

1. PURPOSE

This policy states Council's position in relation to:

- Responding to offers of gifts, benefits and hospitality from external parties
- Providing gifts, benefits and hospitality to external parties.

The policy is intended to support Councillors and staff to avoid conflicts of interest and maintain high levels of integrity and public trust. It supports and is consistent with behaviours outlined in the *Local Government Act 2020* and Council's Code of Conduct for Councillors and Code of Conduct for Staff.

2. SCOPE

This policy applies to all Councillors and Council staff, including full-time, part-time, casual, permanent and contracted staff.

Exclusions:

- Discounts received by Councillors and/or staff that are commonly available to any individual that meets the general requirements that do not specifically relate to Council business related activities, are excluded from this policy, for example, corporate discounts for leisure centres, bulk purchase discounts.
- Gifts, benefits and hospitality offered to Councillors and/or staff as a result of a Council or management procedure are also excluded from this policy, for example, recognition of service awards.

3. PRINCIPLES

3.1 COMMITMENT

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

Policy principle	This means ...
Impartiality	Individuals have a duty to place the public interest above their private interests when carrying out their official functions. They will not accept gifts, benefits or hospitality that could raise a reasonable perception of, or actual, bias or preferential treatment. Individuals do not accept offers from those about whom they are likely to make business decisions.
Accountability	Individuals are accountable for – <ul style="list-style-type: none"> • 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 offer • The responsible provision of gifts, benefits and hospitality. Individuals with direct reports are accountable for overseeing management of the acceptance or refusal of non-token gifts, benefits and hospitality by their staff, modelling good practice and promoting awareness of Council's Gifts, Benefits and Hospitality policy and associated processes.
Integrity	Individuals will 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. They will refuse any offer that may lead to a general or material conflict of interest as defined in the <i>Local Government Act 2020</i> , sections 127-128.
Risk-based approach	Council, through its policies, processes and the Audit and Risk Committee, will ensure gifts, benefits and hospitality risks are appropriately assessed and managed. Individuals 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 staff are exposed.

3.2 COUNCIL HAS A PREFERENCE FOR NO GIFTS

As a general principle, Councillors and staff will:

- Decline any offer of gifts, benefits or hospitality in a way that will not cause offence
- Not make a request for the provision of gifts, benefits or hospitality a condition of any financial or in-kind support to an external party.

3.3 RECEIVING OFFERS OF GIFTS, BENEFITS AND HOSPITALITY

This section sets out the process for accepting, declining, recording and reporting offers of gifts, benefits and hospitality. Any exceptions to this process must have the prior written approval of the CEO, or in the case of a Councillor or CEO, the Mayor.

Councillors and staff must avoid situations giving rise to the appearance that a person or body, through the provision of gifts, benefits or hospitality of any kind, is attempting to gain favourable treatment from an individual Councillor, staff member or from Council. They must also take reasonable steps to ensure that their immediate family members do not receive gifts or benefits that give rise to the appearance of an attempt to gain favourable treatment.

3.3.1 Conflict of Interest and Reputational Risks

When deciding whether to accept an offer, Councillors and staff 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 general or material conflict of interest or reputational risk exists.

GIFT Test

G	Giver	<p>Who is providing the gift, benefit or hospitality and what is their relationship to me?</p> <p>Does my role require me to select suppliers, award grants, regulate industries or determine government policies? Could the person or organisation benefit from a decision I make?</p>
I	Influence	<p>Are they seeking to gain an advantage or influence my decisions or actions?</p> <p>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?</p>
F	Favour	<p>Are they seeking a favour in return for the gift, benefit or hospitality?</p> <p>Has the gift, benefit or hospitality been offered honestly? Has the person or organisation made several offers over the last 12 months?</p> <p>Would accepting it create an obligation to return a favour?</p>
T	Trust	<p>Would accepting the gift, benefit or hospitality diminish public trust?</p> <p>How would the public view acceptance of this gift, benefit or hospitality? What would my colleagues, family, friends or associates think?</p>

