

Staff Code of Conduct 2026–2027

Issue 2.0

2026–27

1. Scope

This policy applies to all employees and volunteers at schools under the direction of Pele Trust, its Board and its Academy Committees. This is not a contractual policy.

2. Purpose

The purpose of the Code of Conduct is to set out the standards and expectations that apply to employees and volunteers (referred to as "staff" throughout this document). It provides guidance so that they are clear about how to conduct themselves in a manner that brings credit to their school and Pele Trust.

The Code reflects the principle that the public is entitled to expect the highest standards of conduct from all employees who work within schools, and it should be applied with that in mind. To depart from this principle would damage the trust and confidence that is of vital importance to the school and Pele Trust. The reputation of our schools and Trust depends not only on the organisation's conduct as a provider of education but also on the behaviour of staff. Staff should be aware that breaches of this Code could result in further investigation under the relevant Pele Trust policy.

3. Roles and responsibilities

Staff: all Pele Trust staff must follow this Code of Conduct. In some cases, failure to do so may put employment or volunteering at risk. By following this Code, staff can be sure that no reasonable person can question their integrity and motives in connection with their role.

Headteachers and Academy Committees: at certain points in this Code, staff are required to make declarations to, or seek permissions from, the Headteacher (or, in the case of the Headteacher, from the Chair of the Academy Committee). Such declarations and permissions should be considered fairly and consistently in accordance with this Code. A separate, complementary code exists for Academy Committee members and Directors.

4. Preamble: the Seven Principles of Public Life

The Code of Conduct embraces the seven principles of public life drawn up by the Nolan Committee and endorsed by Parliament. They apply to anyone who works as a public office-holder, including all people appointed to work in education. All public office-holders are both servants of the public and stewards of public resources, and are expected to consider carefully where and how to apply the principles in their daily duties:

- Selflessness — acting solely in terms of the public interest.
- Integrity — avoiding placing yourself under any obligation to people or organisations that might try inappropriately to influence you in your work; not acting or taking decisions to

gain financial or other material benefits for yourself, your family or your friends; declaring and resolving any interests and relationships as detailed in this Code.

- Objectivity — acting and taking decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- Accountability — being accountable to the public for your decisions and actions and submitting yourself to the scrutiny necessary to ensure this.
- Openness — acting and taking decisions in an open and transparent manner; not withholding information from the public unless there are clear and lawful reasons for doing so.
- Honesty — acting with honesty and being truthful.
- Leadership — exhibiting these principles in your own behaviour, actively promoting and robustly supporting them, and being willing to challenge poor behaviour wherever it occurs.

5. General standards

You are expected to give the highest possible standard of service to the public and, where it is part of your duties, to provide appropriate advice to Academy Committees and fellow employees with impartiality. You should bring to the attention of your line manager any deficiency in the provision of service.

You must report to your line manager, in writing, any impropriety or breach of the policies or procedures of your school. If there is any difficulty with this, you should report the matter to the Headteacher or a higher level of management, such as the Chair of the Academy Committee. If you discover or suspect that a fraud or other financial irregularity has taken place, you are required to report this to a senior manager (including the Academy Committee). The school will ensure that all employees making such reports in good faith are protected from victimisation.

Pele Trust and Academy Committees encourage employees to report any activities which may be illegal, improper, unethical or inconsistent with this Code, rather than overlooking the problem. Further information is in the Trust Whistleblowing Policy, available from the school office or the Pele Trust website. You should regard yourself as an ambassador for your school and act in all situations in a way that brings credit to yourself and your employer.

6. Setting an example

All members of staff who work in schools set examples of behaviour and conduct which can be copied by pupils. Staff must therefore avoid using inappropriate or offensive language in the work environment, especially in discussions with pupils, parents and carers, or other key stakeholders. Staff must refrain from making political or ideological statements based on their own beliefs within their school role, and at all times perform their duties in an objective manner. All members

of staff should demonstrate respect, dignity, courtesy and professionalism in order to encourage our pupils to do the same. This Code helps staff to understand what behaviour is and is not acceptable.

7. Safeguarding pupils

Every member of staff has a duty to safeguard pupils from physical abuse, sexual abuse, emotional abuse and neglect. The duty to safeguard pupils includes the duty to report concerns about a pupil to the school's Designated Safeguarding Lead (DSL).

