

## Code of Conduct for Pele Trust Employees (2021-22)

### Scope

This procedure applies to all employees and volunteers at schools who are under the direction of Pele Trust and its Academy Committees.

### 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 the remainder of this document). It provides guidance so that they are clear about how they should conduct themselves in a manner that will bring credit to their school and Pele Trust.

The Code reflects the perspective 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 school’s and Trust depend not only upon the organisation’s conduct as a whole as a provider of education but also upon the behaviour of staff.

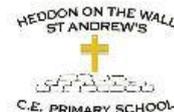
### Roles and responsibilities

#### Staff

All Pele Trust staff are expected to 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/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 Academy Committee). Such declarations or permissions should be considered fairly and consistently in accordance with this Code.



## **Preamble: Seven Principles of Public Life**

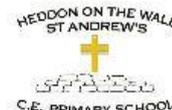
The Code of Conduct embraces the seven principles of public life, which were drawn up by the Nolan Committee and endorsed by Parliament.

The principles of public life apply to anyone who works as a public office-holder. This includes all those who are elected or appointed to public office, nationally and locally, and all people appointed to work in the civil service, local government, the police, courts and probation services, and in the health, education, social and care services. All public office-holders are both servants of the public and stewards of public resources. You are expected to consider carefully where and how to apply the principles in your daily duties.

The Seven Principles are:

1. **Selflessness**
  - a. Acting solely in terms of the public interest.
2. **Integrity**
  - a. Avoiding placing yourself under any obligation to people or organisations that might try inappropriately to influence you in your work. You should not act or take decisions in order to gain financial or other material benefits for yourself, your family, or your friends. You must declare and resolve any interests and relationships as detailed in the Code of Conduct.
3. **Objectivity**
  - a. Act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
4. **Accountability**
  - a. Be accountable to the public for your decisions and actions and submit yourself to the scrutiny necessary to ensure this.
5. **Openness**
  - a. Act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
6. **Honesty**
  - a. Act with honesty, and be truthful.
7. **Leadership**
  - a. Exhibit these principles in your own behaviour. Actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

These principles apply to all aspects of public life. They are set out here for the benefit of all who serve the public in any way.



## 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 also 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 individual Academy Committees encourage employees to report any activities which may be illegal, improper, unethical or inconsistent with the Code of Conduct, rather than overlooking the problem. Employees can find further information on how to do this by viewing the school's Whistleblowing Policy which is available from the Pele Trust or school website.

You should regard yourself as an ambassador for your school and act in all situations in a way that will bring credit to yourself and your employer.

## Setting an example

All members of staff who work in schools set examples of behaviour and conduct which can be copied by pupils/students. Staff must therefore avoid using inappropriate or offensive language in the work environment. They must also refrain from making political or ideological statements based on their own beliefs within their school role.

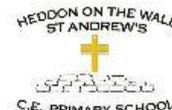
All members of staff should demonstrate respect, dignity and professionalism in order to encourage our pupils/students to do the same.

This code helps staff to understand what behaviour is and is not acceptable.

## Safeguarding pupils/students

Every member of staff has a duty to safeguard pupils/students from:

- Physical abuse
- Sexual abuse
- Emotional abuse



- Neglect

The duty to safeguard pupils/students includes the duty to report concerns about a pupil/student to the school's Child Protection Lead or Designated Safeguarding Lead (CPL/DSL).

All staff must also avoid putting themselves at risk of allegations of abusive or unprofessional contact. For example, avoid contacting a student through a personal mobile phone or private email account; meeting with a student in a 1-2-1 situation in a closed room.

Members of staff have access to the Trust and school's Child Protection Policy, and the annual DfE Keeping Children Safe in Education document, and must be familiar with both. Copies of these are available

Staff must not demean or undermine pupils and their parents/carers.

Staff must take utmost care of pupils/students under their supervision with the aim of ensuring their safety and welfare. (Reference: Keeping Children Safe in Education 2019 <https://bit.ly/2kD6Ksb> )

### **Safer Working Practice**

All staff in schools will have direct contact to a greater or lesser degree with students. Staff must conduct themselves in accordance with the Guidance on Safer Working Practice for Adults who work with Children and Young People. Failure to do so may result in action under the Trust Disciplinary Procedure, which may put continued employment at risk.

