



PETERBOROUGH KEYS ACADEMIES TRUST

CODE OF CONDUCT FOR ALL ADULTS

Version 3.0

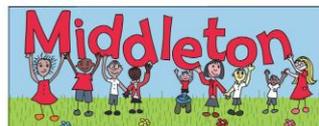
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I. Introduction

- I.1 This policy is managed and maintained by the Chief Operating Officer in conjunction with Trust Executive Leadership Group, and presented for final approval by Trustees at the first Trust Board Meeting of the Academic Year in line with the Scheme of Delegation section 4.19.
- I.2 For the purposes of this Code of Conduct (“the Code”) the term and references to ‘Adult’ means the following: Local Governing Body and Trust Members and Trustees, all teaching and other staff (whether or not paid or unpaid, employed or self-employed and whether or not employed directly by the Trust or its Schools), external contractors providing services to pupils on behalf of the Trust or its Schools, teacher trainees and other trainees/apprentices, volunteers and any other individuals who work for or provide services on behalf of or for the Trust or its Schools to include but not limited to all those detailed in each school’s single central record. For the purposes of this Code ‘young person/people’, ‘pupils’ and ‘child/ren’ includes all those for whom the Trust’s schools provide education or other services.
- I.3 This Code sets out the professional standards expected and the duty placed upon all adults to abide by it. All adults have a duty to keep pupils safe, promote their welfare and to protect them from sexual, physical and emotional harm. This duty is, in part, exercised through the development of respectful, caring and professional relationships between adults and pupils and behaviour by adults that demonstrate integrity, maturity and good judgement. Following this Code will help to safeguard all adults from being maliciously, falsely or mistakenly suspected or accused of misconduct in relation to pupils and the Required Professional Standards.
- I.4 All adults must feel able to raise issues of concern without delay and everyone must fully recognise their duty to do so particularly in terms of child protection. Adults have a duty to report any child protection or welfare concerns to the designated members of staff in school in line with the Peterborough Keys Academies Trust Child Protection & Safeguarding Policy. Anyone who has other concerns in the public interest must follow the Peterborough Keys Academies Trust Whistleblowing Policy which is available from the main office of any of the Trust’s Schools. An adult who, in good faith, “whistleblows” or makes a public interest disclosure will have the protection of the relevant legislation.
- I.5 This Code cannot provide an exhaustive list of what is, or is not, appropriate behaviour for adults. However, it does highlight behaviour that is illegal, inappropriate or inadvisable in relation to the Required Professional Standards. There will be occasions and circumstances in which adults have to make decisions or take action in the best interests of the pupil where no specific guidance has been given. Adults are expected to make responsible and informed judgements about their own behaviour in order to secure the best interests and welfare of the pupils

for which that individual is responsible. These judgements are expected to extend beyond the place of work.

1.6 Any member of staff who is found to have committed a breach of this Code will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. Each School's Local Governing Body, and the Board of Trustees, will take a strict approach to serious breaches of this Code. Where it is alleged that an adult has:

- (a) behaved in a way that has harmed a child, or may have harmed a child;
- (b) possibly committed a criminal offence against or related to a child; or,
- (c) behaved towards a child or children in a way that indicates s/he would pose a risk of harm to children;

then the Local Governing Body will follow the Trust's Statement of Procedures for Dealing with Allegations of Abuse Against Teachers and Other Staff and Volunteers, the Trust Whistleblowing Policy and the guidance set out in [Part Four of Keeping Children Safe in Education DfE September 2020](#). This may include, where appropriate, referring Governors, Members, Trustees, staff or volunteers to the Disclosure and Barring Service under the legal obligation placed on employers with management or control of regulated activity by The Safeguarding Vulnerable Groups Act 2006 (SVGA).

2. Expected Professional Standards

- 2.1 All adults as appropriate to the role and/or job description of the individual, must:
- (a) place the well-being and learning of pupils at the centre of their professional practice;
 - (b) have high expectations for all pupils, be committed to addressing underachievement, and work to help pupils progress regardless of their background and personal circumstances;
 - (c) treat pupils fairly and with respect, take their knowledge, views, opinions and feelings seriously, and value diversity and individuality;
 - (d) model the characteristics they are trying to inspire in pupils, including enthusiasm for learning, a spirit of enquiry, honesty, tolerance, social responsibility, patience, and a genuine concern for other people;
 - (e) respond sensitively to the differences in the home backgrounds and circumstances of pupils, recognising the key role that parents and carers play in pupils' education;

- (f) seek to work in partnership with parents and carers, respecting their views and promoting understanding and co-operation to support the young person's learning and well-being in and out of school;
- (g) reflect on their own practice, develop their skills, knowledge and expertise, and adapt appropriately to learn with and from colleagues;
- (h) ensure that the same professional standards are always applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity; and
- (i) ensure that they are aware of the core values, principles, aims and curriculum intents of the Trust and uphold these within their professional life.
- (j) Comply with Health & Safety arrangements, policies and procedures including risk assessments as defined in the Health & Safety at Work Act (1974).

- 2.2 Teachers are required to comply with the [Teachers' Standards](#), in particular Part 2 Personal and Professional Standards.
- 2.3 Teaching Assistants are required to comply with the [Teaching Assistants' Professional Standards](#) documentation published by leading education organisations in 2016.
- 2.4 All adults must be familiar with and act in accordance with [Part 1 of Keeping Children Safe in Education DfE September 2020](#). The DfE guidance should be read in conjunction with this Code and will be issued as an Appendix for hard copies and is also available on the DfE website for electronic access and reference.
- 2.5 All adults must further be familiar with and act in accordance with the most recent versions of the following documents: 'Working Together to Safeguard Children', *HM Government* (statutory); Prevent Duty Guidance, *HM Government* (statutory); 'The Prevent duty departmental advice for schools and childcare providers', *DfE*; and 'Guidance for safer working practice for those working with children and young people in education settings' (non-statutory).
- 2.6 An employee who fails to bring a matter of concern to the attention of senior management and/or the relevant agencies is likely to be subject to disciplinary action.