3.3.2 Offers to be Refused

Councillors and staff should consider the GIFT test and the following requirements to help decide whether to refuse an offer. They must refuse offers:

- Likely to influence them, or be perceived to influence them, in the course of their duties or that raise a general or material conflict of interest
- That could bring them, or Council 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
 - Made by someone with a planning or other application with Council
 - Where Council is involved in a dispute with another party
- 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 (refer to 3.3.11 Prohibited Gifts)
- Where, in relation to hospitality and events, the CEO considers the organisation will already be sufficiently represented to meet its business
- 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 Council, Councillors or staff
- Made in secret.

Councillors and staff must not accept anonymous gifts (*Local Government Act 2020*, section 37). If a Councillor or staff member finds themselves in possession of a gift and they don't know the name and address of the person who gave it, they should transfer the gift to Council for disposal within 30 days to avoid a breach of the Act (Councillors) and this policy (Councillors and staff) (refer to 3.3.12 Disposal of Gifts).

If a Councillor or staff member considers they have been offered a bribe or inducement, the offer must be reported to the Director Corporate Services or Manager Governance and Information who will report any suspected criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-corruption Commission.

3.3.3 Refusing an Offer

Where a Councillor or staff member has decided not to accept the offer of a gift, benefit or hospitality, it is important that the offer is declined in a way that does not cause offence to the donor or damage relationships. This can be achieved by explaining Council's policy and ensuring the donor understands that the offer is appreciated.

Where the gift would likely bring the person or Council into disrepute, Council will return the gift. If it represents a conflict of interest, Council will either return the gift or transfer ownership to the organisation to mitigate this risk.

In some cases it would be inappropriate to refuse an offer, for example, official gift from government officials or international delegates. In this case the gift should be accepted on behalf of Council and passed over to the CEO (refer to 3.3.10 Ceremonial Gifts).

Where a Councillor or staff member is offered a gift for speaking at a conference or meeting, it is reasonable to accept a modest gift in recognition of this, as to refuse such an offer may cause offence or embarrassment.

All gifts offered, whether accepted or declined, should be recorded on the Gifts, Benefits and Hospitality Declaration Form and submitted the CEO for approval. The Governance Team will then record this information onto the Gifts, Benefits and Hospitality Register.

In all circumstances, offers of money, bribes or other offers prohibited through this policy or by legislation should be refused and reported where applicable (refer to 3.3.2 Offers to be Refused and 3.3.11 Prohibited Gifts).

3.3.4 Token Offers (\$20 or less)

A token offer is an offer of a gift, benefit or hospitality that is of inconsequential or trivial value to both the person making the offer and the Councillor or staff member to whom the offer is being made. It may include promotional items such as a pen, note pad or coffee mug, and modest hospitality that would be considered a basic courtesy, such as light refreshments, for example, sandwiches, tea/coffee during a meeting. Giveaways, ballot and raffle prizes at conferences and other events valued at \$20 or less are considered token offers.

Councillors and staff may generally accept token offers without approval or declaring the offer on Council's Gifts, Benefits and Hospitality Declaration Form, as long as the offer does not create a general or material conflict of interest, or lead to reputational damage.

3.3.5 Non-token Offers (over \$20)

Councillors and staff can only accept a non-token offer if:

- It does not raise a general or material conflict of interest or have the potential to bring the individual or Council into disrepute
- There is a legitimate business reason for acceptance
- It is offered in the course of the Councillor or staff member's official duties, relates to the person's responsibilities and has a benefit to Council.

For example, attendance at an event where you've been invited to perform an official function such as a presentation or guest speaker.

Giveaways, ballot and raffle prizes at conferences and other events valued at over \$20 are considered non-token offers.

