



Code of Conduct Guidelines for Employees

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1. Guidelines

1.1 Outline of the Code of Conduct

A code of conduct for Council employees is set out in *Schedule 2A to the Local Government (General) Regulations 2013 (Code of Conduct)*. The Code of Conduct prohibits seeking out or receiving a gift or benefit which:

- is intended or likely to create a sense of obligation on the part of the employee to a person or influence the employee in the performance or discharge of the employee's functions or duties; or
- could reasonably be taken to be intended or likely to create a sense of obligation on the part of the employee to a person or influence the employee in the performance or discharge of the employee's functions or duties.

The Code of Conduct also requires an employee to provide details of a gift or benefit received by the employee which is valued at more than \$50 to the Chief Executive Officer (CEO) of the Council. These details are then to be recorded in a register of gifts and benefits to be maintained by the CEO. The register is publicly available at the principal offices of the Council and by publication on a website determined by the CEO.

A gift or benefit received by 'a person related to an employee' is considered to be a gift or benefit received by the employee. The term 'a person related to an employee' is defined in the *Local Government Act 1999* (see discussion below in Part 4).

1.2 Purpose of these Guidelines

Council employees must determine whether or not a gift or benefit sought or received by them (or a person related to the employee) is subject to the Code of Conduct. These guidelines have been prepared to assist council employees to determine this matter and understand the processes for complying with the Code of Conduct.

The guidelines focus on council employees compliance with the Code of Conduct. There are other governance and legal requirements which apply to council employees (as public officers) and councils (as public authorities) in respect of the use and allocation of public resources. These requirements, however, are not discussed in these guidelines.

1.3 Purpose of the Code of Conduct

Employees of Councils are required by the *Local Government Act* to act honestly and with reasonable care and diligence in the performance of official duties.¹ Council employees should not allow the performance of their official duties to be influenced by the receipt of gifts or benefits.

Public confidence in local government can be undermined if a council employee seeks or receives a gifts or benefits which is intended to oblige the council employee

¹ Section 109, *Local Government Act 1999*



to another person or likely to influence the Council employee in the discharge of his or her functions or duties (or is reasonably perceived to have this effect). The Code of Conduct addresses this risk by requiring Council employees to be accountable for, and transparent about, gifts and benefits sought or received.

The code aims to maintain the effectiveness of local government by ensuring that the actions or decisions of Council employees are not influenced by self-interest relating to gifts and benefits.

1.4 Prohibitions on seeking and receiving gifts or benefits

The Code of Conduct sets out various prohibitions on seeking out or receiving gifts and benefits.

Council employees are prohibited from:

- seeking out a gift or benefit that:
 - is intended to create a sense of obligation on the part of the employee or influence the employee in the performance or discharge of the employee's functions or duties;
 - is likely to create a sense of obligation on the part of the employee or influence the employee in the performance or discharge of the employee's functions or duties;
 - could reasonably be taken to be intended to create a sense of obligation on the part of the employee or influence the employee in the performance or discharge of the employee's functions or duties; or
 - could reasonably be taken to be likely to create a sense of obligation on the part of the employee or influence the employee in the performance or discharge of the employee's functions or duties; and
- receiving a gift or benefit that:
 - is intended to create a sense of obligation on the part of the employee or influence the employee in the performance or discharge of the employee's functions or duties;
 - is likely to create a sense of obligation on the part of the employee or influence the employee in the performance or discharge of the employee's functions or duties;
 - could reasonably be taken to be intended to create a sense of obligation on the part of the employee or influence the employee in the performance or discharge of the employee's functions or duties; or
 - could reasonably be taken to be likely to create a sense of obligation on the part of the employee or influence the employee in the performance or discharge of the employee's functions or duties.²

Set out below is an explanation of these prohibitions with guidance to assist Council employees determine whether or not a particular gift or benefit is subject to a prohibition.

The following matters are considered in the context of the Code of Conduct:

- what are gifts and benefits?
- who must seek out or receive the gift or benefit?
- when will a gift or benefit be prohibited?