All staff must also avoid putting themselves at risk of allegations of abusive or unprofessional conduct: for example, avoid contacting a pupil through a personal mobile phone, social media platform or private email account, or meeting a pupil one-to-one in a closed room.

Members of staff have access to the Trust and school Safeguarding and Child Protection Policy and the current edition of Keeping Children Safe in Education, and must be familiar with both. Copies are available from the school office and on the school website. Staff must not demean or undermine pupils or their parents or carers in any way, and must take the utmost care of pupils under their supervision with the aim of ensuring their safety and welfare (reference: the current edition of Keeping Children Safe in Education).

8. Notification of criminal investigations and other required disclosures

This Code places a general obligation on all employees to disclose information relevant to their capability, capacity and suitability to carry out the duties for which they are employed. This applies irrespective of role and is not limited to information relating to a conviction or caution.

For employees undertaking roles for which a Disclosure and Barring Service (DBS) check is required, there is a specific obligation to disclose any convictions or cautions (including youth cautions) they receive which are relevant to their employment, subject to the filtering rules under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975. The Trust will only take into account information it is lawfully entitled to consider.

For the avoidance of doubt, staff must immediately inform their Headteacher if, during their employment with the Trust, they are:

- included on the DBS Children's Barred List;
- disqualified from working with children under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018;
- advised that they are under investigation for a criminal act (including road traffic offences);

- arrested in connection with a criminal act;
- notified that criminal charges are being considered against them, or in receipt of a summons to appear before a court for an alleged offence;
- found guilty and convicted of any offence, or in receipt of a police caution; or
- involved in any other matter which it would be reasonable to think would impact upon their role or professional standing.

Employees who are required to drive as part of their duties must also declare any penalties received in connection with motoring offences. Failure to disclose this information may be treated as a disciplinary offence. The Headteacher will consider any possible effects of these matters on an individual's employment, taking relevant advice and, if necessary, appropriate action.

9. Honesty and integrity

Implicit in your contract of employment is the requirement to act with honesty and integrity. If you behave in such a manner that you can no longer be trusted, you risk losing your employment. For example, you must not falsify timesheets, expense claims, work progress logs or any other work records.

Staff are required to deliver their contracted hours during their agreed or contractual hours of work, including any additional days or hours they are contracted and paid to work. Additional hours to be paid as overtime or taken as time off in lieu must be agreed by your line manager in advance. Staff should be at work at the agreed start time (unless there is a prior arrangement); planned absences, annual leave, special leave or other leave of absence must be agreed in advance with the Headteacher or line manager in accordance with the Trust Leave of Absence Policy, before any time off is taken or holidays booked. All employees must follow the Trust's absence reporting procedure if absent due to sickness; failure to do so may result in action under the Disciplinary Policy.

10. Loyalty

It is a fundamental implied term of your contract of employment that you are loyal to your employer. Generally speaking, you must not actively criticise or challenge the policies or decisions of your school or managers in public, which includes on social media. However, it is perfectly legitimate for you to use the methods of protest and persuasion available to any citizen, such as lawful industrial action, letters of complaint, approaches to your local councillor, attendance at protest meetings or writing to the press. What you must not do is use inside information not available to the public at large, or capitalise on your position in the school, in statements intended for publication. It is also legitimate to raise a matter of concern informally with your line manager and, if the matter affects your employment, to use the Grievance Policy. The Trust's Whistleblowing Policy provides for raising major concerns that fall outside the scope of other procedures.

Staff agree to serve Pele Trust and the school loyally and in good faith and not to act against its interests. This duty subsists throughout your employment up to your termination date and consists of: not misusing the Trust's or school's property, data, materials, equipment or other resources; not soliciting any commercial customers of the school in order to transfer their custom to yourself once you have left employment; not setting up in direct competition with any commercial activities of the school (although the Code does not prevent you from seeking alternative employment while still employed); not disrupting the school's business; and not bringing the school into disrepute through your actions.

11. Courtesy and dignity

You have the right to be treated with respect, courtesy, dignity and understanding by your colleagues, school and Trust leaders, the Academy Committee and Pele Trust Directors. You should help and support your colleagues in all their legitimate endeavours at work, and you have the right to support from your line manager in any difficulties with work colleagues, the public or pupils, provided you have acted in accordance with your contract and this Code. Conversely, you are expected to treat colleagues, leaders, the Academy Committee and Directors with respect, courtesy, dignity and understanding, working collaboratively and constructively, communicating appropriately and recognising the professional responsibilities of others.

