

APPLICABLE TO	All Catholic Schools Office and diocesan school employees
DOCUMENT OWNER	Director of Schools
APPROVAL DATE	February 2022
APPROVED BY	CSO Leadership Team
SCHOOL ACTIONS	System Policy – Schools are to ensure their practices are consistent with this policy. A local policy is not required.
LAST REVIEW DATE/S	2017; 2018; May 2021
NEXT REVIEW DATE	2024
RELATED DOCUMENTS	Business Credit Card Policy and Procedures Code of Conduct Conflict of Interest Policy and Procedures Financial Recording Procedures Gifts and Benefits Policy and Procedures Related Party Transactions Policy and Procedures Work Health and Safety Policy

Purpose

This policy sets out the expectations of the Catholic Schools Office in relation to the provision and acceptance of hospitality in system and school contexts.

The policy aims to ensure that all aspects of hospitality are managed in accordance with the Catholic Schools Office and diocesan schools' legal obligations, reflect the values and ethos of the organisation and not compromise the reputation of the Catholic Schools Office, diocesan schools and/or employees.

Guiding Principles

Hospitality within a school and diocesan community is seen as a significant and valued cultural component of school and system life. It is important that a policy position is grounded within this context. The Catholic Schools Office, as a responsible employer, also has a key commitment to protect the reputation and safety of school leaders and all staff, students, parents/carers and community members. Further, the Catholic Schools Office has accountability to legislative requirements with regard to governance and risk mitigation, including but not limited to, those noted in the final section of this policy. Finally, all practices associated with diocesan schools must reflect the values upon which we are grounded that relate to responsible, safe and ethical behaviour. In this regard, this policy promotes behavioural expectations consistent with the Code of Conduct.

In the context of this policy, hospitality is taken to mean the provision of food, beverages, including alcoholic beverages, and recreational activities by the Catholic Schools Office and diocesan schools to employees and non-employees. Further, hospitality is categorised as Official Entertainment, Official Events, School Social Functions, Staff Social Functions and Working Meals so as to differentiate the application of elements of the policy to particular forms of hospitality that might typically occur within the context of the Catholic Schools Office or diocesan schools.

Policy Statement

It is expected that hospitality provided by the Catholic Schools Office and diocesan schools will reflect the values and ethos of the organisation and community standards. In meeting this expectation Catholic Schools Office and diocesan school employees must be mindful of the appropriateness of the hospitality activities and events, including, but not limited to: the venue at which the hospitality will be provided; the type of entertainment included in the event, if any; the standard of food and beverage to be provided, if any; and overall costs.

Use of Catholic Schools Office or Diocese School Funds for the provision of hospitality

School, system or public funds are only to be used for hospitality at the Catholic Schools Office or in diocesan schools after due consideration as to the appropriateness of the use of those funds for the particular purpose.

Availability of Alcohol

Alcohol may be available at Catholic Schools Office and diocesan schools events if it is deemed appropriate to the occasion.

General expectations in relation to the availability and management of alcohol at such events are outlined in the following section of this policy and in the guidance notes in the Appendix.

Use of Catholic Schools Office or diocesan school funds for the purchase of alcohol

The use of Catholic Schools Office or diocesan school funds for the purchase of alcohol is not deemed to be an appropriate use of such funds unless it is in relation to Official Entertainment or an Official Event as outlined in the Categories of Hospitality section of this policy.

In circumstances where it is deemed appropriate to use Catholic Schools Office or diocesan school funds for the purchase of alcohol, consideration must be given to the quantum and cost of the purchase to ensure that it remains within reasonable limits.

Permission to use system or school funds for the provision of alcohol must be sought from the Director of Schools or his or her delegate prior to the event. Permission may be sought via email by providing details of the event and reasons why system or school funds are proposed to be used. Confirmation of approval via return email is deemed to be acceptable evidence of the approval process.

