ALMA EDUCATION

Staff Code of Conduct

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Statement of Intent

Alma Education is committed to maintaining the highest standards of professional conduct across all of its work with young people. The young people Alma serves are among the most vulnerable in the education system. They have often experienced instability, exclusion or harm, and they place a significant degree of trust in the adults who work with them.

This Code of Conduct sets out the professional standards that Alma expects of every person who works with or on behalf of the organisation. It exists to protect young people, to support staff in exercising sound professional judgement, and to ensure that families, commissioning schools and local authorities can place complete confidence in Alma's practice.

Alma's learning mentors work in community settings, students' homes and Alma hubs, often in 1:1 arrangements. The responsibility this places on individual staff members is significant. Clear standards are not a sign of distrust: they are a framework that enables staff to act with confidence and to demonstrate that their practice is open, professional and in the interests of the young people they serve.

This Code applies to all Alma staff, consultants, volunteers and anyone working on Alma's behalf. All staff are required to read this Code at induction, sign a declaration confirming their understanding, and uphold its standards at all times.

Legislation and Statutory Guidance
Keeping Children Safe in Education 2026
Working Together to Safeguard Children 2026
Children Act 1989
Children Act 2004
Children's Wellbeing and Schools Act 2026
Safeguarding Vulnerable Groups Act 2006
Sexual Offences Act 2003
Equality Act 2010
Data Protection Act 2018 and UK GDPR
Public Interest Disclosure Act 1998
Bribery Act 2010
Worker Protection (Amendment of Equality Act 2010) Act 2023
Employment Rights Act 1996

Working Time Regulations 1998 (as amended)
Human Rights Act 1998

1. Purpose and Scope

This Code of Conduct sets out the professional standards Alma expects of everyone who works with or on behalf of the organisation. It applies to the Director of Education, all learning mentors, consultants, volunteers and any other person engaged to work with students on Alma's behalf.

The conduct of staff directly affects the safety, dignity and wellbeing of the young people in Alma's provision. Clear standards protect young people, protect staff, and protect the trust that families, schools and local authorities place in Alma.

2. Core Principles

All Alma staff will demonstrate the following principles in every aspect of their work:

- Selflessness: act in the interests of students and their families, not for personal gain.
- Integrity: do not place yourself under any obligation to individuals or organisations that might influence your professional conduct.
- Objectivity: make decisions on merit.
- Accountability: accept scrutiny of decisions and actions from the Director of Education and Advisory Board, and cooperate fully with oversight.
- Openness: share information transparently and appropriately to keep students safe.
- Honesty: declare private interests that might conflict with professional duties and act to resolve conflicts in the interests of students.
- Trust: act in a way that deserves and sustains the trust that students, families and the public are entitled to place in Alma and its staff.
- Respect: treat all students, families and colleagues with dignity and never discriminate unlawfully or unfairly.
- Leadership: promote these principles by example at all times.

3. Professional Behaviour and Conduct

Staff are expected to demonstrate consistently high standards of personal and professional conduct such that public confidence in Alma's integrity is sustained.

Staff will:

- Have proper and professional regard for Alma's ethos, policies and practices at all times.
- Maintain high standards of attendance and punctuality.
- Cooperate with the Director of Education and Advisory Board in meeting Alma's legal and operational duties.

- Treat students, families, colleagues and all other contacts with dignity and respect.
- Observe professional boundaries appropriate to their role, showing tolerance and respect for the rights of others.
- Inform the Director of Education immediately if they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution.
- Remain subscribed to the DBS Update Service throughout their employment at Alma.
- Uphold fundamental British values including democracy, the rule of law, individual liberty, and mutual respect and tolerance.
- Act appropriately in terms of the views they express; personal political views must not be expressed during sessions or in any context related to work at Alma.

Staff will not:

- Use foul, abusive or discriminatory language.
- Perpetrate discrimination, bullying, harassment or intimidation of any kind, including physical, sexual and verbal abuse.
- Misuse or misrepresent their position, qualifications or experience.
- Seek to bring Alma into disrepute.

4. Safeguarding

Safeguarding is everyone's responsibility at Alma. All staff have a duty to protect the welfare of students and to act on any concern without delay.

In accordance with Keeping Children Safe in Education 2026, staff have a responsibility to safeguard students by:

- Providing help and support to meet students' needs as soon as problems emerge.
- Protecting students from maltreatment, whether within or outside the home, including online.
- Preventing the impairment of students' mental and physical health or development.
- Taking action to enable all students to have the best outcomes.