12. Equality issues

Pele Trust and the school are committed to tackling discrimination in how they treat employees and deliver services, and to actively promoting and championing equality in the community. You are entitled to expect fair and reasonable treatment by your colleagues, school leaders and Academy Committees; if you feel you have been unfairly treated, discriminated against or harassed, you are entitled to use the Grievance Policy. You are also entitled to be treated with respect by service users and members of the public, and to be supported by the school in this.

In the same way, you are required to treat your colleagues, pupils, parents and members of the public fairly and with respect. Harassment is a disciplinary offence and may also be a criminal offence. The Trust has a legal duty to take reasonable steps to prevent sexual harassment of its staff, including by third parties; the Anti-harassment and Bullying Policy sets out how complaints are handled and the protections available, including whistleblowing protection for those who report sexual harassment. It is your responsibility to read and abide by the school's equality policies and to be familiar with your legal duties under the Equality Act 2010.

13. Personal behaviour

Your personal behaviour will influence the public's opinion of the Trust and your school in any situation where you can be identified as an employee, which includes social media platforms. Examples might include the use of bad language, unprofessional behaviour at work, situations that might affect work, or conduct below the standard expected of school employees. While on

school business you represent the Trust and school at all times, in and outside the workplace. Staff should be aware that their behaviour, in or out of the workplace, could compromise their position in relation to the protection of children and adults, loss of trust and confidence, or bringing the employer into disrepute, and may put employment at risk.

13.1 Alcohol, drugs and medication at work

Being under the influence of alcohol or illegal drugs during the working day (including lunch breaks and directed time) or before commencing work is unacceptable, as even small quantities have an adverse effect on work performance and the reputation of your employer. If you are suspected of being incapable of properly performing your duties by reason of alcohol or drugs (including the use of school machinery or vehicles), you are liable to be suspended from duty pending a decision on disciplinary action, in line with the Trust Managing the Effects of Alcohol or Drug Misuse Policy. The use of alcohol or illegal drugs outside the work setting that leads to police involvement, criminal proceedings, or complaints that bring the Trust, your school or your professional role into disrepute may also result in disciplinary action. Staff taking medication that may affect their fitness for work should inform their line manager, as set out in the Managing the Effects of Alcohol or Drug Misuse Policy.

13.2 Smoking and vaping

You must observe the statutory smoking ban. Smoking, e-cigarettes and other vaping devices are not permitted in any area of any Pele Trust school site, including yards, car parks and playing fields, at any time. Those who breach the rules may be liable to disciplinary action, and you are expected to report incidents where the policy is being breached.

14. Personal appearance

In your appearance, as in your behaviour, you should regard yourself as an ambassador for your school and dress in clothing appropriate for your duties. All staff are expected to dress formally and be neat and tidy in appearance. Where required, staff should wear appropriate clothing and footwear in accordance with health and safety requirements (for example science and technology technicians and PE staff). If you are required to wear specific items of clothing, hairstyles or jewellery in accordance with your ethnic background or faith, your needs will be accommodated where possible and practicable, provided this does not pose a hazard to health and safety or contravene a legitimate and reasonable requirement of the school. The school reserves the right to require that particular items of clothing or jewellery are not worn where they may cause offence or pose a risk to health and safety.

15. Internet and social networking

Personal access to the internet is acceptable provided the use is reasonable, properly sanctioned by school leaders and in the user's own time; the same applies to staff who operate school equipment in their homes. The school monitors the use of the internet for legitimate business reasons, including compliance with this policy; by using the internet, users are deemed to have consented to the monitoring, recording and auditing of internet use. Employees should familiarise themselves with any Internet Usage Policy in place in the school.

The school recognises that staff may keep personal blogs and use social networking sites to interact socially with colleagues and friends. While the school does not wish to discourage this, it expects certain standards of conduct to be observed to protect its legitimate business interests, its pupils and its employees, both inside and, in certain circumstances, outside the workplace. As a member of staff you must:

- not access social networking sites during working hours, unless authorised to do so for school business;
- make clear when posting on social networking sites that personal views expressed do not represent those of the school;
- not post information which is confidential to the school, its pupils or parents, or its suppliers, customers or contractors;
- refrain from making reference on social networking sites to the school, its staff or governors, its pupils or parents, its clients, or its suppliers and contractors;
- not post entries which are derogatory, defamatory, discriminatory or offensive in any way, or which could bring the school into disrepute;
- be aware that blogs may create documents that the courts can order to be disclosed for use in litigation, and that staff will be assumed to have written any contentious items unless they can prove definitively otherwise;
- not make discriminatory or offensive comments about work colleagues on social media;
- immediately report to senior leaders any inappropriate social media comments relating to themselves or the school;
- not discuss or share data relating to pupils, parents/carers or colleagues in staff social media groups; and
- not use school social media or networking platforms (for example Dojo or Tapestry) for personal communication or matters unrelated to the children in your care.