² Clause 1(1) Schedule 2A of the Local Government (General) Regulations

1.4.1 What are gifts or benefits?

Gifts

The term 'gift' is defined for the purposes of the Code of Conduct as:

a transaction in which a benefit of pecuniary value is conferred without consideration or for less than adequate consideration, but does not include an ordinary commercial transaction or a transaction in the ordinary course of business'.³

According to this definition a gift may be free, but may also be provided at a cost which is lower than the value of the gift. For example, if a Council employee sought or received a good or service at a discounted price or with a rebate then this could be considered to be seeking or receiving a gift for the purposes of the Code of Conduct.

The definition of 'gift' specifically excludes an ordinary commercial transaction or a transaction in the ordinary course of business. This exclusion distinguishes between transactions which have a connection with the employees' role at the Council and transactions which are distinct from that role. If something of value is provided for free or at a discount in the ordinary course of business (ie unrelated to the employees employment by the Council) then it will not be considered to be a gift for the purposes of the Code of Conduct. Whether this is the case would depend on the particular circumstances in which the item of value was provided.

A gift provided by a Council to an employee would fall within the definition of 'gift' for the purpose of the Code of Conduct. Contravening or failing to comply with the Code of Conduct is a ground for suspending, dismissing or taking other disciplinary action against an employee. A Council could not rationally take this type of action against an employee on the basis of a gift provided by the Council to the employee. For this reason, the Code of Conduct can be read as not applying to gift or benefit provided by the Council to its employee.

A good or service provided to the Council for free or at a discounted price will also not be a gift for the purposes of the Code of Conduct. This is because the gift is not being received by an employee, but by the Council. A supplier of services to the Council may, for example, determine to provide certain services at a discounted price or to bundle services to provide value to the Council. This is not subject to the Code of Conduct.

Benefits

The term 'benefit' is not defined for the purposes of the Code of Conduct. The concept of a benefit is broad being '*anything that is for the good of a person or thing*'.⁴ Anything of value to a Council employee may, therefore, fall within the concept of a benefit for the purposes of the Code of Conduct.

Unlike the term 'gift' which excludes ordinary commercial transactions or a transactions in the ordinary course of business, there are no exclusions from

³ Clause 1(7), Schedule 2A - Local Government (General) Regulations & Clause 1, Schedule 3 - Local Government Act 1999

⁴ Macquarie Dictionary

the term 'benefit'. However as with gifts, a benefit provided to the Council (rather than to an employee) will not be subject to the Code of Conduct.

While the seeking or receipt of a benefit from the Council is literally covered by the prohibition in the Code, this is not the prohibition's purpose. As with the receipt of a gift from the Council, a Council could not rationally take disciplinary action against an employee on the basis of a benefit provided by the Council to the employee. For example, the provision by the council of training opportunities, conference/seminar attendance, food and beverages, discounts to use Council assets (eg golf courses, aquatic centre) or flexible working hours are each benefits, but could not form the basis for taking disciplinary action against an employee.

Similarly, hospitality which is offered incidentally to activities which an employee is permitted by the Council to undertake in the course of his or her employment could not form the basis for taking disciplinary action against the employee. For example, accepting a morning tea or lunch offered during a training or information seminar which the employee is attending due to his or her role at the Council, could not be the basis for disciplinary action for breach of the Code of Conduct.

Gifts and Benefits

- Gifts may be free, but may also be the provision of something of value at a discount.
- Gifts do not include items of value given for free or at a discount in the course of ordinary commercial transactions.
- A gift or benefit provided by a Council to its employee cannot rationally form the basis of disciplinary action against the employee.
- A gift or benefit provided to a Council is not subject to the Code of Conduct.
- A benefit which is incidental to activities required or permitted by a Council (eg hospitality at a training seminar) could not form the basis for disciplinary action by the Council against the employee.

1.4.2 Who must seek out or receive the gift or benefit?

Employee

An employee of a Council who seeks out or receives a gift or benefit with a prohibited outcome (see discussion at page 5 below) will be in breach of the Code of Conduct. A person working on either a permanent or temporary basis for the council is considered to be an 'employee' for the purpose of the Code of Conduct for Council employees.⁵

A person related to an employee

An employee of a Council will also be in breach of the Code of Conduct if a person related to the employee receives a gift or benefit with a prohibited outcome. The term 'a person related to an employee' is defined as:

- a member of the employee's family;
- a family company of the employee; or

⁵ Section 108 of the Local Government Act 1999

- a trustee of a family trust of the employee.⁶

For the purposes of the Code of Conduct:

- ‘family’ means a spouse or domestic partner of the employee and a child of the employee who is under the age of 18 years and normally resides with the employee;
- ‘family company’ means a proprietary company in which the employee or a member of their family is a shareholder and the employee or the family member is able either individually or jointly to control more than 50% of the maximum number of votes which may be cast at a general meeting of the company; and
- ‘family trust’ means a trust (other than a testamentary trust) of which the employee or a member of the employee’s family is a beneficiary and which is established or administered wholly or substantially in the interests of the employee or the family member either individually or jointly.

