Gifts, Benefits and Hospitality Procedure

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Officer: Governance

Authorised Officer: Chief Executive Officer **Due for review:** 28/02/2025(Triennial)

PURPOSE

The purpose of this Gifts, Benefits and Hospitality Procedure (the Procedure) is to establish the minimum accountabilities expected of Board Directors and employees engaged by GOTAFE - relating to the receipt of or provision of Gifts, Benefits and Hospitality.

This procedure is intended to support individuals and GOTAFE to avoid conflicts of interest and maintain high levels of integrity and public trust, including ensuring equity and consistency across GOTAFE.

This procedure supports the behaviour expectations outlined in the GOTAFE Employee Code of Conduct, Code of Conduct for Victorian Public Sector Employees and Code of Conduct for Directors of Victorian Public Entities.

RELEVANT POLICY/POLICIES

This procedure relates to:

POHR-08 Conflict of Interest Policy

ROLES AND RESPONSIBILITIES

This procedure applies to all GOTAFE employees, labour hire employees, contractors and Board Directors.

GOTAFE's Audit, Risk and Finance committee will receive a report at least annually on the administration and quality control of the Gifts, Benefits and Hospitality policy, processes and register.

The Gifts, Benefits and Hospitality Register is maintained by the Strategy and Governance division.

PROCEDURE

1. OFFERS OF GIFTS, BENEFITS AND HOSPITALITY

This section sets out the process for accepting, declining and recording offers of Gifts, Benefits and Hospitality.

The Gifts, Benefits and Hospitality flow chart (Appendix A) provides a summary of the decision-making process to follow when offered a gift, benefit or hospitality.

1.1. Minimum accountabilities when offered Gifts, Benefits or Hospitality

The following minimum accountabilities apply when being offered Gifts, Benefits and/or Hospitality:

- Do not seek or solicit Gifts, Benefits or Hospitality for themselves or others.
- Refuse all offers of Gifts, Benefits or Hospitality that:
 - are money, items used in a similar way to money, or items easily converted to money (eg shares, gift cards with monetary value)

- o give rise to an actual, potential or perceived conflict of interest;
- may adversely affect their standing as a public sector employee or Board member or which may bring GOTAFE or the public sector into disrepute
- are a non-token offer that extend to their relatives or friends or are without a legitimate business benefit

(refer also section 1.2 GIFT Test)

- Declare all non-token offers (valued at \$50 or more) of Gifts, Benefits and Hospitality (whether accepted or declined) on the Gifts, Benefits and Hospitality Declaration Form for inclusion on the register.
- Refuse bribes or inducements and report inducements and bribery attempts to the CEO (who should report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-corruption Commission (IBAC)).

1.2. GIFT Test

When deciding whether to accept an offer, the offer should first be assessed using the GIFT Test to determine whether it 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 conflict of interest or reputational risk exists.

Individuals are to refuse offers:

- likely to influence them, or be perceived to influence them, in the course of their duties or that raise an actual, potential or perceived conflict of interest
- could bring them, GOTAFE or the public sector 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:
 - o made by a current or prospective supplier; or
 - made during a procurement or tender process by a person or organisation involved in the process;
- 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
- where, in relation to hospitality and events, the organisation will already be sufficiently represented to meet its business needs
- 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 Ministers,
 Members of Parliament or public sector organisations; or
- made in secret.

If an individual considers they have been offered a bribe or inducement, the offer must be reported to the CEO (who should report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-corruption Commission (IBAC)).

Table 1: GIFT Test

G	Giver	Who is providing the gift, benefit or hospitality and what is their relationship to me?			
		Does my role require me to select contractors, award grants, scholarships or qualifications, regulate industries or determine government policies? Could the person or organisation benefit from a decision I make?			
ı	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 nontoken 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 in return for the gift, benefit or hospitality?			
		Has the gift, benefit or hospitality been offered honestly? Has the person or organisation made several offers over the last 12 months?			
		Would accepting it create an obligation to return a favour?			
Т	Trust	Would accepting the gift, benefit or hospitality diminish public trust?			
		How would the public view acceptance of this gift, benefit or hospitality? What would my colleagues, family, friends or associates think?			