Councillors and staff may be offered a gift, benefit or hospitality where there is no opportunity to seek approval prior to accepting, for example, they may be offered a wrapped gift that they later identify as being a non-token gift. In this situation, they must submit the Gifts, Benefits and Hospitality Declaration Form to the CEO within 14 days.

Where the gift would likely bring the Councillor, staff member or the organisation into disrepute, Council will return the gift. If it represents a general or material conflict of interest for the Councillor or staff member, Council will either return the gift or transfer ownership to the organisation to mitigate this risk.

3.3.5.1 Recording non-token offers of gifts, benefits and hospitality

The Gifts, Benefits and Hospitality Declaration Form must be completed and submitted to the CEO for all non-token offers, regardless of whether they have been accepted or declined. The business reason for accepting the non-token offer, with sufficient detail to link the acceptance to the individual's work functions and benefit to Council must be

recorded in the form. The Governance Department will then record these details in the Gifts, Benefits and Hospitality Register.

When recording the business reason on the Gifts, Benefits and Hospitality Declaration Form, Councillors and staff should include as much detail as possible, for example:

“I attended the event sponsored by Council in an official capacity as I was responsible for evaluating and reporting on the outcomes”.

In addition to the above requirements, Councillors and nominated officers who have received gifts, benefits and hospitality valued at \$500 or more in the form of goods or services and multiple gifts, must also record the details in their biannual personal interests return which must be lodged between 1 and 31 March and 1 and 30 September each year [*Local Government (Governance and Integrity) Regulations 2020, regulation 9(1)(k)*].

3.3.6 Gifts, Benefits and Hospitality Reporting

Council’s Executive Management Team and Audit and Risk Committee will receive a report at least annually on the Gifts, Benefits and Hospitality Policy, Process and Register.

A summarised version of the Gifts, Benefits and Hospitality Register will be published on the Horsham Rural City Council website. Access to the full Gifts, Benefits and Hospitality Register is restricted to relevant persons within Council.

3.3.7 Process

Value	Roles and Responsibilities
Token offers i.e. \$20 or less	Individuals may generally accept token offers without approval or declaring the offer on Council’s Gifts, Benefits and Hospitality Register, as long as the offer does not create a conflict of interest or lead to reputational damage.
Non-token offers More than \$20	Individuals will: <ul style="list-style-type: none"> • Complete the Gift, Benefits and Hospitality Declaration Form and submit to the CEO within 14 days of receiving the offer • Formally acknowledge the donor. The CEO will: <ul style="list-style-type: none"> • Determine compliance in accordance with the Gifts, Benefits and Hospitality Policy • Determine the method of disposal (refer to 3.3.12 Disposal of Gifts) Finalise and sign the Gifts, Benefits and Hospitality Declaration Form and submit to the Governance Department for updating of Gifts, Benefits and Hospitality Register. The Mayor will: <ul style="list-style-type: none"> • Sign the Gifts, Benefits and Hospitality Declaration Form for gifts offered to the CEO.

3.3.8 Ownership of Gifts Offered to Councillors and Staff

Non-token gifts with a legitimate business benefit that have been accepted by a Councillor or staff member for their work or contribution may be retained by the person where the CEO or their Manager has provided written approval and the gift is not likely to bring them or Council into disrepute (refer to 3.3.5 Non-Token Offers).

Councillors and staff must transfer official gifts or any gift of cultural significance or significant value to the organisation (refer to 3.3.10 Ceremonial Gifts).

3.3.9 Repeat Offers of Gifts, Benefits and Hospitality

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 you. Councillors and staff must refuse repeat offers (token or non-token) from the same source as they may create a general or material conflict of interest or lead to reputational damage.

3.3.10 Ceremonial Gifts

Ceremonial gifts such as books, plaques, artworks or artefacts from other Councils, Government departments, organisations or sister cities, are official gifts provided as part of the culture and practices of communities and government, within Australia or internationally.