Employee or a person related to an employee

- Gifts or benefits sought or received by a Council employee with a prohibited outcome will be subject to the Code of Conduct.
- Gifts or benefits received by a ‘family member’, ‘family company’ or ‘family trust’ with a prohibited outcome will be subject to the Code of Conduct

1.4.3 When will seeking or receiving a gift or benefit be prohibited?

Only the seeking or receiving of gifts or benefits with an outcome contemplated in clause 1(1) of the Code of Conduct is prohibited. These outcomes relate to the effect, likely effect or perceived effect of a gift or benefit on the Council employee.

Intention to oblige or influence

Where a gift or benefit is intended to create a sense of obligation in the Council employee to any person then the seeking or receiving of the gift or benefit is prohibited. The sense of obligation does not need to be to be owed to the giver of the gift or benefit. If a Council employee feels obliged to any other person, this may influence the manner in which the Council employee undertakes functions and duties.

Where a gift or benefit is intended to influence the Council employee in the performance or discharge of the employee’s function or duties, then the seeking or receiving of the gift or benefit is prohibited. Council employees should not be motivated by personal gain to undertake their functions or duties in a particular manner.

Council may reward or encourage employee performance by providing benefits to their employees or may in some circumstances provide gifts to their employees. While these circumstances may be technically prohibited by the

⁶ Clause 1(7) Schedule 2A - Local Government (General) Regulations & Clause 1(1) Schedule 3 - Local Government Act 1999



Code of Conduct, it would not be rational for the Code of Conduct to apply to gifts or benefits provided by the Council to its employees.

An intention is the outcome that the seeker or giver of the gift or benefit is trying to achieve when the gift or benefit is sought or received. The state of mind of the person seeking or giving the gift or benefit is relevant to establishing the intention in seeking or receiving a gift or benefit. This intention could be stated by the seeker or giver of the gift or benefit or alternatively could be implied from the circumstances in which the gift or benefit is sought or received.

Likely to oblige or influence

Where a gift or benefit is likely to create a sense of obligation in the Council employee to any person then the seeking or receiving of the gift or benefit is prohibited. The sense of obligation does not need to be to be owed to the giver of the gift or benefit.

Where a gift or benefit is likely to influence the Council employee in the performance or discharge of the employee's function or duties, then the seeking or receiving of the gift or benefit is prohibited.

Whether an outcome is likely would be determined by considering the circumstances relevant to the seeking or receiving of a gift or benefit. Generally, the term 'likely' refers to an outcome which is more probable than not. This could be expressed as a 51% chance of the outcome occurring. This is an objective enquiry which does not relate to the state of mind of a seeker or giver of a gift or benefit.

Could be reasonably taken to be intended or likely to oblige or influence

Where a gift or benefit could be reasonably taken to be intended or likely to create a sense of obligation in the Council employee to any person then the seeking or receiving of the gift or benefit is prohibited.

The sense of obligation does not need to be to be owed to the giver of the gift or benefit. Where a gift or benefit could be reasonably taken to be intended or likely to influence the Council employee in the performance or discharge of the employee's function or duties, then the seeking or receiving of the gift or benefit is prohibited.

The evaluation of whether or not an outcome could be reasonably taken to be intended or likely depends on the perspective of the reasonable person. If a reasonable person who was aware of the relevant facts would reasonably conclude that a gift or benefit was intended or likely to created a sense of obligation or was intended or likely to influence a Council employee in the discharge of his or her functions or duties then the gift or benefit will be prohibited.

