



PETERBOROUGH KEYS ACADEMIES TRUST

CODE OF CONDUCT FOR ALL ADULTS

Version 2.1

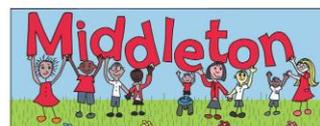
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I. Introduction

- I.1 This policy is managed and maintained by the Chief Operating Officer with ratification from the Trust Executive Leadership Group, and presented for final approval by Trustees at the first Trust Board Meeting of the Academic Year.
- 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 2019](#). 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.
- 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 2019](#). 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).

3. Confidentiality

- 3.1 As data controllers, all schools are subject to the Data Protection Act 1998 and the General Data Protection Regulations 2018. 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 confidential information about pupils in order to undertake their responsibilities. In some circumstances the information may be sensitive and/or confidential. Confidential or personal information about a pupil or her/his family must never be disclosed to anyone other than on a need to know basis. In circumstances where the pupil's identity does not need to be disclosed the information should be used anonymously. Information must never be used to intimidate, humiliate, or embarrass the pupil.
- 3.3 There are some circumstances in which an adult may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such

cases, individuals have a duty to pass information on without delay to those with designated pupil protection responsibilities.

- 3.4 Confidential information about pupils must be held securely. Confidential information about pupils must not be held off any school site other than on security protected school equipment. Information must only be stored for the length of time necessary to discharge the task for which it is required.
- 3.5 If an adult is in any doubt about the storage or sharing of information s/he must seek guidance from a senior member of staff, or the Local Data Officer within their school. Any media or legal enquiries must be passed to senior management.
- 3.6 All adults must exercise great care when communicating via any means regarding the personal information of staff and students to avoid any data loss. Such data incidents, where breaches occur or have the potential to occur, will be investigated and disciplinary action may occur. Any individual involved in a potential data incident must report the matter without delay. It is important to make notes of the circumstances, the individuals involved, the possible data that has been compromised and other key data as the incident may be reportable to the Information Commissioner's Office.
- 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. There is potential for exploitation and harm of vulnerable young people. Adults should maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. They should report any incident with this potential without delay.
- 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

- 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. This could be misinterpreted as a gesture either to bribe, or single out the young person. 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.

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, text messaging, emails, social media including but not limited to Twitter, Instagram, Snapchat and Facebook, Instant Messaging (IM) platforms including but not limited to Whatsapp and Facebook Messenger, digital cameras, videos, web-cams, websites and blogs. Adults should not share any personal information with pupils. 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. If a pupil seeks to establish social contact, or if this occurs coincidentally, the adult should exercise his or her professional judgment in making a response and should ensure that all communications are transparent and open to scrutiny.
- 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.
- 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.

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.
- 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 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.
- 9.8 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.

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. One to One Situations and Meetings with Pupils

- 11.1 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.
- 11.2 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.

- 11.3 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. Transporting Pupils

- 12.1 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.
- 12.2 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.
- 12.3 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.
- 12.4 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.

13. Educational Visits and School Clubs

- 13.1 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.

14. Curriculum

- 14.1 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.
- 14.2 The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit or otherwise sensitive nature. Responding to pupils'

questions can require careful judgement and adults must take guidance in these circumstances from a senior member of staff. Adults must not enter into or encourage inappropriate discussion about sexual activity or behaviour. Please refer to each school's Sex and Relationship Education Policy.

15. Photography, Videos and Other Creative Arts

- 15.1 Please refer to each school's guidance on the use of images and the consent forms therein.
- 15.2 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.
- 15.3 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.
- 15.4 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.
- 15.5 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.
- 15.6 The following guidance must be followed:
 - (a) photographs/images must be securely stored and used only by those authorised to do so.
 - (b) be clear about the purpose of the activity and about what will happen to the photographs/images when the lesson/activity is concluded
 - (c) ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose.

- (d) ensure that all photographs/images are available for scrutiny in order to screen for acceptability
- (e) be able to justify the photographs/images made
- (f) do not take photographs in one to one situations
- (g) 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.

15.7 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.

16. Whistleblowing and Cyber-Bullying

16.1 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.

16.2 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. 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 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.

17.2 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.

17.3 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

17.4 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.

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.