Irrespective of value, ceremonial gifts are the property of the organisation and should be accepted by the Councillor or staff member on behalf of Council. The Gifts, Benefits and Hospitality Declaration Form must be completed by the person accepting the gift and the Governance Department will record the details on Council's Gifts, Benefits and Hospitality Register (refer to 3.3.7 Process).

3.3.11 Prohibited Gifts

In addition to the other limitations imposed by this policy, monetary gifts of any value must never be accepted. This includes cash, gift cards, vouchers, Flybuys, Frequent Flyers or similar rewards.

Hospitality or other retail discounts offered specifically to Councillors or staff that are not commonly available to the general public are also prohibited and should not be accepted.

3.3.12 Disposal of Gifts

The Chief Executive Officer may dispose of gifts by any of the following methods:

- Return to the original recipient
- Return to giver
- Disposal by resolution of Council
- Transfer as a gift to a recognised charitable, aid or non-profit organisation
- Archival action by the Victorian Museum or State Library
- Reduction to scrap
- Destruction.

3.4 PROVISION OF GIFTS, BENEFITS AND HOSPITALITY

This section sets out the requirements for where Council, Councillors or staff provide gifts, benefits and hospitality to others.

HOST Test

H	Hospitality	<p>To whom is the gift or hospitality being provided? Will recipients be external business associates, or individuals of the host organisation?</p>
O	Objectives	<p>For what purpose will hospitality be provided? Is the hospitality being provided to further the conduct of official business? Will it promote and support Council’s policy objectives and priorities? Will it contribute to staff wellbeing and workplace satisfaction?</p>
S	Spend	<p>Will Council funds be spent? What type of hospitality will be provided? Will it be modest or expensive, and will alcohol be provided as a courtesy or an indulgence? Will the costs incurred be proportionate to the benefits obtained?</p>
T	Trust	<p>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 Council? Have records in relation to the gift or hospitality been kept in accordance with reporting and recording procedures?</p>

3.4.1 Requirements for Providing Gifts, Benefits and Hospitality

Gifts, benefits and hospitality may be provided when welcoming guests, to facilitate the development of business relationships, further public sector business outcomes and to celebrate achievements. When deciding whether to provide a gift, benefit or hospitality, or the type to provide, Councillors and staff 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 Council policy objectives and priorities
- That any costs are proportionate to the benefits obtained for the Council, and would be considered reasonable in terms of community expectations (the ‘HOST’ test above is a good reminder of what to think about in making this assessment)
- It does not raise a general or material conflict of interest.

The Gifts, Benefits and Hospitality Declaration Form must be completed and submitted to the CEO for all non-token offers of gifts, benefits and hospitality provided by Council, Councillors and staff to external parties. The Governance Department will then record the details in the Gifts, Benefits and Hospitality Register.

3.4.2 Containing Costs

Costs involved with providing gifts, benefits and hospitality should be contained wherever possible. The following questions may be useful to assist people to decide on the type of gift, benefit or hospitality to provide:

- Will the cost of providing the gift, benefit or hospitality be proportionate to the potential benefits?
- Is an external venue necessary or does the organisation have facilities to host the event?
- 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?

3.5 BREACHES

Disciplinary action consistent with Council’s Performance Management Procedure (Procedure No P04/230) and relevant 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 general or material conflict of interest in relation to gifts, benefits and hospitality in accordance with the *Local Government Act 2020*.

Councillors and staff are responsible for maintaining their own records in relation to receipt of gifts in accordance with the *Local Government Act 2020*, and, where applicable, reporting these on the Gifts, Benefits and Hospitality Declaration Form and their Personal Interests Return. Failure to do so could constitute an offence under the Act.

3.5.1 Reporting of Breaches

Councillors and staff who consider that gifts, benefits and hospitality, or general or material conflicts of interest within Council may not have been declared, or are not being appropriately managed, should speak up and notify their Director, the Manager Governance and Information or the CEO.