Prohibited outcomes

- Was it intended that the seeking or receiving of the gift or benefit would create a sense of obligation to another person or influence the Council employee in the performance or discharge of his or her functions or duties?
- Is it more probable than not considering the circumstances that the gift or benefit would create a sense of obligation to another person or influence the Council employee in the performance or discharge of his or her functions or duties?
- Would a reasonable person conclude from the circumstances that the seeking or giving of the gift or benefit was intended or likely to create a sense of obligation or influence the council employee in the performance or discharge of his or her functions or duties?

1.5 Declaration of gifts and benefits

Clause 1(2) of the Code of Conduct requires a Council employee who receives a gift or benefit valued at an amount greater than \$50 to provide details of the gift or benefit to the Chief Executive Officer of the Council (CEO) in accordance with any requirements to the CEO. The Code of Conduct also requires a Council employee to provide details to the CEO of a gift or benefit received by a person related to the Council employee valued at over \$50. A person related to a council employee is for this purpose a 'family member', 'family company' or 'family trust' (as described in Part 3 of these guidelines).

Read literally, clause 1(2) of the Code of Conduct requires any gift or benefit received by a Council employee or person related to a Council employee in any circumstances to be declared. It is not the intention of this provision of the Code of Conduct, however, for a gift or benefit which is unrelated to the employment of the Council employee to be declared. For example, a Council employee receiving a birthday gift valued at over \$50 from his or her aunt would not need to be declared.

An implied connection between the employment of the Council employee and the gift or benefit needs to be read into the Code of Conduct. The LGA suggests that the Code can be interpreted as requiring the declaration of a gift over the value of \$50 where:

- an employee receives a gift or benefit in the course of, in connection with or as a consequence of, his or her employment by the Council; or
- a person related to an employee of a Council receives a gift or benefit which could reasonably be considered to be in connection with, or as a consequence of, the employee's employment by the Council.

There may be circumstances where the value of a gift or benefit is unknown and it would be inappropriate to ask about the value. If it seems likely that the gift or benefit would be valued at more than \$50 then it would be prudent to declare the gift or benefit.

Declaration of gifts and benefits

- Gifts over \$50 received by a Council employee or a person related to a Council employee need to be declared to the Council's CEO.
- The circumstances in which the gift or benefit is received must be connected to the Council employees' employment.
- A 'person related to a Council employee' includes a family member, family company or family trust.

1.6 Consequences of non-compliance

Compliance with the Code of Conduct is required by the *Local Government Act*.⁷ If a Council employee does not comply with the Code of Conduct then a complaint may be made to the relevant Council. The Code of Conduct requires each Council to deal with a complaint of this nature in accordance with a policy prepared and maintained by the Council relating to complaints against employees.

Non-compliance with the Code of Conduct can also be a basis for disciplinary action to be taken against a Council employee. This disciplinary action can include suspending and dismissing the Council employee.⁸