Offensive, defamatory or inappropriate comments about the school, its customers, suppliers or any of its staff or governors written on social networking sites will not be tolerated, nor will comments of any kind about pupils or parents. Where conduct breaches this Code or the Pele Trust Social Networking Policy, disciplinary action may be taken in accordance with the

Disciplinary Policy, up to and including dismissal. Blog entries made inside or outside the workplace that are defamatory, derogatory or discriminatory about the school, its customers, pupils, suppliers, staff or governors will be investigated as potential gross misconduct and, if substantiated, may lead to summary dismissal after due process. Before using social networking, you should read and understand the current Pele Trust Social Networking Policy.

16. Relationships with Academy Committee members and Directors

You are responsible to the school through its senior leaders. If your role is to give advice to Academy Committees, Directors and senior leaders, you should remember that all are there to carry out the school's work. Mutual respect between staff and Academy Committees and Directors is essential to effective local governance. Close personal familiarity between staff and individual Academy Committee members can create potential issues, and all parties should adopt a professional approach at all times. Any such relationships must be declared to the Headteacher, who may record and publish any business or pecuniary interests.

17. Relationships with parents and the local community

You should always remember your responsibilities to the community you serve and ensure courteous, efficient and impartial service to all groups and individuals within it. We appreciate that some staff will have social or personal relationships with parents and carers; however, staff must act professionally at all times in the execution of their duties and set clear boundaries between professional and social or personal relationships, to avoid situations which may give cause for concern or require action under this Code or any other Pele Trust policy. Failure to uphold these standards, or behaviour that gives rise to a conflict of interest, undermines confidence in the integrity of the Trust, brings the school or Trust into disrepute, or places pupils, colleagues or the school at risk, will be treated as a serious matter and may lead to formal action under this Code or other relevant Trust policies, including disciplinary procedures.

18. Relationships with contractors

All relationships of a business or private nature with external contractors, or potential contractors (except public utilities), should be made known to your Headteacher. Orders and contracts must be awarded on merit, by fair competition against other tenders where applicable, and no special favour should be shown to businesses run by, for example, friends, partners or relatives. No part of the local community should be discriminated against. If your job entails engaging or supervising contractors, or any other official relationship with contractors, and you have or have had a business or personal relationship with any of them in a private or domestic capacity, you must declare that relationship to your Headteacher. You must not use, in a private or domestic capacity, any contractor with whom you have or have had an official relationship (except public utilities) without first obtaining the permission of the Chief Executive Officer or Chief Operating Officer. Staff, Headteachers and Academy Committees must also be mindful of the rules on related party transactions in the Academy Trust Handbook and the Pele Trust Finance Policy.

19. Workplace relationships with spouses, partners and close personal friends

Good working relationships within the school, and the formation of social links, are signs of a healthy organisation and should be encouraged. If a social or professional relationship develops into a close personal relationship, this can interfere with normal working relationships and cause others to doubt that they will be treated fairly; it is imperative that we are all seen to operate to the highest standards of openness, fairness and integrity. If a person with whom you have a close personal relationship is employed in the school or is a member of the Academy Committee, you should take special care to conduct yourself so that the relationship does not interfere with working relationships or cause others to doubt fair treatment; appropriate action will be taken where necessary. Academy Committees and senior leaders have a particular responsibility to ensure there can be no question of favouritism or bias in the appointment or treatment of anyone with whom they have a close personal relationship; the more senior the person, the greater the likelihood of an adverse effect. Those involved in a close personal relationship with a colleague that has broken down must ensure they do not involve others in their private affairs within the workplace; relationships and their breakdown must not interfere with working arrangements, and the school will not allow parties in a domestic dispute to use its employment policies and procedures as a means of pursuing a campaign of victimisation.

