



FESA POLICY STATEMENT NO. 69
FESA File Ref – 08267

FIRE & EMERGENCY SERVICES AUTHORITY

Title: **GIFTS, BENEFITS, HOSPITALITY AND ENTERTAINMENT**

Responsibility: **DIVISION:** OFFICE OF THE CEO

BRANCH: OFFICE OF THE CEO

RESPONSIBLE
OFFICER: MANAGER OFFICE OF THE CEO

DATE APPROVED: 25 July 2006

BILL HEWITT, A/CEO

DATE FOR REVIEW: 25 July 2009

POLICY STATEMENT

FESA members will always act with honesty and integrity and will not accept or offer gifts, benefits, hospitality or entertainment in exchange for real or perceived influence or assistance in any matter dealt with by FESA.

BACKGROUND:

The community expects FESA to maintain a high level of professionalism, public trust, integrity and accountability.

Public sector employees should avoid making commitments that could bias or be seen to bias their judgement or compromise the performance of their public duties. Accepting or offering gifts, benefits, hospitality or entertainment inappropriately could damage FESA's reputation and may be illegal.

The sensitive nature of this topic requires balanced judgement, common sense and due care to be used when assessing whether it is appropriate to accept or offer gifts, benefits, hospitality or entertainment and should be used in conjunction with this policy.

AIM:

This Policy aims to:

- Preserve and protect the reputation of FESA and its members;
- Provide clear procedures and guidelines for dealing with gifts, benefits, hospitality or entertainment;
- Make FESA members aware of their obligations and responsibilities; and
- Practice and endorse principles set out in the Western Australian Public Sector Standards Commission-Public Sector Code of Ethics, FESA Values and Policy Statements and all relevant legislation.

LEGISLATION:

Public Sector Management Act 1994 (WA)

Corruption and Crime Commission Act 2003 (WA)

The Criminal Code (WA)

Fringe Benefits Tax Assessment Act 1986 (Cth)

Fire & Emergency Services Authority of WA Act 1998 (WA)

FESA VALUES:

This policy supports the following values of FESA:

Put the community first

FESA will provide a higher level of service to the community by avoiding potential conflicts of interest and acting with professionalism, integrity and accountability.

Respect and value each other

Compliance with this policy will ensure that the reputation of FESA, and its members, is respected and valued.

Act with integrity and honesty

FESA is committed to always acting with integrity and honesty to ensure it provides a fair and equitable service to the community at large.

Have open and honest two-way communications

FESA encourages its members to communicate openly and honestly regarding any issues that arise from the acceptance or offering of gifts, benefits, hospitality and entertainment.

RISK MANAGEMENT:

The risks associated with the absence of a policy on gifts, benefits, hospitality and entertainment are:

- Not having clear and consistent procedures and guidelines for FESA members to follow;
- FESA members' actions constituting a real or perceived conflict of interest, or in extreme cases bribery, which is an offence under the *Criminal Code (WA)*; and
- Damage to FESA's public image if its dealings do not appear transparent and accountable.

The procedures and guidelines set out in this policy seek to minimise these risks.

DEFINITIONS:

FESA member: FESA, FESA staff, volunteers, Board of Management and all other persons engaged by FESA to provide services.

Gifts or Benefits: Any form of gift, benefit, reward, giveaway, or inducement accepted or provided by a FESA member. Examples include:

- Cash, vouchers or shares
- Any form of negotiable instrument
- Promotional material

- Goods
- Services
- Discounts
- Frequent Flyer or other loyalty programs
- Any other type of free offer

Hospitality or Entertainment: Any form of hospitality, entertainment or related benefit received or provided by a FESA member. Examples include:

- Official functions
- Breakfasts, luncheons and dinners
- Sponsored travel
- Entry to or hospitality at sporting, cultural or other entertainment events
- Media or industry gatherings
- Alcohol or flowers at certain events

APPLICATION:

This policy applies to all FESA members.