Individuals who believe they have observed corrupt conduct by their colleagues may also make a protected disclosure to the Public Interest Disclosure Coordinator or Public Interest Disclosure Officer in accordance with HRCC Public Interest Disclosure Procedure. Council will take appropriate action, including possible disciplinary action, against individuals who discriminate against or victimise those who speak up in good faith.

4. COMMUNICATION

Council’s policy in relation to receiving and providing gifts, benefits and hospitality will be promoted through the Horsham Rural City Council website. This policy will also be promoted on the staff intranet and Councillor Portal, as part of the Councillor and staff induction process (Governance Onboarding), and included in the Councillor and Staff Codes of Conduct.

5. RESPONSIBILITY

Policy Owner: Manager Governance and Community Relations

This Policy will be reviewed every 4 years or earlier as required by changed circumstances including changes to legislation and plans, strategies or policies of HRCC.

6. DEFINITIONS

Term	Meaning
Act	<i>Local Government Act 2020</i>
Anonymous gifts	Anonymous gift not to be accepted: (1) Subject to subsection (2), a Councillor must not accept, directly or indirectly, a gift for the benefit of the Councillor, the amount of value of which is equal to or exceeds the gift disclosure threshold unless: (a) The name and address of the person making the gift are known to the Councillor; or (b) At the time when the gift is made – (i) The Councillor is given the name and address of the person making the gift; and

Gifts, Benefits and Hospitality Policy (Administrative)

Term	Meaning
	<p>(ii) The Councillor reasonably believes that the name and address so given are the true name and address of the person making the gift.</p> <p>Penalty: 60 penalty units</p> <p>(2) If the name and address of the person making the gift are not known to the Councillor for whose benefit the gift is intended, the Councillor is not in breach of subsection (1) if the Councillor disposes of the gift to the Council within 30 days of the gift being received.</p> <p>(3) In addition to the penalty specified in subsection (1), a Councillor who is found guilty of a breach of that subsection must pay to the Council the amount or value of the gift accepted in contravention of that subsection.</p> <p><i>Local Government Act 2020, Section 137.</i></p>
Business associate	An individual or body that the public sector organisation 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	<p>Benefits include preferential treatment, privileged access, favours or other advantage offered to an individual. They may include invitations to sporting, cultural or social events, access to discounts and loyalty programs and promises of a new job.</p> <p>The value of benefits may be difficult to define in dollars, but as they are valued by the individual, they may be used to influence the individual's behaviour.</p>
Biannual Personal Interest Return	Declaration of interests made by a specified person (Councillor, delegated committee member who is not a Councillor, CEO or nominated officer) between 1 and 31 March and 1 and 30 September each year in accordance with the <i>Local Government Act 2020, s. 134.</i>
Bribe	To give money or some other form of consideration to a public official so as to persuade the official not to exercise his or her common law or statutory powers or to bestow some privilege or favour.
Ceremonial Gifts	<p>Ceremonial gifts are 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. Examples include books, plaques, artworks and artefacts.</p> <p>Ceremonial gifts are the property of the public sector organisation, irrespective of value, and should be accepted by individuals on behalf of the public sector organisation. Receipt of ceremonial gifts should be recorded on the Gifts, Benefits and Hospitality Register.</p>
Conflict of Interest	<p>Conflicts of interest may be:</p> <p>General: Where an impartial, fair minded person would consider that the person's private interests could result in the person acting in a manner that is contrary to their public duty.</p> <p>Material: If an affected person would gain a benefit or suffer a loss depending on the outcome of the matter. The benefit or loss may be directly or indirectly, or in a pecuniary or non-pecuniary form.</p> <p><i>Local Government Act 2020, sections 127-128.</i></p>
Gifts	Gifts are 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 (for example, artwork, jewellery, or expensive pens), low value (for example, small bunch of flowers), consumables (for example, chocolates) and services (for example, painting and repairs).
Hospitality	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.
Legitimate business benefit	A gift, benefit or hospitality may have a legitimate business benefit if it furthers the conduct of official business or other legitimate goals of Council.
Money	Includes cash, cheques, money orders, travellers' cheques, direct deposits, shares, vouchers, credit notes fly buys or other items which can be easily converted to cash.
Nominated officer	A member of Council staff who: (a) has a statutory or delegated power, duty or function; and (b) is nominated by the CEO because of the nature of that power, duty or function [<i>Local Government Act 2020, S.132(1)</i>]
Official gifts	Gifts presented to Council including gifts received from a Sister City, organisation or corporation that is bestowing a corporate gift, for example, plaques, plates, vases, trophies, artworks or souvenirs.
Register	A register of all declarable gifts, benefits and hospitality, including those declined.
Token offer	A gift, benefit or hospitality that is of inconsequential or trivial value to both the person making the offer and the recipient (such as basic courtesy). Token offers are those that are worth \$20 or less.
Non-token offer	A gift, benefit or hospitality that is, or may be perceived to be by the recipient, the person making the offer or by the wider community, of more than inconsequential value. All offers worth more than \$20 are non-token offers and must be recorded on Council's gift, benefit and hospitality register.

