Gifts and Benefits Procedure

1 Purpose

To provide guidance to University Members on accepting and giving gifts and benefits and define the disclosure and reporting requirements.

2 Scope

This Procedure applies to all University Members and should be read in conjunction with the Code of Conduct Policy, the Council Conflict of Interest Policy and Procedure, the Conflict of Interest Procedure and the Financial Management Practice Manual (FMPM), where relevant.

2.1 Exclusions

This Procedure does not apply to:

- gifts or benefits offered in response to the University's fundraising and philanthropic activities covered by the Gift Acceptance Policy or the Australian Government's Cultural Gifts Program;
- contributed or donated Asset(s) that have an associated donation agreement;
- gifts or benefits given or received under the Recognition and Reward Policy, the Study Assistance Procedure or any approved Employee health and wellbeing program, Employee benefits provider or recognition and rewards program.

3 Procedure Overview

This procedure outlines the process for managing gifts and benefits offered and given by University Members. It provides clear guidance to ensure that all actions align with the highest standards of integrity and transparency, in line with the University's commitment to ethical conduct.

University Members must adhere to the following steps when considering gifts and benefits:

- Careful consideration - any offer of gift or benefit that is outside normal Employee entitlements must be carefully considered and only accepted where deemed appropriate,

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- Acceptance criteria - University Members must not accept or give gifts or benefits that may adversely affect the integrity and professionalism of the University or create any perception of undue influence,

- Solicitation is prohibited - University Members are strictly prohibited from soliciting gifts or benefits from external parties or another University Member in connection with their official duties.

The procedure ensures that all gifts and benefits are managed in a way that maintains public trust and upholds the University's values.

4 Procedures

4.1 Defining Gifts and Benefits

Gifts and Benefits are items given and received in the course of official duties, including:

- the transfer of property or other benefit without compensation or for a value substantially less than full market value, or

- a loan of property made on a permanent, or an indefinite, basis or at materially less than market value, or

- in respect of a University Member that is an Employee, anything of value offered in the course of employment other than normal employment entitlements.

The following are examples (not an exhaustive list) of common Gifts and Benefits that may be offered to University Members:

- tickets or corporate hospitality at sporting events, the theatre or other major recreation attractions

- alcohol, clothes, flowers, food items and other products

- hospitality or entertainment provided as part of a meeting, conference or other event attended as part of official duties

- preferential treatment such as queue jumping or the use of facilities

- merchandise such as pens, pencils, caps, notepads, cups

- use of facilities such as holiday homes and discounted travel

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- items won in competitions held at conferences
- gifts given by a Student to an Employee
- gifts of flights or accommodation for unofficial travel. Note that where an Employee is providing services e.g. presenting at a conference, and the travel has been approved through the University's travel system, contributions from the conference organiser towards the cost of travel are not considered Gifts and Benefits.

Where uncertainty exists, University Members may seek advice from the COFO, the Director (Finance) or the Director (Governance and Compliance).

4.2 Offer of gifts and benefits

If University Members are offered a gift or benefit, they must first consider whether it is appropriate to accept it having regard to this Procedure. Only after this consideration, and consultation with their Manager, may the gift or benefit be officially accepted.

Consideration must be given to factors including:

- why the offer has been made e.g. to influence, to show gratitude, serve as a token gesture, or fulfill cultural or ceremonial requirement,
- the likely public perception of receiving it,
- whether it has been received in a public forum i.e. consider the openness and transparency of the gesture,
- the Value and any associated ongoing obligations e.g. storage, recurrent licensing; and
- the frequency with which gifts or benefits are offered and accepted.

University Members performing sensitive roles or tasks (e.g. internal audit, Procurement and Purchasing, tender evaluation, Student admissions, Scholarship panels, recruitment panels) would normally be expected to decline any offer of gifts or benefits.

Where uncertainty exists, University Members may seek advice from the COFO or the Director (Governance and Compliance) and that advice must be followed.

4.2.1 Declining offers of Gifts and Benefits

University Members must not:

- accept any gift or benefit for any official function or duties which could create a Conflict of Interest,
- accept any gift of money or benefit by way of a loan (or similar funding) for any functions or duties performed or not performed,
- accept any monetary gift such as cash, cheques, gift cards, money orders, direct deposits, shares, betting account deposits and the like,
- accept any Gift or Benefit that could lead to reputational damage for the University.