DELEGATIONS:

Executive Directors are responsible for ensuring compliance with this policy within their areas.

Manager Office of the CEO is responsible for the maintenance and monitoring of this policy.

Manager Information Resources is responsible for maintaining the FESA Gifts & Benefits Register (Attachment 4).

PREVIOUS POLICY:

Nil.

PROCEDURES:

The following documents contain the mandatory conditions and procedures that support this policy:

- FESA Conditions & Procedures: Gifts & Benefits (Attachment 1); and
- FESA Conditions & Procedures: Hospitality & Entertainment (Attachment 2).

1. FRINGE BENEFITS TAX (“*FBT*”)

1.1 FBT is a legislated taxation requirement upon FESA for any form of gift, benefit, hospitality or entertainment which is:

- provided by FESA to a FESA employee and/or associate (e.g. immediate family member);
- considered a ‘personal benefit’ to that FESA employee and/or associate; and
- not subject to any legislative exemption.

1.2 A personal benefit (or accumulated benefits) exceeding \$1000 in value is classed a Reportable Tax Benefit. All Reportable Tax Benefits will appear on the FESA employee’s Payroll Summary (Group Certificate) and will affect personal income tax and social security obligations.

1.3 There are many rules regarding FBT and its application varies on a case to case basis. Examples include:

- An expensive luncheon funded by FESA attended by a FESA employee and non-FESA associates aiming to develop business relationships: FESA employee’s meal is subject to FBT. A receipt needs to be provided so that only the employee’s meal is taxed.
- Lunch of a simple nature (e.g. sandwiches and juice) at an all day conference funded by FESA for FESA employees: Not subject to FBT. Lunch in this case would be considered part of the conference.

1.4 Due to potential liability regarding FBT, individuals are encouraged to seek guidance prior to incurring a personal benefit. Queries regarding FBT should be directed to the **FESA Corporate Accountant Financial Services Branch**.

2. CORPORATE CREDIT CARDS

2.1 This policy also applies to FESA members who use Corporate Credit Cards to purchase gifts, benefits, hospitality and entertainment, in addition to any other obligations and responsibilities arising from FESA Corporate Credit Card use.

2.2 FESA members possessing a Corporate Credit Card must have read, fully understood and agreed to conditions set out in the FESA Corporate Credit Card Application/Agreement form. The conditions clearly state that Corporate Credit Cards will only be used for official

purposes and must not be used for personal benefit or entertainment expenses unless authorised.

3. BREACHES OF THIS POLICY

3.1 Breaches of this policy may contravene the following legislation and guidelines:

- *The Criminal Code (WA)*
- *Public Sector Management Act (1994) WA*
- *Corruption and Crime Commission Act (2003) WA*
- Western Australian Public Sector Standards Commission-Public Sector Code of Ethics
- FESA Values and Policy Statements

3.2 FESA members who breach this policy may be subject to internal disciplinary action (pursuant to the FESA Policy Statement No 46: Discipline Standard) and/or external disciplinary action (through bodies such as the WA Ombudsman, Western Australian Police and Corruption & Crime Commission).

Reporting Procedures

3.3 Individuals are encouraged to report suspected breaches to the most appropriate authority (which will depend on nature of the breach, parties involved etc). Individuals should report their suspicions to one of the following parties:

FESA Executive Director:

As applicable.

FESA Anti-Corruption or Public Interest Disclosure Officer:

Contact the Office of the CEO for details.

