sent to the offeror where appropriate.

Benefits and hospitality

In the case of benefits and hospitality, it is very unusual for a situation to arise where you cannot decline an offer. The most obvious, but still extremely unlikely, scenario is that refusing would offend the offeror in a way that would make you feel unsafe.

In such cases, as soon as possible declare that you accepted the offer and why.

Follow-up response

KPST will take action to ensure our staff are not placed in such situations in the future.

HELPFUL GUIDE ON WHETHER TO ACCEPT OR REFUSE

Example – Offers by suppliers or contractors

An organisation you are likely to make, or influence, a decision about in the foreseeable future offers you a learning opportunity that is relevant to your work duties and has a legitimate business benefit. It is free for all attendees.

You can accept the offer if it is also consistent with community expectations. An offer to attend a free webinar is far more likely to be consistent with community expectations than an offer to attend a conference – particularly if the latter includes accommodation, travel or related benefits, such as a gala dinner.

Refuse the offer if it is made by a person, group or organisation whose primary purpose is to lobby ministers, members of parliament or public sector agencies.

You can use the following GIFT questions to help assess whether to accept or refuse a particular gift, benefit or hospitality. GIFT is an acronym that stands for: giver, influence, favour and trust.

Useful questions to prompt your thinking

Giver	<ul style="list-style-type: none"> • Who is providing the gift, benefit or hospitality and what is their relationship to me? • Does my role require me to select suppliers, award grants, regulate industries or determine government policies? • Could the person, group or organisation benefit from a decision I make?
Influence	<ul style="list-style-type: none"> • 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 basic courtesy or token of appreciation or is it a non-token offer? • Does its timing coincide with a decision I'll be making in the foreseeable future?
Favour	<ul style="list-style-type: none"> • 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, group or organisation made several offers over the last 12 months? • Would accepting create an obligation, or feeling of obligation, to return a favour?
Trust	<ul style="list-style-type: none"> • 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?

Remember, these are meant to be useful prompts only. The obligations for employees are set out in 'Integrity Tests – Offers you must refuse'.

9. TOKEN OFFERS – WHAT YOU MUST DO

If you receive a token offer (value less than \$50):

- You can only accept the offer if it passes the 'integrity test'
- Remember, thanks is enough. Do you need to accept?
- You do not need to declare the offer.
- You do not need a legitimate business reason to accept.
- You do not need approval from your manager to accept.
- You are the owner of the gift, benefit or hospitality.

10. NON-TOKEN OFFERS – WHAT YOU MUST DO

If you receive a non-token offer (value \$50 or more):

- You must declare the offer even if you refuse it.
- Remember, thanks is enough. Even if you have a legitimate business reason, do you need to accept?
- You can accept the offer if it passes the 'integrity test' (Integrity test - offers you must refuse).
- As part of the integrity test, you must have a legitimate business reason to accept.
- You must have prior approval in writing from your manager or delegate to accept.
- If you accept the offer you do so on behalf of KPST. It is not usually yours to keep. Some exceptions exist, but you will need to apply to see if you qualify in the circumstances. For more information see 'applying for ownership of a non-token gift' below.
- The offer and outcome are recorded in the internal register. Certain information may also be published in the online public register.

How to declare an offer

To declare a non-token offer:

- Use the declaration form available in the Teams Approval app
- If you accept the offer, record the business reason on the form in enough detail to link it with your duties and the benefit to KPST, the public sector or the State.
- Submit the form to your manager, who will arrange for the offer and outcome to be recorded in the internal register.
- The CEO should submit their form to the Trust Chair for review and approval.

Examples – legitimate business reason

These are examples of how to record the legitimate business reason in enough detail:



Unacceptable

- 'Networking'
- 'Maintaining stakeholder relationships'

Acceptable

- 'I am responsible for evaluating and reporting on the outcomes of KPST's sponsorship of Event A. I was offered a free ticket by the event organisers. I accepted so I could attend Event A in an official capacity and reported back to KPST on the event.'
- 'I presented to a visiting international delegation. The delegation presented me with a cultural item which, consistent with our policy on official gifts and items, I accepted on behalf of the KPST.'
- 'I was offered to attend professional development by one of our stakeholders, who supplies legal services to KPST and more broadly to other organisations in the public sector. The session would count towards my Continuing Professional Development obligations as a lawyer. The event was free to everyone, and KPST paid for travel costs.'

Internal register and public register

Access to the internal register is restricted to relevant persons in KPST. Certain information from the internal register is published online in the public register, consistent with VPSC guidance on gifts, benefits and hospitality.

