



Future Health Research and Innovation Fund Advisory Council

Gifts, Benefits and Hospitality Policy

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Policy Reference: FFAC-P-4

Version: 2.0

1. Introduction

The Western Australian Future Health Research and Innovation (FHRI) Fund Advisory Council (Advisory Council) is an advisory body established¹ by the Minister for Medical Research (the Minister)² under the *Western Australian Future Health Research and Innovation Fund Act 2012* (the Act).³

The Act provides for the Advisory Council to determine its own procedure subject to any matters determined by the Minister.⁴

The Advisory Council is subject to:

- legislative requirements under the Act
- requirements set out in the Instruments of Appointment
- the Advisory Council governance and policy documents and
- the *FHRI Scheme Governance Framework* (the *Governance Framework*)
- any Statement of Expectation issued by the Minister

This *Gifts, Benefits and Hospitality Policy* should be read in conjunction with the documents listed above.

2. Purpose

The purpose of the Advisory Council *Gifts, Benefits and Hospitality Policy* is to ensure a consistent and effective approach to the integrity governance and management of risks associated with gifts, benefits and hospitality offered to Advisory Council members. The *Gifts, Benefits and Hospitality Policy* specifies the principles and minimum requirements with which Advisory Council members must comply and includes monitoring and reporting requirements.

3. Applicability

This *Gifts, Benefits and Hospitality Policy* applies to the Chair and all members of the Advisory Council. This includes voting and non-voting members, any alternate member appointed under section 4H(5) of the Act and any nominee under section 4G(3)(a), (b).

In cases where the Minister for Health considers it appropriate, the requirements under section 5 of this Policy related to members, apply to any person, other than a public service officer, who has a role in providing assistance to the Advisory Council. The Advisory Council secretariat in the Office of Medical Research and Innovation (Department of Health) provides operational support for functions relevant to this policy.

4. Mandatory requirements

Compliance with the *Gifts, Benefits and Hospitality Policy* is a condition of appointment as a member of the Advisory Council as specified in the relevant Instrument of Appointment.

Advisory Council members are required to sign an acknowledgment of having read and understood this policy (refer Appendix 1).

¹ *Western Australian Future Health Research and Innovation Fund Act 2012* (WA) s 4G.

² Whilst the Act references the Minister for Health, on 08/02/2022 the Governor committed the Act (except Part 3) to the Minister for Medical Research and all references to the Minister for Health in the Act are to be read as the Minister for Medical Research.

³ [Western Australian Future Health Research and Innovation Fund Act 2012 \(WA\)](#)

⁴ *Western Australian Future Health Research and Innovation Fund Act 2012* (WA) s 4H(2), (3).

5. Policy

Advisory Council members may be offered gifts, benefits and hospitality as a consequence of undertaking official duties. However, accepting gifts, benefits and hospitality creates a risk that may undermine the public's trust and confidence in the Advisory Council and may:

- create a potential, perceived or actual conflict of interest
- influence Advisory Council members to act in their own personal interest rather than in the public interest, or to unfairly favour or disadvantage an organisation or individual
- create a culture of entitlement
- present opportunities with the potential to escalate into bribery, misconduct or corruption.

Effectively managing the risks of gifts, benefits and hospitality is essential to maintain public trust and give confidence that decisions are being made fairly and impartially.⁵

The *Gifts, Benefits and Hospitality Policy* is informed by the following Public Sector Commission (PSC) resources:

- *Commissioner's Instruction 40 Ethical Foundations*
- 'Managing the Risks of Gifts, Benefits and Hospitality – good practice guidance for WA public authorities' [PSC website]
- *Governance Manual for WA Government Boards and Committees (October 2023)*

The *Gifts, Benefits and Hospitality Policy* should be read in conjunction with other Advisory Council policies:

- *Charter* (Policy Ref: FFAC-P-1)
- *Code of Conduct* (Policy Ref: FFAC-P-2)
- *Conflict of Interest Policy* (Policy Ref: FFAC-P-3)

5.1. Policy position

Advisory Council members are required to act in alignment with required standards of conduct and integrity and at a minimum:

- should never expect to receive anything extra for doing what they are paid to do
- should never use their role to solicit gifts, benefits and hospitality for themselves or others
- should never accept:
 - offers of cash and items easily converted to cash such as gift vouchers and shares
 - bribes and inducements to act in certain ways
 - offers provided to family members and associates on their behalf
 - offers from people and organisations they are making a decision in relation to as part of their role as a member.

