

VI GIFTS, BENEFITS AND HOSPITALITY POLICY

May 2019

Version 2

Last reviewed September 2022

1. Purpose

This policy states the Victorian Inspectorate's (VI) position on:

- responding to offers of gifts, benefits, and hospitality; and
- providing gifts, benefits, and hospitality.

This policy is intended to support individuals and the VI to avoid conflicts of interest and maintain high levels of integrity and public trust.

The VI has issued this policy to support behavior consistent with the *Code of Conduct for Victorian Public Sector Employees of Special Bodies (the Code)*. All employees are required under clause 1.1 of the Code to comply with this policy.

2. Application

This policy applies to all workplace participants. For the purpose of this policy, this refers to: a Victorian Inspectorate Officer (as defined under the *Victorian Inspectorate Act 2011*) (**VI Officer**) and includes, employees, contractors,¹ consultants and any individuals or groups undertaking activity for or on behalf of the VI.

3. Policy principles

This policy has been developed in accordance with requirements outlined in the binding *Minimum accountabilities for the management of gifts, benefits, and hospitality*² issued by the Victorian Public Sector Commission (**VPSC**)³.

The VI is committed to and will uphold the following principles in applying this policy:

3.1. Public Interest

All VI Officers must place public interest above their private interest when carrying out official duties. VI Officers have a duty to serve the VI by:

- acting apolitically and providing frank and fearless advice to the Inspector;
- complying with legislation and policies;
- performing their roles fairly and reasonably and adhering to the principles of natural justice;
- applying the public sector values (Respect, Accountability, Integrity, Impartiality, Responsiveness, Leadership and Human Rights) set out at section 7 of the *Public Administration Act 2004*;
- applying the VI values (we act with integrity in everything we do; we demonstrate professional courage, leadership and persistence; we are reflective, transparent and purposeful in our actions; we are dedicated to delivering work to the highest possible standards; we work collaboratively and respectfully with each other and integrity agencies, and we promote and uphold the Charter of Human Rights);
- adhering to the Code;

¹ Note the application of clause 1.4 of the Code of conduct for Victorian Public Sector Employees of Special Bodies to the engagement of contractors and consultants. Contractors and consultants are only bound by the code if explicitly required by their contract for services.

² [Minimum accountabilities for the management of gifts, benefits and hospitality.](#)

³ In accordance with the requirements of the Standing Directions 2018, issued under the *Financial Management Act 1994*.

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- not accepting gifts, benefits, or hospitality that could raise a perception of, or actual bias or preferential treatment;
- not accepting offers from current or prospective suppliers; and
- not accepting offers from those about whom they are likely to make business decisions.

3.2. Accountability

All VI Officers are accountable for:

- not engaging in the soliciting of gifts, benefits, and hospitality for themselves or others;
- declaring all non-token offers of gifts, benefits, and hospitality;
- declining non-token offers of gifts, benefits, and hospitality, or where an exception applies under this policy, seeking approval to accept the non-token offer; and
- the responsible provision of gifts, benefits, and hospitality.

VI Officers with direct reports are accountable for:

- overseeing management of their direct reports' acceptance or refusal of non-token gifts, benefits, and hospitality; and
- modelling good practice and promoting awareness of gifts, benefits, and hospitality policies and processes.

3.3. Integrity

VI Officers strive to earn and sustain public trust through providing or responding to offers of gifts, benefits, and hospitality in a manner that is consistent with community expectations. VI Officers will refuse any offer that may lead to an actual, perceived, or potential conflict of interest.

3.4. Risk-based approach

The VI, through its policies, processes, and Audit & Risk Committee, will ensure gifts, benefits, and hospitality risks are appropriately assessed and managed. VI Officers with direct reports will ensure they are aware of the risks inherent in their team's work and functions and monitor the risks to which their direct reports are exposed.

4. Definitions

The following table describes definitions used in this Policy.