3. Confidentiality

- 3.1 As data controllers, all Schools are subject to the General Data Protection Regulation (GDPR) and Data Protection Act 2018 ("Data Protection Legislation"). In addition, teachers owe a common law duty of care to safeguard the welfare of their pupils. This

duty is acknowledged in the provisions governing disclosure of information about pupils.

- 3.2 Adults may have access to special category personal data about pupils and their families, which must be kept confidential at all times and only shared when legally permissible to do so and in the interests of the child. Records should only be shared with those who have a legitimate professional need to see them. In circumstances where special category personal data needs to be shared, the Data Protection Legislation contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent. In such cases, adults have a duty to pass the information on without delay to those with designated safeguarding responsibilities.
- 3.3 Confidential or personal information about a pupil or their family must never be disclosed to anyone other than on a need to know basis and advice should be sought prior to disclosure to ensure such disclosure is in accordance with the Data Protection Legislation, The Education (Pupil Information) Regulations 2005 (Maintained Schools), and the Trust's Privacy Notices. In circumstances where the pupil's identity does not need to be disclosed the information should be used anonymously. The information must never be used to intimidate, humiliate, or embarrass the pupil. The information must never be used by anyone for their own or others advantage (including that of partners, friends relatives or other organisations).
- 3.4 Confidential information about pupils must be held securely. Confidential information about pupils must not be held off the Trust's School sites other than on security protected Trust equipment. The information must only be stored for the length of time necessary to discharge the task for which it is required.
- 3.5 If a pupil or parent/carer makes a disclosure regarding abuse or neglect, the adult must follow the School's procedures and the guidance as set out in 'Keeping Children Safe in Education'. Confidentiality must not be promised to the pupil or parent/carer, however, reassurance should be given that the information will be treated sensitively.
- 3.6 If an adult is in any doubt about the storage or sharing of information they must seek guidance from the School's Designated Safeguarding Lead. Any media or legal enquiries must be passed to senior management.
- 3.7 Peterborough Keys Academies Trust has in place a GDPR Policy for further detailed information regarding data protection.

4. Propriety, Behaviour and Appearance

- 4.1 All adults working with children have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of pupils. They should

adopt high standards of personal conduct in order to maintain the confidence and respect of their colleagues, pupils and the public in general. An individual's behaviour or actions, either in or out of the workplace, should not compromise her/his position within the work setting or bring the school into disrepute. The misuse of drugs, alcohol or acts of violence would be examples of such behaviour.

- 4.2 Adults are required to notify the Trust immediately of any allegation/s of misconduct that are of a safeguarding nature made against them (or implicating them), by a child or adult in relation to any outside work or interest (whether paid or unpaid) and, of any arrest or criminal charge whether child related or not. Where employees fail to do so, this will be treated as a serious breach of this Code and dealt with under our Disciplinary Rules & Discipline Procedures for all Staff.
- 4.3 Individuals should not behave in a manner which would lead any reasonable person to question their suitability to work with children or to act as an appropriate role model; make, or encourage others to make sexual remarks to, or about, a pupil; use inappropriate language to or in the presence of pupils; discuss their personal or sexual relationships with or in the presence of pupils; make, or encourage others to make, unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such. Behaving in an unsuitable way towards children may result in disqualification from childcare under the Childcare Act 2006, prohibition from teaching by the TRA, a bar from engaging in regulated activity, or action by another relevant regulatory
- 4.4 A person's dress and appearance are matters of personal choice and self-expression. However, all adults must ensure they are dressed in ways which are appropriate to their role and not likely to be viewed as offensive, revealing or sexually provocative and specifically should not distract, cause embarrassment or give rise to misunderstanding, should be culturally sensitive and free of any political or otherwise contentious slogans, and not considered to be discriminatory. Those who dress or appear in a manner which may be considered as inappropriate could render themselves vulnerable to criticism or allegations of misconduct.
- 4.5 Personal property of a sexually explicit nature such as books, magazines, CDs, DVDs or such material on any electronic media must not be brought onto or stored on the school premises or on any school equipment.
- 4.6 It is expected that professionalism and confidentiality must be maintained when working alongside colleagues in school or within the wider Trust. Failure to do this may be deemed as bringing the Trust into disrepute and considered a disciplinary matter.

5. Sexual Contact with Children & Young People and Abuse of Trust

- 5.1 A relationship between an adult and a child or young person is not a relationship between equals; the adult has a position of power or influence. There is potential for exploitation and harm of children or vulnerable young people and all adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Adults must not use their status or position to form or promote relationships with children (whether current pupils or not), that are of a sexual nature, or which may become so. Adults should maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. They should report any incident with this potential.
- 5.2 Any sexual behaviour or activity, whether homosexual or heterosexual, by a member of staff, Governor, Member, Trustee or volunteer with or towards a child or young person is illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether there is consent or not. Where a person aged 18 or over is in a specified position of trust with a child or young person under 18 years, the Sexual Offences Act 2003 makes it an offence for that person to engage in sexual activity with or in the presence of that child or to cause or incite that child to engage in or watch sexual activity.
- 5.3 Sexual behaviour includes non-contact activities, such as causing a child or young person to engage in or watch sexual activity or the production of indecent images of children. 'Working Together to Safeguard Children', defines sexual abuse as "forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening...".
- 5.4 Adults must not have sexual relationships with pupils, have any form of communication with a child or young person which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, texts, electronic mail, phone calls, social networking contact or physical contact. The adult should not make sexual remarks to, or about, a child or young person or discuss their own sexual relationships with or in the presence of pupils. Adults should take care that their language or conduct does not give rise to comment or speculations. Attitudes, demeanour and language both spoken and written, all require care and thought.
- 5.5 There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child or young person, and manipulate that relationship so that sexual abuse can take place. Adults should be aware that conferring special attention without good reason or favouring a pupil has the potential to be construed as being part of a 'grooming' process, which is a criminal offence.