20. Making staff appointments and other employment matters

All appointment panels will include a member of staff and/or Academy Committee member who has undertaken safer recruitment training. If you are involved in appointments, you should ensure that they are made on the basis of merit; it could be unlawful to make an appointment based on anything other than the candidate's ability to undertake the duties of the post. To avoid any accusation of bias, you should not be the sole decision-maker or attempt to influence an appointment where the applicant is related to you, is your partner, or is a close personal friend outside work ("related" meaning parent, grandparent, child, stepchild, adopted child, grandchild, brother, sister, uncle, aunt, nephew or niece). You must not be involved in, or attempt to influence, decisions relating to discipline, promotion or pay adjustments for any employee who is a relative, partner or close personal friend, or in any situation from which you could benefit. Information in an applicant's self-disclosure of criminal convictions or their DBS certificate is highly confidential, and access will be restricted to those entitled to see it as part of their duties.

21. Health and safety

In line with legal and contractual obligations, all employees are required to co-operate with and ensure compliance with Trust and school health and safety policies and objectives, including adherence to all identified safe working procedures and risk assessments. Staff have a duty to help prevent accidents and injuries at work by being aware of the applicable policies and complying with them at all times. All employees are encouraged to familiarise themselves with health and safety documentation, especially risk assessments, attend any training identified as

part of their role, and be proactive in raising health and safety concerns with their line manager in the first instance.

22. Educational visits and after school clubs

Staff should always take care to have another adult present during out of school activities, unless otherwise agreed with senior staff. Health and safety requirements must be strictly adhered to, and staff should maintain a professional relationship with pupils at all times. Ahead of any out of school activity, staff should follow school visit procedures and ensure appropriate risk assessments have been carried out and parental consent obtained. Staff are not permitted to visit the home of a pupil unless pre-arranged with the Headteacher and the Designated Safeguarding Lead informed; the appointment must be logged by the DSL. When staff work regularly on an individual basis with children they are more vulnerable to allegations; meetings should, wherever possible, be arranged so that staff are visible and/or audible and not in secluded areas of the school. Staff should not arrange to meet a pupil away from school premises without good reason and, where necessary, only with the express approval of parents and a senior member of staff.

23. Use of financial resources

You must ensure that you use public funds entrusted to you in a responsible and lawful manner, strive to ensure value for money, and avoid legal challenge to the school or Pele Trust. You must act in accordance with Pele Trust's financial and procurement policies and procedures and follow any instructions given by school leaders, Trust leaders and independent auditors.

24. Disclosure of information

Many staff regularly deal with private and confidential information relating to pupils, parents, members of the public or colleagues, and to organisations. You must not supply confidential information to anyone not entitled to see it, and must take appropriate action to protect against accidental disclosure and to ensure that unauthorised people do not gain access to school or Trust information systems. You must read and follow school policies relating to data protection and information security; data protection is the responsibility of all members of staff. Deliberate or negligent breaches of confidentiality and these policies are a serious disciplinary matter. You must not use information obtained in the course of your employment for personal gain or benefit.

25. Outside commitments

An employee's off-duty hours are their own personal concern, but they should not subordinate their employment duty to their private interests or put themselves in a position where duty and private interests conflict. As a general rule the school will not preclude employees from undertaking additional employment, but any such employment must not, in the view of the

school, conflict with or react detrimentally to the school's interests or weaken public confidence in the conduct of the school's business.

Teachers and professional support staff are expected to devote their service to the work of the school. Additional employment (paid or unpaid) should not interfere with or negatively affect performance in school. Additional roles for teachers may include exam board marking and private tutoring; staff should notify the Headteacher if they plan to tutor an existing pupil at a Pele Trust school, and tutoring sessions must not take place on school premises. If in any doubt about secondary employment, staff should discuss their intentions with the Headteacher. If you engage in any paid or unpaid secondary employment or business, you must not use or mention your employment with the school or Pele Trust to gain business or trade for it, other than providing the name of an employer for references.

26. Personal and pecuniary interests

You must declare any financial and non-financial interests which could conflict with the school's or Pele Trust's interests to your Headteacher, using the Register of Directors and Staff Interests Form available from the school office. You must also declare membership of any organisation not open to the public without formal membership and commitment of allegiance, which has secrecy about rules, membership or conduct. Information supplied will not affect your position in the school and will normally be available only to your Headteacher and the nominated custodian; however, where a relevant complaint or query is made, the Trust's senior leaders and auditors will also have access so that a proper response can be made.