GENERAL EXPECTATIONS IN RELATION TO THE AVAILABILITY OF ALCOHOL

The Catholic Schools Office and diocesan schools are required to comply with the following expectations if alcohol is available at functions:

- a. Clearly specify the commencement and completion time of the function.
- b. *Anyone consuming alcohol agree to act in in a socially responsible manner that would set a good example to children.*
- c. Ensure that non-alcoholic and low alcohol beverage options are available.
- d. Ensure that food is available as part of the function.
- e. Ensure that people serving alcohol at the function hold a current Responsible Service of Alcohol Certificate.
- f. Students must not be involved in the service of alcohol.
- g. Principals must deal with any instances of inappropriate behaviour by staff or guests immediately.
- h. Alcohol is not to be available or consumed at school and/or staff functions held in what would reasonably be considered to be school hours. This includes employees, students and visitors and other people who use school premises.

- i. The consumption of alcohol is not permitted at school functions (including those conducted outside school premises) at any time when school students, from any school, are present, with the exception of Year 12 formals where parents are present (refer to the section 'Year 12 Formals' in the guidance notes in the Appendix). A school function is any function organised by the school and/or in the name of the school and applies to all types of functions including dances, farewells, sporting fixtures and barbecues.
- j. Community groups may be permitted to consume alcohol on school premises outside school hours.
- k. Alcohol must not be stored on site at either the Catholic Schools Office or diocesan schools.

In addition to the expectations above, the following expectations also apply to **staff functions**:

- l. Ensure that expectations regarding consumption of alcohol and general behaviour are clearly articulated to staff members
- m. Consider risk mitigation strategies appropriate to the circumstances including but not limited to the provision of transport and/or personalised breathalysers

CATEGORIES OF HOSPITALITY

For the purposes of this policy, hospitality offered by the Catholic Schools Office or diocesan schools is organised according to the following categories:

1. Official Entertainment

Members of the Catholic Schools Office Leadership Team and diocesan school Principals are authorised to provide hospitality and incur reasonable related expenditure for the reception and entertainment of:

- Overseas and interstate visitors
- Visiting dignitaries
- Visiting senior representatives of Catholic Schools Offices in other Diocese and/or Catholic Schools NSW
- Senior representatives of the Diocese of Maitland-Newcastle and other dioceses

Members of the Catholic Schools Office Leadership Team and diocesan school Principals may nominate an employee to act as the host on their behalf. In such instances, the nominated employee must apply for approval to incur the expenditure from the authorised employee. Provision of details of the event and request for approval to use system or school funds may be made via email. Confirmation of approval via return email is deemed to be acceptable evidence of the approval process.

2. Official Events

Members of the Catholic Schools Office Leadership Team and diocesan school Principals are authorised to provide hospitality and incur reasonable related expenditure for an official event such as:

- A school anniversary celebration
- Graduation ceremony
- Award presentation
- School open day
- Supper following annual Called to Serve Mass
- Director/Principals' End of Year Dinner
- Priest/Principals Dinner (following Priest/Principals Day)
- Regional Executive Meetings Evening Dinner

- Official presentations and celebrations to mark extended periods of service (eg., Afternoon Tea for staff with over 35 years' service)
- Regional COSI Review Team evening meals
- Retirement or Special Celebration Dinner for Catholic Schools Office Leaders (eg Director's retirement dinner)
- End-of-Year, Thank you and/or Retirement dinners for Catholic Schools Office strategic committees (e.g. Schools Planning and Development Committee)

Members of the Catholic Schools Office Leadership Team and diocesan school Principals may nominate an employee to act as the organiser of an official event on their behalf. In such instances, the nominated employee must apply for approval for the event and to incur the expenditure from the authorised employee. Provision of details of the event and request for approval to use system or school funds may be made via email. Confirmation of approval via return email is deemed to be acceptable evidence of the approval process.

3. School Functions

All Catholic Schools Office and diocesan schools employees are expected to be mindful of the appropriateness of school social functions and activities and ensure that they are consistent with the values and ethos espoused by the school and the Catholic Schools Office.