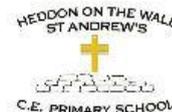
### **Honesty**

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, expenses claims, work progress logs or any other work records.

### **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. However, it is perfectly legitimate for you to use the methods of protest and persuasion that any other citizen can use 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 to use "inside information" which is not available to the public at large or to capitalise on your position in the school if you make statements intended to be published to the public at large.

It is also perfectly legitimate for you to raise a matter of concern informally with your line manager, and, if the matter affects your employment, to use the Grievance Procedure.

The Trust has a published Whistle Blowing policy which provides for raising major concerns that fall outside the scope of other procedures.

Employees 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 any other resources provided for in relation to your employment
- 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 extend to prevent you from seeking alternative employment whilst still employed); and
- not disrupting the school's business

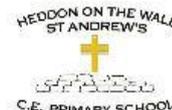
### **Personal behaviour**

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 on social media platforms. Examples might include use of bad language, unprofessional behaviour at work, or situations that might affect work, or any conduct that is not of the standard expected of school employees. Whilst on school business you should be mindful that you are representing the Trust and school at all times.

The consumption of alcohol 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 official duties by reason of alcohol or drugs, which would include the use of school machinery or vehicles, you are liable to be suspended from duty pending a decision on disciplinary action being taken against you.

You must observe the statutory smoking ban which bans smoking in nearly all enclosed workplaces and public spaces. Smoking or use of e-cigarettes is not permitted in any area of any Pele Trust school site,



including yards, school car park and playing fields, at any time. Those who breach the rules may be liable to disciplinary action. You are expected to report incidents where the policy is being breached.

### **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 of the school and Pele Trust Directors.

You should help and support your colleagues in all their legitimate endeavours at work. You have the right to support from your line manager in any difficulties you might have with work colleagues, the public or pupils provided that you have acted in accordance with your contract of employment and this Code.

### **Personal appearance**

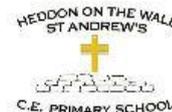
In your appearance as well as in your behaviour, you should regard yourself as an ambassador for your school and dress in clothing that is appropriate for your duties. All staff are expected to dress formally and be neat and tidy in appearance. Where required, staff should also wear appropriate clothing and footwear in accordance with health and safety regulations, e.g. science and technology technicians, 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, however this must not pose a hazard to the health and safety of any person or contravene any legitimate or reasonable requirement of the school. The school reserves the right to insist that you do not wear particular items of clothing or jewellery which it believes may cause offence or which may pose a risk to the health and safety of any person.

### **Internet and Social Networking**

Personal access to the internet is considered acceptable provided that the use is reasonable, properly sanctioned by school leaders and is in the user's own time. Similarly, this kind of use is acceptable for 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 and accepts that staff may keep personal web logs (blogs) and that internet social networking sites are a useful way of interacting socially with colleagues and friends. While the school does not wish to discourage employees from accessing such sites, it expects certain standards of conduct to be observed to protect both its legitimate business interests, its students and its employees



from the dangers of inappropriate use. This applies both inside and, in certain circumstances, outside the workplace.

As a staff member you must:

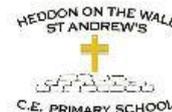
- not access social networking sites during working hours, unless you are authorised to do so for school business;
- make it clear when posting information or comments on social networking sites that any personal views which are expressed do not represent those of the school;
- not post information on a social networking site which is confidential to the school, its students or parents, its suppliers, customers or contractors;
- refrain from making reference on a social networking site to the school, its staff or governors, its students or parents, its clients, its suppliers and contractors;
- not post entries on a social networking site 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 which the courts can order to be disclosed for use in litigation. Consequently, staff will be assumed to have written any contentious items unless they can prove definitively that they have not done so; and
- not make discriminatory or offensive comments about work colleagues on social networking sites
- Immediately report to senior leaders any inappropriate social media comments relating to themselves or the school

Offensive, defamatory or inappropriate comments about the school, its customers, suppliers or any of its staff or governors that are written on social networking sites will not be tolerated, nor will any comments of any kind about students or parents.

