

GIFTS AND HOSPITALITY ACCEPTANCE (DLI) PROCEDURE

Section 1 - Preamble

- (1) This Procedure is effective from 15 December 2025.

Section 2 - Purpose

- (2) This Procedure outlines the requirements for staff who are offered gifts or hospitality in connection with their work or association with the University.

Section 3 - Scope

- (3) This Procedure applies to all staff and associates of the University and includes the controlled entities.
- (4) During the establishment of DLI, all policy, procedures and supporting processes will be regularly reviewed. In the establishment phase, defined as the first two years from when students commence DLI programs, any issues arising from the implementation of current policy, procedure or process will be referred to a jointly-convened Policy and Procedure Review Panel (PPRP). The PPRP will comprise designated academic and professional service representatives from the University Partners and the Office of the Rector. The PPRP will recommend an outcome best aligned with relevant principles and the best interests of any student(s) concerned, staff and/or associates and will advise DLI on the future development of policy, procedure and supporting processes. During the establishment phase, the PPRP may make recommendations to vary any given policy only with endorsement from relevant University Partner governance processes. All policy and procedure will be subject to a full review at the end of the two-year establishment phase.

Section 4 - Policy

- (5) This Procedure is pursuant to the DLI Integrity policy.

Section 5 - Procedure

- (6) Staff and associates must conduct themselves lawfully, properly and ethically and must not use their position or association with the University to seek gifts or benefits from a third party. A general presumption applies that gifts given to staff in the course of employment or University duties, are gifts to the University and are accepted on that basis, and are to be disclosed and delivered to the University.

Prohibited Gifts

- (7) The following gifts offered to staff, associates or family members as part of University business must not be accepted under any circumstances:
 - a. a gift of cash;
 - b. where acceptance places an obligation on the University or a member of staff;

- c. where the gift relates to a procurement process with a current or potential supplier; or
- d. where the gift may create or be perceived by a reasonable person to create a conflict of interest as defined in the Declaration of Interest (DLI) procedure.

Acceptance of Gifts

- (8) Staff, students, and associates must not solicit gifts or hospitality.
- (9) Gifts must be declared within five working days of receipt.
- (10) Gifts or hospitality should only be accepted if:
 - a. It does not influence decision-making.
 - b. It aligns with cultural or professional norms.
 - c. It complies with applicable laws and university policies.
- (11) Where there is a Tax implication, this will be addressed on a case by case basis
- (12) The financial value of gifts must be ascertained and acceptance is subject to the following requirements:

Value	Classification	Acceptance	Disclosure	Additional Requirements
<IDR 1,000,000	Nominal	Yes	Disclosure to leader	
IDR 1,000,001-5,000,000	Reportable	Yes, subject to approval by leader	Disclosure to leader Central disclosure and registration via Gift and Hospitality Registration Form	Leader must seek approval of the DLI Rector DLI Rector must seek endorsement from a member of the Governing Board
>\$5,000,000	Reportable	Yes, subject to approval by leader	Central disclosure and registration via Gift and Hospitality Registration Form	Leader must seek approval of the DLI Rector DLI Rector must seek endorsement from a member of the Governing Board

Reporting Gifts and Hospitality

- (13) Complete a Gifts and Hospitality Declaration Form.
- (14) Submit the form to the designated Integrity Officer or Business Manager within five working days.
- (15) Declarations must include:
 - a. Description of the gift/hospitality.
 - b. Estimated value.
 - c. Provider's name and organization.
 - d. Circumstances under which the gift/hospitality was provided.

- (16) A Gift Register will be maintained by the DLI Finance function or Business Manager who will report to the Rector biannually.

Evaluation and Approval

- (17) The Integrity Officer or Business Manager reviews each declaration within five working days of receipt.
- (18) Approval for retaining gifts/hospitality above IDR 1,000,000 must be granted by the Rector.
- (19) Gifts deemed inappropriate or exceeding allowable value must be returned or donated to charity under DLI oversight.

Exceptional circumstances

- (20) In exceptional circumstances it may be impracticable for a staff member or associate to follow the normal assessment and approval process, for example when engaged on international visits or hosting an international visit. In these circumstances, the assessment and approval steps must be completed as soon as practicable.

Non-compliance

- (21) Staff and associates who become aware of a non-compliance with this Procedure must manage the non-compliance in accordance with the Compliance Management policy.
- (22) Staff and associates who fail to report or register a reportable gift received may be subject to disciplinary proceedings in accordance with the Staff Discipline procedure.

Section 6 - Definitions

- (23) For the purpose of this procedure:
- a. **Associate:** contractors, consultants, volunteers, visiting appointees and visitors to the University.
 - b. **Conflict of interest:** see Declaration of Interest procedure.
 - c. **Family member:** includes immediate family and anyone else who is known to have been or is related to the staff member or associate.
 - d. **Gift (or hospitality):** a gift, hospitality or benefit under this Procedure is something of monetary value or worth, or other advantage or privilege derived as a result of a business-related relationship connected with the University. Examples could include a dinner at a restaurant, tickets to attend a sporting or cultural event, other offers of hospitality or travel, an item given for a religious or cultural celebration, or presented on reaching agreement with a supplier, etc.
 - e. **Procurement process:** any pricing or engagement process undertaken with a potential supplier for the provision of goods or services.
 - f. **Staff:** a member of the academic or professional staff, Executive or Honoraries appointed by the University.

ASSOCIATED DOCUMENTS

- (24) These associated documents are available on the DLI Policy page:
- Integrity (DLI) Policy
 - Declaration of Interest (DLI) Procedure

- DLI Gift and Hospitality Registration Form
- Compliance Management (DLI) Policy
- [Higher Education Support Act 2003](#) (Australian Commonwealth)
- [Higher Education and Research Act 2017](#) (United Kingdom)

PROCEDURE DETAIL	
Name of procedure	Gifts and Hospitality Acceptance Procedure
Overarching policy	Integrity Policy
Approved by	Yayasan Governing Board
Approval date	14 December 2025
Date of effect	Upon publication
Date of review	To be reviewed within 12 months to confirm effectiveness
DLI Approver	Joint Management Committee 12 December
Responsible Executive	DLI Rector
Implementation Officer	DLI COO
Policy or procedure superseded	Not applicable
Associated documents	<ul style="list-style-type: none"> • Integrity (DLI) Policy • Declaration of Interest (DLI) Procedure • DLI Gift and Hospitality Registration Form
Summary	This Procedure outlines the requirements for staff who are offered gifts or hospitality in connection with their work or association with the University.
Key words for online searching	Present, Benefit, Reward, Entertainment, Advantage, Free
Category	Governance
Target audience	Staff and associates