Gifts, Benefits and Hospitality
Policy and Procedure

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1. Purpose
This policy states the Geelong Arts Centre's position on:

- responding to offers of gifts, benefits and hospitality; and
- providing gifts, benefits and hospitality.

The Geelong Arts Centre (the Centre) has issued this policy to support behaviour consistent with the Code of Conduct for Victorian Public Sector Employees (the Code). Under the Victorian Public Sector (VPS) Code of Conduct, employees must never seek gifts and must refuse offers that compromise impartiality, create conflict of interest, or appear as an inducement.

2. Scope

This policy applies to all Workplace Participants including:

- Centre employees
- Trust Members
- contractors, consultants and labour hire employees
- other workplace participants representing or completing work with the Centre.

This policy excludes the activities as outlined in the Centre's House Seats Policy.

3. Key principles

3.1. Integrity and Impartiality

Individuals have a duty to place the public interest above their private interests when carrying out their official functions. As a general rule, gifts, benefits or hospitality should not be accepted unless there is a legitimate and compelling business or public interest reason to do so and it can be demonstrated that acceptance is not considered an actual, potential or perceived conflict of interest.

This protects you and the workplace if questions of wrongdoing are raised and helps individuals to navigate difficult situations.

Gifts of a token value may sometimes be accepted by the Centre for cultural, ceremonial or historic reasons. Approval of any acceptance is required in each instance.

3.2. Accountability

Individuals are accountable for;
- 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; and
- the responsible provision of gifts, benefits and hospitality.

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4. PART A - Receiving Gifts, Benefits and Hospitality Offers

4.1. Token Offers

A Token Offer may include promotional items which would be considered a basic courtesy, during a meeting for Official Business purposes. Individuals may accept token offers of gifts, benefits and hospitality without approval or declaring the offer on the Register.

Employees are to refuse all offers (excluding token hospitality) which are:

- made by a current or prospective supplier; and / or
- made during a procurement or tender process by a person or organisation involved in the process.

A 'thanks is enough' approach is encouraged where there is uncertainty on whether to accept or decline an offer.

The Centre encourages employees speak with their direct manager or the Manager Governance, Risk & Compliance if they are unsure on the approach to take.

4.2. Minimum accountabilities

Consistent with the Victorian Public Sector minimum accountabilities, gift, benefit or hospitality (token or non-token) must be refused, if any of the following apply.

Geelong Arts Centre employees must:

- Not seek or solicit gifts, benefits and hospitality for themselves or others;
- Refuse all offers of gifts, benefits and hospitality that:
    - Are money, items used in a similar way to money (gift cards/vouchers), or items easily converted to money;
    - Give rise to an actual, potential or perceived conflict of interest;
    - Extend to relatives or friends;
    - Have no legitimate business benefit;
    - Could compromise the public's trust in either the public sector entity or individual from performing public duties in an impartial manner;
    - Is not consistent with community expectations and could adversely affect their standing as a public official, or which may bring their public sector employer or the public sector into disrepute; or
    - Are repeat offers that could be cumulative and combined could be seen to influence outcomes;
    - where, in relation to hospitality and events, the Centre will already be sufficiently represented to meet its business needs;
    - made by a person or organisation with a primary purpose to lobby Ministers, Members of Parliament or public sector agencies;
    - are made in secret.

- Declare all non-token offers (valued at $50 or more) of gifts, benefits and hospitality (whether accepted or declined) on either:
    - the Centre's Gifts, Benefits & Hospitality Register, (*seek written approval from the manager or authorised delegate in advance of accepting any non-token offer*); or
    - the Centre's Register of Private Interests for Directors.

- Refuse bribes or inducements and report inducements and bribery attempts to:
  - the Director Corporate Services or CEO, where the matter involves employees; or
  - the Trust Chair, where the matter involves Directors.

Note: The Centre and other public sector organisations are required to publish all non-token offers of gifts, benefits or hospitality to the value of $50 or more received, irrespective of whether or not they are accepted or declined on their website.

Employees should refer to the **GIFT Test in Attachment A2** of this policy for further information on responding to a non-token offer.

Register an offer: To declare a gift, benefit and/or hospitality offer, the register can be found on Amplify on the forms page under Organisational Info in the Governance forms section.