Applying for ownership of a non-token gift

Usually, a non-token gift belongs to KPST. However, if the gift was given to you specifically in recognition of your work or contribution, you may retain it provided that:

- it is not an official gift (refer to Offers to employees, 14. Official gifts and items – what you must do)
- it is unlikely to bring you or KPST into disrepute
- it would be consistent with community expectations, and
- your manager or appropriate delegate gives written approval.

Retrospective approval

If you cannot obtain prior approval to accepting an offer, in limited circumstances you can obtain retrospective approval. Apply within 5 business days. For example:

- if it was reasonable to be unaware the gift was non-token – such as a wrapped gift
- if it would have caused serious offence to refuse – but remember, except for official gifts or items, this is not usually sufficient reason.

11. OFFERS MADE IN A PERSONAL CAPACITY

It is normal to receive offers of gifts, benefits and hospitality in your personal life that are unconnected to your work.

You can accept these offers, provided you believe on reasonable grounds that the offers are made in a personal capacity.

If you are unsure whether an offer is being made to you in a personal capacity or because of your role with KPST, apply the integrity test, consider the GIFT questions and follow this policy as you would in your professional capacity.

12. NON-TOKEN OFFER FROM ANOTHER PUBLIC SECTOR ORGANISATION

Non-token offer from a government department

In the course of your work as an employee of KPST, you might be offered a non-token gift, benefit or hospitality by:

- a Victorian government department or administrative office
- the VPSC.

If this occurs:

- you can accept the offer if it complies with the 'Integrity test - offers you must refuse'
- you do not need to declare the non-token offer.

However, if the offer does not meet the 'Integrity test - offers you must refuse' it must be refused and declared.

Non-token offer from a public entity or other public sector organisation

In the course of your work as an employee of KPST, you might be offered a non-token gift, benefit or hospitality by another Victorian public sector organisation, such as a public entity.

For example, you might be offered free tickets to an event where our organisation:

- has helped to organise the event
- otherwise actively supports the event or the organisation.

If this occurs:

- you can accept the offer if it complies with the Integrity test
- regardless of whether you accept the non-token offer, you must declare it.

Non-token offers of uncertain origin

If you receive an offer via a work colleague and you believe they may be offering on behalf of a third party with the possible intention of influencing you:

- refuse the offer and declare it, and
- report it to your manager or the appropriate delegate, as it may need to be referred on to an integrity body or the police.

Offers from an interstate or Commonwealth public sector organisation

Offers from public sector organisations that are part of a different state or part of the Commonwealth public sector should be treated the same as any other organisation that is not a Victorian public sector organisation.

13. EXCEPTIONS TO DECLARATION RULE

Generic offers that are refused

In the course of your public duties you may receive generic offers of non-token gifts or benefits. For example:

- emails targeting our employees with offers to attend a seminar or webinar at a discount rate
- SPAM email.

You don't need to declare a generic non-token offer if you refuse it.

If you want to accept it, the usual restrictions in the 'Integrity test - offers you must refuse' apply as to whether you can do so.

Targeted email blasts

Often, generic offers may appear personalised by being addressed to you directly, or through the use of generative language tools that can quickly and believably personalise the body of emails whilst still sending them to a large number of people.

If you receive an email and you are unsure if it is a generic offer, talk to your manager to determine if you need to declare it. Some useful questions to ask when unsure are:

- Do I have a relationship with the person who sent the email?
- Do I have a relationship with the organisation who sent the email?
- Is the offer related to my work or the work of my area of the organisation?

If the answer to all of the above is 'no' then it is likely a generic offer.

Multi-employee declaration

Sometimes, KPST will issue a non-token declaration on behalf of all or some of our employees.

If this happens, we will let the relevant employees know, as it means they don't need to make an individual declaration of a non-token offer.

This can be a multi-employee refusal or multi-employee acceptance, depending on the offer. These declarations will be issued by the most appropriate delegate.

Example

Sometimes, if a number of our employees receive a non-token offer to attend a learning opportunity, KPST will issue a multi-employee declaration.

If we accept the offer using a multi-employee declaration we will let eligible employees know that they will be covered by this declaration if they attend.

Employees who decide to attend will still need to let the event organiser know as KPST will only approve attendance for eligible employees, not confirm it with the organisers.

Employees still have an obligation to raise and manage any conflicts of interest that they believe the offer may create for them.