6. Infatuations and Crushes

- 6.1 A child or young person may develop an infatuation with an adult who works with them. An adult who becomes aware that a pupil may be infatuated with him/herself or a colleague, must report this without delay to a senior colleague so that appropriate action can be taken to avoid any hurt, distress or embarrassment. The situation will be taken seriously and the adult should be careful to ensure that no encouragement of any kind is given to the pupil. It should also be recognised that careless and insensitive reactions may provoke false accusations.
- 6.2 Examples of situations which must be reported without delay are given below:
- (a) Where a member of staff or volunteer is concerned that he or she might be developing a relationship with a pupil which could have the potential to represent an abuse of trust,
 - (b) Where an adult is concerned that a pupil is becoming attracted to him or her or that there is a developing attachment or dependency.
 - (c) Where an adult is concerned that actions or words have been misunderstood or misconstrued by a pupil such that an abuse of trust might be wrongly suspected by others.
 - (d) Where an adult is concerned about the apparent development of a relationship by another member of staff or volunteer, or receives information about such a relationship

7. Gifts, Rewards, Favouritism and Exclusion

- 7.1 It is against the law for public servants to take bribes. Adults need to take care that they do not accept any gift that might be construed by others as a bribe, or lead the giver to expect preferential treatment. There are occasions when pupils or parents wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you and this is acceptable. The Trust's school Hospitality Policies classify as acceptable receipt of a 'modest gift' although guidance from Her Majesty's Revenue and Customs defines as a 'trivial gift'. Therefore, for clarity, it is unacceptable to receive gifts on a regular basis or of any significant value. Should there be any doubt about the definitions of value or regularity senior management should be consulted before accepting any material gesture.
- 7.2 Personal gifts must not be given to pupils or their families/carers. This could be misinterpreted as a gesture either to bribe or groom. It might be perceived that a 'favour' of some kind is expected in return. Any reward given to a pupil should be consistent with the School's behaviour or rewards policy, recorded, and not based on favouritism.
- 7.3 Care should be taken when selecting children for specific activities, jobs, privileges and when pupils are excluded from an activity in order to avoid perceptions of favouritism

or injustice. Methods of selection and exclusion should be subject to clear, fair and agreed criteria.

8. Social Contact and Social Networking

- 8.1 Communication between pupils and adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, tablets, text messages, emails, instant messages, websites, social media such as Facebook, Twitter, Instagram, chat-rooms, forums, blogs, apps such as Whatsapp, gaming sites, digital cameras, videos, webcams and other handheld devices. Adults should not share any personal information with pupils and they should not request, or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role. They should ensure that all communications are transparent and avoid any communication that could be interpreted as 'grooming behaviour'.
- 8.2 All adults must not give their personal contact details such as home/mobile phone number; home or personal e-mail address or social networking details to pupils unless the need to do so is agreed in writing with senior management. If, for example, a pupil attempts to locate an adult's personal contact details and attempts to contact or correspond with them, the adult should not respond and must report the matter to their manager.
- 8.3 It is recommended that all adults ensure that all possible privacy settings are activated to prevent pupils from making contact on personal profiles and to prevent students from accessing photo albums or other personal information which may appear on social networking sites.
- 8.4 Adults must not have any pupils or any ex-pupils under the age of 18 as friends on their social networking sites. Adults are advised not to have any online friendships with any young people under the age of 18, unless they are family members or close family friends. Adults are strongly advised not to have online friendships with parents or carers of pupils, or members of the governing body/Board of Trustees. Where such on line friendships exist, adults must ensure that appropriate professional boundaries are maintained.
- 8.5 Adults are personally responsible for what they communicate in social media and must bear in mind that what is published might be read by colleagues, pupils, the general public, future employers and friends and family for a long time. Staff must ensure that their on-line profiles are consistent with the professional image expected by the Board of Trustees and should not post material which damages the reputation of the Trust or its schools or which causes concern about their suitability to work with children and young people. Those who post material which may be considered as inappropriate could render themselves vulnerable to criticism or

allegations of misconduct which may be dealt with under disciplinary procedures. Even where it is made clear that the writer's views on such topics do not represent those of the School or Trust, such comments are inappropriate.

- 8.6 Some employees may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the employee or seeks support outside of their professional role this should be discussed with senior management and, where necessary, referrals made to the appropriate support agency.