As a matter of good governance, a risk assessment should be completed and documented in relation to school functions regardless of who is deemed to be responsible for the event (i.e. the school, the P & F, parents etc.). It is acknowledged that identification and management of associated risks may vary depending on the scheduled time of the event (i.e. in school hours, out of school hours, immediately after school, evening etc.).

Catholic Schools Office and diocesan school employees responsible for school functions should follow the usual procedures for the completion of risk assessments in relation to Catholic Schools Office and school activities. Further details regarding risk assessment procedures are provided in the Catholic Schools Office Work Health and Safety Policy.

Obligations in relation to reasonable use of school, system and/or public funds must also be considered if expenses are to be met by the school.

Alcohol at School Functions

Alcohol may be available at school functions under certain circumstances and in keeping with the requirements outlined in Appendix of this policy.

Schools are required to comply with the expectations outlined in the Appendix.

School functions covered by this policy include, but are not limited to, the following examples:

- Welcome events for new families
- End of year celebration/family events
- Mother's Day and/or Father's Day Celebrations
- Anniversary and/or celebrations of other local historical events
- P & F Fundraising Events
- Staff Farewells (e.g. hosted by P &F)
- Farewells and/or other celebrations of key members of the school community (e.g. P & F executive members)
- Student Farewells (e.g. Year 6 farewell from primary school)

4. Staff Functions

All Catholic Schools Office and diocesan school employees are expected to be mindful of the appropriateness of staff social functions and activities and ensure that they are consistent with the values and ethos espoused by the Catholic Schools Office and diocesan schools.

Members of the Catholic Schools Office Leadership Team and diocesan school Principals should complete a risk assessment of proposed staff functions and retain documented evidence of the steps taken to manage any risks identified as part of this process.

Catholic Schools Office and diocesan school employees responsible for staff functions should follow the usual procedures for the completion of risk assessments in relation to Catholic Schools Office and school activities. Further details regarding risk assessment procedures are provided in the Catholic Schools Office Work Health and Safety Policy.

In identifying risks associated with staff functions, potential or real risk to reputation should not be underestimated. This is particularly relevant to the consumption of alcohol, staff behaviour and choice of venue.

Given that Work Health and Safety (WHS) and Duty of Care obligations remain with the school, these conditions apply regardless of who is meeting the cost of the activity (e.g. staff social fund).

Reference should also be made to the Catholic Schools Office Gifts and Benefits Policy and Procedures for further information regarding expectations in relation to the provision of gifts and benefits, including hospitality, to staff.

System or school funds may be used to contribute to the cost of staff functions such as the end of year celebration. Such contribution could include meeting the cost of the meal or food component of the function and/or hire of the venue but must not include payment of the cost of alcohol. This does not preclude the Catholic Schools Office or diocesan schools from holding other staff functions or social gatherings throughout the course of the year, but it would be expected that staff would meet the costs of such events.

Approval to use system or school funds for more than one (1) staff function in any year must be sought from the relevant Assistant Director or Head of Service area. Provision of details of the event and request for approval to use system or school funds may be made via email. Confirmation of approval via return email is deemed to be acceptable evidence of the approval process.

Expectations in relation to staff social functions apply to Catholic Schools Office and diocesan school staff functions.

Alcohol at Staff Functions

The Catholic Schools Office does not prohibit the consumption of alcohol at staff functions as long as they are not held at the school during school hours and no school students are present.

If alcohol is available at staff social functions, all staff are required to comply with the expectations outlined in the "General Expectations in Relation to the Availability of Alcohol" section of this policy and the "Availability of Alcohol at Staff Functions" section of the guidance notes provided as Appendix 1 of this policy.

Staff functions covered by this policy include, but are not limited to, the following examples:

- Birthday celebrations
- Celebrations of significant local events (e.g. completion of COSI process, school anniversaries etc.)
- Melbourne Cup Parties
- Staff Farewells
- Celebration of significant staff events (e.g. engagement, marriage, birth etc.)