WA Ombudsman:

The Ombudsman

Ph: (08) 9220 7555

www.ombudsman.wa.gov.au

Western Australian Police (WAPOL):

Public Sector Investigation Unit

Ph: (08) 9223 1086

Level 14, 26 St George's Terrace, Perth

Corruption & Crime Commission (CCC):

Complaints Assessment Unit

Ph: (08) 9215 4888

www.ccc.wa.gov.au

Confidentiality & Protection for Individuals

- 3.4 Any information received by FESA will be handled in a confidential manner.
- 3.5 Individuals reporting a suspected breach are afforded different levels of legislative protection against civil action and victimisation, depending on which authority they report to. Victimisation of individuals reporting a breach will not be tolerated as it contravenes FESA Values, FESA Policy and State and Commonwealth legislation.
- 3.6 Individuals are also afforded some level of protection from vexatious complaints. Purely vexatious complaints contravene FESA Values and State and Commonwealth legislation, and may result in internal and/or external disciplinary action against the vexatious complainant.

RESOURCES:

Attached are the following document templates:

- Sample letter refusing/returning a gift, benefit, hospitality or entertainment (Attachment 3)
- FESA Gifts & Benefits Register (Attachment 4)

Copies of this policy can be obtained from the Policy & Legislation Officer Office of the CEO.

MONITORING:

Manager Office of the CEO is responsible for monitoring this policy.

EVALUATION:

The following performance indicators measure the application of this policy:

APPROPRIATENESS

The appropriateness of this policy will be measured by assessing how broadly and accurately it is adopted and applied by FESA members to relevant situations.

EFFECTIVENESS

The effectiveness of this policy will be measured by collecting feedback from FESA members and other stakeholders on how well relevant situations are managed or controlled by the organisation.

EFFICIENCY

The efficiency of this policy will be measured by assessing how quickly and easily the enclosed procedures are followed in relevant situations.

FURTHER INFORMATION:

The Policy & Legislation Officer Office of the CEO can assist FESA members with questions regarding this policy.

REFERENCES:

This policy is linked to:

- Premier's Circular Number 2006/06: Guidelines for Expenditure on Official Hospitality
- Western Australian Public Sector Standards Commission- Public Sector Code of Ethics
- Public Sector Code of Ethics (WA) – Justice
- FESA General Circular 5/2005 – Acceptance of Gifts and Invitations
- FESA Financial Services Circular Issue No. 02-0405 – Donations & Deductibility
- FESA Policy Statement No. 15: Anti-Corruption
- FESA Policy Statement No. 56: Conflict of Interest
- FESA Policy Statement No. 63: Corporate Travel
- FESA Policy Statement No. 67: Procurement

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FESA Conditions & Procedures: GIFTS & BENEFITS

1. MANDATORY CONDITIONS

- 1.1 FESA members must never take advantage of their official position to obtain a gift or benefit for themselves, a member of their family, or any other associated individual or business.
- 1.2 Gifts or benefits must not be accepted if acceptance could reasonably:
- create a real or perceived conflict of interest;
 - be construed as an attempt to influence FESA administrative, regulatory or contractual decisions; or
 - undermine, or be seen to undermine, the impartiality of a FESA member.

A useful tool is the “6pm News / Parliamentary Question Test”:

Would acceptance of the gift or benefit cause FESA embarrassment if the story was presented on the 6 o'clock News or questioned by a parliamentary committee?

Consider:

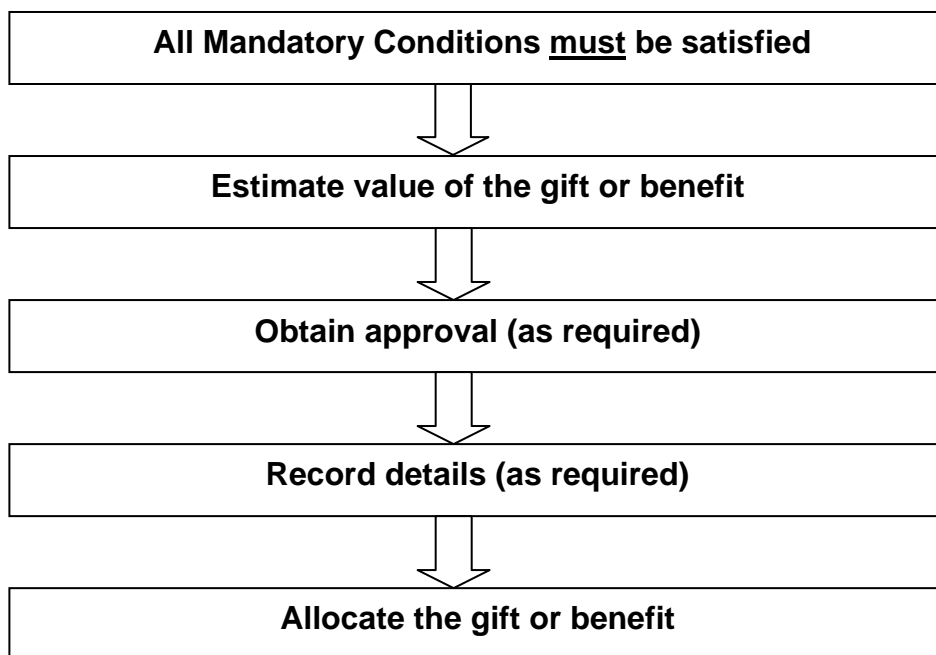
- ⇒ *The type and significance of the gift or benefit*
- ⇒ *The relationship between FESA and the individual/organization offering the gift or benefit*
- ⇒ *The timing of the gift or benefit*
- ⇒ *Whether refusing the gift would cause significant damage to FESA's business/cultural relationships*

If the answer is yes or maybe, the gift or benefit must not be accepted. For example, most gifts or benefits offered in connection with services provided or a tender, purchase, selection or recruitment process should not be accepted.

- 1.3 FESA members must never seek or solicit gifts or benefits in any way.
- 1.4 Gifts or benefits must never be accepted personally, but on behalf of FESA as a gift to FESA.
- 1.5 All gifts or benefits accepted by FESA must be allocated fairly and appropriately.
- 1.6 A FESA member must never coerce another FESA member into accepting a gift or benefit.

- 1.7 All decision making regarding the acceptance of a gift or benefit must be informed, transparent and impartial.
- 1.8 If a FESA member has any doubt or uncertainty when applying this policy they should refer the matter to their manager.
- 1.9 All conditions and procedures regarding the acceptance of gifts or benefits apply to the provision of gifts or benefits by FESA, unless otherwise stated.

2. PROCEDURE FOR ACCEPTING GIFTS OR BENEFITS



Estimating Value of a Gift or Benefit

- 2.1 The value of a gift or benefit should be established by estimating its current market price (including GST).

Obtaining Approval

2.2 The following table illustrates who is authorized to decide whether a gift or benefit can be accepted and what action is required:

Value of Gift or Benefit	What Action is Required:
Less than \$50.00	Individual offered the gift or benefit is the decision maker. No approval required.
\$50.00 - \$100.00	Individual offered the gift or benefit is the decision maker but must advise their immediate manager.
\$100.00 - \$1000.00	Obtain written approval from Executive Director.
\$1000.00 or More	Obtain written approval from CEO.

2.3 Retrospective approval is only allowed when circumstances make it impossible or impractical for an individual to obtain approval (or advise their immediate manager) in advance.

Recording Details

2.4 The following details must be recorded for any gift or benefit accepted:

- Description of gift or benefit
- Value of gift or benefit
- Date received
- Who provided / who received the gift or benefit
- Any relevant information that should be disclosed

2.5 The following table illustrates who is responsible for recording the details of a gift or benefit and how:

Value of Gift or Benefit	What Action is Required:
Less than \$50.00	Individual accepting the gift keeps their own record.
\$50.00 - \$100.00	Individual accepting the gift keeps their own record.
\$100.00 - \$1000.00	Details need to be forwarded to Manager Information Resources and recorded on the FESA Gifts & Benefits Register.
\$1000.00 or More	Details need to be forwarded to Manager Information Resources and recorded on the FESA Gifts & Benefits Register.