When in doubt, employees should ask their manager for direction or seek clarification from the Executive Director, Corporate Services.

1.3. Token Offers

Token Offers of Gifts, Benefits and Hospitality may be accepted and do not need to be reported using the Gifts, Benefits and Hospitality Declaration Form.

1.4. Non-Token Offers

All Non-Token Offers received must be declared using the Gifts, Benefits and Hospitality Declaration Form (FHR-80) within fourteen days of the offer being made, regardless of whether the offer is accepted or rejected.

Non-Token Offers may only be accepted if they have a genuine business benefit and be approved in writing as set out in section 1.5.

Examples of acceptable and unacceptable levels of details include:

Unacceptable: "Networking" or "Maintaining stakeholder relationships"

Acceptable:

"Individual is responsible for evaluating and reporting outcomes of GOTAFE's sponsorship of Event A. Individual attended Event A in an official capacity and reported back to GOTAFE 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 GOTAFE's property."

1.5. Gifts, Benefits and Hospitality Register and Authorisation

The Gifts, Benefits and Hospitality Register is maintained by the Strategy and Governance division.

The table below sets out the authorisation requirements when being offered Gifts, Benefits and Hospitality.

Table 2: Authorisation and Register Reporting Requirements

Туре	Authorisation	Register
Token Offers	Approval is not required to accept Token Offers	Lodgment on the Gifts, Hospitality and Benefits Register not required
Non-Token Offers	Non-Token Offers may only be accepted if they have a genuine business benefit and be approved in writing by the direct manager. Non-Token Offers made to a member of the Executive Leadership Team (other than the CEO) may only be approved by the CEO. Non-Token Offers made to the CEO or a Board Member may only be approved by the Board Chair.	All Non-Token Offers, whether accepted or not, must be declared using the Gifts, Benefits and Hospitality Declaration Form (FHR-80) and lodged with the Strategy and Governance division within fourteen days of the offer. The business reason for accepting any Non-Token Offer must be recorded in the register and provide sufficient detail to link the acceptance to the individual's work functions and benefit to GOTAFE. Note: Non-token gifts with a legitimate business benefit and have been accepted for work or contribution may be retained by the employee. Official gifts or any gift of cultural or ceremonial significance, or of significant value, must be transferred to GOTAFE.

Туре	Authorisation	Register
All gifts that are of an entertainment nature and/or are valued at \$300 or more.	Authorisation for Token and Non- Token Offers is as set out above.	All gifts that are of an entertainment nature and/or are valued at \$300 or more must be reported to the Director, Finance and Procurement for Fringe Benefit Tax (FBT) reporting purposes.

When in doubt employees, should ask their manager for direction, or seek clarification from the Executive Director, Corporate Services.

2. PROVISION OF GIFTS, BENEFITS AND HOSPITALITY

This section sets out the requirements for providing Gifts, Benefits and Hospitality.

2.1. Minimum accountabilities when providing Gifts, Benefits or Hospitality

The following minimum accountabilities apply when providing Gifts, Benefits and/or Hospitality:

- Ensure that any Gift, Benefit or Hospitality is provided for a business purpose in that
 it furthers the conduct of official business or other legitimate organisational goals or
 promotes and supports GOTAFE's or government policy objectives and priorities.
- Ensure that any costs are proportionate to the benefits obtained by GOTAFE and would be considered reasonable in terms of community expectations.
- Ensure that when hospitality is provided, individuals demonstrate professionalism in their conduct, and uphold their obligation to extend a duty of care to other participants.
- Reference / consideration toward section 2.2 HOST Test.

2.2. HOST Test

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

The HOST Test should be used to assist employees to decide whether or not to provide Gifts, Benefits or Hospitality to employees or stakeholders.

Table 3: HOST Test

Н	Hospitality	To whom is the gift or hospitality being provided?		
		Will recipients be external business partners, or individuals of the host organisation?		
0	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 GOTAFE and 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?		
Т	Trust	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 the public sector? Have records in relation to the gift or hospitality been kept in accordance with reporting and recording procedures?		