18. Reporting Concerns and Incidents

18.1 All adults must report concerns and incidents in accordance with the guidance set out in [Keeping Children Safe in Education DfE September 2019](#), the Trust's Whistleblowing Policy and/or the managing allegations of abuse policy. The following is a non-exhaustive list of behaviours which would be a cause for concern:

18.2 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

19. Child Safeguarding Competencies

19.1 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.

20. Safeguarding and Prevent

20.1 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.

20.2 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.

- 20.3 If the safeguarding issue relates to holding extreme or radical views, also include the reference PREVENT within your communication.
- 20.4 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.
- 20.5 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.
- 20.6 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.
- 20.7 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.
- 20.8 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.
- 20.9 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.
- 20.10 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/>

21. Version History

- 21.1 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



PETERBOROUGH KEYS ACADEMIES TRUST

Code of Conduct for All Adults, Version 2.1

Dated – September 2019

Keeping Children Safe in Education, Part 1

Dated – September 2019

Staff Agreement Form

User Signature

I have read and understood the Code of Conduct for All Adults, Version 2.1
September 2019 and Keeping Children Safe in Education, Part 1, September 2019
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 2.0

September 2019

Trustee Committee: PI Cttee 30 September 2019

Reviewed by CEO and Co Sec: 6 September 2019

Date Policy Reviewed: September 2019

Date of Next Review: September 2020



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

The Trust recognises the following as the fourth core function of governance:

- Gathering the views of pupils, 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 the following:

Role & Responsibilities

- We understand the purpose of the board and its strategic role.

- We understand how the role of the board differs from and works with others including the headteacher and where appropriate, executive leaders, the Trust Board and Local Governing Bodies.
- We accept that we have no legal authority to act individually, except when the board has given us delegated authority to do so, and therefore we will only speak on behalf of the governing board when we have been specifically authorised to do so.
- We accept collective responsibility for all decisions made by the board or its delegated agents. This means that we will not speak against majority decisions outside the governing board meeting.
- We have a duty to act fairly and without prejudice, and in so far as we have responsibility for staff, we will fulfil all that is expected of a good employer.
- We will encourage open governance and will act appropriately.
- We will consider carefully how our decisions may affect the community and other schools.
- We will always be mindful of our responsibility to maintain and develop the ethos and reputation of our school and Trust. Our actions within the school / Trust and the local community will reflect this.
- In making or responding to criticism or complaints we will follow the procedures established by the governing board.
- We will actively support and challenge the executive leaders.
- We will accept and respect the difference in roles between the board and staff, ensuring that we work collectively for the benefit of the organisation.
- We will respect the role of the executive leaders and their responsibility for the day to day management of the organisation and avoid any actions that might undermine such arrangements.
- We agree to adhere to the Trust's and school's rules and policies and the procedures of the governing board as set out by the relevant governing documents and law.
- When formally speaking or writing in our governing role we will ensure our comments reflect current organisational policy even if they might be different to our personal views
- When communicating in our private capacity (including on social media) we will be mindful of and strive to uphold the reputation of the organisation.
- We will avoid, as far as possible, becoming involved in any communication which may lead to a conflict of interest with the role of the governing board.

Commitment

- We acknowledge that accepting office as a governor/trustee/academy committee member involves the commitment of significant amounts of time and energy.

- We will each involve ourselves actively in the work of the governing board, and accept our fair share of responsibilities, including service on committees or working groups.
- We will make full efforts to attend all meetings and where we cannot attend explain in advance why we are unable to.
- We will get to know the school/s well and respond to opportunities to involve ourselves in school activities.
- We will visit the school/s, with all visits arranged in advance with the headteacher and undertaken within the framework established by the governing board.
- When visiting the school in a personal capacity (i.e. as a parent or carer), we will maintain our underlying responsibility as a governor/trustee/academy committee member.
- We will consider seriously our individual and collective needs for induction, training and development, and will undertake relevant training.
- 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.
- In the interests of transparency we accept that information relating to governors/trustees/academy committee members will be collected and logged on the DfE's national database of governors (Get information about schools).

Relationships

- We will strive to work as a team in which constructive working relationships are actively promoted.
- We will express views openly, courteously and respectfully in all our communications with other governors/trustees/academy committee members, the clerk to the governing board and school staff both in and outside of meetings.
- We will support the chair in their role of ensuring appropriate conduct both at meetings and at all times.
- We will confront malpractice by speaking up against and bringing to the attention of the relevant authorities' any decisions and actions that conflict with the Seven Principles of Public Life (see annex) or which may place pupils at risk.
- We are prepared to answer queries from other board members in relation to delegated functions and take into account any concerns expressed, and we will acknowledge the time, effort and skills that have been committed to the delegated function by those involved.
- We will seek to develop effective working relationships with the executive leaders, staff and parents, the trust, the local authority and other relevant agencies and the community.