Non-compliance will be managed in accordance with the University's disciplinary Procedures.

4.3 Acceptance, retention and reporting

Where accepting a gift or benefit is determined to be consistent with this Procedure, the recipient must comply with the acceptance, retention and reporting requirements outlined in the table below.

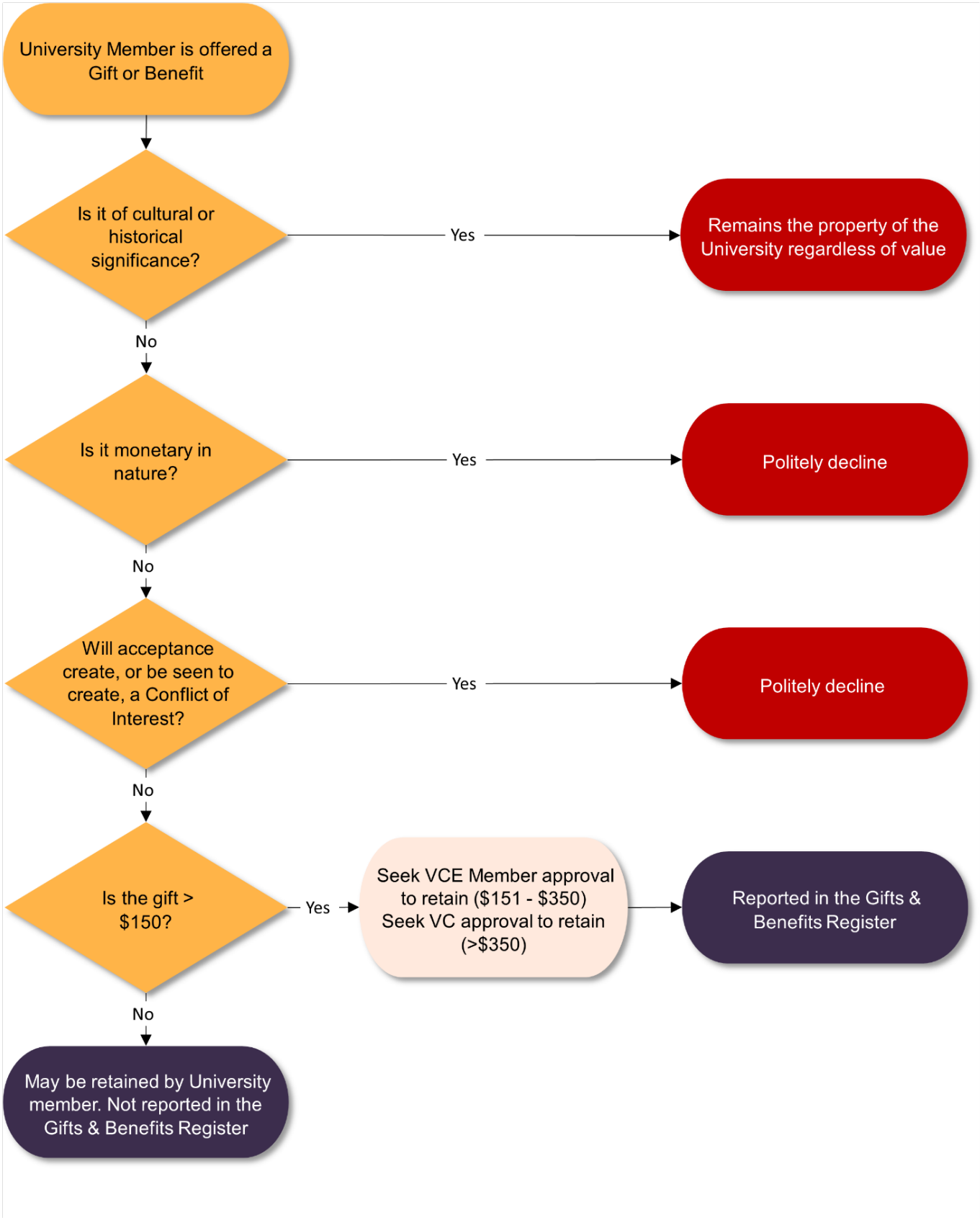
Acceptance of a gift or benefit by a University Member does not automatically mean it can be retained. The Value is used to assess the retention requirements. University Members may retain Reportable Gifts and Benefits where appropriate approval has been received. Retrospective approval is only accepted for consumable and/or perishable items received e.g. fruit baskets and baked goods where it may be impractical to seek approval prior to those items perishing or otherwise being unfit for their intended use.