When in doubt employees should ask their manager for direction, or seek clarification from the Executive Director, Corporate Services.

3. REFRESHMENTS, FUNCTIONS AND EMPLOYEE GIFTS

Refer to Appendix B: Refreshments, functions and employee gifts matrix for a summary of requirements.

3.1. Meetings and employee-facing training on GOTAFE premises

For meetings or training held for GOTAFE employees on-site; and are scheduled for two or more hours over the normal lunchtime period (between 12pm to 1pm) - light meals or refreshments may be provided at GOTAFE's expense for attendees up to a maximum of \$10 per head. Wherever possible in these scenarios, all catering should be sourced through the on-site GOTAFE café.

GOTAFE will <u>not</u> fund refreshments for meetings or training that do not meet the criteria above.

3.2. Functions

From time to time, GOTAFE may host external or off-site functions. Employees may attend functions by invitation only.

Functions involving third parties, and which are for a specific business purpose **may** be funded by GOTAFE. Prior written approval must be obtained from the relevant financial delegate.

At the Executive Director or CEO discretion, GOTAFE **may** fund farewell functions for staff that have contributed significantly to the organisation. All farewell functions will be limited to a morning or afternoon tea. Wherever possible, all catering should be sourced through the on-site GOTAFE café.

All other functions will not be funded by GOTAFE, unless approved by an Executive Director.

3.3. Christmas functions and gifts

At the CEO's discretion, GOTAFE may fund an employee Christmas function; or allocate an allowance per head for independent Directorate or Department Christmas functions.

At the CEO's discretion, GOTAFE may fund Christmas gifts for all employees. GOTAFE will <u>not</u> otherwise fund Christmas gifts for teams or departments.

3.4. Reward and Recognition

Under GOTAFE's Reward and Recognition program, GOTAFE **may** issue reward or recognition of an employees', or teams', contribution to GOTAFE.

All rewards shall be registered through the People and Culture division and be limited to a maximum of \$200 per staff member.

Gifts for recognition for years of service shall be limited to the value set out below:

Years of Service	Recognition Amount
<10 years	\$0
10 – 20 years	\$100
20 - 30 years	\$200
>30 years	\$300

Gift cards and store cards to be presented as rewards or recognition may only be purchased by an Executive Assistant, People & Culture, or a member of the Executive Leadership Team.

For the purposes of this procedure, rewards and recognition shall not be considered as a Gift and do not need to be recorded in the Gifts, Benefits and Hospitality register.

3.5 Provision of Alcohol

The supply of alcohol at any event can lead to increased risks, including the risk of anti-social behaviour and reputational damage. Alcohol at a function may be funded by GOTAFE on a case-by-case basis if approved by the CEO or an Executive Director. As per the HOST test noted above, the provision of alcohol should be incidental to the overall level of hospitality provided.

Any alcohol should be taken in moderation with professional, responsible behaviours and good judgement around alcohol consumption being expected when attending both internal and external functions. Staff who are driving to and from events are also reminded of their obligations under Victorian Road Safety Regulations and the GOTAFE Motor Vehicle Policy.

Funding / payment of alcohol for GOTAFE activities must be completed only through those eligible occasions and in accordance with the principles outlined herein. Per the Travel and Expense Claim Procedure – claiming alcohol as an expense for individual / personal reimbursement is not authorised.

3.6. Other gifts

GOTAFE funded gifts **may** be appropriate where a staff member has had a major illness or in the case of bereavement of a close family member. Gifts will be limited to a maximum of \$80 per staff member.

A farewell gift may also be appropriate where the staff member has been an employee of GOTAFE for two (2) or more years and has made a positive contribution to GOTAFE. The following limits apply:

Team morning tea up to a maximum of \$10 per head, approved by the supervisor.
 Wherever possible, all catering should be sourced through the on-site GOTAFE café and/or

Farewell gift valued up to \$100, at the discretion of the Executive Director or CEO.