Allocating the Gift or Benefit Accordingly

2.6 All gifts or benefits accepted by FESA must be allocated fairly and appropriately. The person approving the gift or benefit should decide how it should be allocated. Examples include:

- Assigning it to a FESA individual or FESA group (e.g. Social Club)
- Donating it to a registered charity

- Raffling it off as a prize amongst staff (if selling tickets beware of gaming laws www.rgl.wa.gov.au/gaming/document/standard.pdf)
- Allocating it on a rotational basis
- Displaying it within FESA or the FESA Museum

3. PROVIDING GIFTS OR BENEFITS

3.1 The above conditions and procedures are also applicable to the provision of gifts or benefits by FESA, with the following additional requirements:

- expenditure is an efficient, effective and ethical use of public funds in accordance with Public Sector guidelines; and
- expenditure must comply with all other FESA policies, procedures and guidelines (e.g. FESA Policy Statement No. 67: Procurement, Corporate Credit Card terms and conditions).

4. REFUSING & RETURNING GIFTS OR BENEFITS

4.1 When refusing/returning a gift or benefit, it is the responsibility of the decision maker to advise the gift giver as soon as possible. When written refusal is appropriate see sample letter (Attachment 3).

5. SPECIFIC SITUATIONS

Competition Prizes, Rewards & Giveaways

5.1 FESA members must never intentionally enter competitions offering prizes, rewards, giveaways or any other gift or benefit arising from their official role or duties. If inadvertently entered into a competition, the same procedures for accepting, refusing and/or returning a gift or benefit apply.

Frequent Flyer Programs

5.2 Frequent Flyer points accumulated in the course of official travel must not be used for private purposes (see FESA Policy Statement No. 63: Corporate Travel Policy).

Personal Gifts or Benefits

5.3 This policy does not apply to gifts or benefits:

- arising from personal achievements not subsidised by FESA or arising from official duties; and
- given by colleagues/friends for a celebratory event, not subsidised by FESA.

Donations

- 5.4 This policy does not apply to legitimate fundraising or community-type donations (e.g. donating money to a local fire brigade). Monetary donations should be received pursuant to FESA Financial Circular Issue No. 02-0405 "Donations & Deductibility". For further information contact Financial Services. If equipment is donated, it must be tested and approved pursuant to FESA Executive Circular No: 7/2006 "Use of Unauthorised Accessories or Equipment". For further information contact Operational Services.

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FESA Conditions & Procedures: HOSPITALITY & ENTERTAINMENT

1. MANDATORY CONDITIONS

- 1.3 FESA members must never take advantage of their official position to provide or accept hospitality for themselves, a member of their family, or any other associated individual or business entity.
- 1.4 Hospitality expenditure is only appropriate when the primary purpose is advancing official business and it is publicly justifiable as a legitimate use of public funds.
- 1.5 Due to the sensitive and visible nature of many forms of hospitality, FESA members must restrict expenditure to a reasonable and appropriate level.
- 1.6 Hospitality must not be provided or accepted under any circumstances if it could reasonably be seen to:
- be a misappropriation of public funds;
 - create a real or perceived conflict of interest;
 - influence FESA administrative, regulatory or contractual decisions; or
 - undermine, or be seen to undermine, the impartiality of a FESA member.

A useful tool is the “6pm News / Parliamentary Question Test”:

Would provision or acceptance of hospitality cause FESA embarrassment if the story was presented on the 6 o’clock News or questioned by a parliamentary committee?