Value	$0-150	$151-$350	>$350	Item of cultural or historical significance
Acceptance	Inform Manager of the Gift or Benefit.	Manager's approval required to accept the Gift or Benefit.	Manager's approval required to accept the Gift or Benefit.	Manager's approval required to accept the Gift or Benefit.
Retention	May be retained by the University Member.	Retained by the University unless approved otherwise by Vice-Chancellor's Executive Member.	Retained by the University unless otherwise approved by the Vice-Chancellor.	Retained by the University regardless of value.
Reporting requirements	These are Nominal Gifts and Benefits, not recorded in the Gifts and Benefits Register unless multiple Gifts or Benefits are received from the	Complete Gifts and Benefits Received Declaration and submit to COFO. These are Reportable Gifts and Benefits,	Complete Gifts and Benefits Received Declaration and submit to COFO. These are Reportable Gifts and Benefits,	Complete Gifts and Benefits Received Declaration and submit to COFO. Items >$150 are Reportable Gifts and Benefits, recorded in

	same Donor that cumulatively exceed $150 in a 12-month period.	recorded in the Gifts and Benefits Register and available publicly on request from the COFO.	recorded in the Gifts and Benefits Register and available publicly on request from the COFO.	the Gifts and Benefits Register and available publicly on request from the COFO.

4.3.1 Decision tree

Reportable Gifts and Benefits accepted by University Members remain the property of the University unless the applicable approval authority determines that it is appropriate for the recipient to retain the gift or benefit. The below decision tree assists in determining the appropriate course of action.



Further guidance on accepting Gifts and Benefits can be found in the Public Service Commission Gifts and Benefits Guideline.

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4.4 Giving gifts and benefits

The University may give gifts or benefits to University Members or external parties in the course of its operations that may include:

- official hospitality;
- corporate gifts; and
- gifts in accordance with social or cultural practices.

Gifts given will be monitored regularly and Reportable Gifts and Benefits will be recorded in the Gifts and Benefits Register.

4.4.1 Official hospitality

The University recognises that entertaining key stakeholders may be beneficial to the operations of the University. Examples of key stakeholders include:

- interstate and overseas visitors,
- representatives of business or industry, recognised community organisations, schools, the press and other Media,
- representatives from other universities and government agencies, and
- Students and their families and friends for official University functions e.g. graduations and Scholarship awards.

Expenditure for approved official hospitality must be in accordance with the relevant policies and procedures in the Financial Management Practice Manual (FMPM).

4.4.2 Corporate gifts

It may be appropriate in some circumstances to provide corporate gifts to individuals or organisations on behalf of the University as a token of appreciation or a gesture of courtesy. Examples include gifts presented to:

- sponsors of, or speakers at, events,
- artists in appreciation of their work,

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- judges of events or awards acting in an honorary capacity (excluding University Members), and
- foreign dignitaries or delegations visiting the University.

University Members may also give gifts when travelling overseas on official University business. Expenditure for approved corporate gifts must be in accordance with relevant Policy Instruments.

4.4.3 Gifts and Benefits given in accordance with social or cultural practices

Gifts may be provided in accordance with social or cultural practices, which generally carry a personal benefit. Such gifts may only be given for employment-related events, such as:

- farewell or retirement; and
- for Aboriginal and/or Torres Strait Islander peoples performing a cultural or ceremonial service to the University, for example Aboriginal and Torres Strait Islander guests invited to the University as cultural advisors or community speakers.

4.5 Gifts and Benefits Register

The Gifts and Benefits Register is a central repository for the University to record Reportable Gifts and Benefits accepted and given and is managed by the Chief Operating and Financial Officer.

The Gifts and Benefits Register must include:

- the date the Gift or Benefit was received or given;
- the description of the Gift or Benefit;
- the retail Value in Australian Dollars;
- the name of the Donor/s and Donor organisation;
- the name of the recipient/s;
- the entity retaining the Gift or Benefit;
- the reason/s for accepting or giving the Gift or Benefit;
- treatment of Gift or Benefit received e.g. consumed, gifted to charity, sold, put on display, made available for Employee use; and

- the position of the appropriate approval authority.