Confidentiality

- We will observe complete confidentiality when matters are deemed confidential or where they concern specific members of staff or pupils, both inside or outside school.
- We will exercise the greatest prudence at all times when discussions regarding school/Trust business arise outside a governing board meeting.
- We will not reveal the details of any governing board vote.
- We will ensure all confidential papers are held and disposed of appropriately.

Conflicts of interest

- We will record any pecuniary or other business interest (including those related to people we are connected with) that we have in connection with the governing board's business in the Register of Business Interests, and if any such conflicted matter arises in a meeting we will offer to leave the meeting for the appropriate length of time.
- We accept that the Register of Business Interests will be published on the school/Trust's website.
- We will also declare any conflict of loyalty at the start of any meeting should the situation arise.
- We will act in the best interests of the school as a whole and not as a representative of any group, even if elected to the governing board.

Ceasing to be a governor/trustee/academy committee member

- We understand that the requirements relating to confidentiality will continue to apply after a governor/trustee/academy committee member leaves office

Breach of this code of conduct

- If we believe this code has been breached, we will raise this issue with the chair and the chair will investigate; the governing board will only use suspension/removal as a last resort after seeking to resolve any difficulties or disputes in more constructive ways.
- Should it be the chair that we believe has breached this code, another governing board member, 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.

The Framework for Ethical Leadership in Education

The Ethical Leadership Commission has developed the following Framework for Ethical Leadership to help school leaders take difficult decisions. As important as the language is, these aren't just fine words, they are meant to support a culture in which ethical decision making can flourish.

1. Selflessness School and college leaders should act solely in the interest of children and young people.
2. Integrity School and college leaders must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. Before acting and taking decisions, they must declare and resolve openly any perceived conflict of interest and relationships.
3. Objectivity School and college leaders must act and take decisions impartially and fairly, using the best evidence and without discrimination or bias. Leaders should be dispassionate, exercising judgement and analysis for the good of children and young people.
4. Accountability School and college leaders are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
5. Openness School and college leaders should expect to act and take decisions in an open and transparent manner. Information should not be withheld from scrutiny unless there are clear and lawful reasons for so doing.
6. Honesty School and college leaders should be truthful.
7. Leadership School and college leaders 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. Leaders include both those who are paid to lead schools and colleges and those who volunteer to govern them.

Schools and colleges serve children and young people and help them grow into fulfilled and valued citizens. As role models for the young, how we behave as leaders is as important as what we do. Leaders should show leadership through the following personal characteristics or virtues:

- a. **Trust:** *leaders are trustworthy and reliable*
We hold trust on behalf of children and should be beyond reproach.
We are honest about our motivations.
- b. **Wisdom:** *leaders use experience, knowledge and insight*
We demonstrate moderation and self-awareness. We act calmly and rationally. We serve our schools and colleges with propriety and good sense.
- c. **Kindness:** *leaders demonstrate respect, generosity of spirit, understanding and good temper*
We give difficult messages humanely where conflict is unavoidable.

- d. **Justice:** *leaders are fair and work for the good of all children*
We seek to enable all young people to lead useful, happy and fulfilling lives.

- e. **Service:** *leaders are conscientious and dutiful*
We demonstrate humility and self-control, supporting the structures, conventions and rules which safeguard quality. Our actions protect high-quality education.
- f. **Courage:** *leaders work courageously in the best interests of children and young people*
We protect their safety and their right to a broad, effective and creative education. We hold one another to account courageously.
- g. **Optimism:** *leaders are positive and encouraging*
Despite difficulties and pressures, we are developing excellent education to change the world for the better.



PETERBOROUGH KEYS ACADEMIES TRUST

Code of Conduct for All Adults, Version 2.1

Dated – September 2019

Keeping Children Safe in Education, Part 1

Dated – September 2019

Trustee and Governor Code of Conduct, Version 2.0

Dated – September 2019

Trustee / Governor Agreement Form

User Signature

I have read and understood the Code of Conduct for All Adults Version 2.1 of September 2019, Keeping Children Safe in Education, Part 1, September 2019 and the Trustee and Governor Code of Conduct Version 2.0 of September 2019 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: _____