



CODE OF CONDUCT

Ember Learning Ltd

Document Reference:	EL-COC-001
Date Adopted:	1 September 2026
Status:	Adopted

1. PURPOSE

This Code of Conduct sets out the ethical principles and professional standards that apply to everyone associated with Ember Learning Ltd. It establishes the values and behaviours that underpin how we operate as an organisation — with commissioning authorities and private companies, with students and mentees, with teachers and mentors, and with each other.

This Code is distinct from the Teacher and Mentor Behaviour Policy (EL-TMBP-001), which sets out operational conduct standards specific to the delivery of sessions. This Code operates at a higher level: it articulates the values that inform those operational standards and that apply across the whole organisation.

2. SCOPE

This Code applies to:

- All Company directors
- All self-employed teachers, mentors, and associates
- Any other person acting on behalf of Ember Learning Ltd in any capacity

3. CORE VALUES

Ember Learning is founded on the belief that every young person and adult deserves a fair chance to learn and to be treated with dignity. Our work with vulnerable students and mentees in alternative provision and mentoring demands that we hold ourselves to high standards in everything we do. Our core values are:

The welfare of children and adults at risk comes first.

Every decision we make — operational, commercial, and interpersonal — is made with the welfare of the students and mentees we serve as the primary consideration. No other interest overrides it.

Integrity.

We are honest, transparent, and consistent in our conduct. We do not misrepresent our qualifications, our services, or our compliance status.

Respect.

We treat every student, mentee, commissioner, teacher, mentor, and colleague with dignity and without discrimination. We do not tolerate conduct — internal or external — that falls below this standard.

Accountability.

We take responsibility for our actions and decisions. We report concerns. We do not ignore wrongdoing. We do not cover up mistakes.

Professionalism.

We represent Ember Learning with consistency and care. Our conduct — in sessions, in communications, and in our professional relationships — reflects the trust placed in us by commissioning authorities, private companies, and the families of the students and mentees we serve.

4. CONFLICTS OF INTEREST

All persons associated with Ember Learning must avoid situations in which their personal interests conflict, or could reasonably be perceived to conflict, with the interests of the Company or of the students we serve. Where a potential conflict arises, it must be disclosed to a Company Director promptly. The Company Director will determine whether and how the conflict can be managed.

Examples of conflicts that must be disclosed include: a teacher or mentor privately teaching or mentoring a student or mentee they have met through Ember Learning; a director having a financial interest in a supplier engaged by the Company; a director being personally connected to a commissioning officer or representative of a private company with whom the Company is negotiating.

5. GIFTS AND HOSPITALITY

No person associated with Ember Learning should offer, solicit, or accept gifts, hospitality, or other benefits that could reasonably be seen to influence their professional judgement or the decisions of others. Modest, occasional, and proportionate hospitality (for example, a working lunch in the context of a business relationship) is acceptable. Any offer of hospitality or a gift that goes beyond this should be declared to a Company Director.

Teachers and mentors must not accept gifts from students, mentees, parents, or carers. This applies equally in mentoring relationships with adults — the professional boundary is the same regardless of age. This is an absolute rule regardless of the value of the gift.

6. USE OF POSITION

No person should use their position with Ember Learning to obtain personal advantage, to access information beyond what is necessary for their role, or to exercise inappropriate influence over students, mentees, commissioners, or colleagues.

All persons must use the authority and information their role gives them solely in the legitimate interests of the Company and the students and mentees it serves.

7. CONFIDENTIALITY

All persons associated with Ember Learning have a duty to protect the confidentiality of information about students, mentees, commissioning authorities, private companies, commercial arrangements, and the Company's internal operations. This duty applies during and after any engagement with the Company.

Confidentiality does not override the duty to report. Where confidential information relates to a safeguarding concern, it must be shared with the DSL in accordance with the Child Protection and Safeguarding Policy. Safeguarding always takes precedence.

8. SOCIAL MEDIA AND PUBLIC CONDUCT

All persons associated with Ember Learning must ensure that their public conduct — including on social media — does not bring the Company into disrepute, undermine trust in the Company's suitability to work with children and adults at risk, or identify or expose students in any way.