4.3. Requirements for accepting non-token offers

There are instances where there is a legitimate business reason for accepting a non-token offer. Centre employees can accept appropriate offers if it provides a legitimate business benefit, such as networking or building relationships, provided the offer does not create a conflict of interest. Compliance relies on transparency, manager approval, and adhering to the Victorian Public Sector's minimum accountabilities. All accepted non-token offers must be approved in writing by the CEO, recorded in the Register and be consistent with the following requirements;

- it does not raise an actual, potential or perceived conflict of interest or have the potential to bring the individual, the Centre or the public sector into disrepute; and
- there is a legitimate business reason for acceptance. It is offered in the course of the individual's official duties, relates to the individual's responsibilities and has a benefit to the Centre, the public sector or the State.

In the instance that a gift is accepted prior to it being identified as a non-token gift, the individual must advise and seek written CEO approval within five business days.

4.4. Recording non-token offers

All Non-Token Offers, whether accepted or declined, must be recorded in the Register. The business reason for accepting the non-token offer must be recorded in the register including sufficient detail to link the acceptance to the individual's work functions and benefit to the Centre, the public sector or State.

Individuals should consider the following examples of acceptable and unacceptable levels of detail to be included in the register when recording the business reason:

Unacceptable	• "Networking" • "Maintaining stakeholder relationships"
Acceptable	• "Individual is responsible for evaluating and reporting outcomes of sponsorship of Event A. Individual attended Event A in an official capacity and reported back to the Centre on the event." • "Individual presented to a visiting international delegation. The delegation presented the Individual with a cultural item worth an estimated $200. Declining the gift would have caused offence. The Gift was accepted, written approval was subsequently obtained for the gift, which became the Centre's property."

4.5. Reporting of offers

The Audit & Risk Subcommittee will receive a report on an annual basis on the administration and quality control of the gifts, benefits and hospitality policy, processes and Register. The report will include analysis of gifts, benefits and hospitality risks (including multiple offers from the same source and offers from business associates), risk mitigation measures and any proposed improvements.

5. PART B - Providing Gifts, Benefits and Hospitality Offers (funded by GAC)

5.1. Centre provision of offers

Gifts, benefits and hospitality may be provided to welcome guests, facilitate the development of business relationships, further public sector business outcomes and to celebrate achievements.

When deciding whether to provide gifts, benefits or hospitality or the type of gift, benefit or hospitality to provide, individuals must ensure:

- any gift, benefit or hospitality is provided for a legitimate business reason in that it furthers the conduct of official business, other legitimate organisational goals, or promotes and supports government policy objectives and priorities;
- that any costs are proportionate to the benefits obtained by the Centre, and would be considered reasonable in terms of community expectations (**refer to the 'HOST' test in Attachment A4** of this policy);
- it does not raise an actual, potential or perceived conflict of interest; and
- that they demonstrate professionalism in their conduct and uphold their obligation to extend a duty of care to other participants.

5.2. Financial Delegations

Employees must ensure that they:

- Have the appropriate level of financial delegation for the level of gift, benefits or hospitality spending, or;
- Have obtained approval in advance by an employee with the appropriate financial delegation.

5.3. Limits on expenditure

Gifts, benefits and hospitality expenditure must be funded from the operating budget unless there is specific provision for such expenditure from other funds.

5.4. Fringe benefits tax

Fringe benefits tax (FBT) is payable on gifts, benefits or hospitality expenditure relating to Centre employees and is charged back to the department responsible for the expenditure.

The effect of FBT is to double the cost of gifts, benefits or hospitality and this must be taken into account in any decision to incur gifts, benefits or hospitality expenditure.

Specific guidelines for the provision of Gifts, Benefits and Hospitality can be found in Attachment A5 of this policy.

6. PART C - Official Business Events

There can be a legitimate business benefit for workplace participants to attend Official Business Events.

The Centre recognises where there are genuine business benefits either where GAC hosts or GAC employees attend an event, to ensure the Centre fulfils its functions as a public sector agency and to further strategic goals.

Attendance by a Centre employee at an Official Business Event for an official business purpose (as outlined below) will not be considered a gift, benefit or hospitality under this policy unless there is a direct conflict with the **Minimum Accountabilities** outlined in **Part A of this policy**.