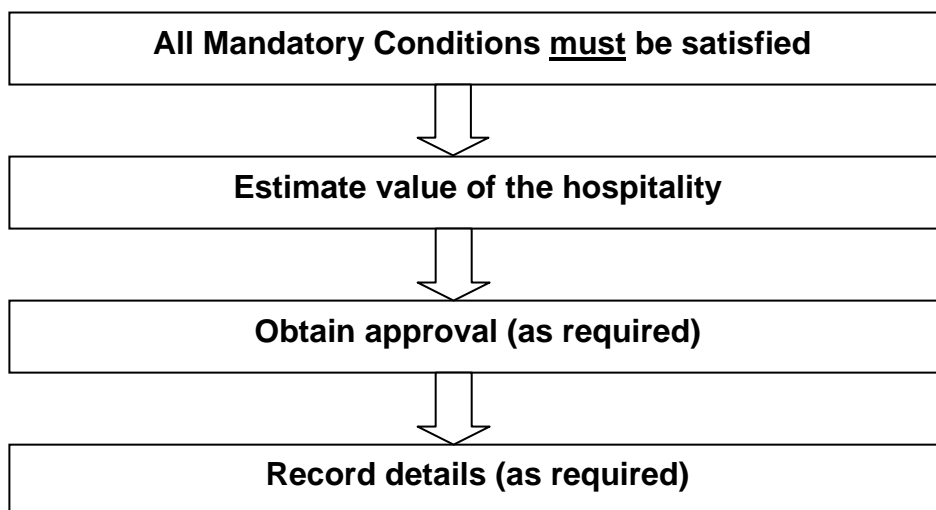
Consider:

- ⇒ *Whether expenditure is an efficient, effective and ethical use of public funds in accordance with Public Sector guidelines*
- ⇒ *Whether expenditure advances official business or contributes to FESA’s objectives*
- ⇒ *The overall appropriateness of the hospitality (type of event, parties involved, timing etc).*

If the answer is yes or maybe, hospitality must not be provided or accepted.

- 1.5 FESA members must never seek or solicit hospitality in any way.
- 1.6 Official hospitality must never be accepted personally, but on behalf of FESA, and should be allocated fairly and appropriately.
- 1.7 All hospitality expenditure must be incurred by the most senior FESA member present.
- 1.8 A FESA member must never coerce another FESA member into providing or accepting hospitality.
- 1.9 All decision making regarding the provision or acceptance of hospitality must be informed, transparent and impartial.
- 1.10 If a FESA member has any doubt or uncertainty when applying this policy they should refer the matter to their manager.
- 1.11 All conditions and procedures regarding the provision of hospitality apply to the acceptance of hospitality by FESA, unless otherwise stated.
- 1.12 The conditions and procedures regarding hospitality also apply to entertainment.

2. PROCEDURE FOR PROVIDING HOSPITALITY



Estimating Value of the Hospitality

- 2.1 The value of the hospitality should be established by estimating its current market price (including GST).
- 2.2 All estimations must be of the *total value* (i.e. lump sum) of the hospitality. Bill splitting, rotational payments or any other method that disguises the true total value is not allowed.

Obtaining Approval

- 2.3 The following table illustrates who is authorized to decide whether hospitality should be provided and what action is required:

Value of Hospitality	What Action is Required:
Less than \$50.00	Individual providing hospitality is the decision maker. No approval required.
\$50.00 - \$100.00	Individual providing hospitality is the decision maker but must advise their immediate manager.
\$100.00 - \$1000.00	Obtain written approval from Executive Director.
\$1000.00 or More	Obtain written approval from CEO.

- 2.4 Retrospective approval is only allowed when circumstances make it impossible or impractical for a FESA member to obtain approval (or advise their immediate manager) in advance.
- 2.5 Hospitality expenditure, including who has authority to incur expenses, must comply with all other FESA policies, procedures and guidelines (e.g. FESA Policy Statement No. 67: Procurement, Corporate Credit Card terms and conditions).