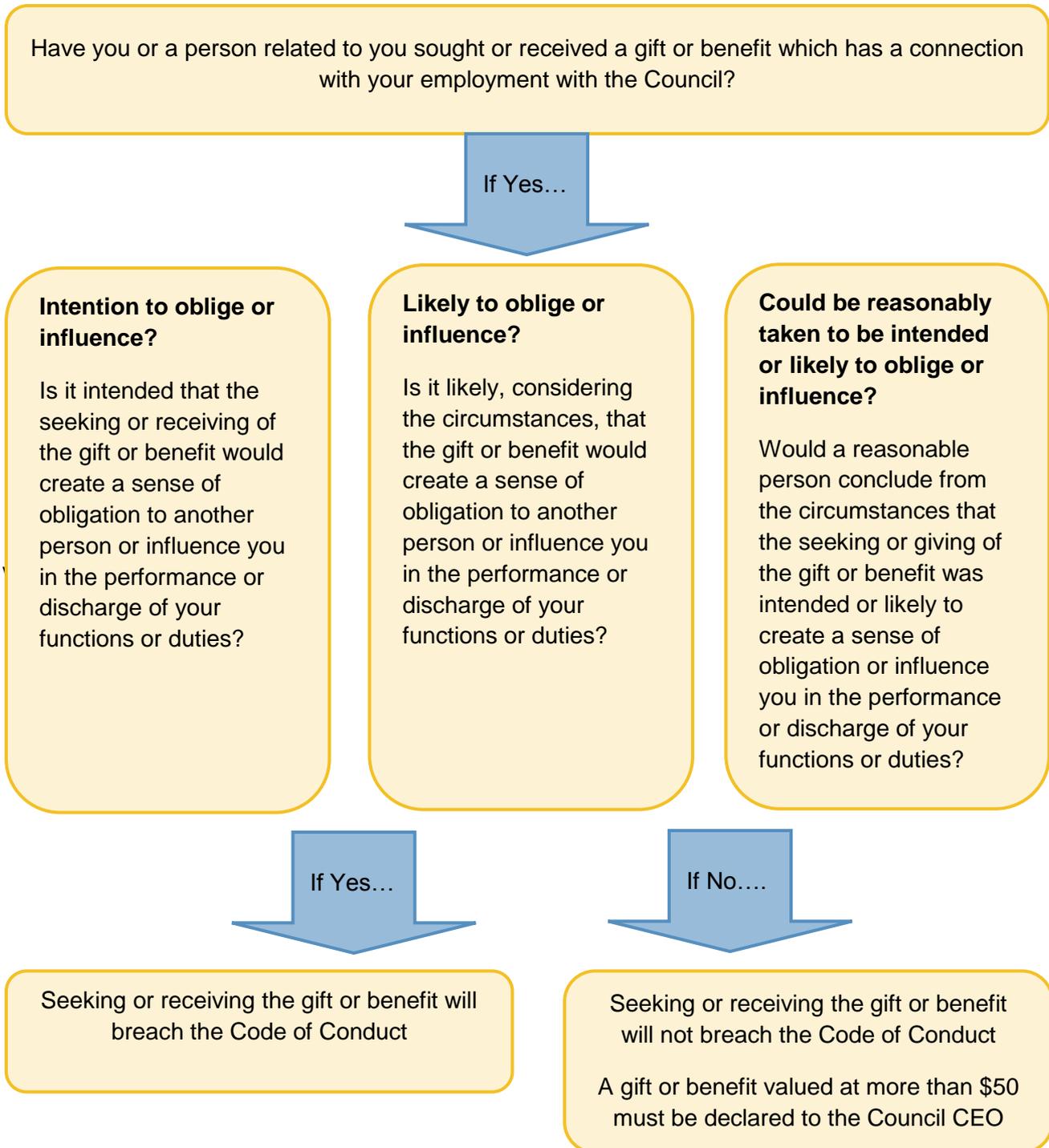
A failure to comply with the Code of Conduct will also constitute 'misconduct in public administration' for the purposes of the *Independent Commissioner Against Corruption Act 2012 (ICAC Act)*. A complaint could be made by a member of the public to the Office for Public Integrity (OPI) in respect of a Council employee's failure to comply with the Code of Conduct. Similarly, a report could be made by a public officer, public authority or the Ombudsman to the OPI regarding a failure to comply with the Code of Conduct and a report would have to be made if the failure to comply with the Code of Conduct constitute 'serious or systemic misconduct' for the purposes of the ICAC Act.⁹

⁷ Section 110(4) of the *Local Government Act 1999*

⁸ Section 110(5) of the *Local Government Act 1999*

⁹ Section 4(2) and 20 ICAC Act

2. Code of Conduct Flow Chart



3. Examples

3.1 Business lunch hosted by existing contractor

You are a CEO of a council. You are invited to attend a business lunch being provided by a telecommunications company. Other potential attendees at the lunch are CEOs of local businesses and state government departments. There may be 15 - 20 other people present. The lunch will be held in the company's board room. It is a three-course lunch plus wine valued at approximately \$100. The company provides telecommunication services to the council. The council is also separately talking with company about its interest in sponsoring a tourism conference.

If you attend the lunch, it will be the receipt of a benefit in connection with your employment.

Intention to oblige or influence?

Probably. Businesses may provide hospitality to existing or potential clients to build their business. The intention may be to build relationships and favourably influence the view of the client or potential client in relation

Likely to oblige or influence

Possibly. You may be more likely to consider the company more favourably when making procurement decisions.

Could be reasonably taken to be intended or likely to oblige or influence?

reasonable person could conclude that the hospitality was intended to influence you in your role as CEO.

In other circumstances ...