- Celebrations of staff years-of-service milestones
- End-of-year celebration, including last-day-of-year lunch

WORKING MEALS

Members of the Catholic Schools Office Leadership Team and diocesan school Principals are authorised to provide and incur reasonable expenditure for working meals under the following conditions:

- The working meal is required to facilitate the conduct of official business
- The working meal is provided at the place where the business activity is conducted, unless it is not practical to do so

Expenditure for working meals must not include recreational activities or alcoholic beverages.

Members of the Catholic Schools Office Leadership Team and diocesan school Principals must avoid holding routine meetings where working meals are served as a regular occurrence.

Members of the Catholic Schools Office Leadership Team and diocesan school Principals may nominate an employee to act as the organiser of a working meal on their behalf. In such instances, the nominated employee must apply for approval to incur the expenditure from the authorised employee.

Scope

This policy applies to all employees of the Catholic Schools Office and diocesan schools.

Definitions

In the context of this policy:

Hospitality means the provision of food, beverages, including alcoholic beverages, and recreational activities by the Catholic Schools Office and diocesan schools to employees and non-employees

Community Standards means compliance with applicable legislation and perceptions of behaviour expected of a not-for-profit Catholic organisation.

Responsibilities

Director of Schools

The Director of Schools is responsible for ensuring the enactment of this policy and that the implementation of the policy and associated procedures is adequately resourced.

The Director of Schools is also specifically responsible for considering requests for the availability of alcohol at school functions held in what would reasonable be considered to be school hours and providing a determination to the relevant school and/or Catholic Schools Office personnel.

Catholic Schools Office Leadership Team

Members of the Catholic Schools Office Leadership Team are to ensure that members of their service areas/and or school Principals are aware of and familiar with this policy. Heads of Service will ensure that all activities of their respective service areas are compliant with this policy and the associated procedures including confirmation of approval for events and the completion of risk assessments.

School Principals

Principals of diocesan schools are to ensure that all staff at the school are aware of and familiar with this policy and that all school activities are compliant with this policy and the associated procedures, including confirmation of approval for events and the completion of risk assessments.

Catholic Schools Office and Diocesan School Employees

All other Catholic Schools Office and diocesan school employees are expected to comply with this policy and the associated procedures.

Budget

The Catholic Schools Office will allocate funding for human and material resources to support the implementation of this policy. Support may include dissemination and communication of documents, including access via the Catholic Schools Office document management system, and educative support via presentation of briefings or inclusion in staff professional development sessions.

Resources will also be allocated to support periodic review of the policy and associated procedures.

Legislative/Professional Guidelines

1. Australian Charities and Not-for-profits Commission (ACNC)
2. Australian Education Act 2013
3. Work Health and Safety Act 2011 (NSW)
4. Work Health and Safety Regulations 2011 (NSW)
5. NSW Education Standards Authority (NESA) Registration Systems and Member Non-Government Schools (NSW) Manual
6. NSW Government Not-for-profit Guidelines for Non-Government Schools

APPENDIX: GENERAL GUIDANCE IN RELATION TO OFFICIAL ENTERTAINMENT AND EVENTS

Official Entertainment

Entertainment expenditure may only be incurred in providing hospitality to the visitors when the Catholic Schools Office or a school has an interest in, or obligation towards, facilitating the visit. As a matter of protocol, the hospitality is usually hosted by a senior employee. The host may extend the hospitality reception to include other guests, including spouses or partners, where the protocol requires their presence.

Entertainment expenditure may include dining and recreational activities such as cultural shows, sporting events and sightseeing tours, as relevant to the purpose of the visit. Alcohol may be provided if it is appropriate to the occasion, provided the event is not on school grounds during school hours and no school students, of any school, are in attendance (with the exception of Year 12 formals where parents are present – refer to the section 'Year 12 Formals' below). Gifts may be given where protocol requires the exchange of gifts. Further information regarding the giving and receiving of gifts is provided in the Catholic Schools Office Gifts and Benefits Policy and Procedures.

Hospitality may be held at any venue appropriate to the occasion.

A Catholic Schools Office Business Credit Card may be used to pay for the entertainment expenses but must be done so in accordance with the Business Credit Card Policy and Procedures.