9. Physical Contact and Personal Privacy

- 9.1 There are occasions when it is entirely appropriate and proper for adults to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. When physical contact is made with pupils this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity, culture and background. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one pupil in one set of circumstances may be inappropriate in another, or with a different pupil.
- 9.2 Physical contact should never be secretive or casual, or for the gratification of the adult, or represent a misuse of authority. If an adult believes that an action could be misinterpreted, the incident and circumstances should be reported as soon as possible in the school's incident book, and, if appropriate, a copy placed on the pupil's file.
- 9.3 Physical contact, which occurs regularly with a pupil or pupils, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to pupils with SEN or physical disabilities). Any such contact should be the subject of an agreed and open school policy and subject to review. Where feasible, adults should seek the pupil's permission before initiating contact. Adults should listen, observe and take note of the pupil's reaction or feelings and – so far as is possible - use a level of contact which is acceptable to the pupil for the minimum time necessary.
- 9.4 There may be occasions when a distressed pupil needs comfort and reassurance. This may include age-appropriate physical contact. Adults should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation. Adults should always tell a colleague when and how they offered comfort to a distressed pupil.
- 9.5 Where an adult has a particular concern about the need to provide this type of care and reassurance s/he should seek further advice from a senior manager.

- 9.6 Some adults, for example, those who teach PE and games, or who provide music tuition will on occasions have to initiate physical contact with pupils in order to support a pupil so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Adults should remain sensitive to any discomfort expressed verbally or non-verbally by the pupil.
- 9.7 All parties should clearly understand from the outset what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers informed of the extent and nature of any physical contact may also prevent allegations of misconduct arising. Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to the senior manager and parent/carer.
- 9.8 Pupils are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard pupils, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the pupils concerned and sensitive to the potential for embarrassment. Adults who are required as part of their role to attend changing rooms should announce their intention of entering any pupil changing rooms and only remain in the room where the pupil/s needs require this.
- 9.9 Adults with a job description which includes intimate care duties will have appropriate training and written guidance. No other adult should be involved in intimate care duties except in an emergency.

Students with special needs – if students require assistance with toileting or assistance with changing e.g. swimming, staff should consider whether it would be possible to arrange for the presence of another adult in the vicinity. For students who are hearing impaired, touching is often an important means of communication. Those adults working closely with these students should ensure that where this happens it is not carried out in a manner which could be misconstrued.

Employees should not assist with personal or intimate care tasks which the pupil is able to undertake independently.

10. Behaviour Management and Physical Intervention

- 10.1 All pupils have a right to be treated with respect and dignity. Corporal punishment is unlawful in all schools. Adults must not use any form of degrading treatment to punish a pupil. The use of sarcasm, demeaning or insensitive comments towards

pupils is not acceptable in any situation. Deliberately intimidating pupils by shouting aggressively, hectoring or overbearing physical presence is not acceptable in any situation. Any sanctions or rewards used should be part of the school's Behaviour Management Policy.

- 10.2 Physical intervention can only be justified in exceptional circumstances. Adults may legitimately intervene to prevent a pupil from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline, however there is no compulsion to do so. Adults should have regard to the health and safety of themselves and others. Under no circumstances should physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence.
- 10.3 We at Peterborough Keys Academies Trust will do everything to avoid the use of any physical intervention or reasonable force and will use all other behaviour management techniques to diffuse a situation. There is no expectation that adults will physically intervene to diffuse a situation. Adults should read the appropriate sections of their school's Behaviour for Learning Policy.
- 10.4 All schools must have trained first aiders/appointed persons. Adults must have had the appropriate training before administering first aid or medication except in an emergency.

11. First Aid and Medication

- 11.1 Each School has a separate policy on supporting pupils with a medical condition. Employees should have regard to the statutory guidance 'Supporting pupils at school with medical conditions' DfE December 2015, which includes advice on managing medicines. All settings must have an adequate number of qualified first aiders/appointed persons. Employees must have had the appropriate training and achieved the necessary level of competency before administering first aid or medication or taking on the responsibility to support pupils with medical conditions. If an adult is concerned or uncertain about the amount or type of medication being given to a pupil this should be discussed with the Designated Safeguarding Lead.
- 11.2 Adults taking medication that may affect their ability to care for children should seek medical advice regarding their suitability to do so and should not work with pupils whilst taking medication unless medical advice confirms that they are able to do so. Adult medication on the premises must be securely stored out of the reach of children.

12. One to One Situations and Meetings with Pupils

- 12.1 One to one situations have the potential to make children/young people more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one to one settings with pupils may also be more vulnerable to unjust or unfounded allegations being made against them. Adults must recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure that the safety and security needs of both adults and pupils are met. Managers should undertake a risk assessment in relation to the specific nature and implications of one to one work for each worker and pupil. Where such a meeting is demonstrably unavoidable it is advisable to avoid remote or secluded areas of the schools and to ensure that the door of the room is left open and/or visual/auditory contact with others is maintained. Any arrangements should be reviewed on a regular basis.
- 12.2 Pre-arranged meetings with pupils away from school premises or on the school sites when the school is not in session are not permitted unless written approval is obtained from their parent/ guardian and the head teacher or other senior colleague with delegated authority.
- 12.3 No child or young person should be in or invited into, the home of an adult who works with them, unless the reason for this has been established and agreed with parents/carers and a senior manager/Head teacher.
- 12.4 Other than in an emergency, an adult must not enter a pupil's home if the parent/carer is absent. Always make detailed records including times of arrival and departure and ensure any behaviour or situation that gives rise to concern is discussed with a senior manager/Headteacher]. A risk assessment should be undertaken and appropriate risk management measures put in place prior to any planned home visit taking place. In the unlikely event that little or no information is available, home visits should not be made alone.

13. Transporting Pupils

- 13.1 In certain situations, e.g. out of school activities, adults may agree to transport pupils. Transport arrangements should be made in advance by a designated adult. Wherever possible and practicable transport should be provided other than in private vehicles, with at least one adult additional to the driver acting as an escort.
- 13.2 Adults should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They must ensure that the vehicle is roadworthy and appropriately insured and that the maximum capacity is not exceeded. It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. The driver should be aware of the current

legislation concerning the use of car seats for younger children where applicable. It is illegal to drive using hand-held phones or similar devices and the driver must ensure that they adhere to all driving regulations.