- Legitimate business purposes can include but are not limited to business development, stakeholder relationship building and activities that facilitate professional connections within the local, national and international arts sector.
- Where attendance by GAC employee/s at an Official Business Event for legitimate business purposes is deemed to not be considered a gift, benefit or hospitality under this policy attendance will not need to be included on the Gift, Benefit & Hospitality Register.
- Gifts, benefits & hospitality received at an event must be declared on the Gift, Benefit & Hospitality Register.
- Attendance at both Official Business Events and non-Official Business Events must be approved in accordance with the Gift, Benefit & Hospitality procedure.
- Attendance at an Official Business Event must be approved by an employee's manager or authorised delegate.

When an event MUST be registered

(Registration on the Gifts, Benefits and Hospitality Register IS required).

- Free attendance paid by a third party: If an external organization or prospective vendor provides you with free tickets, complimentary catering, or hospitality—and it exceeds the token value threshold of $50 it is viewed as a benefit and must be declared.
- No clear business purpose: If the event acts simply as a social function rather than furthering official business goals, it must be registered by completing the Gifts, Benefits and Hospitality Form.
- Potential conflict of interest: If the event invitation comes from someone you are actively making a business decision about (such as a current tender or procurement process), it must be declared and likely declined.

Free professional development, networking events such as workshops, seminars and cross government networking opportunities are not considered a gift, benefit or hospitality offer and do not need to be registered or assessed under this policy.

Note: Instances where hospitality offers are considered a token offer, GAC employees can discuss benefits and compliance in attending with their manager and / or Manager Governance, Risk & Compliance. It is acknowledged that in some cases it will be beneficial for GAC employees to attend however a formal compliance review and approval is required on a case-by-case basis.

7. Breaches

Disciplinary action consistent with the Centre Enterprise Agreements and relevant industrial 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 conflict of interest related to gifts, benefits and hospitality in accordance with the Conflict-of-Interest Policy.

Actions inconsistent with this policy may constitute misconduct under the *Public Administration Act* 2004, which includes:

- breaches of the binding Code of conduct for Victorian public sector employees, such as sections of the Code covering conflict of interest (section 3.7), public trust (section 3.9) and gifts and benefits (section 4.2); and
- individuals making improper use of their position.

For further information on managing breaches of this policy, please contact the Governance Manager, Risk & Compliance.

The Centre will communicate its policy on the offering and provision of gifts, benefits and hospitality to contractors, consultants and other business associates. Those identified as acting inconsistently with this policy may be subject to contract re-negotiation, including termination.

8. Speak Up

The Centre encourages employees to speak up if it is believed there is a breach of this policy including if a breach:

- has happened
- is happening
- could be about to happen.

Individuals who consider that gifts, benefits and hospitality or conflict of interest within the Centre may not have been declared or is not being appropriately managed should speak up and notify their manager or the Director Corporate Services.

The Centre will take decisive action, including possible disciplinary action, against individuals who discriminate against or victimise those who speak up in good faith. Refer to the Public Interest Disclosure Guidelines.

9. Responsibility of Corporate Services

The Manager Governance, Risk & Compliance is responsible for the following:

- Maintain an up-to-date Gifts, Benefits & Hospitality Policy in line with Standing Directions.
- Establishing awareness of and compliance with this policy across the Centre's operations.

- Maintain a record of non-token offers employees receive including gifts, benefits and hospitality worth $50 or more and publishing a register of gifts, benefits and hospitality offers on the Centre's website.
- On an annual basis, provide the Register to the Audit & Risk Subcommittee for review and approval.
- Ensuring hospitality expenditure is reported in accordance with whole of government financial management, accountability and reporting requirements.
- Complete an annual assessment of the Centres practices in line with Standing Directions 2018 requirements and attest to compliance with the Ministerial Standing Directions.

10. Reference VPSC

This policy is based on the Model Gifts, Benefits and Hospitality Policy issued by the Victorian Public Sector Commission (VPSC).