Where conduct is in breach of this Code (or the Pele Trust Social Networking Policy and Guidance document) disciplinary action may be taken in accordance with the Trust's Disciplinary Procedure up to, and including, dismissal.

Any blog entries made inside or outside the workplace that are defamatory, derogatory, or discriminatory about the school, its customers, students, suppliers, staff or governors will be investigated as potential gross misconduct. If substantiated, such conduct may lead to summary dismissal after the due process of the school's Disciplinary Procedure has been followed.

Before using social networking you should read and understand the Pele Trust Social Networking Policy and Guidance document.



### **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/Directors is essential to effective local governance. Close personal familiarity between staff and individual Academy Committee members can create potential issues therefore all parties should adopt a professional approach at all times.

### **Relationships with 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 that community.

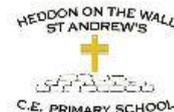
### **Relationships with contractors**

All relationships of a business or private nature with external contractors, or potential contractors (with the exception of the 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 internal or external contractors or having any other official relationship with contractors and you have previously had or currently have a business or personal relationship in a private or domestic capacity with any contractors (except the public utilities), you should declare that relationship to your Headteacher.

You must not use, in a private or domestic capacity, any contractor with whom you have had or are having an official relationship (with the exception of the public utilities), without first obtaining the permission of your Headteacher.

In addition staff, Headteachers and Academy Committees must be mindful of regulations regarding related party transactions as detailed in the Academies Financial Handbook and the Pele Trust Finance Policy.



### **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 these are made on the basis of merit. It would be unlawful to make an appointment that was based on anything other than the ability of the candidate to undertake the duties of the post.

In order to avoid any possible accusation of bias, you should not be involved in or attempt to influence an appointment where the applicant is related to you, is your partner or is a close personal friend outside work. In this context related means if you are the parent, grandparent, child, stepchild, adopted child, grandchild, brother, sister, uncle, aunt, nephew or niece of the applicant.

You must not be involved in or attempt to influence decisions relating to discipline, promotion or pay adjustments for any other employee who is a relative, partner, or close personal friend or in any situation where you could benefit from that situation.

The information contained in an applicant's self-disclosure of criminal convictions or their criminal records certificate from the Disclosure and Barring Service is considered highly confidential and the school will restrict access to those who are entitled to see it as part of their duties.

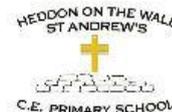
### **Relationships with spouses, partners and close personal friends in the workplace**

Good working relationships within the school and the formation of social links within and between individuals/groups are signs of a healthy organisation and should be encouraged.

If a social relationship develops into a close personal relationship, this can often interfere with the normal working relationships within the school and can cause others to doubt that they will be treated fairly. It is imperative that we are all seen to operate at 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 part of the Academy Committee, you should take special care to conduct yourself in such a manner that the relationship does not interfere with normal working relationships and does not cause others to doubt that they will be treated fairly. Appropriate action will be taken in such circumstances.

Academy Committees and senior leaders have a particular responsibility to ensure that there can be no question of favouritism or bias in the appointment or treatment of any person with whom they have a close personal relationship outside their school. The higher the person is in the management structure, the greater the likelihood of there being an adverse effect on normal working relationships if people with close personal relationships are employed in the organisation.



Those involved in a close personal relationship with a work colleague which has broken down must ensure that they do not involve others in their private affairs within the workplace. Relations and/or their breakdown must not interfere with working arrangements and employees must ensure that work is not affected. Neither will the school allow parties in a domestic dispute to use its employment policies and procedures as a means of pursuing a campaign of victimisation.

### **Interests of spouses, partners and close personal friends**

You must avoid situations arising 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 the normal working relationship and can cause members of the public, actual or prospective contractors and clients to doubt that they will be treated fairly. If such a situation develops then you may not be able to do the job for which you are employed.

### **Use of financial resources**

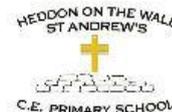
You must ensure that you use public funds entrusted to you in a responsible and lawful manner. You should strive to ensure value for money to the local community and to avoid legal challenge to the school or Pele Trust.

You must abide by Pele Trust's financial and procurement procedures and follow any instructions given by your school leaders, Trust leaders and Internal Audit.