- 13.3 It is inappropriate for adults to offer lifts to a pupil outside their normal working duties, unless this has been brought to the attention of the line manager and has been agreed with parents/carers.
- 13.4 There may be occasions where a pupil requires transport in an emergency situation or where not to give a lift may place a pupil at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

14. Educational Visits and School Clubs

- 14.1 Adults should take particular care when supervising pupils in the less formal atmosphere of an educational visit, particularly in a residential setting, or after-school activity. Adults remain in a position of trust and the same standards of conduct apply. Please refer to the appropriate school's policy on educational visits and the Health and Safety policy.

15. Curriculum

- 15.1 Many areas of the curriculum can include or raise subject matter which is sexually explicit, or of an otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This plan should highlight particular areas of risk and sensitivity.
- 15.2 The curriculum can sometimes include or lead to an unplanned discussion about subject matter of a sexually explicit, political, cultural, religious or otherwise sensitive nature. Responding to pupils' questions can require careful judgement and adults must take guidance in these circumstances from the Designated Safeguarding Lead. Adults must not enter into or encourage inappropriate discussion about sexual, political or religious activity or behaviour or, discussions which may offend or harm others. Adults should take care to protect children from the risk of radicalisation and should act in accordance with advice given under Part 1 of Keeping Children Safe in Education DfE and accordingly must not express any prejudicial views or, attempt to influence or impose their personal values, attitudes or beliefs on pupils.
- 15.3 Further guidance is available in each School's policy on sex and relationships education (SRE) and, the policy on spiritual, moral, social and cultural development

(SMSC), which promotes fundamental British values. Care should be taken to comply with these policies and ensure they are consistently applied.

16. Photography, Videos and Other Creative Arts

- 16.1 Please refer to each school's guidance on the use of images and the consent forms therein. Adults should have regard to the ICO CCTV code of practice and the guidance 'Taking Photographs in Schools'.
- 16.2 Many school activities involve the taking or recording of images. This may be undertaken as part of the curriculum, extra school activities, for publicity, or to celebrate achievement. The Data Protection Act 1998 and GDPR 2018 affects the use of photography. An image of a child is personal data and it is, therefore, a requirement under the legislation that consent is obtained from the parent of a child before any images are made such as those used for school web sites, notice boards, productions or other purposes.
- 16.3 Adults need to be aware of the potential for such images to be misused to create indecent images of children and/or for 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken. There should be an agreement as to whether the images will be destroyed or retained for further use, where these will be stored and who will have access to them.
- 16.4 Adults should remain sensitive to any pupil who appears uncomfortable and should recognise the potential for misinterpretation. It is also important to take into account the wishes of the child, remembering that some children do not wish to have their photograph taken.
- 16.5 Adults may use equipment provided or authorised by the Trust's schools to make/take images for the purposes of justifiable school business. Such devices may, for convenience, include personal mobile telephones or any other similar devices. Adults should familiarise and be completely clear with their school's eSafety and Acceptable Use Policy for guidance on the protocols for the transference of these images to the school's network and deletion from source devices.
- 16.6 The following guidance must be followed:
- (a) If a photograph is used, avoid naming the pupil
 - (b) If the pupil is named, avoid using the photograph
 - (c) photographs/images must be securely stored and used only by those authorised to do so.
 - (d) be clear about the purpose of the activity and about what will happen to the photographs/images when the lesson/activity is concluded

- (e) ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose.
- (f) ensure that all photographs/images are available for scrutiny in order to screen for acceptability
- (g) be able to justify the photographs/images made
- (h) do not take images of pupils for personal use
- (i) do not take photographs in one to one situations.
- (j) be completely familiar with the register of parental consent. Failure to be aware of the register of consent, and/or taking, displaying or distributing photographs of pupils where there is not consent will be considered a breach of safeguarding duties.
- (k) Do not take images of pupils in a state of undress or semi-undress
- (l) Do not take images of pupils which could be considered as indecent or sexual
- (m) Do not take images of a child's injury, bruising or similar (e.g. following disclosure of abuse) even if requested by children's social care
- (n) Do not make audio recordings of a child's disclosure

16.7 Each school asks parents for consent and this information is held on the school Management Information System (MIS). This is SIMS.net in the case of secondaries, and Scholarpack in the case of primaries.

17. Unacceptable Use of ICT Facilities and Monitoring

17.1 Posting, creating, accessing, transmitting, downloading, uploading or storing any of the following material (unless it is part of an authorised investigation) is likely to amount to gross misconduct and result (where the adult is employed) in summary dismissal (this list is not exhaustive):

- (a) Pseudo-images of children (child abuse images), pornographic or sexually suggestive material or images of children or adults which may be construed as such in the circumstances (that is, writing, texting, pictures, films and video clips of a sexually explicit or arousing nature)
- (b) Any other type of offensive, obscene or discriminatory material, criminal material or material which is liable to cause distress or embarrassment to the School or others.

17.2 If indecent images of children are discovered at the premises or on the School's equipment/devices, an immediate referral should be made to the School's designated

Safeguarding Lead and Headteacher (unless they are implicated) and the external Designated Officer (DO) and, if relevant, the police contacted. The images/equipment should be secured, should not be used by others and should be isolated from the network. There should be no attempt to view, tamper with or delete the images as this could jeopardise any necessary criminal investigation. If the images are of children known to the School, a referral should also be made to children's social care in accordance with local arrangements.