Hospitality expenses incurred in relation to official entertainment may be subject to Fringe Benefits Tax (FBT). Further details regarding FBT are provided in the Catholic Schools Office Financial Legislative and Regulatory Requirements and Financial Recording documents.

Official Events

Schools may provide light meals and refreshment to staff, parents, students, community and volunteers for the event. Alcohol may be provided if it is appropriate to the occasion, provided the event is not on school grounds during school hours and no school students, of any school, are in attendance (with the exception of Year 12 formals where parents are in attendance – see below).

School fundraising events are not considered as official events for the purpose of this policy. Expectations in relation to those events are provided under the heading "School Functions".

Depending on the nature of the event and the type of meals provided, expenditure for an official event may be subject to FBT. Further details regarding FBT are provided in the Catholic Schools Office Financial Legislative and Regulatory Requirements and Financial Recording documents.

AVAILABILITY OF ALCOHOL AT SCHOOL FUNCTIONS

1. Functions at which students are present

The Catholic Schools Office does not allow alcohol at school functions at which school students, from any school, are present.

Specific guidance in relation to Year 12 Formals is provided in point 5 below.

2. Functions at which the P & F provide alcohol

In addition to adhering to the "General Expectations in Relation to the Availability of Alcohol" section of this policy, it is recommended that Principals should either retain responsibility for the purchase of alcohol for school functions or communicate expectations regarding quantity and options (e.g. non-alcohol and low-alcohol) very clearly, and preferably in writing, to the responsible party in instances where the function is being organised by another school stakeholder group (e.g. President of the P & F if the function is designated as a P & F event)

3. **Functions at which alcohol will be sold by the school**

It is recognised that the sale of alcohol may be part of the fundraising at school functions. In instances where this is the case, schools must ensure that they have applied for, and been granted, all relevant permissions and licenses in relation to the sale of alcohol at school functions.

Principals should contact Liquor and Gaming NSW for further information regarding this scenario, even if the function is being organised by another party (e.g. P & F). In instances where the event is being organised by another party, the Principal should seek, and be provided with, evidence that the appropriate licences have been issued.

4. **Functions at which parents and guests provide their own alcohol**

It is recommended that schools include a statement of their expectations in relation to alcohol at such events to the parent community in all communications about the event. Such a statement should include an expectation that alcohol consumption will be kept to a minimum, or within recognised safe drinking limits and that the school reserves the right to ask guests to leave the function if their behaviour is deemed unacceptable.

It is recommended that the Principal or a member of staff in attendance at the function holds a current Responsible Service of Alcohol Certificate.

Principals must be prepared to deal appropriately with instances of unacceptable behaviour at school functions immediately.

5. **Year 12 Formals**

The Catholic Schools Office recognises that some schools allow alcohol at Year 12 formals. The following parameters apply to Year 12 formals at which alcohol is allowed.

- Parents must be in attendance at the event.
- Schools must implement a method by which students who are under 18 years of age are easily identifiable and ensure that processes are in place to prohibit their access to alcohol.
- Non-alcoholic and low alcohol beverage options must be available and food provided as part of the function.
- Principals are reminded that although some responsibilities rest with the licensee of commercial hospitality venues, schools retain their duty of care obligations regardless of where the function is held and as such they must communicate expectations clearly in advance of the event and develop and implement management strategies as part of the risk assessment completed for the event.

AVAILABILITY OF ALCOHOL AT STAFF FUNCTIONS

1. **End of Term Drinks and/or Friday Afternoon Drinks**

The Catholic Schools Office acknowledges the importance of formal and informal staff social gatherings and the contribution such gatherings can make to the development of positive professional relationships. However, it is also acknowledged that this practice can raise a number of risks that must be assessed and managed. As a means of mitigating some of the associated risks activities such as "Friday Afternoon Drinks" or other informal staff gatherings must be held "off-site", i.e. not on school property during school hours, and the relevant general guidelines in relation to the availability of alcohol at staff functions outlined above are applied.