GOTAFE will <u>not</u> fund gifts for celebratory purposes such as birthdays, engagements, weddings or birth of children.

When a gift is purchased the related purchase order, credit card statement or staff reimbursement form should include details of the gift such as the recipient's name and the reason the gift was given.

4. BREACHES AND CONSEQUENCE OF NON-COMPLIANCE

Disciplinary action consistent with the relevant industrial instrument and legislation, including dismissal, may be taken where an individual fails to adhere to this procedure. This includes where an individual fails to avoid wherever possible or to identify, declare and manage a conflict of interest related to Gifts, Benefits and Hospitality in accordance with GOTAFE's Conflict of Interest Policy.

Actions seen to be inconsistent with this procedure may constitute misconduct under the Public Administration Act 2004, which includes:

- breaches of the binding Code of Conduct for Victorian Public Sector Employees and/or the Code of Conduct for Directors of Public Entities, such as sections of the Code covering conflict of interest, public trust and gifts and benefits; and
- individuals making improper use of their position.

For further information on managing breaches of this policy, please contact the Executive Director, Corporate Services.

GOTAFE contractors, consultants and other business associates are expected to comply with the Victorian State Governments Supplier Code of Conduct. Those identified as acting inconsistently with this Code may be subject to contract re-negotiation, including termination.

5. OFFICE OF THE CEO

The Office of the CEO shall:

- establish, implement and review policies and processes for the effective management of Gifts, Benefits and Hospitality that comprehensively address the minimum accountabilities set in 1.1. 2.1 and 4.
- establish and maintain a register for Gifts, Benefits and Hospitality offered to GOTAFE employees and Board members that, at a minimum, records sufficient information to effectively monitor, assess and report on these minimum accountabilities.
- communicate and make clear within the organisation that a breach of this Gifts, Benefits and Hospitality procedure may constitute a breach of binding codes of conduct and may constitute criminal or corrupt conduct and may result in disciplinary action.
- establish and communicate a clear policy position to business associates on the
 offering of Gifts, Benefits and Hospitality to employees, including possible
 consequences for a business associate acting contrary to GOTAFE's position. This
 must take into consideration any whole of Victorian Government supplier codes of
 conduct.

- report at least annually to GOTAFE's Governance Committee on the administration and quality control of its Gifts, Benefits and Hospitality procedure and register. This report must include analysis of the organisation's Gifts, Benefits and Hospitality risks (including repeat offers from the same source and offers from business associates), risk mitigation measures and any proposed improvements.
- publish the organisation's Gifts, Benefits and Hospitality procedure and register on the organisation's public website. The published register should cover the current and the previous financial year.

DEFINITIONS

Benefits

are the preferential treatment, privileged access, favours or other advantage offered to an employee. They may include invitations to sporting or cultural events, social events or promises of a new job. While their value may sometimes be difficult to quantify in dollars, they may be highly valued by the intended recipient and therefore used to influence their behaviour. Employees are to be aware that the use of personal loyalty, discount and/or rewards cards when making purchases on behalf of GOTAFE, are considered to be a 'benefit'.

Bribes

are money or other inducements given or promised to employees to corruptly influence the performance of their role.

Business associate An external individual or entity which GOTAFE has, or plans to establish, some form of business relationship, or who may seek commercial or other advantage by offering Gifts, Benefits and Hospitality.

Conflict of interest Occurs when an employee's private interests conflict with their public duty. Employees have a duty to always resolve a conflict in the public interest, not their own. This may mean that they decline a gift or transfer the gift to their employer's ownership if this is identified as being in the public interest. Any actual, potential or perceived conflict of interest matters, as defined, are to be referred to the GOTAFE Conflict of Interest Policy (POHR-08) and Conflict of Interest Procedure (PRHR-163).

