KEYS
Academy Trust

TKAT Code of Conduct for Staff

KEYS Academy Trust
Unlocking the future

Version control summary and overview details

TKAT Statutory Policy • All schools require a policy on this area. • There should be no changes to the core text. • LGBs will minute that they have noted Trust approval and will adopt the policy effective immediately. • This is a Trust policy to be implemented by all schools within The Keys Academy Trust to ensure a consistent approach for all.
Version control Version 2 • No changes from 2025 approved policy.

Reviewed by (Trust Officer)	Hester Wooller, CEO
Approved by TKAT Trustee Committee:	FAPPP
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TKAT vision
We are a family of distinctive schools at the heart of the diverse communities we serve. In line with our Christian ethos, we aspire to excellent learning and pastoral care for pupils and staff and are committed to being open and welcoming to all.

Key areas of note
Please note the following, which will be applicable throughout the policy:

- Any reference to 'headteacher' should read as whatever title is relevant to the school using the policy (i.e. Executive Headteacher/Head of School or Headteacher). Anything else will be explicitly referenced within the policy.
- Any reference to 'everyone' to staff, trustees, local governors and pupils.
- Any reference to 'we' should be read as The Keys Academy Trust.
- Any reference to 'parents' should be read as 'parents, carers and guardians'.

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1. Purpose

1.1 The aim of this Code of Conduct for employees is to set out the standards of conduct expected of all staff and to provide further information for employees. This should be read in conjunction with our Disciplinary Policy, Teachers' Standards and the statutory guidance for Keeping Children Safe in Education.

1.2 This Code should make it clear to employees the expectations the school/The Keys Academy Trust (TKAT) has of them. Employees should note that this Code is not exhaustive in defining acceptable and unacceptable standards of conduct; employees must use common sense in adhering to the underpinning principles. If any employee is ever unsure what the expectations are in any given circumstance, they should speak to their line manager.

1.3 This Code does not form part of any employee's contract of employment; therefore, it may be amended at any time and be expected to be adhered to.

2. Scope

2.1 The Code applies to all employees, regardless of length of service (including those in their probationary period). It also applies to consultants, contractors, casual and agency staff, and volunteers (collectively referred to as staff in this policy although, unlike employees, breaches of the Code will not be managed through the disciplinary procedure).

2.2 As recognisable figures in the local community, the behaviour and conduct of staff of the school/TKAT outside of work can impact on their employment. Therefore, conduct outside work may be treated as a disciplinary matter if it is considered that it is relevant to the employee's employment (see Disciplinary Policy).

3. Safeguarding and promoting the welfare of children and recognising low level concerns

3.1 All employees are responsible for safeguarding children and promoting their welfare. This means that employees are required to take action to protect children from maltreatment, prevent impairment of children's health or development and ensure that children grow up in circumstances consistent with the provision of safe and effective care. This will enable all children to have the best outcomes.

3.2 All employees should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

3.3 All employees must be aware of the signs of abuse and neglect and know what action to take if these are identified.

3.4 All employees must be aware of low-level concerns, no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’. A low-level concern is a concern that an adult working in or on behalf of the school/TKAT may have acted in one of the folllowing ways:

a) Behaviour is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and

b) Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO).

3.5 Examples of such behaviour could include, but is not limited to, the following:

- Being over friendly with children;
- Having favourites;
- Taking photographs of children on their mobile phone;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- Humiliating children.

3.6 Employees must have fully read and understood our Child Protection and Safeguarding Policy, be aware of our systems for keeping children safe and must follow the guidance in these policies at all times.

3.7 All employees must cooperate with colleagues and with external agencies where necessary.

4. Duty of care

4.1 Staff must ensure the following:

- Understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached.
- Always act, and be seen to act, in our students' best interests.
- Avoid any conduct which would lead any reasonable person to question their motivation and/or intentions.
- Avoid any conduct that could amount to discrimination or harassment.
- Ensure their actions are warranted, proportionate, safe and applied equitably.
- Take responsibility for their own actions and behaviour.

5. Health and safety

5.1 All employees must ensure the following, with regard to health and safety:

a) Familiarise themselves with the Health and Safety statement produced by TKAT.
b) Read and understand the school/TKAT's Health and Safety Policy.
c) Comply with Health and Safety Regulations or instructions and use any safety equipment and protective clothing which is supplied to you by the school/TKAT.
d) Comply with any hygiene requirements.
e) Comply with any accident reporting requirements.
f) Never act in a way which might cause risk or damage to any other members of the school/TKAT community or visitors.
g) Inform their line manager of any paid work undertaken elsewhere. This is to comply with the Working Time Regulations, which are a Health and Safety initiative.