- The Mayor has been invited to the business lunch to represent the council. She is unable to attend and there are no other council members available. The Mayor asks you to attend to represent the council. No Code of Conduct issue – you are being asked to attend as part of your role with the council. The lunch should be declared as the value is over \$50*

3.2 Business lunch hosted by the Council

You are a procurement officer at a Council. You have been invited by the Council CEO to attend a business lunch organised by the Council to promote the sponsorship of an upcoming regional tourism conference. The Mayor, other Council Members and other Council employees will attend. Local businesses who have expressed an interest in knowing more about the sponsorship of the conference have been invited. Some of these businesses have existing contracts with the Council.

If you attend the lunch, it will be the receipt of a benefit in connection with your employment.

Intention to oblige or influence?

Not in a manner which is relevant to the Code of Conduct. Attendance at the event may be intended by the Council to influence the manner in which you undertake your functions or duties, but this is not relevant to the application of the Code of Conduct. The Code of Conduct is concerned with the influence of persons external to the Council on you undertaking functions or duties.

Likely to oblige or influence

Not in a manner which is relevant to the Code of Conduct as there would be no sense of obligation to, or influence of, a person external to the Council.

Could be reasonably taken to be intended or likely to oblige or influence?

Not in a manner which is relevant to the Code of Conduct as there would be no sense of obligation to, or influence of, a person external to the Council.

3.3 Coffee with local business person

You are a procurement officer at a Council. You attended a business lunch organised by the Council to promote the sponsorship of an upcoming regional tourism conference. Local businesses who had expressed an interest in knowing more about the sponsorship of the conference attended. Some of these businesses have existing contracts with the Council. During the lunch the operator of a local stationery supply business invites you to meet for coffee to discuss opportunities for the business to supply the Council's stationery. Liaising with potential local suppliers is part of your role at the Council. There is no current procurement process for stationery being undertaken by the Council.

Attending the meeting with the business person is not a gift or benefit.

If the business person buys you a coffee this would be a benefit having connection with your employment at the Council.

Intention to oblige or influence?

Not necessarily. Buying a coffee when you've invited a person to a meeting may be a courtesy and not be intended to create a sense of obligation or influence.

Likely to oblige or influence

No. Drinking coffee at a business meeting is not unusual. Many people would not feel a sense of obligation or be influenced by having a coffee bought for them by the person who has requested.

Could be reasonably taken to be intended or likely to oblige or influence?

Probably not. It is reasonable to conclude that more than receiving a coffee at a once-off business meeting would be required to create a sense of obligation to the business person or to influence you in undertaking your functions or duties.

In other circumstances ...

- *The business person asks you to meet him each week so he can buy you a coffee and have a chat. Possibly a Code of Conduct issue: It may seem more likely that the business person is seeking to influence you through regularly taking you out for coffee. A reasonable person could conclude that the intention was to oblige or influence you.*
- *The café is run by your spouse. During the conversation the business person indicates that all of the stationery company's catering for the last 2 years has been provided by the café. Unlikely to be Code of Conduct issue: The acquisition of the catering from the café appears unrelated to your employment at the Council.*

3.4 Training Opportunity

You are a Governance Officer at a council. One of the legal firms which provides advice to the Council is offering training on the Code of Conduct. The training is scheduled to run from 9 am to 11.30 am and will cost \$85. The director to whom you report to has asked you to attend the training. The Council will pay the cost of the training. You attend the training which includes a morning tea break at which light refreshments are provided.

Attending the training would be a benefit provided to you by the Council.

Intention to oblige or influence?

No. The benefit of the training is provided by the council and is not intended to create a sense of obligation to a person external to the council or influence you in the performance or discharge of your functions or duties. The morning tea is ancillary to the training seminar which the Council has required you to attend as part of your employment.

Likely to oblige or influence

No. The training opportunity (including the morning tea) is provided by the Council is not relevant to the Code of Conduct.

Could be reasonably taken to be intended or likely to oblige or influence?

No. The training opportunity (including the morning tea) is provided by the Council is not relevant to the Code of Conduct.

Having morning tea at a seminar is not unusual. It is unlikely that a reasonable person could conclude that a council employee would be obliged or influenced by receiving morning tea in the context of a training seminar which they are asked to attend by the Council.

In other circumstances....

The seminar is provided for free. No Code of Conduct issue: You are still being required to attend by the Council as part of your role.

3.5 Additional services for a ratepayer

You are employed in the council's Engineering and Works Department. You are pruning street trees and are approached by a resident to trim a tree in his front yard. The resident offers you a slab of beer for trimming the tree.