Corruption

Dishonest activity in which a director, executive, manager, employee or contractor of an entity acts contrary to the interests of the entity and abuses their position of trust in order to achieve some personal gain or advantage for him or herself or for another person or entity. Conduct that may be considered an act of 'fraud' or 'corruption', as defined above, are to be referred to the GOTAFE's Fraud and Corruption Management Procedure (B-P109)

Direct or indirect

A gift may be offered directly or indirectly. It may be offered directly to a Board member or employee or offered indirectly via an offer to his/her relative or close associate, including, a member of his / her

immediate family, a regular member of his / her household, or another close associate (eg. friend, relative, business partner).

Entertainment

Entertainment is specifically defined in tax legislation as entertainment by the way of food, drink, recreation, accommodation or travel associated with the provision of food, drink or recreation

Fraud

Dishonest activity causing actual or potential financial loss to any person or entity of moneys or other property by employees or persons external to the entity and whether or not deception is used at the time, immediately before or immediately after the activity. This includes the deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose or the improper use of information or position. Conduct that may be considered an act of 'fraud' or 'corruption', as defined above, are to be referred to the GOTAFE's Fraud and Corruption Management Procedure (B-P109).

Fringe Benefits Tax (FBT) is a tax payable by an employer in respect of fringe benefits provided to an employee or their associate (e.g. an employee's spouse) from 1 April to 31 March.

Gifts

are free or heavily discounted items, that are offered to employees in association with their work. 'Gifts' may be enduring such as a work of art, consumables such as a box of chocolates, or an offer of a reward, discount or loyalty card or similar item that *provides* either a direct or indirect 'benefit'.

Hospitality

is the friendly reception and entertainment of guests. Hospitality can range from offers of light refreshment at a business meeting or conference program to restaurant meals and sponsored travel and accommodation. In all cases the hospitality should be proportionate to the occasion. Modest hospitality offered as part of official business is not a reportable gift.

Legitimate business benefit

is Gifts, Benefits and Hospitality accepted or provided for a business purpose that is consistent with GOTAFE's functions and objectives, and an individual's role. Examples include the CEO or Board members may be asked to accompany a Minister on official business or individuals may be asked to attend the official opening of a government sponsored project or to take part in a study tour. These activities constitute official business, do not have a private benefit and would not ordinarily be recorded as a reportable gift.

Nominal Value

Refers to the value of a gift, benefit or hospitality offer and is set at \$50 for the 12-month period from 1 April to 31 March and includes multiple offers from a single source. It is used to determine whether an offer, if accepted, is a reportable gift.

Non-Token offer

is 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 more than \$50 are non-token offers and must be recorded on a gift, benefit and hospitality register

Register

is a record, preferably electronic, of all declarable Gifts, Benefits and Hospitality. It records the date an 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 how the offer was managed. For accepted offers, it details the business reason for acceptance and the officer approving the acceptance

Token offer

is an offer of a Gifts, Benefits and Hospitality that is offered as a courtesy or is of inconsequential or trivial value to both the person making the offer and the individual. It may include promotional items such as pens and note pads, and modest hospitality which would be considered a basic courtesy, such as light refreshments offered during a meeting.

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, it cannot be worth more than \$50. (Individuals may accept token offers of Gifts, Benefits and Hospitality without approval or declaring the offer except 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).

Value

is the estimated or actual value of a gift in Australian dollars. It is also the cumulative value of gifts offered by the same individual or organisation within a 12-month period from 1 April to 31 March. Significant gifts may warrant independent valuation.

DOCUMENTATION AND REGULATION

- Gifts, Benefits and Hospitality Declaration Form FHR-80
- Employee Code of Conduct policy POHR14
- Conflict of Interest Policy POHR-08
- Conflict of Interest Procedure PRHR-163
- Fraud and Corruption Management Procedure B-P109
- GOTAFE Employee Code of Conduct
- Public Interest Disclosure Policy POHR-11
- Public Interest Disclosure Procedure PRHR 172
- Financial Management Act 1994: Standing Directions 2018

- Public Administration Act 2004
- Code of conduct for Victorian Public Sector Employees 2015
- Code of conduct for Directors of Victorian Public Entities 2016
- Victorian Public Sector Commission's Gifts, Benefits and Hospitality Policy Framework.

APPENDIX A: GIFTS, BENEFITS AND HOSPITALITY FLOW CHART

Have you been offered a gift, benefit or hospitality?