11. Related policy and legislation

- Victorian Public Sector Commission's Gifts, Benefits and Hospitality Policy
(refer to Standing Directions requirements – Direction 3.4 Internal Control System)
- *Public Administration Act 2004 (Vic)*
- Code of Conduct for Victorian public sector employees 2015
- Code of Conduct for Directors of Victorian public entities 2024
- Geelong Arts Centre Conflict of Interest Policy
- Geelong Arts Centre Fraud, Corruption and Control Policy
- Geelong Arts Centre Recruitment Policy

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Attachments

A1. Definitions

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. 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.
Business associate	An external individual or entity which the organisation has, or plans to establish, some form of business relationship, or who may seek commercial or other advantage by offering gifts, benefits or hospitality.
Ceremonial Gifts	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. Ceremonial gifts are the property of the Centre, irrespective of value, and should be accepted by individuals on behalf of the Centre. The receipt of ceremonial gifts should be recorded on the Register but does not need to be published online.
Conflict of Interest	A conflict of interest exists if you have a private interest that could influence, or reasonably be seen to influence, how you perform your public duties. The conflict can be actual, potential or perceived as follows: • **Actual:** There is a real / confirmed conflict between an employee's public duties and private interests. • **Potential:** An employee has private interests that could conflict with their public duties. This refers to circumstances where it is foreseeable that a conflict may arise in future and steps should be taken now to mitigate that future risk. • **Perceived:** The public or a third party could form the view that an employee's private interests could improperly influence their decisions or actions, now or in the future. If a conflict of interest exists, the Conflict-of-Interest Policy will apply. For more information, refer to the Centre's Conflict of Interest Policy.
Employee	Means any person employed under a contract of employment or contract of training by the Geelong Performing Arts Centre Trust under Clause 14 (1) of the *Geelong Performing Arts Centre Trust Act 1980*.
Gifts	Free or discounted items and any item that would generally be seen by the public as a gift. These include items of high value (e.g., artwork, jewellery), low value (e.g. small bunch of flowers) and consumables (e.g. chocolates, wine). Fundraising by public sector organisations that is consistent with relevant legislation and any government policy is not prohibited under the minimum accountabilities.
Hospitality	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	Gifts, benefits and hospitality accepted or provided for a business purpose, in that it furthers the conduct of official business or other legitimate goals of the organisation, public sector or State.

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Live Performance	Any performance from artforms such as of ballet, comedy, dance, circus, music, opera, theatre or spoken word (or any hybrid thereof) excluding performances at the Centre.
Official Business Event	An event where the reason for attendance: • furthers the conduct of Official Business and is of legitimate business benefit; and • is consistent with the roles of the employee/s attending. Such an event may occur inside or outside normal business hours for industry, business, cultural, networking or learning purposes. This may include: • events or festivals organised by arts and creative sector organisations such as GLAM (Galleries, Libraries, Archives and Museums) or other arts, cultural and tourism organisations • other arts industry stakeholders • formal events or functions hosted by Commonwealth, State government or other government agencies • events with commercial sponsors or partner organisations including where tickets are received under a contract with the host • an education or training related event which is relevant to the workplace participant's role at the Centre • a Live Performance Event as defined in this policy • a Rehearsal Performance as defined in this policy
Public Official	As described under section 4 of the Public Administration Act 2004. This includes: • public sector employees; • statutory office holders; and • directors of public entities.
Register	A record, preferably electronic, of all declarable gifts, benefits and hospitality. It records the position of the person the offer was made to, the date the offer was made and by whom, the nature of the offer, its estimated value, the raising of any actual, potential or perceived conflicts of interest or reputational risks and whether the offer was accepted or declined. For accepted offers, it details the business reason for acceptance and the officer approving the acceptance. A deidentified version of the Register is published on the Centre website following the end of the financial year.
Rehearsal Performance	A performance for which tickets are not available for public purchase, and may include a trial or workshop performance, or as dress rehearsal prior to the first public performance. From time to time, team members will be invited to attend to provide audience feedback prior to public performances. Acceptance of these complimentary tickets is consistent with the Centre's functions and objectives to support, partner and collaborate with the broader industry. At the time the tickets are provided they have no commercial value. Attendance should be recorded in the OBE register.
Token Offer	An offer of a gift, benefit or hospitality that is made as a courtesy or is of inconsequential or trivial value to both the person making the offer and the individual. Whilst the primary determinant of a token offer is that it would not be reasonably perceived within or outside the organisation as influencing an individual or raising an actual, potential or perceived conflict of interest. The token offer must be worth less than $50. If token offers are made often by the same person or organisation, the cumulative value of the offers, or the perception that they may influence the recipient, may result in the offers becoming non-token.