### **Equality issues**

Pele Trust and the school is committed to tackling discrimination in how it treats its employees and how it delivers services, and also 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 that you have been unfairly treated, discriminated against or harassed, you are entitled to make use of the school's Grievance Procedure. You are also entitled to be treated with respect by clients, service users and members of the public, and be supported with this by the school.

In the same way, you are required to treat your colleagues, pupils, parents and members of the public fairly and with respect. Not only is it a criminal offence to harass another person on any grounds, it is also a disciplinary offence.



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.

### **Health and safety issues**

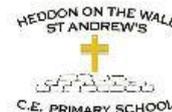
In line with legal and contractual obligations, all employees are required to cooperate and ensure compliance with Trust and school health and safety policies and objectives. This includes adherence to all identified safe working procedures and risk assessments. All employees are actively encouraged 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 any health and safety concerns with, in the first instance, their line manager.

### **Disclosure of information**

The law requires that certain types of information must be available to a range of audiences including Trust Directors, Academy Committees, auditors, government departments, parents, pupils and the public. The Trust and school has procedures to ensure that it complies with its duties and responsibilities under the Freedom of Information Act 2000 which you should read and follow if you receive a request under this legislation. If in doubt, you should assume that information is confidential and seek permission before releasing it.

Separate policies are also in place regarding sharing information for safeguarding and welfare purposes where there can be consequences in not sharing relevant information. These can be accessed from the school office.

Against this background the school must also safeguard privacy and confidentiality and comply with its duties and responsibilities under the General Data Protection Regulation (GDPR). During the course of their duties many staff regularly deal with private and confidential information relating to individual pupils, parents, members of the public or work colleagues and about groups, companies and other organisations. You must not supply confidential information to anyone who is not entitled to see it. You must also take appropriate action to protect against accidental disclosure or discovery of information and to ensure that unauthorised people do not gain access to school or Trust information systems. You should read and follow any school policies on Data Protection and Information Security and any specific procedures that are available. ICT and information security may be managed and coordinated by a specific individual, however, security should be viewed as the responsibility of all members of staff. Deliberate or negligent breaches of confidentiality and the terms of these policies are deemed a serious disciplinary matter. If you are unsure about anything, you should seek advice from a senior leader in the first instance.



You must not use any information obtained in the course of your employment for personal gain or benefit, nor should you pass it on to others who might use it in such a way.

Any particular information received by you from an Academy Committee member, which is personal to that person and does not belong to the school must not be divulged by you without their prior approval except where such disclosure is required or sanctioned by the law.

### **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 their employment duty and their private interests conflict. As a general rule, the school will not attempt to 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 in any way weaken public confidence in the conduct of the school's business.

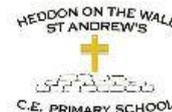
If you are a teacher or a member of professional support staff you are expected to devote your service to the work of the school. We understand that there are occasions when members of staff may wish to undertake additional employment (paid or unpaid) however it should not interfere with or negatively impact your performance in school. Additional roles for teachers may include exam board marking and/or private tutoring. With the latter, staff should notify the Headteacher if they plan to tutor an existing pupil/student at a Pele Trust school and note that any tutoring sessions must not take place on the school premises. If a member of staff is in any doubt about engaging in secondary employment they 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 in order to gain business or trade for that secondary employment notwithstanding the need to provide the name of an employer for references.

### **Personal interests**

You must declare any financial and non-financial interests which could conflict with your school's or Pele Trust's interests to your Headteacher using the Register of Directors and Staff Interests Form, which is available from the school office.

You must declare membership of any organisation not open to the public without formal membership and commitment of allegiance and which has secrecy about rules or membership or conduct (for example, the freemasons) to your Headteacher using the Register of Directors and Staff Interests Form.



The information supplied under the paragraphs above will not affect your position in the school. The information will normally be made available only to your Headteacher and any employee nominated to be responsible for its secure storage. However, where a relevant complaint or query is made, the Trust's senior leaders and its auditors will also have access to the information so that a proper response can be made to the complaint or query.

### **Improper use of position, title or authority**

#### **General**

Good working relationships within the school and the formation of social links within and between work colleagues/groups are signs of a healthy organisation and should be actively encouraged by senior leaders. The paragraphs which follow, however, emphasise the point that, during working hours, you are paid to work for the school and not to represent or promote your private interests.