Recording Details

- 2.6 The following details must be recorded for any hospitality provided:
 - Description of hospitality
 - Value of hospitality
 - Date provided
 - Who received hospitality
 - Who incurred expense
 - Any further relevant information that should be disclosed

2.7 The following table illustrates who is responsible for recording the hospitality details and how:

Value of Hospitality	What Action is Required:
Less than \$50.00	Individual providing hospitality keeps their own record.
\$50.00 - \$100.00	Individual providing hospitality keeps their own record.
\$100.00 - \$1000.00	Details need to be forwarded to Manager Information Resources and recorded on the FESA Gifts & Benefits Register.
\$1000.00 or More	Details need to be forwarded to Manager Information Resources and recorded on the FESA Gifts & Benefits Register.

3. PROCEDURES FOR ACCEPTING OR REFUSING HOSPITALITY

- 3.1 The above conditions and procedures also apply to the acceptance of hospitality.
- 3.2 If acceptance of hospitality contravenes the Mandatory Conditions or is not approved, the invitation must be refused (and if applicable returned).
- 3.3 When refusing/returning an offer of hospitality, it is the responsibility of the decision maker to advise the invitation giver as soon as possible. When written refusal is appropriate see sample letter (Attachment 3).

4. SPECIAL ALLOWANCES & SPECIFIC SITUATIONS

Meals

- 4.1 Due to the frequency of providing and accepting meals in the usual course of business, the following 'special allowance' applies.

A FESA member providing or accepting a meal, regardless of the meal value, does not need to obtain approval and is responsible for recording all necessary details so long as:

- the meal is directly connected with conducting official business or an official business event (e.g. social events such as birthdays, promotions, retirements etc cannot be classified 'official business');*
- it complies with all other FESA policies and regulations (e.g. purchases must be made by a duly authorized incurring officer); and*
- all Mandatory Conditions are satisfied.*

Official Hospitality

- 4.2 Situations where reasonable hospitality expenditure is common practice and generally acceptable include:

- Hospitality directly connected to official events (e.g. openings, launches, promotions, functions, forums, ceremonies, conferences, training, Board functions) aimed at promoting FESA's business interests
- Hospitality when presenting official rewards and recognition (see FESA Policy Statement No. 65: Reward & Recognition) to individuals for their contribution to FESA's goals and achievements
- Hospitality which facilitates business interaction with non-FESA personnel (e.g. working meals where the main purpose of the meal is to conduct official business)
- Accommodating official visitors (e.g. dignitaries, interstate/overseas delegates)
- Working meals where a meeting has been scheduled and it would be advantageous to continue the meeting through a normal meal break
- Reciprocal hospitality
- Hospitality that is publicly accepted as usual business etiquette (e.g. annual FESA Christmas Party)
- Sponsored industry events

4.3 Partners of FESA members may also be included as official guests when this is appropriate to the circumstances and nature of the official function.

Hospitality Not Subject to This Policy

4.4 The following situations are not subject to this policy:

- Light meals of a simple nature (e.g. sandwiches, fruit) without alcohol, provided on business premises or connected with a conference/seminar/training session or urgent project work are considered a business expense.
- Expenditure associated with official travel (see FESA's Policy Statement No. 63: Corporate Travel).
- Social functions, farewells or celebrations funded by individual contributions.

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Attachment 3: Sample Letter Refusing a Gift/Benefit/Hospitality/Entertainment

Our Ref : TRIM NO. XXXX
Telephone : (08) XXXX XXXX
Facsimile : (08) XXXX XXXX
E-Mail : name@fesa.wa.gov.au

[Date]

Mr Gift Giver
1 Benefit Lane
PERTH WA 6000

Dear Mr Giver,

RE: OFFER OF [description] TO [FESA member's name]

The Fire and Emergency Services Authority of Western Australia has a strict policy on members accepting gifts/benefits/hospitality/entertainment. Under this policy, the gift/benefit/hospitality/entertainment described above falls outside FESA guidelines.

It is with regret that I advise that your kind offer cannot be accepted. Acceptance would cause difficulty for the recipient and could be seen to undermine the integrity of FESA.

Please feel free to contact me if you have any questions regarding this matter.

Yours sincerely,

[Manager's name]
[Manager's title]

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