Non-Token Offer	An offer of 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 $50 or more are non-token offers and must be recorded on the Register whether they are accepted or not.
Workplace Participant	means an individual who performs work in any capacity for the Centre including, but not limited to, Geelong Arts Centre employees, Trust and subcommittee members, contractors, subcontractors, apprentices, hirers, performers, trainees, work experience students, interns, and volunteers.

A2. The GIFT Test

The 'GIFT' Test outlines requirements individuals should consider when **deciding whether to accept or decline** a non-token offer. If further support is required or when in doubt confirm with your direct Manager or Governance Manager, Risk & Compliance.

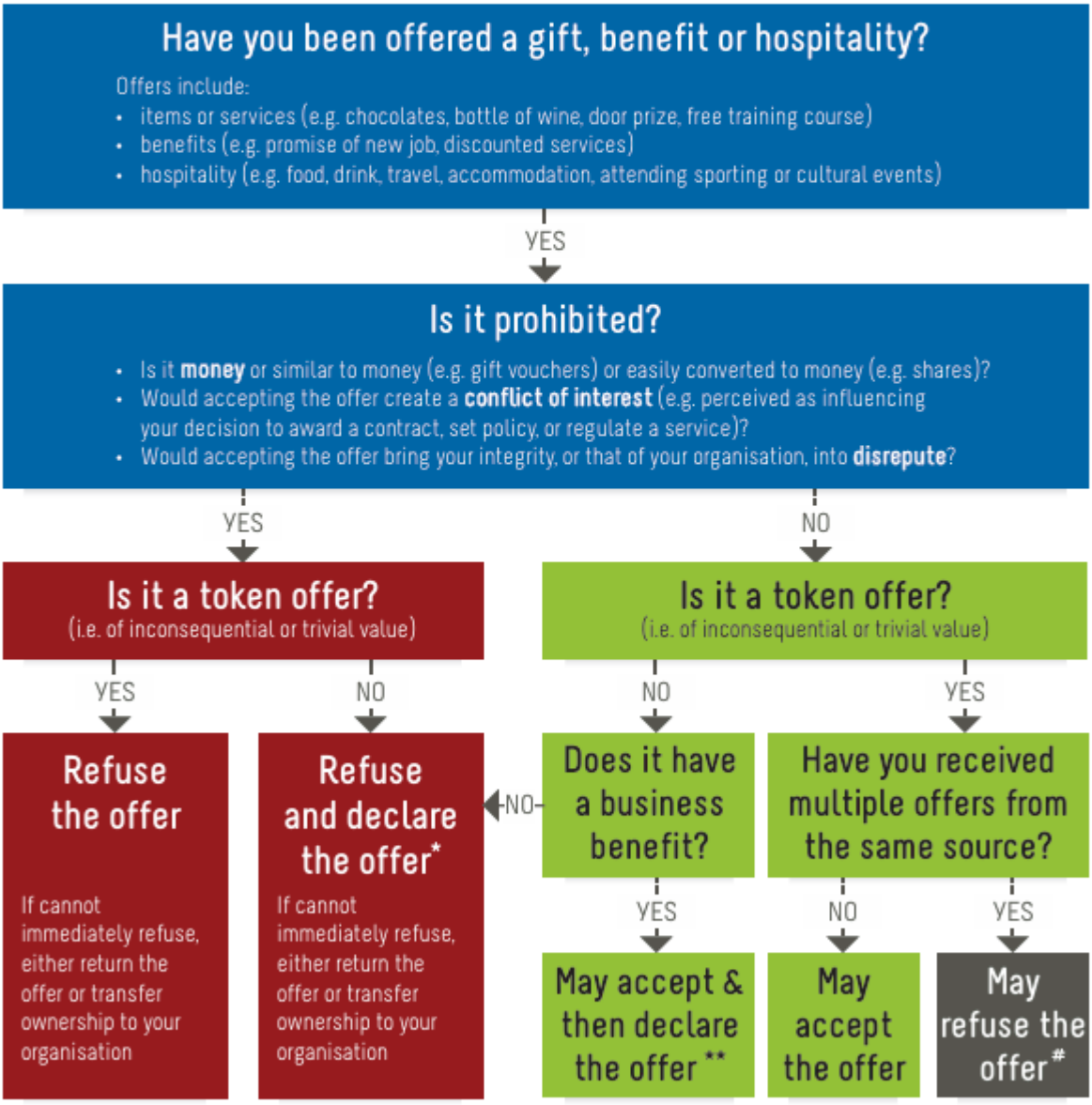
G	**Giver**	**Who is providing the gift, benefit or hospitality offer and what is their relationship to me?** • Does my role require me to select contractors, award grants, regulate industries or determine government policies? • Could the person or organisation benefit from a decision I make? **Note:** All offers from active tenderers or entities subject to regulatory decisions must be refused.
I	**Influence**	**Are they seeking to gain an advantage or influence my decisions or actions?** • Has the gift, benefit or hospitality been offered to me publicly or privately? • Is it a courtesy or a token of appreciation or valuable non-token offer? • Does its timing coincide with a decision I am about to make or endorse a product or service?
F	**Favour**	**Are they seeking a favour or preferential treatment in return?** • Has the person or organisation made several offers over the last 12 months? • Would accepting it create an obligation to return a favour?
T	**Trust**	**Would accepting the gift, benefit or hospitality diminish public trust?** • How would the public view acceptance of the offer? • What would my colleagues, family, friends or associates think?