27. Interests of spouses, partners and close personal friends

You must avoid situations where your spouse, partner or close friends work in occupations or have businesses or other interests that could reasonably be seen by the public to conflict with or benefit from your employment with the school. All interests of this description must be declared to your Headteacher. Such situations often interfere with normal working relationships and can cause the public, contractors and clients to doubt that they will be treated fairly; if such a situation develops, you may not be able to do the job for which you are employed.

28. Improper use of position, title or authority

During working hours you are paid to work for the school and not to represent or promote your private interests. Inside or outside working hours, you must never use your position to attempt to persuade any member of staff to purchase any goods or services. School leaders should not seek sponsorship from, or sell raffle tickets or similar to, their staff, no matter how good or charitable the cause; this does not prevent colleagues from undertaking such activities among themselves — the intention is to remove any real or imagined pressure from school leaders. Touting for or on behalf of any secondary employment during working hours is an improper use of the school's time and will be dealt with accordingly.

29. Use of school or Pele Trust property

The general rule is that school or Trust property must only be used at the workplace for work purposes, with limited exceptions. Teachers necessarily work at home and need to take laptops, books and records home for that purpose. The Headteacher may give staff permission to use school or Trust equipment away from the workplace, for example the short-term loan of equipment, textbooks or manuals for study or practice, or the loan of equipment to enable official work at home. In these circumstances the Headteacher should keep a proper record of the equipment, the period of and reason for the loan, and any restrictions on use.

Premises: you must not engage in any secondary employment or business on school premises at any time; to do so could be interpreted as gaining a pecuniary advantage by way of your employment, which is unlawful. This includes exam board marking and private paid tutoring of pupils. If you are engaged in secondary employment, you must not park an identifiable business vehicle within the school grounds, and you must not store items connected with secondary employment (or personal items not used in connection with your duties) on school premises.

Equipment and other property: where equipment is made available to the public, you may use it at the same charge (if any). Otherwise, equipment and property belonging to the school or Trust must only be used for official purposes. Clothing and personal protective equipment supplied by the school may be worn between home and work but not for domestic use or in connection with secondary employment. Tools of the trade supplied by the school must not be used in connection with secondary employment, with the single exception of teaching staff using their school laptop for exam board marking. Private use of photocopiers must be paid for, and never in connection with secondary employment. Non-official mail must not be franked by the school franking machine; use your own stamps for personal post. Work telephones may be used to receive a reasonable number of incoming calls, to phone home about unexpected late working, and in emergencies, but never in connection with secondary employment. Personal mobiles should be used for personal calls, kept to an acceptable level during work time, not used for calls in the vicinity of pupils during directed or paid hours, and outside those times only in areas where pupils are not present. Staff may use their mobile phone as a camera in school and on planned trips in accordance with our data protection policies, provided images are transferred to school storage and deleted from personal devices as soon as practicable. Documents issued under the banner of Pele Trust or its schools must only be used for official purposes; school-headed paper must only be used when expressing the view of the school or acting on its behalf. Business credit cards and account arrangements are to be used only for official purchases and to enable you to perform your official duties.

30. Situations of personal gain or advantage

It could be a criminal offence to gain a pecuniary advantage by way of your employment. You may purchase from school stocks only where items are generally available for sale to the public

or where the school has specifically invited employees to purchase. You may purchase property, goods or services from contractors engaged by the school only at the prices and by the means adopted for sales to the public at large (except specific arrangements made for all employees, such as a staff discount scheme). You may purchase surplus school property in accordance with internal audit guidelines adopted by your school, and only if invited to do so.

Use of school facilities for personal or commercial activities: some staff may provide additional services to pupils or families, such as holiday clubs, tuition or other paid activities. Where such services use school premises, resources or branding: prior approval must be obtained from the Headteacher and the Trust before any activity is advertised or delivered; charges for the use of premises, equipment or resources will be set at the same rate as for external providers, to ensure fairness and transparency; and school and Trust resources must not be used for personal or commercial purposes without explicit written agreement. Any conflict of interest arising from these activities must be declared and appropriately managed. Failure to follow these requirements may result in disciplinary action and/or withdrawal of permission to use Trust facilities.

31. Bribery and corruption

The Trust has published an Anti-fraud, Corruption and Bribery Policy which applies to all staff. Offences under the Bribery Act 2010 carry a maximum of 10 years' imprisonment and/or an unlimited fine for an individual. You should read and abide by any advice provided by the school in relation to that policy.