6. Honesty and personal integrity

6.1 Employees are expected to demonstrate consistently high standards of personal and professional conduct. The following statements define the behaviour and attitudes which set the required standard for conduct in TKAT.

6.2 Employees must comply with any lawful or reasonable instructions issued by managers or governors.

6.3 Employees uphold public trust in our school/TKAT and maintain high standards of ethics and behaviour, within and outside school, by:

6.3.1 Treating students with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to their professional position;

6.3.2 Having regard for the need to safeguard students' well-being, in accordance with statutory provisions;

a) Showing tolerance of and respect for the rights of others;
b) Not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs; and
c) Ensuring that personal beliefs are not expressed in ways which exploit students' vulnerability or might lead them to break the law.

6.4 Employees must have proper and professional regard for the ethos, policies and practices of our school/TKAT and maintain high standards in their own attendance and punctuality. Employees must treat all colleagues with respect, dignity, fairness and courtesy at all times.

6.5 Staff must maintain high standards of honesty and integrity in their work. This includes the handling and claiming of money and the use of school/TKAT property and facilities.

7. Tackling discrimination and harassment

7.1 Employees are required to understand the types of discrimination, harassment and bullying that students and colleagues may be subject to. Employees are required to have read and understood our Equality, Diversity and Inclusion policy, Dignity at Work policy and Preventing Sexual Harassment at Work policy.

7.2 The law protects employees, workers, contractors, self-employed staff, apprentices, those undertaking vocational training, volunteers, former workers and job applicants from sexual harassment and TKAT has a duty to take reasonable steps to prevent sexual harassment of its staff at work.

7.3 Examples of sexual harassment include, but are not limited to the following:

- Flirting, gesturing, making sexual remarks about someone's appearance in any means of communication.
- Asking question about someone's sex life.
- Telling sexually offensive jokes/pranks and or sharing pornographic or sexual images.
- Unwanted touching, kissing or assault.

7.4 To report an incident of sexual harassment or to raise a concern contact your line manager/Head teacher. Please refer to the Preventing Sexual Harassment at Work policy for details of how TKAT responds to a report of sexual harassment.

7.5 Employees must not ignore any form of discrimination or harassment. Employees must positively promote equality and diversity and inclusion at all times and not display any behaviour that constitutes any form of discrimination, bullying or harassment.

8. Professional boundaries and relationships

8.1 Employees in TKAT are in a position of trust in relation to our students which means that the relationship between an employee and a student is not one of equals. It is a specific offence for a person aged 18 or over (e.g., teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual.

8.2 Employees must ensure that they avoid behaviour which might be misinterpreted by others. This includes any type of communication that they may have with students.

8.3 Employees must not make sexual remarks to any student or discuss their own sexual relationships with, or in the presence of students. Employees must not discuss a student's sexual relationships in inappropriate settings or contexts. Any sexual behaviour by a member of staff towards any student is unacceptable and illegal.

8.4 Employees must ensure that professional boundaries are maintained at all times. This means that employees should not show favouritism to any student and should not allow students to engage in any type of behaviour that could be seen to be inappropriate. Students are not employees' friends and should not be treated as such.

8.5 Employees should be aware that it is not uncommon for students to become strongly attracted to a member of staff or to develop an infatuation. If any member of staff becomes aware of an infatuation they should discuss it with their line manager immediately so that they can receive support on the most appropriate way to manage the situation.

8.6 For employees who are in a relationship with a colleague, parent or carer, or any other person associated with the TKAT we expect that they identify this to the Headteacher and ensure that this does not create a conflict of interest or affect their professional judgement or responsibilities in any way. Where an employee has managerial authority over another employee with whom they are in a close personal relationship, the school/TKAT reserves the right to transfer one or both employees to another role in the school/TKAT following appropriate consultation with both employees in order to seek agreement to the transfer.

9. Confidentiality and data protection

9.1 Members of staff may have access to confidential information about students, colleagues or other matters relating to the school/TKAT. This could include personal and sensitive data, for example information about a student's home life. Employees should never use this information to their own personal advantage, or to humiliate, intimidate or embarrass others. Employees should never disclose this information unless this is in the proper circumstances and with the proper authority.

9.2 If an employee is ever in doubt about what information can or can't be disclosed they should speak to their line manager.