Reportable Gifts and Benefits will be available administratively to the public under the *Right to Information Act 2009* as part of the University's publication scheme upon request. At times, the Gifts and Benefits Register may be subject to internal and external scrutiny. This may include analysis by an independent reviewer for trends or patterns which may cause concern and need corrective and preventative action, analysis for the management of conflicts of interest and Procurement and contract management. Results of reviews will be communicated to the Vice-Chancellor where necessary.

4.6 Non-compliance

University Members have an obligation to declare Gifts and Benefits according to this Procedure. Deliberate attempts to undervalue a Gift or Benefit to avoid the requirements under this Procedure or deliberately failing to declare a Gift or Benefit will lead to assessment of potential fraudulent behaviour. Failing to comply with this Procedure will be dealt with under the relevant University Policy Instruments and/or employment contract as applicable.

5 References

Gifts and Benefits (Directive 22/09) | For government | Queensland Government. (2019). Retrieved from https://www.forgov.qld.gov.au/documents/directive/2209/gifts-and-benefits

Gifts and Benefits guideline | For government | Queensland Government. (2019). Retrieved from https://www.forgov.qld.gov.au/documents/guideline/gifts-and-benefits-guideline

6 Schedules

This procedure must be read in conjunction with its subordinate schedules as provided in the table below.

7 Procedure Information

Accountable Officer	Vice-Chancellor
Responsible Officer	Chief Operating and Financial Officer
Policy Type	University Procedure
Policy Suite	Code of Conduct Policy
Subordinate Schedules	

Approved Date	2/1/2026
Effective Date	2/1/2026
Review Date	23/9/2029
Relevant Legislation	*Crime and Misconduct Act 2001* *Financial Accountability Act 2009* *Financial and Performance Management Standard 2019* *Public Sector Ethics Act 1994* *Right to Information Act 2009* *University of Southern Queensland Act 1998*
Policy Exceptions	Policy Exceptions Register
Related Policies	Art Collection Policy Assets Policy Conflict of Interest Policy Council Conflict of Interest Policy and Procedure Delegations Policy Financial Management and Accountability Policy Marketing and Brand Policy Portable and Attractive Items Policy Privacy Policy Property, Plant and Equipment Assets Policy Public Interest Disclosure Policy Recognition and Reward Policy Taxation Policy
Related Procedures	Assets Procedure Conflict of Interest Procedure

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	Expenditure Procedure Merchandise Procedure Portable and Attractive Items Procedure Privacy Procedure Property, Plant and Equipment Assets Procedure Taxation Procedure Travel Procedure
Related forms, publications and websites	Conflict of Interest Cultural Gifts Examples of conflicts of interest Financial Delegations Schedule Financial Management Practice Manual Gifts and Benefits Received Declaration (revised) Gifts and Benefits (Directive 22/09) Gifts and Benefits Guideline Gifts and Benefits Register (available publicly on request) University Student Endowment Fund (USEF)
Definitions	**Terms defined in the Definitions Dictionary**
	Asset(s) A resource (tangible or intangible) controlled by the University as a result of past events and from which future economic benefits are expected to flow. Assets may be donated to the University, acquired for consideration or subject to financing arrangements. Conflict of Interest If a University Member has an interest that conflicts or may conflict with the discharge of the University Member's duties the University Member should Declare the nature of the interest and the conflict to the University Member's Supervisor as soon as practicable after the

relevant facts come to the University Member's knowledge and must not take action or further action relating to a matter that is or may be affected by the conflict until authorised. An Executive Leader may direct a University Member to resolve a conflict or possible conflict between an interest of the University Member and the University Member's duties. A reference to an interest or to a Conflict of Interest is a reference to those matters within their ordinary meaning under the general law, and, in relation to an interest, the definition in the Acts Interpretation Act 1954, Schedule 1, does not apply. A Conflict of Interest will arise when a University Member's Private Interests conflict with their duty to the University or to serve the public interest as a University Member. The risk of having a conflict of interest increases where a University Member's responsibilities include the authority to make decisions. A conflict of interest may be potential, perceived or actual - when a University Member is in a role where future decision making may be influenced by their Private Interests if a certain condition is fulfilled, they have a potential conflict of interest; a perceived conflict of interest arises where it appears that decisions a University Member make in the course of their University employment may be influenced by their Private Interests, whether or not this is in fact the case; an actual conflict of interest exists where a University Member's actions could be unduly, improperly or excessively influenced by their Private Interests. Serious misconduct can occur when a conflict of interest is concealed, understated, mismanaged or abused.