#### **Influencing colleagues to purchase goods or services**

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 attempt to sell raffle tickets etc., to their staff no matter how good or charitable the cause. However, this paragraph does not prevent colleagues undertaking these activities amongst themselves. The intention here is to remove any real or imagined pressure from school leaders.

#### **Touting on behalf of secondary employment**

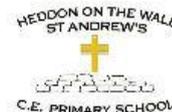
Touting for or on behalf of any secondary employment in working hours is an improper use of the school's time and will be dealt with accordingly.

### **Use of School or Pele Trust Property**

#### **General**

The general rule is that you must only use school or Pele Trust property at the workplace for work purposes and the paragraphs below set out this requirement in more detail. However, there are exceptions.

In the first place, teachers necessarily work at home and need to take laptops, books and records home to do that work. In addition, the Headteacher may give staff permission to use school or Pele Trust equipment away from the workplace. Examples of this might include:



- the short-term loan of equipment, textbooks or manuals so that you may study or practice in your own time and so be able to do your job more effectively
- the loan of equipment to enable you to do official work at home and so increase productivity

In these circumstances, the Headteacher should keep a proper record of the identity of the equipment, the period of the loan, the reason for the loan and any restrictions imposed on the use of the equipment.

### **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 and that is illegal. This includes exam board marking and private (paid) tutoring of pupils/students.

If you are engaged in secondary employment you must not park any vehicle within the school grounds if it can be identified as being a vehicle used for that employment or if it contains any visible materials relating to that secondary employment.

You must not store any items connected with any secondary employment or any personal items (except those which are used in connection with your official 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) as is made to the public. Otherwise, equipment and property belonging to the school or Pele Trust must only be used for official purposes. Some particular examples and exceptions are shown below.

- **Clothing and Personal Protective Equipment**

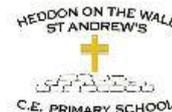
Clothing and personal protective equipment supplied by the school may be worn between home and work if that is convenient for you but under no circumstances may it be worn for domestic use or during, in connection with, or when travelling to or from any secondary employment.

- **Tools-of-the-trade**

No "tools of the trade" supplied by the school or Pele Trust may be used in connection with any secondary employment. The one exception would be where teaching staff engage in exam board marking and require the use of their school laptop.

- **Telephones**

Personal mobiles should be used if there is a need to make personal calls during working hours. You are expected to be conscious of excessive use of mobile phones during work time and this must be kept to an acceptable level.



Staff may use their mobile phone as a camera in school and on planned trips/visits. This is permissible in accordance with our GDPR policies but images should be transferred to school storage, i.e. Google Drive folders, and deleted from personal devices as soon as is practicable.

Staff should avoid using their mobile phones (for phone calls) in the vicinity of pupils/students during their directed hours/paid hours of employment. Outside of these times, mobile phones should only be used in areas of school where pupils are not present.

You may also use the work telephone to receive a reasonable number of incoming calls, to phone home to say that you will unexpectedly be working late and for emergency reasons. Under no circumstances should work telephones be used in connection with any secondary employment.

- **Photocopiers**

Private use of such equipment in school must be paid for and it must not be used in connection with any secondary employment.

- **Fax machines**

School fax machines which are not available for public use must only be used for school business.

- **Franking machines and stamps**

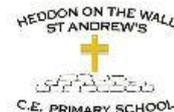
Under no circumstances must any mail which is not official school mail be caused or permitted to be franked by a school franking machine. You should use your own postage stamps on any material posted through the school post system.

- **Computers/laptops**

School computing equipment must be used predominantly for school or Pele Trust purposes. The one exception would be where teaching staff engage in exam board marking and require the use of their school laptop. Staff are allowed to use their laptop to access the internet from home but should be aware that their actions are still bound by the Acceptable Use Policy.

- **Stationery**

Documents issued under the banner of Pele Trust or any of its schools, organisations or establishments must only be used for their official purposes. It should be noted that the use of such documents for any other purpose might constitute a criminal offence.



School headed paper must only be used where you are expressing the view of the school or acting on its behalf.

### **Business credit cards and account arrangements**

Credit cards obtained by the school or Pele Trust are to be used only for official purchases for the relevant body and to enable you to perform your official duties.