9.3 We will comply with the requirements of Data Protection Legislation (being the UK General Data Protection Regulation and Data Protection Act 2018) and any implementing laws, regulations and secondary legislation, as amended or updated from time to time. Employees are expected to comply with the school/TKAT's systems as set out in our Data Protection Policy. If any employee becomes aware that data is at risk of compromise or loss or has been compromised or lost they must report it immediately to the Data Protection Officer, in order (where applicable) for relevant breaches to be reported to the Information Commissioners Office within 72 hours.

9.4 Employees must read and understand our Data Protection Policy and other relevant policies including in relation to criminal records information, recruitment and safer recruitment, internet, email and communications and information security.

10. Physical contact with students

10.1 There are occasions when it is entirely appropriate and proper for staff to have physical contact with students. Employees must ensure that they only do so in ways that are appropriate to their professional role and in response to the student's needs at the time. This should be of limited duration and appropriate to the age, stage of development, gender and background of the student. Employees should always be able to explain why they have made physical contact with a student.

10.2 There may also be occasions where a student is in distress and needs comfort and reassurance which may include age appropriate physical contact. If an employee is in this position then they should consider the way in which they offer comfort, ensuring that it is not open to misinterpretation and is always reported to their line manager.

10.3 Staff may legally physically intervene with students to prevent them from committing a crime, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Physical force should never be used as a form of punishment.

10.4 Sexual contact, including grooming patterns of behaviour, with students is unlawful and unacceptable in all circumstances.

11. Behaviour management

11.1 Employees should not use any form of degrading or humiliating treatment to punish a student. The use of sarcasm, demeaning or insensitive comments towards students is completely unacceptable.

11.2 Where students display difficult or challenging behaviour, employees should follow the school's Behaviour Policy using strategies appropriate to the circumstance and situation.

12. Social contact with students

12.1 Employees should not establish or seek to establish social contact, via any channels (including social media), with students for the purposes of securing a friendship or to pursue or strengthen a relationship. Employees should use their work provided equipment only for communicating electronically with students. If there are any circumstances in which an employee has had to provide their personal contact details, including phone numbers, email address etc, to any student then they should report this to their line manager.

12.2 TKAT's advice to staff is not to connect to students via social media or other communication channels unless this is for professional purposes and that the employee can demonstrate that this is the case.

12.3 Our school/TKAT is part of our community and we recognise that, as members of the community, employees will come into contact with students outside of the school. We expect staff to use their professional judgement in such situations and to report to their line manager any contact that they have had with a student, outside of school, that they are concerned about or that could be misinterpreted by others.

13. Acceptable use of technology

13.1 Staff should only use ICT systems and resources (email and phone) for school/TKAT business or only in line with what is allowed. Employees should read and understand our Online Safety policy.

13.2 Staff must not post disparaging or defamatory statements about our school/TKAT, our students or their parents or carers; our governors or staff; suppliers and vendors; and other affiliates and stakeholders. Staff should avoid social media communications that might be misconstrued in a way that could damage our school/TKAT's reputation, even indirectly.

13.3 Many educational activities involve recording images. These may be undertaken for displays, publicity, to celebrate achievement and to provide records of evidence of the activity. Under no circumstances should employees use their personal equipment to take images of students at or on behalf of the school/TKAT.

14. Personal phones, tablets and other devices

14.1 Staff must not use personal electronic communication devices such as mobile phones or iPads as cameras in school. Any photographs/video footage must be taken using school equipment. Staff must only save images on school IT hardware/computers.

14.2 Staff who are in contact with pupils should not use personal mobile phones in school during their directed/paid hours of employment unless there are exceptional circumstances and they have requested and been given explicit permission to do so by the Headteacher. Outside of these times, mobile phones should only be used in areas of the school where pupils are not present.

15. Alcohol and substance misuse

15.1 Staff are expected to arrive at work fit to carry out their job and to be able to perform their duties safely without any limitations due to the use or after effects of alcohol or drugs. In this policy drug use includes the use of controlled drugs, psychoactive (or mind-altering) substances formerly known as "legal highs", and the misuse of prescribed or over-the-counter medication.

15.2 Alcohol and drug-related problems may develop for a variety of reasons and over a considerable period of time. Therefore, the school/TKAT will seek, where appropriate, to treat these problems in a similar way to other health issues. Support may be provided at this point, in order to aid a full recovery, allowing a return to work/effective performance and the full range of duties.