Business associate	An individual or body that the VI has, or plans to establish, some form of business relationship with, or who may seek commercial or other advantage by offering gifts, benefits, or hospitality.
Benefits	Includes preferential treatment, privileged access, favours, or other advantage offered to a VI Officer. They may include invitations to sporting, cultural or social events, access to discounts and loyalty programs and promises of a new job. The value of benefits may be difficult to define in dollars, but as they are valued by the VI Officer, they may be used to influence the VI Officer's behaviour.

Ceremonial gifts	<p>Official gifts provided as part of the culture and practices of communities and government, within Australia or internationally. Ceremonial gifts are usually provided when conducting business with official delegates or representatives from another organisation, community, or foreign government.</p> <p>Ceremonial gifts are the property of the VI, irrespective of value, and should be accepted by individuals on behalf of the VI. The receipt of ceremonial gifts should be recorded on the internal register but does not need to be published online.</p>
Conflict of interest	<p>Conflicts may be:</p> <p>Actual: There is a <u>real conflict</u> between a VI Officer's public duties and private interests.</p> <p>Potential: A VI Officer has private interests that <u>could conflict</u> with their public duties. This refers to circumstances where it is foreseeable that a conflict may arise in future and steps should be taken now to mitigate that future risk.</p> <p>Perceived: The public or a third party could reasonably <u>form the view</u> that a VI Officer's private interests could improperly influence their decisions or actions, now or in the future.</p>
Delegate	<p>The VI's Executive Director, Legal & Integrity.</p>
Gifts	<p>Free or discounted items or services and any item or service that would generally be seen by the public as a gift. These include items of high value (e.g., artwork, jewelry, or expensive pens), low value (e.g., small bunch of flowers), consumables (e.g., chocolates) and services (e.g., painting and repairs). Fundraising by the VI that is consistent with relevant legislation and any government policy is not prohibited under the minimum accountabilities.</p>
Hospitality	<p>Hospitality is the friendly reception and entertainment of guests. Hospitality may range from light refreshments at a business meeting to expensive restaurant meals and sponsored travel and accommodation.</p>
Legitimate business benefit	<p>A gift, benefit, or hospitality may have a legitimate business benefit if it furthers the conduct of official business or other legitimate goals of the VI, the public sector or the State.</p>
Public official	<p>Public official has the same meaning as section 4 of the <i>Public Administration Act 2004</i> and includes public sector employees, statutory office holders and directors of public entities.</p>
Register	<p>A record, preferably digital, of all declarable gifts, benefits, and hospitality. The VI maintains a register of gifts provided and gifts received. The VI retains an internal register which records detailed information about an offer of a gift, benefit, or hospitality. The VI also retains a public register which contains a subset of information from the internal register, suitable for public access. For details of what information is to be recorded in the Register, see Section 5.6 (where receiving a gift, benefit, or hospitality) and Section 6.2 (where providing a gift, benefit or hospitality) of this policy.</p>
Token offer	<p>A gift, benefit or hospitality that is of inconsequential or trivial value to both the person making the token offer and the recipient (such as basic courtesy). It may include promotional items such as pens and note pads, and modest hospitality that would be considered a basic courtesy, such as light refreshments during a meeting.</p>

	It may also include a small thank you gift following a presentation. The minimum accountabilities state that token offers cannot be worth more than \$50.
Non-token offer	A gift, benefit or hospitality that is, or may be perceived to be by the recipient, the person making the non-token offer or by the wider community, of more than inconsequential value. All offers worth more than \$50 are non-token offers and must be recorded on a gift, benefit, and hospitality register.
Offer	Refers to token and non-token offers.
VI Officer	Means – <ul style="list-style-type: none"> (a) the Inspector; (b) a member of staff of the VI; (c) a person engaged by the VI to provide the Inspectorate with services, information, or advice.

5. Management of offers of gifts, benefits, and hospitality

This section sets out the process for accepting, declining, and recording offers of gifts, benefits, and hospitality. Any exceptions to this process must have the prior written approval of the Executive Director, Legal and Integrity.

5.1. Conflict of interest and reputational risks

When deciding whether to accept an offer, individuals should first consider if the offer could be perceived as influencing them in performing their duties, or lead to reputational damage. The more valuable the offer, the more likely that a conflict of interest or reputational risk exists.