### **Situations of personal gain or advantage**

#### **General**

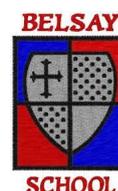
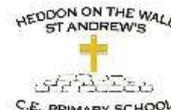
The following paragraphs should be followed carefully as it is a criminal offence to gain a pecuniary advantage by way of your employment with the school or Pele Trust

- **Purchases from school stocks**  
You may purchase from stocks of property or goods owned by the school or Pele Trust, for yourself or for others, only if those items are generally available for sale to the public or if the school has specifically invited employees to make such a purchase.
- **Purchases from school contractors and clients**  
You may purchase property, goods or services for yourself or others from contractors engaged by the school or Pele Trust but only at the prices and by the means adopted for the sale of such items to the public at large. Exceptions to this rule are, for example, where the school or Pele Trust makes specific arrangements (such as the staff discount scheme) for all its employees.
- **Purchase of surplus property**  
You may purchase surplus property or goods owned by the school or Pele Trust in accordance with the guidelines issued by the Internal Audit and adopted by your school, and if invited to do so by your school.

### **Bribery Act 2010**

There are several offences under the Bribery Act 2010 which relate to schools including:

- Bribing
  - where a person offers, promises or gives a financial or other advantage to another person, with the intention of inducing them to perform improperly a relevant function or activity, or to reward a person for such improper performance.
- Receiving a bribe
  - Where a person requests, agrees to receive or accepts a financial or other advantage with the intention that, in consequence, a relevant function or activity should be performed



improperly by themselves or another. It does not matter whether the advantage is direct or through a third party, or whether the benefit is for that person or another.

- Bribing a foreign official
  - Where a person with the intention of obtaining or retaining business, or an advantage in the conduct of business, bribes a foreign public official with the intention of influencing them in their capacity.

The offences under the Act 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 its Anti-Fraud and Corruption Strategy.

### **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 the school. If you are a senior employee with both a client and contractor responsibility, you must be aware of the need for accountability and openness.

If you are privy to confidential information on tenders or costs for contractors, you should not disclose that information to any unauthorised party or organisation.

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 to businesses run by them or employing them in a senior or relevant managerial capacity.

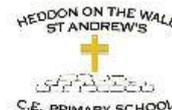
### **Corruption**

You are warned that it is a serious criminal offence corruptly to receive or give any gift, loan, fee, reward or advantage for doing or not doing anything or showing favour or disfavour to any person in your official capacity. If an allegation is made, the law is such that the onus is on you to demonstrate that any such rewards have not been corruptly obtained.

The public is entitled to demand of a school employee, conduct of the highest standard and public confidence in their integrity would be shaken were the least suspicion to arise that they could be influenced by improper motives. Any offers of a bribe must be reported immediately to the Headteacher or Chair of Academy Committee.

### **Sponsorship (giving and receiving)**

This is where an outside organisation wishes to sponsor or is seeking to sponsor a school activity, whether by invitation, tender, negotiation or voluntarily; the basic conventions concerning acceptance of



gifts or hospitality apply. Particular care must be taken 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, must benefit from such sponsorship in a direct way, although there is no objection to you obtaining insignificant or token benefits up to a value of £25. Benefits of greater value should be dealt with in the same way as gifts from service users and pupils.

Where the school through sponsorship, grant aid, financial or other means, gives support in the community, you should ensure that impartial advice is given and that there is no conflict of interest involved.

### **Hospitality**

You should only accept offers of hospitality if there is a genuine need to impart information or represent the school or Pele Trust in the community. Offers to attend purely social or sporting functions should be accepted only when these are part of the life of the community and where the school or Pele Trust should be seen to be represented. In such cases they should be properly authorised by your Headteacher.

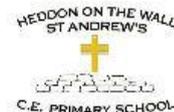
Headteachers should review and approve hospitality but also check at the same time that regular instances of hospitality with the same supplier are appropriate.

When hospitality has to be declined those making the offer should be courteously but firmly informed of the fact that people working in Pele Trust must be seen to be acting impartially and with integrity.

When receiving authorised hospitality you should be particularly sensitive as to its timing in relation to decisions which the school or Pele Trust may be taking affecting those providing the hospitality.