Specifically, Advisory Council members are required to:

- never accept and retain a gift, benefit or hospitality without obtaining approval
- never accept 'unacceptable gifts' as defined by this Policy

⁵ Public Sector Commission (PSC), [Managing the Risks of Gifts, Benefits and Hospitality](#), [website updated 15/1/2025], Government of Western Australia.

- never accept a gift, benefit or hospitality if they are responsible for developing a recommendation or likely to be developing a recommendation in relation to a person or organisation offering the gift
- never solicit gifts, benefits and hospitality through their role as a public officer
- not allow others to accept a gift, benefit or hospitality on their behalf
- accept hospitality only if required for conducting the business of the Advisory Council
- declare all offers of gifts, benefits and hospitality (whether accepted or not) via the Gifts, Benefits and Hospitality Declaration Form (Declaration Form, Appendix 2).

Occasionally, Advisory Council members may be offered gifts, benefits or hospitality as a consequence of undertaking official duties. Usually these will be a token of appreciation and carry no expectation.

Should Advisory Council members be invited to deliver presentations at events or undertake activities that may involve the offer of gifts, including gifts of appreciation, members are to advise the agency issuing the invitation that the Advisory Council's policy requires that members cannot accept gifts.

If Advisory Council members accept gifts of appreciation because of cultural norms or it would cause an offence to decline the gift, the member must complete a Declaration Form, outlining the offer and reason for the acceptance as soon as practicable. This information will be recorded in the *Gifts, Benefits and Hospitality Register*.

5.2. Responsible decision-maker

The responsible decision-maker is to assess declared offers and decide whether the offer should be accepted or declined, and if any further action is required.

For Advisory Council members (or others) making a declaration, the responsible decision-maker is the Advisory Council Chair.

If the Advisory Council Chair is making a declaration, the responsible decision-maker is a senior representative of the Department of Health.

5.3. Responsibilities

The Advisory Council Chair is responsible for:

- ensuring receipt of Advisory Council members signed Acknowledgement Forms
- ensuring Advisory Council members (and others as relevant) remain aware of their responsibilities for declaring and appropriately managing offers of gifts, benefits and hospitality as and when they arise
- providing a point of contact for anyone wanting assistance in appropriately managing an offer of gift, benefit or hospitality, or information or advice about the policy's meaning or application
- assessing whether a conflict of interest exists and determining appropriate management strategies (except for those as declared by the Chair)
- ensuring that all offers are recorded in the *Gifts, Benefits and Hospitality Register*
- appropriately addressing possible breaches of the policy
- managing review of the policy.

Advisory Council members are responsible for:

- reading and understanding the policy, signing the Acknowledgement Form and raising any queries with the Chair of the Advisory Council or secretariat
- identifying and declaring offers of gifts, benefits and hospitality as per the policy and submitting the Declaration Form.

The Director General of the Department of Health (DoH) is responsible under the Act for:⁶

- keeping a record of each disclosure that is made by a member of the Advisory Council (or other person as may be required under certain provisions)
- keeping a record of any other steps that are taken in relation to any actual, or potential, conflict of interest that is disclosed
- making a summary of the record available, on request, for inspection.

The secretariat is responsible for:

- operational support for the Advisory Council Chair and members in actioning the requirements of the *Conflict of Interest Policy* (including maintenance of the Conflict of Interest Register)
- operational support for the Director General DoH in discharge of their relevant responsibilities under the Act.

5.4. Declarations and management

Advisory Council members are required to:

- liaise with the Chair regarding the offer and decision regarding gifts, benefits and hospitality
- declare to the Advisory Council that the offer that was made and have the declaration recorded on the *Gifts, Benefits and Hospitality Register* via completion and submission of the Declaration Form (Appendix 2)
- include in the declaration the decision to accept or not accept the offer and have the decision recorded on the *Gifts, Benefits and Hospitality Register*
- manage conflicts of interest identified from offers of gifts, benefits and hospitality according to this Policy and the *Conflict of Interest Policy*.

5.5. Guidance for members

Appendix 3 provides definitions of key terms relevant to this policy.

Appendix 4 outlines the steps for Advisory Council members to take when offered gifts, benefits or hospitality, and outlines the process for responsible decision-maker review and record keeping.