A3. Gift Benefits and Hospitality Acceptance Process

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RESPONDING TO GIFTS, BENEFITS AND HOSPITALITY

Public officials do not seek offers of gifts, benefits and hospitality.



* Generic, bulk event invitations that are declined (e.g. spam email offers) do not need to be declared.
** Hospitality from Victorian public sector organisations does not need to be declared.
\# More than one token offer may be accepted. However, care should be taken to ensure that multiple offers are not used as a device to avoid offers being recorded on the register.

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A4. The HOST Test

The 'HOST' test notes what to areas should be considered when **deciding whether to provide** gifts, benefits or hospitality offers. If further support is required or when in doubt confirm with your direct Manager or Governance Manager, Risk & Compliance

H	**Hospitality**	**To whom is the gift or hospitality being provided?** • Will recipients be external business partners, or individuals of the host organisation? • Is the hospitality being provided by another public sector body?
O	**Objectives**	**For what purpose will hospitality be provided?** • Is the hospitality being provided to further the conduct of official business? • Will it promote and support government policy objectives and priorities? • Will it contribute to staff wellbeing and workplace satisfaction?
S	**Spend**	**Will public 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?
T	**Trust**	**Will public Trust be strengthened or diminished?** • Could you publicly explain the rationale for providing or receiving the gift or hospitality? • How would the public view acceptance of this gift, benefit or hospitality? • What would my colleagues, family, friends or associates think? • Have records in relation to the gift or hospitality been kept in accordance with reporting and recording procedures?

A5. Geelong Arts Centre Guidelines for the provision of Gifts, Benefits and Hospitality (Internal)

1. Purpose

The following guideline details common instances where it may be reasonable and appropriate for the Centre to use Centre funds to provide gifts, benefits and hospitality. The list outlines common instances compliant with the Gifts, Benefits and Hospitality Policy.

2. Scope

This guideline outlines permitted gifts, benefits and hospitality expenditure. Where an instance arises which is not covered by these guidelines, please consult the HOST Test (in Section 9.2) for guidance. Please seek further advice from the Governance team if required.