No person should post content that: identifies a student, mentee, or commissioner; discloses details of sessions; makes claims about the Company that are false or misleading; or engages in discriminatory, offensive, or inappropriate conduct. This applies to personal accounts as well as any account associated with the Company.

9. SAFEGUARDING AS A NON-NEGOTIABLE

Every person associated with Ember Learning has an unconditional duty to safeguard the welfare of the students and mentees we work with. Where individuals are under 18, this duty is governed by KCSIE and the Children Act. Where individuals are aged 18 or over, this duty is governed by the Care Act 2014. This duty cannot be waived, overridden by commercial considerations, or subordinated to any other interest. Compliance with the Child Protection and Safeguarding Policy (EL-CPSP-001) is mandatory for everyone this Code covers.

Any person who has a safeguarding concern — however minor or uncertain — must report it. Failure to report is a serious breach of this Code and may result in termination of engagement and referral to statutory authorities.

10. LOW-LEVEL CONCERNS

Low-level concerns are those where a member of staff or associate has behaved in a way that is inconsistent with this Code of Conduct, but where the behaviour does not meet the threshold for referral to the LADO, adult social care (under the Care Act 2014, where the individual is aged 18

or over), or the police. Identifying and addressing low-level concerns early is essential to maintaining professional boundaries and preventing escalation.

Examples of low-level concerns include, but are not limited to:

- Being over-friendly with students or mentees in a way that blurs professional boundaries. This applies equally in mentoring relationships with adults — professional boundaries are just as important with adult mentees as with children
- Using language that is inappropriate for a professional teaching or mentoring context
- Showing favouritism or singling out individual students or mentees
- Making inappropriate posts on social media relating to students, commissioners, or the Company
- Any behaviour that, while not immediately reportable, gives rise to unease about a person's conduct with children or adults at risk

A pattern of low-level concerns — even where each individual incident seems minor — can meet the threshold for LADO referral or disciplinary action. Low-level concerns must therefore be recorded and not dismissed.

Procedure for responding to a low-level concern:

- The concern must be reported to the DSL (Jack Bradley) promptly — verbally and then in writing
- The DSL will collect relevant information, speak with the person concerned and any witnesses where appropriate, and keep a written record in line with UK GDPR and the Data Protection Act 2018
- The DSL will advise what action should be taken; final decisions rest with a Company Director
- The DSL may consult the LADO to determine whether a concern is low-level or requires formal referral. The DSL may consult the LADO or, where the individual is aged 18 or over, the relevant Adult Social Care safeguarding team, to determine whether a concern is low-level or requires formal referral. The DSL may also identify any patterns

Where a low-level concern involves the DSL, it must be reported directly to a Company Director.

11. RAISING CONCERNS

Any person who believes that this Code has been breached — by themselves or by any other person — should raise the concern promptly with a Company Director. Where the concern involves a Company Director, it should be raised with another director or with an external body as set out in the Whistleblowing Policy (EL-WBP-001).

No person will be disadvantaged for raising a genuine concern in good faith.

12. BREACHES OF THIS CODE

Breaches of this Code will be taken seriously and addressed in a manner proportionate to their severity. For teachers and mentors, a breach may result in formal discussion, written warning, suspension, or termination of their Teacher and Mentor Agreement, and may be referred to the DBS or statutory authorities where appropriate. For directors, a breach will be addressed through the Company's internal governance process.

13. DECLARATION

All teachers and mentors are required to confirm that they have read, understood, and agree to comply with this Code of Conduct as part of their onboarding. Directors confirm their commitment to this Code on an ongoing basis through their role in the Company.

Name (print):	
Role:	
Signature:	
Date:	

14. REVIEW

This Code will be reviewed annually by the Company Directors and following any significant incident or change in the nature of the Company's operations.

Policy Owner:	Jack Bradley, Director & Designated Safeguarding Lead
Date Adopted:	1 September 2026
Next Review Due:	1 September 2027 (or earlier if a trigger event occurs)
Approved by:	Jack Bradley, Director, 1 September 2026