



Title: Gifts Benefits and Hospitality Annual review

Date: 21 September 2022

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Recommendation:

That the Audit and Risk Committee endorses the annual review of Gifts Benefits and Hospitality practices.

Background

The Executive Officer is required to provide an annual assessment of the implementation of the Gifts Benefits and Hospitality including any actual offers of GBH during the year.

The format to EO's annual report to the Audit and Risk Committee is taken straight from the GBH Policy and Procedure. The items in the left-hand column are contained in the procedure, and the right-hand column is the EO comment or analysis.

A. Risk analysis

Sources, type, and targeting of gift offers (patterns and anomalies)

GBH Policy review	Executive Officer Analysis
<u>Reportable gifts</u>	
Gifts offered: the types and value range of gifts offered, in particular	No gifts were offered or received during the reporting period.
Prohibited gifts: the level, nature and sources of prohibited gifts offers	Nil
Acceptance of gifts: the total number, value, and percentage of gift offers accepted v. refused	Nil
Use and disposal: how the Board used or disposed of the gifts it received	Nil
Bribes: any reports of suspected bribery attempts	Nil
<u>Token gifts</u>	
Same considerations as above.	There were no token gifts offered or received in the reporting period.
<u>Level of compliance with procedure</u>	



<p>Whether there are fewer entries in the gifts register than would reasonably be expected given the size and functions of the Board</p>	<p>The lack of gift offers is consistent with the nature of the Board's work.</p>
<p>Based on research conducted (e.g. surveys and focus groups with Board members and employees; random and targeted spot checks with current/recent suppliers and external contractors, etc.), the estimated level of failure to:</p> <ul style="list-style-type: none"> • disclose reportable gifts by lodging a gift offer declaration form; • disclose token gifts by emailing the responsible person; <p>refuse prohibited gifts.</p>	<p>Board members complete GBH declarations regularly, and there is a standing agenda item on the Board meeting agenda. Members occasionally discuss the declaration and confirm the absence of offers and acceptances.</p> <p>EO assessment is that there is complete compliance with the Policy and Procedure.</p>

B. Steps taken to improve compliance (risk mitigation measures)

<p>An overview of steps taken in the last year to improve compliance with the Gifts, Benefits and Hospitality policy and procedure, including:</p>	<p>Executive Officer Analysis</p>
<p>Substantive changes to business rules, processes and record-keeping requirements</p>	<p>The GBH Policy and Procedure has been updated to reflect the current model policy.</p>
<p>Activities to promote awareness of, and improve compliance with, this procedure, noting who the activities were directed to (i.e. Board members, employees and/or external stakeholders); Prohibited gifts:</p>	<p>Standing Board agenda item.</p>
<p>Remedial action taken to address patterns of frequent or prohibited gift offers (e.g. letters to offerors)</p>	<p>Not required.</p>
<p>Progress in implementing any recommendations made to, and accepted by, the Audit and Risk Committee and/or board</p>	<p>The action list is presented to the ARC each meeting with a status comment. As such the committee can ensure actions are completed in a timely and quality manner.</p>



C. Recommendations (future improvements)

New recommendations, if any, for:

- (i) improving compliance with this procedure; and/or
- (ii) updating this procedure and related business rules, processes and record-keeping requirements.

Executive Officer comment

The GBH Policy and Procedure is listed for review in this ARC agenda. Whilst management does not recommend full adoption of the model policy, the reviewed document reflects the model requirements that are relevant to the Board. As such the policy and procedure are contemporary approaches to GBH.

The Board pays attention to GBH each meeting. Given lack of offers made or received, there are no suggested changes to improve compliance.

Next Steps

If the committee endorse this report, it will be recorded as the annual review. If the committee require more information or have improvement opportunities, the report will be resubmitted at the November meeting.