The slab of beer would be a gift or benefit received in connection with your employment.

Intention to oblige or influence?

Yes, the resident's intention is for you to be influenced to use the Council's resources for private benefit of the resident.

Likely to oblige or influence

Yes, if you accept the slab of beer then you are likely to feel obliged to trim the resident's tree.

Could be reasonably taken to be intended or likely to oblige or influence?

Yes, a reasonable person could conclude that the resident's intention is to influence you to use the Council's resources for private benefit of the resident.

In other circumstances ...

- If you were offered a glass of water by a resident on a hot day while pruning street trees. No Code of Conduct issue: You are not being obliged or influenced to do anything for the resident.
- You are completing a Council work order to trim a private resident's hedge which is obstructing the footpath. No Code of Conduct issue: You are carrying out your functions and duties to the Council.
- Ratepayers living close to a park in the council area are particularly pleased with redevelopment work on the park undertaken by you and other council staff. The residents show their appreciation by sending a slab of beer to the Council's Engineering and Works Department. *No Code of Conduct issue: The residents are thanking staff, not obliging them or influencing them to act in a particular manner.*

3.6 Family company awarded contract

You are a Council Procurement Officer. Your adult daughter operates a company which supplies timber. Your daughter, your son and you are the shareholders of this company. The council is undertaking a tender for maintenance services. You are the officer responsible for the tender. One of the tenderers offers your daughter a lucrative timber supply contract 'if business with the council picks up soon'.

The timber supply contract would be a benefit provided to a person related to you (ie the family company of which you are a shareholder). The tenderer's comment may indicate a connection with your employment at the Council.

Intention to oblige or influence?

Possible A strong inference can be drawn from the circumstances that the tenderer's intention is to oblige or influence you. However, this may not be the case.

If the tender has no knowledge of your interest in the timber company, then the comment may have been a passing remark reflecting a precondition for the awarding of the timber contract

Likely to oblige or influence

Probably. A lucrative contract being awarded to the timber company could be considered likely to influence a person in your circumstances.

Could be reasonably taken to be intended or likely to oblige or influence?

Yes, a responsible person could conclude that the tenderer's intention is to influence you in undertaking your functions and duties.

In other circumstances...

- If the timber company was operated by your uncle and you were not a shareholder. No Code of Conduct issue: However, you still may have a conflict of interest which should be declared to the CEO.
- If you were a customer relations officer for the Council. Possibly a Code of Conduct if the tenderer intended to oblige or influence you in undertaking your functions or duties.
- If the Council awards a timber supply contract to the timber company. No Code of Conduct issue as the council is conferring the benefit (ie there is no obligation to or influence by a person external to the Council). However, you may have a conflict of interest which should be declared to the CEO.

3.7 Event Tickets

You are the public relations officer for a council. The Council is the major sponsor of a once-off music festival for local artists and you are the key liaison between the festival organisers and the Council. You have developed a strong rapport with the organisers of the event. The organisers have offered tickets for you and a guest to attend the opening night concert. The tickets are selling for \$40 per ticket.

The tickets would be a gift provided to you in circumstances which have a connection to your employment with the Council.

Intention to oblige or influence?

Possibly.

The organisers have an interest in you viewing the event positively.

However, as the event is already organised and there may be nothing that the organisers are seeking to influence

Likely to oblige or influence

Possibly.

A gift of the tickets could influence some employees.

Could be reasonably taken to be intended or likely to oblige or influence?

Possibly.

A reasonable person could conclude that the organisers intention is to influence you in undertaking your functions and duties.

In other circumstances ...

- As part of the council's sponsorship arrangements 10 double tickets to the opening night concert are provided to the council. The CEO has offered a double ticket to you given your role in organising the event. No Code of Conduct issue: The gift is being provided to you by the council.
- Your spouse works for a lighting company which will be providing stage lighting for the festival. The owner of the lighting company has given your spouse a double ticket to the opening night concert. No Code of Conduct issue: The gift has no connection with your employment at the council.
- Prior to giving you the ticket, the organisers indicate that they are keen for the festival to become an annual event and ask for your assistance in obtaining council support. Code of Conduct issue: There is a strong inference that the organisers are intending to influence you in your role as a council employee.