Table 1. GIFT test

G	Giver	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 VI policies? Could the person or organisation benefit from a decision I make?
I	Influence	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 courtesy or a token of appreciation or a valuable non-token offer? Does its timing coincide with a decision I am about to make?
F	Favour	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 or organisation made several offers over the last 12 months? Would accepting it create an obligation to return a favour?
T	Trust	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?

5.2. Requirement for refusing offers

Individuals should consider the GIFT test at Table 1 and the requirements below to help decide whether to refuse an offer. VI Officers are to refuse offers:

- likely to influence them, or be perceived to influence them, in the course of their duties or that raise an actual, potential, or perceived conflict of interest;
- that could bring them, the VI or the public sector into disrepute;
- made by a person or organisation about which they will likely make or influence a decision (this also applies to processes involving grants, sponsorship, regulation, enforcement, or licensing), particularly offers:
 - made by a current or prospective supplier;
 - made during a procurement or tender process by a person or organisation involved in the process; or
 - made by an organisation of which the VI has oversight (other than a token offer);
- likely to be a bribe or inducement to make a decision or act in a particular way;
- that extend to their relatives or friends;
- of money, or used in a similar way to money, or something easily converted to money;
- where acceptance could be perceived as endorsement of a product or service, or acceptance would unfairly advantage the sponsor in future procurement decisions;
- made by a person or organisation with a primary purpose to lobby Ministers, Members of Parliament, or public sector organisations; or
- made in secret.

If an individual considers they have been offered a bribe or inducement, the offer must be reported to the Inspector or their delegate (who should report any criminal or corrupt conduct to Victoria Police).

5.3. Token offers

The minimum accountabilities state that token offers cannot be worth more than \$50. If token offers are made often by the same person or organisation, the cumulative value of the token offers over 12 months, or the perception that they may influence the recipient, may result in the offers becoming non-token.

VI Officers may generally accept token offers without approval or declaring the offer on the VI's Register, as long as the token offer does not create a conflict of interest or lead to reputational damage.

VI Officers **must refuse** all offers (with the exception of token hospitality, such as beverages or sandwiches over a lunchtime meeting or invitations to free seminars on legitimate business topics):

- made by a current or prospective supplier;
- made during a procurement or tender process by a person or organisation involved in the process; or
- made by a person the VI Officers will likely make a decision about involving recruitment.

5.4. Non-token offers

VI Officers can only accept non-token offers if they have a legitimate business benefit. All accepted non-token offers must be approved in writing by the VI's Delegate, recorded in Register and be consistent with the following requirements:

- it does not raise an actual, potential, or perceived conflict of interest or have the potential to bring the VI Officer, the VI or the public sector into disrepute; and
- there is a legitimate business reason for acceptance. It is offered in the course of the VI Officer's official duties, relates to the VI Officer's responsibilities and has a benefit to the VI, public sector or the State.

Where a VI Officer accepts a gift in the first instance but later identifies or is advised that the gift should not have been accepted, all reasonable efforts will be made to return the gift to the person or organisation who provided the gift. This includes gifts received by post or email.

Where the provider of the gift cannot be identified, for example if the gift is received by mail and no return address is included, or the gift cannot be returned for other reasons, the gift should be surrendered to the Delegate. The Delegate will determine what action should be taken in relation to the gift on a case-by-case basis (i.e. disposal, donation etc).

5.5. Recording non-token offers of gifts, benefits, and hospitality – Legitimate Business Reasons

All non-token offers, whether accepted or declined, must be recorded in the VI's Register. The business reason for accepting the non-token offer must be recorded in the Register with sufficient detail to link the acceptance to the VI Officer's work functions and benefit to the VI, public sector or State.

The VI Officer should consider the following examples of acceptable and unacceptable levels of detail to be included in the VI's Form (**Schedule A**) when recording the business reason:

Unacceptable:	“Networking” “Maintaining stakeholder relationships”
Acceptable:	“VI Officer presented to a visiting international delegation. The delegation presented the VI Officer with a cultural item worth an estimated \$200. Declining the gift would have caused offence. The gift was accepted, written approval was subsequently obtained for the gift, which became property of the VI.”