- 17.3 The contents of our ICT resources and communications systems are our property. Therefore, adults should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post, conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on our electronic information and communications systems. We reserve the right to monitor, intercept and review, without prior notification or authorisation from adults. Usage of our IT resources and communications systems, including but not limited to telephone, e-mail, messaging, voicemail, CCTV, internet and social media postings and activities are monitored to ensure that our rules are being complied with and for the following purposes:
- (a) To monitor whether the use of the e-mail system or the internet is legitimate and in accordance with this Code
 - (b) To assist in the investigation of alleged wrongful acts
 - (c) To comply with any legal obligation
- 17.4 Personal data will be stored in accordance with the School's Privacy Notices. We may store copies of data or communications for a period of time after they are created, and may delete such copies from time to time without notice. If necessary information may be handed to the police in connection with a criminal investigation.
- 17.5 CCTV systems monitor the Trust's schools 24 hours a day. This data is recorded and may be used as evidence of any alleged wrongdoing.
- 17.6 Cyber-bullying can be experienced by adults as well as pupils. Adults should notify their line Manager if they are subject to cyber-bullying. The Trust will endeavour to protect adults and stop any inappropriate conduct.
- 17.7 Adults who have concerns about any alleged abuse or inappropriate use of ICT resources, virtual learning environments, camera/recording equipment, telephony, social networking sites, email or internet facilities or inappropriate communications, whether by pupils, parents, carers or staff, or others should alert the relevant eSafety Coordinator or Local Data Officer. Where a concern relates to the eSafety Coordinator, this should be reported to the Chief Operating Officer. If a matter concerns child protection it should also be reported to the Designated Child Protection Officer for the school.

- 17.8 Cyber-bullying can be experienced by adults as well as pupils. Adults should notify their line Manager if they are subject to cyber-bullying. The Trust will endeavour to protect adults and stop any inappropriate conduct.

18. Unacceptable Use of ICT Facilities and Monitoring

- 18.1 Posting, creating, accessing, transmitting, downloading, uploading or storing any of the following material (unless it is part of an authorised investigation), is likely to amount to gross misconduct and result in summary dismissal (this list is not exhaustive):
- (a) pornographic or sexually suggestive material or images of children or adults which may be construed as such in the circumstances (that is, writing, texting, pictures, films and video clips of a sexually explicit or arousing nature),
 - (b) Any other type of offensive, obscene or discriminatory material or criminal material or material which is liable to cause distress or embarrassment to the Trust, it's schools, or others.
- 18.2 The contents of our ICT resources and communications systems are our property. Therefore, adults should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post, conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on our electronic information and communications systems.
- 18.3 We reserve the right to monitor, intercept and review, without further notice, usage of our IT resources and communications systems, including but not limited to telephone, e-mail, messaging, voicemail, CCTV, internet and social media postings and activities, to ensure that our rules are being complied with and for the following purposes:
- (a) to monitor whether the use of the e-mail system or the internet is legitimate and in accordance with this Code:
 - (b) to assist in the investigation of alleged wrongful acts; or
 - (c) to comply with any legal obligation
- 18.4 Adults consent to monitoring by acknowledgement of this Code and the use of our resources and systems. We may store copies of data or communications for a period of time after they are created, and may delete such copies from time to time without notice. If necessary information may be handed to the police in connection with a criminal investigation.

- 18.5 CCTV systems monitor the Trust's Schools 24 hours a day. This data is recorded and may be used as evidence of any alleged wrongdoing.

19. Reporting Concerns and Incidents

- 19.1 All adults must report concerns and incidents in accordance with the guidance set out in [Keeping Children Safe in Education DfE September 2020](#), the Trust's Whistleblowing Policy and/or the managing allegations of abuse policy. In the event of an allegation being made, or incident being witnessed, the relevant information should be immediately recorded and reported to the Headteacher, Senior Manager or Designated Safeguarding Lead, as appropriate. An employee who fails to bring a matter of concern to the attention of senior management and/or the relevant agencies will be subject to disciplinary action.
- 19.2 In addition to behaviours outlined elsewhere in this Code and, the types of abuse and neglect set out in Keeping Children Safe in Education DfE, the following is a non-exhaustive list of some further behaviours which would be a cause for concern:

An adult who:

- (a) Allows a pupil/young person to be treated badly; pretends not to know it is happening
- (b) Gossips/shares information inappropriately
- (c) Demonstrates inappropriate discriminatory behaviour and/or uses inappropriate language
- (d) Dresses in a way which is inappropriate for the job role
- (e) Does not treat pupils fairly - demonstrates favouritism
- (f) Demonstrates a lack of understanding about personal and professional boundaries
- (g) Uses his/her position of trust to intimidate, threaten, coerce or undermine
- (h) Appears to have an inappropriate social relationship with a pupil or pupils
- (i) Appears to have special or different relationships with a pupil or pupils
- (j) Seems to seek out unnecessary opportunities to be alone with a pupil