3. Guidelines

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Type of expenditure	Guidance	Maximum values to funded by the Centre (excl. GST)
Alcohol	Alcohol may be provided to support Official Business Events where it would reasonably be expected or appropriate as part of the Centre's legitimate business activities. Serving of alcohol must be managed in accordance with the Centre's Alcohol and Drugs Policy and Alcohol Service Management Policy.	Not applicable.
Alcohol cabinets	Stocks of alcohol may be maintained for the purpose of offering modest hospitality to guests and external visitors. **Alcohol purchased from Centre funds is not, under any circumstances, to be taken home.**	Not applicable.
Meetings with Geelong Arts Centre Employee (including All Staff Meetings)	Where a meeting requiring the attendance of Geelong Arts Centre Employees (such as training or quarterly All Staff meetings) exceeds 3 hours or is held after hours, refreshments may be provided.	$30 pp maximum
Meetings with external parties	Where meetings for a legitimate business purpose which may include business associates, Government department officials, sponsors, supporters and other guests, a catered morning or afternoon tea may be supplied.	$35 pp maximum
Working breakfasts / lunches / dinners (including for Trust meetings and events such as the annual Strategic Planning Day)	Where the only available and practicable time for a meeting to occur is during the normal breakfast, lunch or dinner period, a light meal, without alcohol, will be provided from Centre funds. These meetings would typically include Executive Leadership and / or management.	$35 pp maximum
	With regard to Trust meetings and events a light meal may be provided. In the instance that the meeting or event occurs from the early evening onwards, a modest supply of alcohol may be provided in accordance with relevant policies.	$40 pp maximum
	Meetings as outlined in this section may require venue hire off-site which may be obtained from the Centre's partner/s in accordance with the defined budget and in-line with reasonable expectations for this kind of hire (consider value for money, multiple quotes). The catering for these events will be modest and consider the mealtimes that the meeting will cover.	Not applicable

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Opening nights and launches	Opening nights and launches are considered Official Business Events in accordance with this Policy. Pre-show, interval and post-show hospitality are all part of opening nights and of legitimate business benefit to the Centre. Generally, canapes, mini meals, drinks and a modest service of alcohol will be provided to attendees of these events.	And ratified as part of the overall budget process.
Employee farewells and retirements	Managers are responsible for organising farewell functions. For employees with 5 years of service - costs will be paid for from a voluntary collection from employees.	Not applicable.
	For employees with 5 - 10 years of service: the cost of a catered morning or afternoon tea can be covered by Centre funds. For employees with over 10 years of service: the cost of a catered morning or afternoon tea or a cocktail style function at the Centre will be covered by Centre funds. In consultation with the departing employee, all employees may be invited to this function. The CEO may approve the attendance of family members and external parties that have worked closely with the employee.	$20 pp To a maximum of $800 per occasion
Employee farewells and retirements gifts	Managers are responsible for organising farewell gifts. For employees with up to 5 years of service: costs will be paid for from a voluntary collection from employees.	Not applicable.
	For employees with a minimum of 5 years of service: gifts are provided for exceptional service only and must be approved by the CEO and/or Trust.	$150
Special (departmental) celebratory functions	Expenditure for employee celebrations is permitted to recognise a notable achievement by a department where there are clear benefits relating to training and/or employee morale. Directors and managers will determine such occasions. The frequency of such functions is limited to one event per year. Once the per employee maximum value has been reached, personal funds should be used.	$30 per employees member per year, strictly subject to CEO approval
Flowers, gifts or donations to a nominated charity	There must be a legitimate business benefit and reasoning for providing flowers or gifts or making a donation to a nominated charity on someone's behalf. At the CEO or Trust's discretion, the Centre or Trust may wish to recognise an employee, other workplace participant or business associate on a significant achievement, milestone or event or make a consolation	Determined by the CEO or Trust Chair as necessary $100 maximum

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	in the event of a bereavement. Where applicable, the Centre should adhere to the recipient's Gifts, Benefits & Hospitality policies or similar and provide any required documentation on request. The Centre/Trust may send flowers or a gift basket in recognition of: • the death of an Employee; • an Employee's illness; or • the illness of an Employee's immediate family or member of their household Directors/Managers should ensure that condolence or congratulations messages are clearly represented as being initiated from the Centre rather than from specific individuals. An appropriate message with one of the following sign off options is permitted: • "From all of us at Geelong Arts Centre"; or • "From [Trust Chair name] , [CEO Name], Trust and Geelong Arts Centre Employees/the Geelong Performing Arts Centre Trust".	
	The Centre will not fund the purchase of recognition gifts for births, birthdays, engagements and marriages. Such gifts may be funded by voluntary contributions by employees.	Not applicable.