Policy Directive: compliance is mandatory

Benefit Schemes Policy Directive

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Summary
The Benefit Schemes Policy Directive ensures that all SA Health employees are aware that they are not permitted to utilise benefit schemes or receive benefits arising from government funded business. Additionally, this policy directive is aligned with the Code of Ethics for the South Australian Public Sector, and the Commissioner for Public Sector Employment Guideline: Gifts and Benefits.

Keywords
Benefits, Gifts, Loyalty Programs, Frequent Flyer Points, Government Funded Travel, Code of Ethics, Policy Directive, Finance

Policy history
Is this a new policy? Y
Does this policy amend or update an existing policy? N
Does this policy replace an existing policy? N

Applies to
All SA Health Portfolio

Staff impact
All Staff

EPAS compatible
N/A

Registered with Divisional Policy
Yes

Contact Officer

Policy doc reference no.
D0388

Version control and change history

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Benefit Schemes Policy Directive

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Benefit Schemes Policy Directive

1. Objective

The objective of this policy directive is to outline to all SA Health employees that they are not permitted to utilise benefit schemes or receive benefits arising from government funded business.

This policy directive is aligned with the *Code of Ethics* for the South Australian Public Sector, and the Commissioner for Public Sector Employment Guideline: *Gifts and Benefits*.

2. Scope

This policy directive is applicable to the entire SA Health Portfolio.

3. Principles

The following principles must be followed:

> The Chief Executive (CE) / Chief Executive Officers (CEO) must ensure an appropriate reporting and monitoring process is established for the management of benefits schemes, e.g. frequent flyer.

> All benefit scheme rewards (e.g. points, upgrades etc…) belong to the Crown. SA Health employees must use accrued rewards for government funded travel only and not for personal use.

> SA Health employees must not solicit or accept any gift, benefit or prize for themselves or others (e.g. another public sector employee, a family member, or a friend) that could reasonably be perceived as influencing them or affecting their impartiality in the performance of their duties.

> The *Employee Frequent Flyer Points Record* form must be updated each time government funded travel occurs.

4. Detail

Benefit schemes offer benefits in the form of loyalty programs, which may include, but are not limited to; frequent flyer points, reward points for purchases, preferential treatment and future discounted purchases. The use of personal rewards cards (e.g. a Fly Buys Card) does not entitle the individual to accumulate any loyalty points for their own personal use if the original purchase is being reimbursed by SA Health.

The *Employee Frequent Flyer Points Record* form should be updated by the employee each time they undertake government funded travel. The form should be retained by the employee to record the total number of business related frequent flyer points that can be utilised when next government funded travel.
The Crown, as the employer of all public servants, is the owner of any benefits that might arise from loyalty programs, or frequent flyer points as a result of government funded business. Accordingly, any personal use of these benefits may be perceived as a conflict of interest, which could be seen to constitute misconduct as defined in the Public Sector Act 2009. If found benefiting or taking advantage of any such scheme, a staff member may be liable to disciplinary action or termination, under the Code of Ethics.

There are various schemes available that can attract benefits or bonuses which must be reported to the CE/CEO, and monitored, in accordance with the Commissioner for Public Sector Employment Guideline Gifts and Benefits.

4.1. Frequent Flyer Points

Any accumulated frequent flyer points that are received as a result of work related travel, must be used for work arrangements only and should not be used by an employee for private use. For example, the frequent flyer points gained on a business flight. In this instance the points accumulated should be used for business purposes only. Private use of points received is not permitted as this could be seen as using public money for personal gain; which contravenes the Public Sector Code of Ethics.

4.1.1. Recording Frequent Flyer Points

Employees are to complete an Employee Frequent Flyer Points Record form for all government funded travel and forward it to their business unit’s administration officer at the time of making a travel request. This is to ensure transparency for audit purposes, and so that all available points can be fully utilised when the employee travels on government funded business.

4.2. Other Benefits

It should be noted that it is unacceptable for SA Health employees to solicit or accept any gift, benefit or prize for themselves or others (e.g. another public sector employee, a family member, or a friend) that could reasonably be perceived as influencing them or affecting their impartiality in the performance of their duties. Benefits include:

> the giving of preferential treatment (e.g. travel upgrades);
> privileged access;
> discounts; or
> favours or other advantages offered to an employee.

While the value of benefits may be difficult to quantify in dollars, they may be highly valued by the intended recipient, and therefore used to influence future behaviours.

4.2.1. Recording Other Benefits

Employees are to record all information on the Employee Benefits Record form, and forward it to their business unit’s administration officer, who will in turn provide the form to the CE’s/CEO’s office.

5. Roles and Responsibilities

5.1. Chief Executive/Chief Executive Officer

It is the responsibility of the CE/CEO to:

> ensure the establishment of an appropriate reporting and monitoring process for the management of frequent flyer and other benefit schemes.
5.2. All SA Health Staff

It is the responsibility of all SA Health staff:

> when undertaking government funded travel, to ensure that there will be no personal use of any business frequent flyer points, or gain from any other kind of benefit scheme;
> to keep a record of the frequent flyer points accumulated through government funded travel on the Employee Frequent Flyer Points Record form;
> to forward their Employee Frequent Flyer Points Record form to their business unit’s administration officer and, if applicable, to be used for future work related purposes;
> to know that it is not permitted to solicit or accept any gift, benefit or prize for themselves or others (e.g. another public sector employee, a family member or a friend);
> to record any benefits they receive on an Employee Benefits Record form, and submit it to their business unit’s administration officer who in turn will submit the information to the CE’s/CEO’s office; and
> declare any upgrade in your class of travel to your immediate supervisor and record this on the Employee Benefits Record form.

5.3. Business Unit’s Administration Officer

It is the responsibility of the business unit’s administration officer to:

> retain copies of the Employee Frequent Flyer Points Record forms so the points can be used for future work related travel; and
> retain copies of the Employee Benefits Record forms and send completed forms to the CE’s/CEO’s office as soon as they are received.

6. Reporting

N/A

7. EPAS

N/A

8. Exemptions

N/A

9. National Safety and Quality Health Services Standards

N/A
10. Risk

Non-compliance with this policy directive may result in a conflict of interest whether perceived or actual, which may result in a potential breach of the Code of Ethics.

11. Evaluation

Compliance with this policy directive will be seen when:
- all the Employee Frequent Flyer Points Record forms are held by the CE / CEO for their reporting and monitoring processes; and
- all the Employee Benefits Record forms are held by the business unit’s administration officer.

12. Definitions

In the context of this document:
- benefits and benefit schemes may include, but are not limited to, accruing value or points for loyalty schemes, such as frequent flyer schemes, car hire or other discounts, meals, hospitality and travel upgrades.
- business unit is a term used to describe the operational units located within the LHNs, SAAS and the department. Business units may be used to describe an individual hospital within a LHN (e.g. RAH) as well as a division within the department (e.g. eHealth Systems), or clinical area (e.g. Cardiology) within a LHN.
- Frequent Flyer Points means an arrangement between an individual and an airline under which benefits in the form of future free air travel are provided as a result of having flown with the airline concerned.

13. Associated Policy Directives / Policy Guidelines

- Probity in SA Health Procurement Policy Directive
- Supplier Interaction and Engagement Protocols Policy Directive

14. References, Resources and Related Documents

- Commissioner for Public Sector Employment Guideline: Gifts and Benefits
- Employee Benefits Record Form
- Employee Frequent Flyer Points Record Form
- Office for the Public Sector - Code of Ethics
- Public Sector Act 2009