It is acceptable for you to accept hospitality through attendance at relevant conferences and courses when it is clear the hospitality is corporate rather than personal, where the Headteacher gives consent in advance and is satisfied that any purchasing decisions are not compromised. Where visits to inspect equipment etc., are required, you should ensure that the school meets the cost of such visits to avoid jeopardising the integrity of subsequent purchasing decisions.

A checklist is provided at Appendix A which can you use to help you decide whether or not it is appropriate to accept hospitality.



## Gifts

### General principles

The high standards of integrity applying to people employed in education, in particular, require that all staff provide an equally high standard of service to all service users, pupils, clients and contractors without fear or favour.

In other circumstances, in a climate where gifts are accepted, the general public and the givers of gifts can come to believe that the level of service provided could be influenced by gifts, whether or not this is true in practice. Therefore, neither you nor members of your family should accept significant personal gifts from service users, clients, pupils, contractors or outside suppliers, although the school has no objection to you keeping insignificant items of token value such as pens, diaries, etc., up to a value of £25. Gifts of greater value should be dealt with as set out below. Where a number of small gifts over a period of time amount to more than £25 collectively these should be declared.

A checklist is provided at Appendix A which can you use to help you decide whether or not it is appropriate to accept gifts.

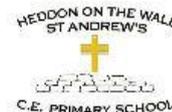
### Gifts from service users or clients

The aim must always be to refuse a gift politely and tactfully and to give a proper explanation of the reasons for the refusal. If it is clearly not going to be possible to do this without causing unnecessary distress or offence to the donor, try to make an opportunity to consult your line manager before accepting. If this is not possible, and you are quite sure that refusal would cause significant distress or offence, accept the gift but make an immediate written note of the details of the gift and the circumstances in which the gift was made and give that note to your line manager at the first available opportunity so the information can be formally recorded. It will be for the Headteacher to decide what should happen to the gift.

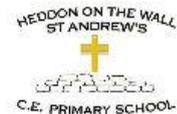
Occasionally a gift may simply be delivered and there may be a problem over returning it, for example, a hamper at Christmas. Should that happen, consult a senior leader about what to do. It may, for example, be acceptable to the donor for the gift to be raffled and the proceeds donated to charity. Whatever is done should be agreed with the Headteacher and the agreed course of action should be clearly documented.

### Gifts from pupils

It is recognised that pupils often give presents to members of staff, especially at Christmas, the end of trips or when a member of staff or class is leaving. The Code is not intended to prevent this happening. However, in the unlikely event of a member of staff receiving a substantial gift from an individual pupil (or



their parent/carer) at an unexpected time, it would be advisable for the member of staff to register the gift with their headteacher in accordance with the above guidance.



Registered address: Callerton Lane, Ponteland, Newcastle upon Tyne NE20 9EY. A charitable company limited by guarantee registered in England and Wales (company number: 11395017).

## Appendix A - Checklist for considering whether to accept a gift or hospitality

The question in all cases is one of judgement, and the following checklist of queries should help you to decide whether a gift or an offer of hospitality should be accepted or tactfully declined:

1. Is the value of the gift/hospitality £25 or over?
2. If under £25 is it intended as an inducement?
3. Is the extent of the hospitality, or nature of the gift reasonable and appropriate?
4. Does the donor have any form of contractual relationship with the school or Pele Trust, does it provide goods or services to the school or Trust of any kind?
5. Is the invitation/gift directed to a large group of unrelated individuals or open to the public, or have you been targeted because of your employment with the school and nature of your role?
6. What do you think is the motivation behind the invitation/gift?
7. For hospitality do you want to go and if so, why? Is it because there will be genuine benefits to the school in terms of networking and contacts gained? Or is a desire to go centred around personal enjoyment?
8. Would acceptance of the invitation be, in any way, inappropriate or place you under pressure in relation to any current or future matter involving the school or Trust?
9. For gifts is there a difficulty in returning the gift? If it would cause offence can the gift be given to charity or can you pay an equivalent price of the gift to charity?
  - a. If you decide to accept a gift over £25 you must register that 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.
  - b. You should consider carefully whether to register gifts and offers of gifts below £25 having regard to issues highlighted above