Decision

A determination made by an Employee, contractor or other authorised delegate in the course of their duties on behalf of the University.

Donor

An individual or other entity that makes a contribution of value to an Organisation to further the organisation objectives. A Donor includes prospective donors and an individual or entity that has previously made a contribution with the exclusion of government funding for core business purposes.

Employee

A person employed by the University and whose conditions of employment are covered by the Enterprise Agreement and includes persons employed on a continuing, fixed term or casual basis. Employees also include senior Employees whose conditions of employment are covered by a written agreement or contract with the University.

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Expenditure

Decreases in economic benefits during the Reporting Period in the form of outflows or depletions of Assets or incurrences of liabilities that result in decreases in equity. This encompasses losses as well as expenses that arise in the ordinary course of business.

Financial Delegate

An officer of the University who has financial authority in accordance with the University Financial Delegations.

Information

Any collection of data that is processed, analysed, interpreted, organised, classified or communicated in order to serve a useful purpose, present facts or represent knowledge in any medium or form. This includes presentation in electronic (digital), print, audio, video, image, graphical, cartographic, physical sample, textual or numerical form.

Manager(s)

A University Member who is responsible for managing staffing and physical resources of the University.

Media

All print, radio, television and electronic Media including the internet and allied distribution channels. Includes social Media which are works of user-created video, audio, text or multimedia that are published and shared in a social environment, such as a blog, podcast, forum, wiki, or video hosting site. More broadly, social Media refers to any online technology that enables people to publish, converse and share content online.

Nominal Gift or Benefit

Any Gift or Benefit that is below $150 (including GST) in retail Value that do not meet the definition of Reportable Gifts and Benefits.

Procurement

The entire process by which all classes of materials, facilities and services are obtained by the University. This can include the functions of planning, design, establishing standards, evaluating risk, writing specifications, selecting Suppliers, developing contracts and method of payment and subsequent disposal.

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Purchasing

The method for acquiring the Goods and/or Services required. This can include credit cards, purchase orders and/or leasing arrangements.

Reportable Gift or Benefit

Any Gift or Benefit that exceeds $150 in Value or multiple Gifts or Benefits from a single Donor made to a single recipient within a 12-month period where the aggregated total Value is greater than $150.

Scholarship

A Scholarship is Student recognition, typically based on Academic Merit, which provides a financial grant to a Student to undertake or complete a program of study at the University over a nominated period of time, in accordance with the selection criteria. A Scholarship may take the form of periodic payments to the Student or a reduction in specified costs, such as tuition fees for the duration of the Scholarship.

Student

A person who is enrolled in a UniSQ Upskill Course or who is admitted to an Award Program or Non-Award Program offered by the University and is: currently enrolled in one or more Courses or study units; or not currently enrolled but is on an approved Leave of Absence or whose admission has not been cancelled.

University Members

Persons who include: Employees of the University whose conditions of employment are covered by the UniSQ Enterprise Agreement whether full time or fractional, continuing, fixed-term or casual, including senior Employees whose conditions of employment are covered by a written agreement or contract with the University; members of the University Council and University Committees; visiting, honorary and adjunct appointees; volunteers who contribute to University activities or who act on behalf of the University; and individuals who are granted access to University facilities or who are engaged in providing services to the University, such as contractors or consultants, where applicable.

Vice-Chancellor

The person bearing the title of Vice-Chancellor and President, or as

	otherwise defined in the University of Southern Queensland Act 1998 , including a person acting in that position.
	Definitions that relate to this procedure only
	Associate(s) Per section 318 of the Income Tax Assessment Act 1936 including: • any relative, spouse or business partners of an Employee; or • any entity controlled by an Employee, their relative, spouse or business partner. **Value** The GST inclusive equivalent purchase price or market value.
Keywords	Gift, Benefit, Code of Conduct, Conflict of Interest, Accountability, Declaration, Hospitality, Entertainment
Record No	19/176PL

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