14. OFFICIAL GIFTS AND ITEMS – WHAT YOU MUST DO

If you accept the following you do so on behalf of KPST:

- official gift
- official item (item with cultural, ceremonial, religious, historic, or other significance).

Official gifts and official items (for example a culturally significant gift from an official delegation) are an exception to our usual ‘thanks but no thanks’ approach.

Regardless of its monetary value, an official gift or official item:

- must be declared
- will be recorded in the internal register
- will not usually be published in the online public register
- belongs to KPST, not you.

Some exceptions exist (see below).

Applying for ownership of an official item

If an official item was given to you specifically in recognition of your work or contribution, you may retain it provided that:

- it is the express wish of the giver
- it benefits KPST’s relationship with the giver
- it is appropriate given the significance and value of the item
- it would be consistent with community expectations
- it is unlikely to bring you or KPST into disrepute, and
- your manager or, depending on the gift, an appropriately senior delegate gives written approval.

You cannot retain the gift unless it meets all the above requirements.

15. OFFERS TO KPST

Sometimes offers are made to KPST itself; for example, offers of equipment.

In deciding whether to accept such an offer, KPST will take into account:

- whether the offer passes the ‘Integrity test - offers you must refuse’
- in particular, will carefully scrutinise:
 - o the people or organisation making the offer
 - o the nature and circumstances of the offer
 - o the level of public benefit if the offer is accepted.

KPST must reject any offer that is not consistent with community expectations.

Official items

If an offer of an official item is accepted by one of our employees, it becomes the property of KPST, with some exceptions (see above). KPST will decide what to do with each official item that comes into its possession according to the nature of the item and our own policies.

Reward and recognition offers

Sometimes, an offer is made to provide KPST with a benefit like discounts, free tickets or equipment for employees.

Sometimes, our organisation may decide to accept the offer for reward and recognition purposes after taking into account:

- the above factors, and
- any other relevant requirements of this policy.

Donations or gifts given on KPST's behalf

Sometimes an individual or business that has a relationship with KPST may seek to donate or gift to a third party, like a charity, in our name or on our behalf. Often this happens without seeking prior approval from KPST or giving us any opportunity to accept or refuse the gift or donation.

There are reputational risks associated with any donation or gift made on our behalf, even where this is well meaning.

For example, it can be seen as preferencing one charitable organisation over another and can impact the perception of and trust in the Victorian Government as a whole.

There are other risks associated with allowing a commercial partner to donate or gift in this manner, including the impact that this may have on future procurement or work activities.

KPST expects that everyone who works with us is made aware of our expectations around donations made in our name.

While there is no opportunity to refuse the donation or gift once made, the commercial partner should be informed that no gift or donation should be made on KPST's behalf in future without a formal offer and approval.

Where a gift or donation has been made without prior approval, that gift or donation should be listed on the gifts, benefits and hospitality register, noting that there was no opportunity to accept or refuse.

PART C – Providing to others

16. INTEGRITY TEST – PROVIDING GIFTS, BENEFITS OR HOSPITALITY

When providing a gift, benefit or hospitality on behalf of KPST, you must ensure all of the following:

1. Business reason

Ensure it is for a business reason. There must be a legitimate business benefit that furthers the conduct of official business or other legitimate goals of KPST, the public sector or the State.

Some examples of legitimate business reasons are to:

- welcome guests
- facilitate the development of business relationships and outcomes
- celebrate achievements.

2. No conflict of interest

Ensure it does not raise a conflict of interest (actual, potential or perceived).

3. Proportionate costs

Ensure that any costs incurred are proportionate to the benefits obtained for the State.

4. Consistent with community expectations

Ensure that the event would be considered reasonable and consistent with community expectations.

Example

KPST is running a workshop for all staff, with mandatory attendance. It is an all day event and KPST has organised catering to provide lunch for all attendees.

This is a legitimate business reason for KPST to provide hospitality. It does not raise a conflict of interest, it is proportionate in costs, and it is consistent with community expectations.

HELPFUL GUIDE ON WHETHER OR NOT TO PROVIDE GIFTS, BENEFITS OR HOSPITALITY TO OTHERS

You can use the following HOST questions to help you assess if providing a particular gift, benefit or hospitality would comply with the 'Integrity test – providing' above.

HOST is an acronym that stands for: hospitality, objectives, spend and trust.