5.6. Declaring and recording non-token offers of gifts, benefits, and hospitality

VI Officers must declare all non-token offers, whether accepted or declined by completing and providing a **VI Gifts, Benefits and Hospitality Declaration Form (Schedule A)** to the General Manager, Corporate Services. Where there is no opportunity to seek written prior approval from the Delegate prior to accepting a gift or hospitality, the VI Officer must seek approval from the Delegate and complete a VI Gifts, Benefits and Hospitality Declaration Form (**Schedule A**) within five business days of responding to the offer.

In relation to the receipt of gifts, benefits, and hospitality, the VI will maintain an internal Register setting out the following:

- Name of person/organisation making the offer
- Title
- Declaration Date

- Description of gift, benefit or hospitality
- Estimated/Actual Value
- Reason for accepting or declining the gift, benefit, or hospitality
- Date Offered
- Accepted date (if applicable)
- Date of approval by Delegate (if accepted)
- Decision about ownership of the gift (if accepted)

Access to the internal Register is restricted to the following relevant persons within the VI, the:

- Inspector;
- Executive Director, Legal and Integrity;
- General Manager, Corporate Services;
- Executive Assistant to the Inspector; and
- Senior Project Officer – Governance.

The public register will contain a subset of the information detailed in the VI's internal register and will be published on the VI's website in accordance with the *VPSC Gifts, Benefits and Hospitality Minimum Accountabilities*.

5.7. Ownership of gifts offered to VI Officers

Non-token gifts with a legitimate business benefit that have been accepted by a VI Officer for their work or contribution may be retained by the VI Officer where the gift is not likely to bring them or the VI into disrepute, and where their Delegate has provided written approval. VI Officers must transfer to the VI official gifts or any gift of cultural significance or significant value (over \$50).

5.8. Repeat offers

Receiving multiple offers (token or non-token) from the same person or organisation can generate a stronger perception that the person or organisation could influence a VI Officer or the VI. VI Officers should refuse repeat offers from the same source if they create a conflict of interest or may lead to reputational damage.

5.9. Ceremonial gifts

Ceremonial gifts are the property of the organisation, irrespective of value, and should be accepted by VI Officers on behalf of the VI. The receipt of ceremonial gifts should be recorded on the VI's internal Register, but this information does not need to be published online.

5.10. Hospitality provided by Victorian public sector organisations

Victorian public sector organisations may provide hospitality to stakeholders, as part of their functions. When offered hospitality by a Victorian public sector organisation, VI Officers should consider the requirements of the minimum accountabilities.

Accepted hospitality offered by a Victorian public sector organisation as part of official business does not need to be declared or reported, where the reason for the VI Officer's attendance is consistent with the VI's functions and objectives and with the individual's role.

However, VI Officers do need to declare invitations from Commonwealth, Local Government, and other State Government jurisdictions.

6. Management of the provision of gifts, benefits, and hospitality

This section sets out the requirements for providing gifts, benefits, and hospitality.

Gifts, benefits, and hospitality may be provided to welcome guests, to facilitate the development of business relationships, to further public sector business outcomes and to celebrate achievements.

6.1. Requirements for providing gifts, benefits, and hospitality

When deciding whether to provide gifts, benefits or hospitality or the type of gift, benefit, or hospitality to provide, VI Officers must ensure:

- any gift, benefit or hospitality is provided for a business reason that furthers the conduct of official business or other legitimate organisational goals, or promotes and supports government policy objectives and priorities;
- that any costs are proportionate to the benefits obtained for the State, and would be considered reasonable in terms of community expectations (the 'HOST' test at Table 2 is a good reminder of what to think about in making this assessment); and
- it does not raise an actual, potential, or perceived conflict of interest.

Table 2. HOST test

H	Hospitality	To whom is the gift or hospitality being provided? Will recipients be external business associates, or individuals of the host organisation?
O	Objectives	For what purpose will hospitality be provided? Is the hospitality being provided to 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?
S	Spend	Will public funds be spent? What type of hospitality will be provided? Will it be modest or expensive, and will the gift be provided as a courtesy or an indulgence? Will the costs incurred be proportionate to the benefits obtained?
T	Trust	Will public trust be enhanced or diminished? Could you publicly explain the rationale for providing the gift 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?

