

## Gifts and Benefits Policy

### 1. Purpose

The receipt of gifts or benefits by members of employees or Directors may be perceived by others as an inducement which could place a Director or employee under an obligation to the donor or associated parties. This also applies in the reverse.

The purpose of this policy is to protect the reputation of Directors, employees, the organisation, and by association, the community housing sector, from the deleterious effects of the inappropriate receipt or giving of gifts or benefits.

### 2. Scope

Gifts or benefits received or given by PLH, a Director or employee from or to an external party.

### 3. Examples of Gifts or Benefits

Gifts or benefits include monetary gifts, goods, services, discounts, favours or special consideration.

Examples include:

- Cash
- Free or discounted entry to events
- Free travel or travel concessions
- Access to holiday accommodation
- Free or discounted services provided by suppliers
- Free or discounted goods supplied by contractors.

### 4. Policy and Guidelines

This policy prohibits the receipt of gifts or benefits by Directors and employees

- In particular, Directors and employees must not:
  - (i) Solicit for private purposes any gift or benefit in connection with their official functions and duties
  - (ii) Accept any gift or benefit for any functions or duties, performed or not performed, which are part of their normal duties
  - (iii) Accept any offer of money in any form, e.g. cash, pay out of a loan.
- Directors and employees need to inform clients that they are prohibited from receiving gifts or benefits of any kind under the organisation's gifts or benefits policy.
- Where a Director or employee considers that the offer of a gift or benefit constitutes a bribe, they should terminate the transaction and report their concerns to the CEO or the Board immediately.
- Where PLH or a Director or employee is proposing to give a gift to an external party, consideration should be given to whether they may have a similar policy and how this may be perceived by the recipient and their associated parties.

### 5. Gifts of Nominal Value

In some circumstances, the receipt of tokens or gifts of nominal value may be accepted especially when the rejection of such gifts has the potential to cause upset or offence. These gifts are usually mass produced, of little value and carry an organisation's logo. PLH considers a gift or benefit with a value not exceeding \$50 as a token which is not required to be recorded in the Register of Gifts or Benefits.

Example of such gifts include;

- Food, Chocolates, Sweets
- A bottle of wine
- Flowers.

### 6. Gift Register

PLH will maintain a Register of Gifts or Benefits. A record of all gifts or benefits received will be kept in this register and include (a) the date of the donation (b) the type and value of the gift (c) the donor's name, company (if applicable) and contact details and (d) notes explaining why the donation was accepted or declined.

The Register of Gifts or Benefits may be monitored by the Board of Directors, as required. In some instances, gifts may be handed on to an appropriate charity or not-for-profit organisation when the disposal of a gift is considered more appropriate.

### 7. Complaints and Appeals

Any person who believes that there has been a breach of this policy can lodge a complaint in accordance with the procedures set out in the organisation's Fraud Control Policy.

### 8. Quality Assurance

Quality assurance measures should include the following:

- Ensure that all employees, Directors, contractors and suppliers are aware of the organisation's policy on gifts or benefits.
- All gifts or benefits exceeding \$50 in value are to be recorded in the Register of Gifts or Benefits.

Policy Owner	Executive Manager, Governance & Compliance
Approval Authority	Board
Approval Date	September 2021
Next Review	September 2024
Website published	Yes