20. Child Safeguarding Competencies

20.1 The following competencies are necessary for all adults who work with Children and Young People:

- (a) Emotional Awareness
 - (i) Aware of the range of emotions in self and others
 - (ii) Demonstrates empathy for the concerns of others
 - (iii) Listens to and understands directly and indirectly expressed feelings
 - (iv) Encourages others to express themselves openly
 - (v) Manages strong emotions and responds constructively to the source of problems
 - (vi) Listens to personal comments without becoming defensive
 - (vii) In highly stressful situations, keeps own feelings in check, takes constructive action and calms others down
 - (viii) Has a range of mechanisms for dealing with stress, can recognise when to use them and does so
 - (ix) Shows respect for others' feelings, views and circumstances.
- (b) Working within Professional Boundaries
 - (i) Demonstrates professional curiosity
 - (ii) Accepts responsibility and accountability for own work and can define the responsibilities of others
 - (iii) Recognises the limits of own authority within the role
 - (iv) Seeks and uses professional support appropriately
 - (v) Understands the principle of confidentiality.
- (c) Self-awareness
 - (i) Has a balanced understanding of self and others
 - (ii) Has a realistic knowledge of personal strengths and weaknesses
 - (iii) Can demonstrate flexibility of approach
 - (iv) Shows a realistic appreciation of the challenges of working with this client group.
- (d) Ability to Safeguard and promote the welfare of children and young people
 - (i) Appreciates the significance of safeguarding and interprets this accurately for all individual children and young people whatever their life circumstances

- (ii) Has a good understanding of the safeguarding agenda
- (iii) Can demonstrate how s/he has promoted 'best practice'
- (iv) Shows a personal commitment to safeguarding children
- (v) Reports any concerns without delay
- (vi) Attends training when arranged to refresh own understanding of the safeguarding agenda and the Trust's arrangements
- (vii) Maintains familiarity at all times of who to report concerns to and the methods for so doing.

21. Safeguarding and Prevent

- 21.1 Peterborough Keys Academies Trust will follow the procedures set out in Interagency Procedures produced by the Local Safeguarding Children's Board and the Local Authority Education Safeguarding Procedures.
- 21.2 Any adult who is concerned about a child or receives a disclosure of abuse, an allegation or suspects that abuse may have occurred **MUST** make an accurate record and report it immediately to the Designated Safeguarding Lead for the school. This information, wherever possible, should be recorded using the MyConcern electronic platform. Information recorded must include the name of the person who the referral relates to, what was said or seen, putting the event into context, providing the date, time and location. All records will be dated and logs updated to include the action taken. Information regarding concerns will be recorded on the same day and will include a clear, precise, factual account of observations or events.
- 21.3 If the safeguarding issue relates to holding extreme or radical views, also include the reference **PREVENT** within your communication.
- 21.4 All records should be given to the Designated Safeguarding Lead or Deputies promptly using the MyConcern platform wherever possible. Making a record should never delay referrals being made to the Designated Safeguarding Lead or appropriate authority.
- 21.5 All physical notes will be kept in a confidential file and stored securely, including those of any student who is being monitored for child protection reasons, even when there is no need to refer the matter to Children's Social Care immediately. MyConcern is a secure website that stores concerns confidentially in the cloud.
- 21.6 Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. Nationally, there have been occasions where extremist groups have attempted to radicalise vulnerable children and young people to hold extreme

views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

- 21.7 Whilst Peterborough Keys Academies Trust values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values, we also recognise that free speech is subject to laws and policies governing equality, human rights, community safety and community cohesion.
- 21.8 Peterborough Keys Academies Trust seeks to protect children and young people against the messages of all violent extremism and will view any attempt to manipulate the vulnerable in this way as a matter of safeguarding.
- 21.9 Each School's SPOC (Single Point of Contact) is the Lead for Safeguarding in relation to protecting individuals from radicalisation, sharing relevant information in a timely manner with the appropriate agency, including Channel.
- 21.10 Staff receive Child Protection, Code of Conduct and Prevent training. Below are two on-line links for further Prevent training. Should members of staff undertake this on-line training please give a copy of the certificate obtained to the appropriate colleague with responsibility in your school for maintaining training records.

http://course.ncalt.com/Channel_General_Awareness

<http://www.foundationonline.org.uk/>

22. Version History

22.1 Table of Versions

VERSION	ACTION	RESPONSIBLE	DATE
1.0	Concept of Trust Code of Conduct based on Jack Hunt v4.1 agreed at Trust PI Cttee	Pamela KILBEY	24/09/2018
1.0	Trust version adapted and drafted	Matthew DEERE	02/10/2018
2.0	Revised version drafted for 2019-20 and to Leadership Group 12 September 2019	Matthew DEERE	21/08/2019

2.1	Incorporated Company Secretary amends to Trustee and Governor Code of Conduct	Matthew DEERE	16/09/2019
3.0	Revised version drafted for 2019-20 incorporating agreed Governor / Trustee Code from Company Secretary and amending to match EPM CoC (last updated 2019)	Matthew DEERE	18/09/2020



PETERBOROUGH KEYS ACADEMIES TRUST

Code of Conduct for All Adults, Version 3.0

Dated – September 2020

Keeping Children Safe in Education, Part I

Dated – September 2020

Staff Agreement Form

User Signature

I have read and understood the Code of Conduct for All Adults, Version 3.0
September 2020 and Keeping Children Safe in Education, Part I, September 2020
and I agree to abide by them at all times.

Please sign below and return this page only to your school office or personnel
administrator.

Signature: _____ Date: _____

Print Name: _____

School: _____ Role: _____



PETERBOROUGH KEYS ACADEMIES TRUST

TRUSTEE and GOVERNOR CODE OF CONDUCT

Appendix 2 of the Code of Conduct for All Adults

Version 3.0

September 2020

Trustee Committee: PI Committee 28 September 2020

Reviewed by CEO and Co. Secretary: 11 September 2020

Date Policy Reviewed: September 2020

Date of Next Review: September 2021



The governing board has the following strategic functions:

Establishing the strategic direction, by:

- Setting and ensuring clarity of vision, values, and objectives for the school which align with the strategic direction, vision, values and objectives of the Trust.
- Agreeing the school improvement strategy with priorities and targets
- Meeting statutory duties

Ensuring accountability, by:

- Appointing the headteacher
- Monitoring the educational performance of the school and progress towards agreed targets
- Performance managing the headteacher
- Engaging with stakeholders
- Contributing to school self-evaluation

Overseeing financial performance, by:

- Setting the budget
- Monitoring spending against the budget
- Ensuring money is well spent and value for money is obtained
- Ensuring risks to the organisation are managed

Ensuring the voices of stakeholders are heard:

- Gathering the views of learners, parents and staff and reporting on the results.
- Reaching out to the school's and Trust's wider community and inviting them to play their part.
- Using the views of stakeholders to shape the school's and Trust's culture and the underpinning strategy, policies and procedures.