6.2. Containing costs

VI Officers should contain costs involved with providing gifts, benefits, and hospitality wherever possible, and should comply with the financial probity and efficient use of resources guidance outlined in the Code.

The following questions may be useful to assist VI Officers to decide on the type of gift, benefit, or hospitality to provide:

- Is an external venue necessary or does the VI have facilities to host the event?

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- Is the proposed catering or hospitality proportionate to the number of attendees?
- Does the size of the event and number of attendees align with intended outcomes?
- Is the gift symbolic, rather than financial, in value?
- Will providing the gift, benefit or hospitality be viewed by the public as excessive?

Records relating to the provision of hospitality, such as approval forms and records relating to procurement and expenditure, must be retained in accordance with their requirements under the *Financial Management Act 1994*. In relation to the provision of gifts, benefits, and hospitality, the VI will maintain an internal register setting out the following:

- Recipient Name
- Title and organisation (if applicable)
- Declaration Date
- Description of gift, benefit, or hospitality
- Estimated/Actual Value
- Reason for gift, benefit, or hospitality
- Date Offered
- Accepted date

7. Related policy, legislation, and other documents

- [Minimum accountabilities for the management of gifts, benefits and hospitality](#)
- The VI's Conflict of Interest Policy
- [Public Administration Act 2004](#)
- [Code of Conduct for Victorian Public Sector Employees of Special Bodies](#)
- [Victorian Public Sector Commission Gifts, Benefits and Hospitality Policy Guide](#)
- [VPSC Circular 2018-01: Gifts, Benefits and Hospitality](#)

For guidance, VI staff also have access to the following [DJCS Guidelines](#) via the DJCS intranet:

- *GBH Guideline – Appropriate Acceptance of GBH – GIFT*
- *GBH Guideline – Appropriate Provision of GBH – HOST*
- *GBH Guideline – How to respectfully decline offers*

8. Reporting

The information from the Gifts, Benefits and Hospitality Form (**Schedule A**) will also be recorded on the internal Register. To provide public transparency, the public register will contain an appropriate subset of the information detailed in the VI's internal Register and will be published on the VI's website in accordance with the *VPSC Gifts, Benefits and Hospitality Minimum Accountabilities*. The public register will make public all non-token offers whether accepted or declined.

The VI's Audit & Risk Committee will receive a report at least annually on the administration and quality control of the gifts, benefits, and hospitality policy, processes, and register. The report will

include analysis of the VI's gifts, benefits, and hospitality risks (including multiple offers from the same source and offers from business associates), risk mitigation measures and any proposed improvements.

9. Authorising Officer and Delegate

This policy is issued under the authority of the Executive Director, Legal and Integrity and is subject to annual review.

10. Breaches

Disciplinary action consistent with the relevant industrial instrument and legislation, including dismissal, may be taken where an individual fails to adhere to this policy. This includes where an individual fails to avoid wherever possible or identify, declare, and manage a conflict of interest related to gifts, benefits, and hospitality in accordance with the VI's Conflict of Interest Policy.

Actions inconsistent with this policy may constitute misconduct under the *Public Administration Act 2004*, which includes:

- breaches of the Code, such as the sections covering conflict of interest, public trust and gifts and benefits; and
- VI Officers making improper use of their position.

For further information on managing breaches of this policy, please contact the General Manager, Corporate Services.

The VI will communicate its policy on the offering and provision of gifts, benefits and hospitality to contractors, consultants, and other business associates as required. Those identified as acting inconsistently with this policy may be subject to contract re-negotiation, including termination.

11. Speak up

VI Officers who consider that gifts, benefits, and hospitality or conflict of interest within the VI may not have been declared or are not being appropriately managed should speak up and notify the Delegate. The VI will take decisive action, including possible disciplinary action, against VI Officers who discriminate against or victimise those who speak up in good faith.