Useful questions to prompt your thinking

Hospitality	<ul style="list-style-type: none">• To whom is the gift or hospitality being provided?• Will recipients be external business associates, our employees, or a mixture of both?
Objectives	<ul style="list-style-type: none">• What is the business reason for providing the hospitality?• Will it 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?
Spend	<ul style="list-style-type: none">• Will the cost be proportionate to the benefits obtained?• What type of hospitality will be provided?• Will the hospitality be modest or expensive?• If alcohol is to be provided, why? Would it be a courtesy or an indulgence?• Is an external venue necessary or can KPST host the event?• Is the catering or hospitality proportionate to the number of attendees?• Does the size of the event and number of attendees align with the intended outcomes?• If a gift is to be given, is it symbolic rather than financial in value?
Trust	<ul style="list-style-type: none">• Will public trust be enhanced or diminished?• Will the gift, benefit or hospitality be proportionate to public expectations or seen as excessive?• Is there a conflict of interest?• Could you publicly explain the rationale for providing the gift, benefit 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?

Remember, these are meant to be useful prompts only. The obligations on you are set out in the 'Integrity test – providing gifts, benefits or hospitality'

17. PROCESSES YOU MUST FOLLOW – PROVIDING GIFTS, BENEFITS, OR HOSPITALITY

Our organisation has processes and procedures for providing gifts, benefits and hospitality. For example, for providing hospitality at:

- internally focussed events
- externally focussed events.

These requirements must be complied with. For example, requirements in relation to:

- alcohol
- financial expenditure and approval
- reward and recognition programs
- recording and reporting.

Conduct during hospitality

Consistent with minimum accountability 7, if you participate in hospitality in your public sector role you must:

- demonstrate professionalism in your conduct
- uphold your duty of care to other participants.

Providing official gifts and items

Before providing an official gift or item, make reasonable enquiries to ensure it will be appropriate to do so.

Example

Before providing a ceremonial gift to an official representative of an Aboriginal or Torres Strait Islander group, reasonable enquiries could include making enquiries with:

- the group that the person represents
- an organisation such as the Victorian Aboriginal Heritage Council or the Local Registered Aboriginal Party (RAP) or Traditional Owner Organisation.

PART C – Alleged breaches

18. DEALING WITH AN ALLEGED BREACH

If you may have breached this policy notify your manager in writing immediately. This enables us to assess how best to mitigate the risk – for example, we may arrange to return the gift.

KPST's response

KPST will respond to alleged breaches of this policy consistent with the Act, the code, this policy and any other obligations that apply.

We will take a graduated approach. Our response will be fair, reasonable and proportionate. In some instances, no action will be taken. In others, we will deal with the matter:

- on an informal basis, for example, through education or counselling
- through a performance management process or similar, or
- if other methods are not appropriate, through a misconduct process.

A finding of misconduct may amount to a breach of the code of conduct. Serious misconduct can result in termination of employment.

Contractors may be subject to contract renegotiation or termination.

If a criminal offence may have occurred, the Victorian or Federal Police may investigate and prosecute.

19. SPEAK UP

We encourage you to speak up if you believe a breach of this policy:

- has happened
- is happening
- might be about to happen.

You can do so by notifying your manager or the Senior Manager Governance and Compliance.

IBAC and the Victorian Ombudsman

Alternatively, if you believe corrupt or improper conduct is occurring, you can make a complaint directly to the Independent Broad-based Anti-corruption Commission (IBAC) or the Victorian Ombudsman. Sometimes this can occur on a whistle-blower basis as a public interest disclosure.

How KPST must respond

KPST must always:

- actively support and protect employees who speak up in good faith
- take decisive action, including possible disciplinary action, against anyone who discriminates against or victimises an employee who speaks up in good faith
- respond in a constructive manner to the information provided.

RELATED DOCUMENTS

HRPOL001 Code of Conduct

HRPOL012 Conflict of Interest Policy

GOV015 Public Interest Disclosure Procedure

Victorian Public Sector Commission – Minimum Accountabilities for the Management of Gifts, Benefits and Hospitality

VERSION CONTROL AND CHANGE HISTORY

VERSION NUMBER	DATE	DETAILS OF CHANGE
1	9.5.2016	Published
2	9.12.2016	Formatted, update nominal value and reference VPSC
3	31.01.18	Formatted, update position title GM F&CS.
4	August 2013	Template changed, position title CFO
5	10.05.2024	Alignment with VPS policy and position responsibilities clarified. Approved by ELT/CEO.
6	12/08/2024	Updated to reflect new VPSC model policy and minimum accountabilities. Approved by ELT/CEO Augst 2024