6. Compliance and monitoring

Advisory Council members must sign the Acknowledgement Form as soon as practicable when commencing as a new or reappointed member (refer Appendix 1). Advisory Council members must provide the Acknowledgement Form before undertaking any role as an Advisory Council member. The Chair of the Advisory Council is responsible for monitoring compliance via signing for the receipt of the Acknowledgement Form.

⁶ Western Australian Future Health Research and Innovation Fund Act 2012 (WA) s 41(4).

Compliance with the policy will be monitored via:

- ensuring the *Gifts, Benefits and Hospitality Register* is accurate and up to date.
- including declarations in the Member Interest summary reporting tabled to Advisory Council meetings (three-year history)
- performance evaluation surveys of Advisory Council members
- review of any feedback, complaints or issues raised.

The Chair is supported by the secretariat in monitoring and review activities.

Non-compliance with the policy will be managed via the relevant responsible decision-maker and in accordance with provisions in the Advisory Council *Charter* and *Code of Conduct*.

7. Record keeping

The secretariat will maintain the corporate files of relevant information including:

- the *Gifts, Benefits and Hospitality Register*
- the *Conflict of Interest Register*
- Acknowledgement Forms (Form Ref: FFAC-P-4-F-1)
- Declaration Forms (Form Ref: FFAC-P-4-F-2)
- related correspondence and papers.

The files are the property of the Department of Health. Record keeping obligations must be complied with, including those obligations under the *State Records Act 2000* (WA) and the *Freedom of Information Act 1992* (WA).

Access to the above Registers is restricted to the Chair of the Advisory Council and the secretariat. Access by other parties must be approved by the Chair of the Advisory Council. Proposed and granted access will be recorded in the relevant Register.

8. Related policies and supporting information

The following information relates to, or informs and/or supports the implementation of, this Policy:

Advisory Council policies

- *Advisory Council Charter* (Policy Ref: FFAC-P-1)
- *Advisory Council Code of Conduct* (Policy Ref: FFAC-P-2)
- *Advisory Council Conflicts of Interest Policy* (Policy Ref: FFAC-P-3)

Government resources

- Public Sector Commission *Commissioner's Instruction 40 Ethical Foundations*
- Public Sector Commission *Governance Manual for WA Government Boards and Committees (October 2023)*
- Public Sector Commission website www.psc.wa.gov.au
 - Conduct and integrity
 - Managing the risks of gifts, benefits and hospitality – good practice guidance for WA public authorities
 - Governance of WA government Boards and Committees
 - Commissioner's Instructions

9. Document control

Approval

The Advisory Council is authorised to determine its own procedure subject to any matters determined by the Minister.⁷ The Advisory Council is responsible for approval of this policy.

Review

The Advisory Council will review this policy annually, or at another interval not exceeding five years.

Document Control table

Version	Effective from	Effective to	Approved date	Approved by	Description
1.0	22/02/2021		22/02/2021	Advisory Council	Advisory Council endorsement of the Policy at its meeting of 22 February 2021
1.1	01/07/2022			<i>Minor update – retention of formal approved date as 22/02/2021</i>	- Updated policy to refer to new responsible Minister, change in name to Office of Medical Research and Innovation. - Updated document names changes and corrected typographical errors.
1.2	NA	NA	NA	NA	Formal Review March 2026. - Version drafted for review/approval. - Version 1.2 endorsed by FHRI Fund Advisory Council on 31/03/2026. - For legal review ahead of Minister review/approval.
1.3	NA	NA	NA	NA	Draft finalisation May 2026. Minor edits. Version 1.3 submitted to Minister for approval.
2.0	27/07/2026		27/07/2026		Noted by Minister 27/07/2026. Version finalised for release as v2.0 based on FHRI Fund Advisory Council endorsement 31/03/2026.

Appendices

Appendix 1 – Gifts, Benefits and Hospitality Policy Acknowledgement Form (Form Ref: FFAC-P-4-F-1)

Appendix 2 – Gifts, Benefits and Hospitality Policy Declaration Form (Form Ref: FFAC-P-4-F-2)

Appendix 3 – Definitions

Appendix 4 – Steps to take when offered gifts, benefits and hospitality

⁷ Western Australian Future Health Research and Innovation Fund Act 2012 (WA) s 4H(2), (3).