Separation of roles during tendering: if you are involved in the tendering process or dealing with contractors, you should be clear on the separation of client and contractor roles within the Trust and school; senior employees with both client and contractor responsibility must be aware of the need for accountability and openness. If you are privy to confidential information on tenders or costs, you must not disclose it to any unauthorised party. You should ensure that no special favour is shown to current or recent former employees or their partners, close relatives or associates in awarding contracts.

Gifts: it is a serious criminal offence to receive or give any gift, loan, fee, reward or advantage for doing or not doing anything, or for showing favour or disfavour to any person, in your official capacity. If an allegation is made, the onus is on you to demonstrate that any such reward has not been corruptly obtained. Any offer of a bribe must be reported immediately to the Headteacher, the Chair of the Academy Committee, or the Chief Executive or Chief Operating Officer.

32. Sponsorship

Where an outside organisation wishes to sponsor a school activity, whether by invitation, tender, negotiation or voluntarily, the basic conventions concerning the acceptance of gifts and

hospitality apply, with particular care when dealing with contractors or potential contractors. Where the school wishes to sponsor an event or service, neither you nor any partner, spouse or relative may benefit in a direct way, although insignificant or token benefits up to a value of £25 are permitted; benefits of greater value should be dealt with in the same way as gifts. Where the school gives support to the community through sponsorship, grant aid or other means, you should ensure that impartial advice is given and that there is no conflict of interest.

33. Gifts and hospitality

Hospitality: you should only accept offers of hospitality where there is a genuine need to impart information or represent the school or Trust in the community. Offers to attend purely social or sporting functions should be accepted only when they are part of the life of the community and where the school or Trust should be seen to be represented; in such cases they should be authorised by your Headteacher or, for Headteachers, by the CEO. Headteachers should review and approve hospitality, checking at the same time that repeated hospitality from the same supplier is appropriate. When hospitality has to be declined, those making the offer should be courteously but firmly informed that people working in Pele Trust must be seen to be acting impartially and with integrity. When receiving authorised hospitality, be sensitive to its timing in relation to decisions the school or Trust may be taking affecting those providing it. It is acceptable to accept hospitality through attendance at relevant conferences and courses where it is clearly corporate rather than personal, the Headteacher consents in advance, and purchasing decisions are not compromised. Where visits to inspect equipment are required, the school should meet the cost, to avoid jeopardising the integrity of subsequent purchasing decisions.

When deciding whether to accept a gift or hospitality, consider: whether acceptance could be perceived as influencing your judgement; the scale, nature and timing of the offer; whether the donor has a contractual relationship with, or provides goods or services to, the school or Trust; whether the invitation or gift is directed to a large group or open to the public, or targeted at you because of your role; the motivation behind it; for hospitality, whether attendance genuinely benefits the school through networking and contacts or is centred on personal enjoyment; whether acceptance would place you under pressure in any current or future matter involving the school or Trust; and, for gifts, whether returning it would cause difficulty or offence (in which case it may be donated to charity or an equivalent price paid to charity). If you accept a gift over £25 you must register it in the register of interests; if you decline a gift over £25 this should also be registered, with a statement that the gift was declined. You should consider carefully whether to register gifts and offers below £25, having regard to the issues above.

Appendix A — Associated policies

- Pele Trust Whistleblowing Policy
- Pele Trust Safeguarding and Child Protection Policy
- Pele Trust Managing the Effects of Alcohol or Drug Misuse Policy

- Pele Trust Grievance Policy
- Pele Trust Leave of Absence Policy
- Pele Trust Social Networking Policy
- Pele Trust Anti-harassment and Bullying Policy
- Pele Trust Anti-fraud, Corruption and Bribery Policy
- Pele Trust Managing Sick Absence Policy

Document control

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Approved by	Board of Directors

Issue	Date	Notes
2.0 (2026-27)	September 2026	KCSIE references made edition-proof (section 7). Criminal records terminology updated to youth cautions with the filtering rules safeguard added (section 8). Harassment provisions include the Trust's preventative sexual harassment duty and whistleblowing protection referenced (section 12). Social Networking Policy cross-reference un-dated (section 15). Medication cross-reference added (13.1). Anti-harassment and Bullying Policy added to associated policies. Separate action: right-to-join-a-union statements to be added to offer and induction documentation before October 2026 (Employment Rights Act 2025).
1.1 (2025-26)	September 2025	Annual review.