In keeping with requirements in relation to the acceptable use of system and school funds, members of the Catholic Schools Office Leadership Team and diocesan school Principals are not to use system or school funds for the purchase of alcohol. Payment for non-alcoholic beverages and/or food may be considered reasonable for special occasions such as significant school achievements or staff retirements provided it is within the expectations outlined in the "Staff Functions" section of this policy. In particular, members of the Catholic Schools Office Leadership Team and diocesan school Principals are reminded of the requirement to seek approval to use system or school funds for more than one (1) staff function in any year.

2. Staff Annual Retreats

While it is reasonable to consider an activity such as a staff retreat as appropriate professional development for Catholic Schools Office or diocesan school staff, the consideration of appropriate venue and cost is also reasonable and indeed necessary.

The choice of venue for activities such as staff retreats or other staff or general school functions raises a number of issues for schools and the Catholic Schools Office including the appropriate use of school funds and reputational risk. Conflicts of Interest and Related Party Transaction issues could also be relevant depending on the relationship between the venue owners and/or operators and the school.

The Catholic Schools Office is committed to consistency of experience for staff in schools across the Diocese as a matter of equity and as such expects that the standard of venue for staff functions, including retreats is also consistent across the Diocese. Suffice to say, it is not deemed fair or reasonable for more highly resourced or financed schools to choose more expensive (per capita) options.

It is recommended that the Catholic Schools Office and diocesan schools seek quotes from a range of venues as part of the decision-making process in relation to staff retreats. Quotes should be all inclusive meaning that they include the cost of all aspects of venue use such as hire, technology and other resources, accommodation and meals.

While it may be reasonable for alcohol to be available as part of a retreat's evening or celebratory meal, system or school funds are not to be used for the purchase of alcohol. The "General Expectations in Relation to the Availability of Alcohol" section of this policy applies to the consumption of alcohol at staff retreats.

3. Overnight Excursions

In light of obligations and risks in relation to Duty of Care, Work Health and Safety, reputation, appropriate use of school funds and behaviour consistent with the values and ethos of the organisation, alcohol is not to be consumed during any school excursions including those that extend overnight.

This expectation applies to all employees, parents and other volunteers who may be attending the excursion.

4. Regional Principals' Retreats

A number of regions have well established traditions of annual or bi-annual spiritual gatherings. These events, within the context of the faith formation of school leaders, have a valued role.

In keeping with requirements in relation to the acceptable use of system and school funds, appropriate accommodation and meals may be supported; however, system or school funds are not to be used for the purchase of alcohol. This is at an individual's personal expense.

ACCOMMODATION AND ASSOCIATED EXPENSES

Staff who have significant travel to attend system-required professional courses or meetings have an entitlement to accommodation. Staff from diocesan schools in Forster, Taree, Wingham, Gloucester, Muswellbrook, Aberdeen, Scone, Denman and Merriwa are considered eligible for this provision of accommodation.

When accommodation is provided, there is also the provision of a dinner and breakfast allowance. In keeping with requirements in relation to the acceptable use of system and school funds, the provision of alcohol and personal items is at an individual's expense.

WORKING MEALS

Working meals for business meetings, including training, workshops, seminars, conferences or professional development courses) are allowable in any of the following circumstances:

- When a meeting has been scheduled which covers the normal lunch period because all participants would not have otherwise been available at the same time
- When staff are required to work as a whole, or in groups, through lunch or later at night
- When a full day's meeting has been scheduled and there are cost advantages in continuing through the normal lunch break
- When the meal is attended by officers from at least one other external agency or staff from other sites and is for the purpose of conducting business during the meal; or
- When the meeting progresses for longer than four hours

Working meals may also be provided for meetings with business and industry clients, volunteers and committee members if any of the above circumstances are met.

Examples of appropriate working meals include:

- finger foods such as sandwiches, rolls, chicken pieces etc.
- fruit
- fruit juices and soft drinks; and
- coffee, tea and biscuits

Working meals may be subject to FBT, particularly if they are provided away from the place of business. Further details regarding FBT are provided in the Catholic Schools Office Financial Legislative and Regulatory Requirements and Financial Recording documents.