16. Working one-to-one with students

16.1 There will be times where an employee is working one to one with a student and this is acceptable. Employees need to understand that this means that they may be more vulnerable to allegations being made against them. Therefore, it is important that employees ensure the following:

a) Avoid meeting on a one to one basis in secluded areas of the school.
b) Ensure that the door to the room is open or that there is visual access into the room.
c) Inform a colleague or line manager of the meeting, preferably beforehand.
d) Report to their line manager if the student becomes distressed or angry.

17. Curriculum

17.1 Many areas of the curriculum can include or raise subject matter which is sexually explicit or of a political or 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 can be supported by developing ground rules with students to ensure sensitive topics can be discussed in a safe learning environment. This plan should highlight particular areas of risk and sensitivity and care should especially be taken in those

areas of the curriculum where usual boundaries or rules are less rigorously applied e.g. PSHE.

17.2 The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit, political or otherwise sensitive nature. Responding to children's questions requires careful judgement and employees should take guidance in these circumstances from the Designated Safeguarding Lead.

18. Dress and appearance

18.1 Working in TKAT employees are role models to our students and how they present themselves is important. Our expectation is that staff are decently, appropriately and professionally dressed in work at all times. We do not permit the wearing of clothes that are revealing, allow underwear to be seen, have offensive logos or writing, or are ripped or torn at any times. If an employee is unsure whether any item of clothing is inappropriate then they should not wear it to work. Employees can always speak to their line manager if they are unsure. Where we identify that an employee is wearing clothing that we do not find acceptable, they will be informed.

19. Gifts and hospitality

19.1 TKAT has a Gifts and Hospitality policy and employees should read and adhere to this. Staff should not give gifts to students unless this is part of a recognised practice in line with the school's Behaviour Policy.

20. Keeping within the law

20.1 Staff are expected to operate within the law. Unlawful or criminal behaviour, at work or outside work, may lead to disciplinary action, including dismissal, being taken. However, being investigated by the police, receiving a caution or being charged will not automatically mean that an employee's employment is at risk.

20.2 Employees must ensure the following:

20.2.1 They uphold the law at work

20.2.2 They never commit a crime away from work which could damage public confidence in them or the school/TKAT, or which makes them unsuitable for the work they do. This includes, for example:

a) Submitting false or fraudulent claims to public bodies (for example, income support, housing or other benefit claims).
b) Breaching copyright on computer software or published documents.
c) Sexual offences which will render them unfit to work with children or vulnerable adults.
d) Crimes of dishonesty which render them unfit to hold a position of trust.

20.2.3 Write and tell the Headteacher (Chair of Governors if they are the Headteacher) immediately if they are questioned by the police, charged with, or convicted of, any crime whilst they are employed at the school/TKAT (this includes outside of their working hours). The Headteacher and/or governors will then need to consider whether this charge or conviction damages public confidence in the school/TKAT or makes the employee unsuitable to carry out their duties.

21. Conduct outside of work and at work related functions

21.1 Unlike some other forms of employment, working at TKAT means that an employee's conduct outside of work could have an impact on their role.

21.2 Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the school/TKAT or the employee's own reputation or the reputation of other members of the TKAT community. Employees should be aware that any conduct that we become aware of that could impact on their role within TKAT or affect the school/TKAT's reputation will be addressed under our disciplinary procedure.

21.3 We therefore expect employees to make us aware immediately of any such situations that have happened outside of the school/TKAT.

21.4 Employees are required to demonstrate responsible behaviour at work-related functions and work-related social events that take place outside normal work hours and to act in a way that will not have a detrimental effect on our reputation.

21.5 Staff must not behave in a way outside work that may impact on their suitability to work with children. This includes behaviour which does not directly involve a child/children. Should we become aware of any such incident or behaviour, we may treat the issue as a safeguarding matter and manage it in accordance with the Keeping Children Safe in Education statutory guidance document. Employees should be aware that any behaviour that we consider may impact on an employee's suitability to work with children will be addressed under our disciplinary procedure and may lead to a referral to the Disclosure and Barring Service (DBS) and the Teaching Regulation Agency (where appropriate).

21.6 We therefore expect employees to make us aware immediately of any such situations that have happened outside of the school/TKAT

22. Agency workers

22.1 We will investigate allegations made against agency workers with the cooperation of the agency. Whilst we may decide to cease using the services of an agency worker, this will not prevent us from investigating allegations and liaising with the Local Authority Designated Officer (LADO) to determine a suitable outcome. We expect agency workers and agencies to cooperate with our investigations and with external agencies where applicable.

22.2 We will discuss with the agency whether it may be appropriate for them to consider suspending an agency worker, or whether we are prepared to redeploy an agency worker during an investigation.