Term	Meaning
Value	The face value or current estimated retail value.

7. SUPPORTING DOCUMENTS

Document	Location
Biannual Personal Interests Return	Councillor portal
Councillor Code of Conduct	HRCC website, Councillor portal
Freedom of Information Part II Statement	HRCC website
Gifts, Benefits and Hospitality Declaration Form (Form No F04/011)	HRCC website, intranet
Gifts, Benefits and Hospitality Register	HRCC website
HRCC Conflict of Interest Procedure	HRCC website, Councillor portal, intranet
HRCC Performance Management Procedure (Procedure No P04/230)	Intranet
HRCC Fraud & Corruption Control Policy and Framework	HRCC website, Councillor portal, intranet
HRCC Procurement Policy (Policy No C04/019)	HRCC website, intranet
HRCC Public Interest Disclosure Procedure	HRCC website, Councillor portal, intranet
HRCC Public Transparency Policy (Policy No C04/015)	HRCC website, intranet
<i>Independent Broad-based Anti-corruption Commission (IBAC) Act 2011</i>	Internet
<i>Local Government Act 2020 – Sections 137 and 138</i>	Internet
<i>Local Government (Governance and Integrity) Regulations 2020, regulation 9(1)(k)</i>	Internet
Mayor and Councillor Event Information Form	HRCC Website
Staff Code of Conduct	Intranet
Victorian Auditor-General's Report "Implementing the Gifts, Benefits and Hospitality Framework", December 2015	Internet
Victorian Public Sector Commission "Gifts, benefits and hospitality – Policy Framework", October 2016	Internet
Victorian Public Sector Commission's Gifts, Benefits And Hospitality Policy Guide	Internet

8. DOCUMENT CONTROL

Version Number	Approval Date	Approval By	Amendment	Review Date
01	11 March 2014	EMG	New template	
02	11 December 2017	EMG	Amendments to reflect loyalty reward offers	11 December 2020
03	17 December 2018	Council	Amendments to reflect token gifts, provision of gifts and enhanced accountability requirements	17 December 2021
04	22 March 2021	Council	Amendments to reflect requirements of the <i>Local Government Act 2020</i>	22 March 2024
4.1	March 2023	n/a	New logo	22 March 2024
4.2	8 October 2024	EMT	Scheduled review, administrative changes only. Endorsed by Audit & Risk Committee 23 Sept.	8 October 2028

It is recognised that from time-to-time circumstances may change leading to the need for minor administrative changes to Council and Administrative Policies. Where an update does not materially alter a Policy, such a change may be made administratively, without the need for formal adoption by EMT or Council. Examples include a change to the name of a Council Department/Position Title, a change to the name of a Federal or State Government Department, and a minor update to legislation which does not have a material impact. However, all changes will be noted in the document control section and version number updated.