As individuals on the board we agree to:

Fulfil our role & responsibilities

1. We accept that our role is strategic and so will focus on our core functions rather than involve ourselves in day to day management.
2. We will develop, share and live the ethos and values of our Trust and its schools.
3. We agree to adhere to school/trust policies and procedures as set out by the relevant governing documents and law.
4. We will work collectively for the benefit of the Trust and its schools.

5. We will be candid but constructive and respectful when holding senior leaders to account.
6. We will consider how our decisions may affect the Trust's and its schools' and local community.
7. We will stand by the decisions that we make as a collective.
8. Where decisions and actions conflict with the Seven Principles of Public Life or may place pupils at risk, we will speak up and bring this to the attention of the relevant authorities.
9. We will only speak or act on behalf of the board if we have the authority to do so.
10. We will fulfil our responsibilities as a good employer, acting fairly and without prejudice.
11. When making or responding to complaints we will follow the established procedures.
12. We will strive to uphold the Trust's and school's reputation in our private communications (including on social media).

Demonstrate our commitment to the role

13. We will involve ourselves actively in the work of the board, and accept our fair share of responsibilities, serving on committees or working groups where required.
14. We will make every effort to attend all meetings and where we cannot attend explain in advance why we are unable to.
15. We will arrive at meetings prepared, having read all papers in advance, ready to make a positive contribution and observe protocol.
16. We will get to know the school/s well and respond to opportunities to involve ourselves in school activities.
17. We will visit the school/s and when doing so will make arrangements with relevant staff in advance and observe the Trust's Governor Visits Policy and reporting format.
18. When visiting the school in a personal capacity (i.e. as a parent or carer), we will continue to honour the commitments made in this code.
19. We will participate in induction training and take responsibility for developing our individual and collective skills and knowledge on an ongoing basis, in accordance with the expectations set out by the Trust Board.

Build and maintain relationships

20. We will develop effective working relationships with school leaders, staff, parents and other relevant stakeholders from our local community/ communities.

21. We will express views openly, courteously and respectfully in all our communications with governors, trustees and staff both inside and outside of meetings.
22. We will support the chair in their role of leading the board and ensuring appropriate conduct.

Respect confidentiality

23. We will observe complete confidentiality both inside and outside of school when matters are deemed confidential or where they concern individual staff, pupils or families.
24. We will not reveal the details of any governing board vote.
25. We will ensure all confidential papers are held and disposed of appropriately.
26. We will maintain confidentiality even after we leave office.

Declare conflicts of interest and be transparent

27. We will declare any business, personal or other interest that we have in connection with the board's business and these will be recorded in the Register of Business Interests.
28. We will also declare any conflict of loyalty at the start of any meeting should the need arise.
29. If a conflicted matter arises in a meeting, we will offer to leave the meeting for the duration of the discussion and any subsequent vote.
30. We accept that the Register of Business Interests will be published on the school/trust's website.
31. We will act in the best interests of the Trust and its schools and not as a representative of any group.
32. We accept that in the interests of open governance, our full names, date of appointment, terms of office, roles on the governing board, attendance records, relevant business and pecuniary interests, category of governor and the body responsible for appointing us will be published on the school's website.
33. We accept that information relating to board members will be collected and recorded on the DfE's national database of governors (Get information about schools), some of which will be publicly available.

Breach of this code of conduct

- If we believe this code has been breached, we will raise this issue with the chair of trustees who will investigate; trustees will only use suspension/removal as a last

resort after seeking to resolve any difficulties or disputes in more constructive ways.

- Failure to attend meetings without providing apologies which have been accepted by the board for a continuous period of six months will result in removal from board unless there are exceptional circumstances.
- Should it be the chair of trustees that we believe has breached this code, another trustee, such as the vice chair, will investigate.

Annex

The seven principles of public life

Originally published by the Nolan Committee: The Committee on Standards in Public Life was established by the then Prime Minister in October 1994, under the Chairmanship of Lord Nolan, to consider standards of conduct in various areas of public life, and to make recommendations)

Selflessness - Holders of public office should act solely in terms of the public interest.

Integrity - Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

Objectivity - Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

Accountability - Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

Openness - Holders of public office should 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.

Honesty – Holders of public office should be truthful

Leadership – Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

APPENDIX 3 – AGREEMENT FORM: GOVERNORS AND TRUSTEES



**PETERBOROUGH KEYS
ACADEMIES TRUST**

Code of Conduct for All Adults, Version 3.0

Dated – September 2020

Keeping Children Safe in Education, Part 1

Dated – September 2020

Trustee and Governor Code of Conduct, Version 3.0

Dated – September 2020

Trustee / Governor Agreement Form

User Signature

I have read and understood the Code of Conduct for All Adults Version 3.0 of September 2020, Keeping Children Safe in Education, Part 1, September 2020 and the Trustee and Governor Code of Conduct Version 3.0 of September 2020 and I agree to abide by them at all times.

Please sign below and return this page only to your Clerk to Governors / Trustees.

Signature: _____ Date: _____

Print Name: _____