A VI Officer who believes that another VI Officer is engaging or potentially engaging in improper conduct through their acceptance of or failure to disclose gifts, benefits or hospitality, may also make a Public Interest Disclosure. More information about this process can be found in the VI's [Public Interest Disclosure Guidelines](#).⁴

12. Contacts for further information

A conflict of interest resulting from the acceptance of a gift, benefit or hospitality is not always clear to those who have the conflict. VI Officers who are unsure about accepting a gift, benefit or hospitality, or the application of this policy, should ask the General Manager, Corporate Services or the Delegate for advice.

⁴ <https://www.vicinspectorate.vic.gov.au/public-interest-disclosures-guidelines/7-pids-about-vi#72-how-pids-about-the-vi-or-a-vi-officer-will-be-handled>

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Schedule A

VI Gifts, Benefits, and Hospitality Declaration Form

This declaration form supports the VI's Gifts, Benefits, and Hospitality Policy.

Employees must:

- declare all non-token offers of gifts, benefits, and hospitality (whether accepted or declined) using this form; and
- seek written approval from the Delegate to accept any non-token offer.

Fields marked in blue will be published on the VI's public register on the VI's website.

Individual to complete	
1. Declaration date	
2. Name (recipient)	
3. Position (e.g., Inspector)	
4. Team (e.g., Corporate, Legal, Operations)	
Details of the gift, benefit, or hospitality	
5. Date offered	
6. Describe the gift, benefit, or hospitality offered	
7. Estimated or actual value	
8. Offered by (name of individual/organisation making the offer)	Individual: Organisation:
9. Type of organisation; for example: a) sporting organisation; b) conference organisation; or c) lobbying firm	
10. Is the person or entity making the offer a business associate of the VI (Y/N)? If yes, describe the relationship between them and the VI. If no, describe the relationship between you and the person or organisation making the offer.	
11. Reason for making the offer	
12. Would accepting the offer:	Detail of conflict of interest:

Individual to complete	
<p>a) create an actual potential or perceived conflict of interest exist (Y/N); or b) bring you, the organisation or the public sector into disrepute (Y/N)?</p> <p>(If either is answered YES, then the offer must be declined in accordance with the minimum accountabilities)</p>	
<p>13. Would accepting the offer bring you, the VI or the public sector into disrepute (Yes / No)? If yes, then the offer must be declined in accordance with the minimum accountabilities</p>	
<p>14. Is there a legitimate business benefit to the VI, public sector or State for accepting the offer, i.e. does it meet the following:</p> <p>a) it was offered during the course of your official duties (Y/N); and b) it relates to your official responsibilities (Y/N); and c) it has a benefit to the organisation, public sector or State (Y/N).</p> <p>(If NO then offer must be declined, and if YES then the business benefit must be detailed, in accordance with the minimum accountabilities).</p>	
<p>15. Is the offer an official or ceremonial gift provided when conducting business with official delegates or representatives from:</p> <p>a) another organisation; b) the community; or c) a foreign government? (Yes / No) If yes, please provide details</p>	
<p>16. I accepted the offer</p>	<p>YES / NO Please circle answer</p>
<p>Signature Date</p>	

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Manager or delegate to complete	
1. Name	
2. Position (e.g. Director)	
3. Relationship to employee	
Complete if the VI Officer declined offer	
4. I have reviewed this declaration form and submitted it for inclusion on the VI's gifts, benefits and hospitality register.	Signature: Date:
Complete if the VI Officer accepted offer	
5. I have reviewed this declaration form and submitted it for inclusion on the VI's gifts, benefits and hospitality register. I confirm that, to my knowledge, accepting this offer: a) does not raise an actual, potential or perceived conflict of interest for the VI Officer or myself; and b) will not bring the VI Officer, myself, the VI or the public sector into disrepute; and c) will provide a clear business benefit to the VI, the public sector or the State.	Signature: Date:
6. Record the decision about ownership of the gift; for example did the employee: a) retain the gift; b) accept an official or ceremonial gift on behalf of the VI c) transfer ownership of the gift to the VI; d) return the gift to the donor; or e) donate the gift to charity?	
Any other comments:	
Completed form to be submitted to the General Manager, Corporate Services for inclusion on the VI's internal Gifts, Benefits, and Hospitality Register.	