APPENDIX 1

*Future Health Research and Innovation Fund Advisory Council Gifts Benefits and Hospitality Policy***Future Health Research and Innovation Fund Advisory Council****Gifts, Benefits and Hospitality Policy
Acknowledgement Form**

I have read and understood the Advisory Council *Gifts, Benefits and Hospitality Policy* and agree to comply with it in accordance with the terms of the Instrument of Appointment.

I am committed to working in accordance with the *Gifts, Benefits and Hospitality Policy* and accept my responsibilities within this framework.

Confirmation of acknowledgement: Advisory Council member

Full Name			
Signature		Date	

Receipt of acknowledgment: Advisory Council Chair*

Full Name			
Role			
Signature		Date	

**Where the Advisory Council Chair is also the member making the acknowledgement, this form will be receipted by a senior representative of the Department of Health.*

Please forward a completed signed copy of this acknowledgement form to the secretariat in the Office of Medical Research and Innovation, Department of Health via:

FHRI.Fund@health.wa.gov.au

APPENDIX 2

Future Health Research and Innovation Fund Advisory Council Gifts Benefits and Hospitality Policy

Gifts, Benefits and Hospitality Declaration Form

PART 1 – Advisory Council member to complete

Member making declaration

Full Name

Description of offer

Name of person / role / organisation making the offer

Date of offer

___/___/___

Description of offer

Estimated or actual value

Member assessment of offer

Why is the offer being made (or was made)?

Could accepting the offer create an actual, potential or perceived conflict of interest?

☐ Yes ☐ No ☐ Unsure

If yes, ensure decision reflects appropriate management strategy, and complete a Conflict of Interest Disclosure Form.

Have any previous offers been made to you by the same person/organisation in the last 12 months?

☐ Yes ☐ No

Member action regarding offer

Have you already accepted or declined the offer?

Accepted? ☐ Yes ☐ No Declined? ☐ Yes ☐ No

Date accepted/declined: ___/___/___

Do you want to accept the offer?

☐ Yes ☐ No

If yes, why?

Has the offer been discussed with the responsible decision-maker? (If Member then is AC Chair, If AC Chair then is DoH)

☐ Yes ☐ No

If yes, what was the outcome? If no, why not?

Member declaration

I declare that the information I am providing in this declaration is true and accurate to the best of my knowledge.

Name

Signature

Date



ACTION REQUIRED: Member to send to secretariat FHRI.Fund@health.wa.gov.au

APPENDIX 2

Future Health Research and Innovation Fund Advisory Council Gifts Benefits and Hospitality Policy

PART 2 – Responsible decision-maker to complete**Responsible decision-maker****Name****Role****Recommendation**

I have reviewed the information provided and recommend the following action:

- ☐ Offer be declined
☐ Gift or benefit be returned to person/organisation
☐ Gift or benefit be retained by officer
☐ Gift or benefit be retained by authority
☐ Gift or benefit be disposed of by authority (e.g. donated to charity)
☐ Hospitality be accepted
☐ Other (detail):

I confirm that to the best of my knowledge the offer or its acceptance:

- ☐ will not create/has not created an actual, potential or perceived conflict of interest
☐ where **hospitality** is accepted, it has a link or obvious benefit to either the authority or government priorities and objectives; and creates no actual, potential or perceived conflict of interest.

Comments:

Signature**Date**

ACTION REQUIRED: Return to secretariat FHRI.Fund@health.wa.gov.au

PART 3 – Secretariat to complete**Addition to Gifts, Benefits and Hospitality Register**

- ☐ Confirmation of addition to register
☐ Return of completed form to member

Date

APPENDIX 3

Future Health Research and Innovation Fund Advisory Council Gifts Benefits and Hospitality Policy

Definitions

Source: [Managing the Risks of Gifts, Benefits and Hospitality](#), Public Sector Commission website.