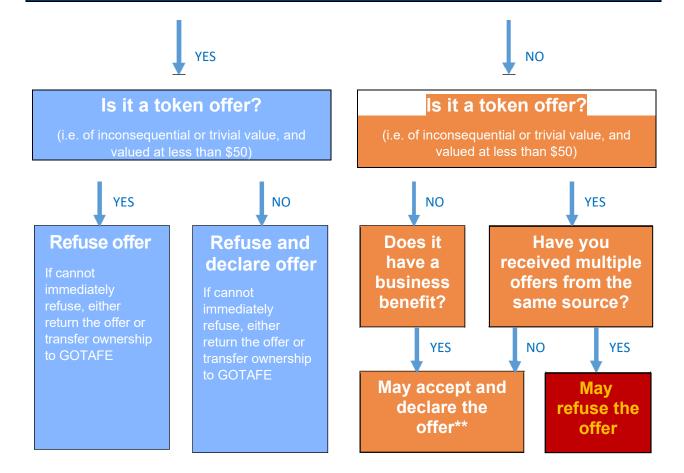
Offers include:

- Items or services (e.g. chocolates, bottle of wine, door prize, free training course)
- Benefits (e.g. promise of new job, discounted services)
- Hospitality (e.g. food, drink, travel, accommodation, attending sporting or cultural events)

YES

Is it prohibited?

- Is it money or similar to money (e.g. gift vouchers) or easily converted to money (e.g. shares)
- Would accepting the offer create a **conflict of interest** (e.g. perceived as influencing your decision to award a contract, set policy, or regulate a service)?
- Would accepting the offer bring your integrity, or that of your organization, into disrepute?



- * Generic, bulk event invitations that are declined (e.g. spam email offers) do not need to be declared.
- ** Hospitality from Victorian public sector organisations do 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.



APPENDIX B: REFRESHMENTS, FUNCTIONS AND EMPLOYEE GIFTS MATRIX

Description	Benefit	Requirement(s)	Limit or Condition	Approval
Hospitality for meetings or employee- facing training	Light meals or refreshments	 Held on-site 2 or more hours Over lunchtime period (12-1pm) 	 Maximum \$10/ attendee Sourced through GOTAFE café (where possible) 	Supervisor/ financial delegate
External or off-site functions	Attendance at function		By invitation only	Executive Director or CEO
All -staff Christmas function	Attendance at function		By invitation only	Executive Director or CEO
Team Christmas function	Attendance at function		CEO may allocate an allowance per head for team/ department Christmas functions in lieu of an all-staff Christmas function	CEO discretion only
Farewell functions	Morning tea	 employee of GOTAFE for two (2) or more years and has made a positive contribution to GOTAFE 	Maximum \$100	Supervisor/ financial delegate
Christmas gifts	Receipt of gift		CEO may provide Christmas gifts to all- staff.	CEO discretion only



Description	Benefit	Requirement(s)	Limit or Condition	Approval
			Additional Christmas gifts will not be funded by GOTAFE	
Employee rewards	Receipt of recognition	Rewards registered through People and Culture	 Maximum \$200 Gift cards may only be purchased by EAs, P&C, ELT, or CEO 	Executive Director or CEO
Recognition for years of service	Receipt of recognition	Recognition to be registered through People and Culture	 0-10 yrs \$0 10-20yrs \$100 20-30yrs \$200 30+yrs \$300 Gift cards may only be purchased by EAs, P&C, ELT, or CEO 	Executive Director or CEO
Bereavement or major illness of close family member	Flowers or other gifts	Register on Gifts, Benefits and Hospitality Register	Maximum \$80	Supervisor/ financial delegate
Farewell gifts		 employee of GOTAFE for two (2) or more years and has made a positive contribution to GOTAFE 	Maximum \$100	Executive Director or CEO
Celebratory gifts, such as births, birthdays, weddings, engagements	Celebratory gifts are not to be funded by GOTAFE.		•	Celebratory gifts are not to be funded by GOTAFE.