Benefit	Any preferential treatment, privileged access, favours or other advantages offered to an officer above their normal salary or engagement entitlements. A benefit is usually intangible – something that can be experienced such as personal services, job offers or discounts on goods and services.
Conflict of interest	A situation arising from a conflict between the officer's personal interests and their public duty. A conflict of interest should always be managed in the public interest. A conflict of interest can be categorised as: • actual – where an officer's personal interests and public duties conflict; it is happening now and needs to be declared and managed • potential – where the conflict between an officer's personal interest and public duty is likely to occur in the future • perceived – where a reasonable third party could form a view that personal interests could improperly influence the officer's decisions now or in the future, whether or not this is in fact the case.
Gift	Anything of value offered either directly or indirectly to an officer above their normal salary or engagement entitlements. A gift is usually tangible – something that can be seen or held such as a box of chocolates, bottle of wine or ticket to a concert.
Gift, benefit and hospitality register	A record of declared offers and acceptances of gifts, benefits and hospitality. Declaration requirements and expectations are determined by the authority.
High risk positions, functions and activities	Includes but is not limited to those: • who have the most interaction with clients, suppliers and stakeholders • who have discretionary decision-making powers • who work with limited or no supervision • who work away from the main site • who are responsible for: ○ purchasing goods and services ○ managing contracts ○ allocating grants ○ undertaking inspection and regulatory roles ○ managing facilities ○ exercising powers over planning and land development • who work in internal audit or integrity roles • whose impartiality needs to be beyond doubt.
Hospitality	The friendly reception and treatment of stakeholders such as offering refreshments at a business meeting, providing meals to conference delegates and sponsored travel or accommodation.
Non-token offer	An offer that would be perceived by the recipient and community as being of high value and/or high risk such as jewellery.
Public Authority	A public sector agency (department, SES organisation and non-SES organisation), local government, public university, government trading enterprise, other entity and some boards and committees.
Public Officer	For the purposes of this guide has the meaning given by section 1 of The Criminal Code and includes those appointed to, employed in and contracted to public authorities.
Token Offer	An offer that would be perceived by the recipient and community to be of low value and/or low risk such as like a box of chocolates to say 'thanks'.
Western Australian government sector	A collective reference to WA public authorities.

APPENDIX 4

Future Health Research and Innovation Fund Advisory Council Gifts Benefits and Hospitality Policy

Steps to take when offered gifts, benefits and hospitality**1. Consider response to the offer of the gift, benefit and/or hospitality**

When considering an offer of a gift, benefit and/or hospitality the member must act in accordance with the *Gifts, Benefits and Hospitality* policy.

Wherever possible, the offer of the gift, benefit and/or hospitality should be declined.

Where the acceptance of the offer is being considered, this ought to be discussed with the Chair of the Advisory Council (or other responsible decision-maker as relevant) prior to acceptance wherever practicable.

In consideration of the offer, the GIFT decision-making tool can assist:⁸

G - Giver:

- Who is providing the gift, benefit or hospitality and what is their relationship to me?
- Does my role require me to select contractors, award grants, regulate industries or determine government policies?
- Could the giver (person or organisation) benefit from a decision I make?

I - Influence:

- Is the giver seeking to influence my decisions or actions?
- Has the gift, benefit or hospitality been offered to me publicly or privately?
- Is it a courtesy, a token of appreciation or highly valuable?
- Does its timing coincide with a decision I am about to make?

F - Favour:

- Is the giver seeking a favour in return for the gift, benefit or hospitality?
- Has the gift, benefit or hospitality been offered honestly?
- Has the giver made several offers to me or people in my business area over the last 12 months?
- Would accepting it create an obligation to return a favour?

T - Trust:

- Will public trust be enhanced or diminished?
- Could I publicly explain why I am accepting the gift, benefit or hospitality?
- What would my colleagues, family, friends and associates think? Have I made good records on accepting the gift, benefit or hospitality been kept in accordance with reporting and recording procedures?

2. Record the offer, decision and outcome

- The Advisory Council member is to complete the Gift, Benefit and Hospitality Declaration Form (FFAC-P-4-F-2) and send to the secretariat at FHRI.Fund@health.wa.gov.au
- The secretariat will send the Declaration Form to the relevant responsible decision-maker for review and signing. This records the receipt and approval of the declaration and provides the opportunity for any further action that may be required. The completed Declaration Form is returned to the secretariat.
- The secretariat will add the record to the *Gifts, Benefits and Hospitality Register*.

3. Report summary to the Advisory Council

- Declaration and relevant outcomes to be included in Member Interest summary reporting at the next meeting of the Advisory Council.
- At the meeting, the Advisory Council member may provide any further update if required.

⁸ [Decision-making tool: GIFT test](#), 'Managing the Risks of Gifts, Benefits and Hospitality', Public Sector Commission.