Alma expects that staff will:

- Read and comply with Alma's Safeguarding Policy and Part 1 of Keeping Children Safe in Education 2026, provided at induction.
- Complete safeguarding training at induction and refresh it at least annually.
- Act on any concern about a student's welfare immediately, without waiting for certainty.
- Report all safeguarding concerns to the Designated Safeguarding Lead (DSL) without delay.
- Record all safeguarding concerns on CPOMS, Alma's safeguarding recording platform, as soon as practicable.
- Never promise a student that information shared with them will be kept confidential, as this may not be in the student's best interests.

- Reassure students who disclose concerns that they are being taken seriously and will be supported; never give the impression that a student is creating a problem by reporting abuse, exploitation or harassment.
- Be aware of their local early help process and their role within it.
- Not assume that a colleague will take action; information that may be critical to a student's safety must be shared with the DSL without delay.

Staff will be alert to all forms of abuse, neglect and exploitation including:

- Physical abuse, emotional abuse, sexual abuse and neglect.
- Child criminal exploitation (CCE) and child sexual exploitation (CSE).
- Child-on-child abuse.
- Domestic abuse, honour-based abuse, forced marriage and female genital mutilation (FGM).
- Serious violence and county lines exploitation.
- Online abuse and harmful online content.

Staff will also be aware of factors that may increase a student's vulnerability, including but not limited to:

- Students who have a social worker, are subject to a Child in Need plan or a Child Protection Plan.
- Looked-after children (LAC), previously looked-after children (PLAC) and care leavers.
- Students absent from education for repeat or sustained periods.
- Students receiving or requiring mental health support.
- Students with SEND or health conditions.
- Students who are or are perceived to be LGBTQ+.

Staff will understand that mental health difficulties can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will recognise that even where there are no reported incidents of child-on-child abuse, this does not mean it is not happening. Students may disclose peer abuse from outside their Alma sessions.

Where a staff member has concerns about a colleague's conduct towards a student, this must be reported to the Director of Education immediately. If the concern is about the Director of Education, it must be reported to the commissioning local authority or school without delay.

5. Low-Level Concerns

Keeping Children Safe in Education 2026 requires Alma to create a culture in which low-level concerns about staff conduct can be raised and recorded without requiring a formal allegations

process. A low-level concern is any behaviour that does not meet the threshold for a formal referral but that is inconsistent with the standards expected of Alma staff.

Examples of low-level concerns include:

- Being over-familiar with a student.
- Having private conversations with a student outside agreed Alma channels.
- Using a personal device during sessions or to contact students directly.
- Spending time alone with a student outside formally arranged session time.
- Arriving at a student's home unexpectedly or outside agreed times.
- Making comments about a student's appearance.
- Sharing personal information with students beyond what is appropriate to the session.
- Failing to record session information on the Staff Portal as required.

Staff are encouraged to report low-level concerns about a colleague to the Director of Education without delay. Staff who consider that their own conduct during a session may have been misinterpreted are also encouraged to self-refer to the Director of Education.

Low-level concerns will be recorded by the Director of Education and reviewed for patterns. Where a pattern emerges, or where a concern escalates, it will be addressed through Alma's formal disciplinary or safeguarding process as appropriate.

If the concern is about the Director of Education, it must be reported to the commissioning local authority or school.

6. Professional Relationships with Students

The 1:1 nature of Alma provision places particular responsibility on staff to maintain clear professional boundaries while remaining warm, consistent and genuinely present for students. Both are necessary: cold detachment does not serve vulnerable young people, and poor boundaries put them at risk.

Alma expects that staff will:

- Maintain professional boundaries with students at all times and consider whether their actions are warranted, proportionate, safe and necessary.
- Act in an open and transparent way that would not lead others to question their conduct.
- Use contact details for parents and carers only. Staff must not contact students directly through any channel, including social media.
- Use Alma email addresses for all correspondence and queries relating to homework tasks or session content.
- Be prepared to explain and justify any action that could be misinterpreted.

Staff must not:

- Establish social contact with students for the purpose of securing a friendship or strengthening a personal relationship.
- Develop personal or romantic relationships with students.
- Discuss their own personal life, relationships, views on adult topics or sexual behaviour with or in the presence of students.
- Adopt an ongoing support role beyond the scope of their Alma duties.
- Invite or allow students to visit their home.
- Attend students' homes outside of formally arranged Alma sessions.
- Allow students to access their personal devices.
- Give personal gifts or special favours to students.

Under the Sexual Offences Act 2003, it is a criminal offence for a person aged 18 or over in a position of trust to engage in sexual activity with a person under 18. All Alma staff are in a position of trust in relation to the young people they work with.

If a student attempts to make personal contact with a staff member, the staff member will inform the Director of Education as soon as possible. This will be recorded and managed as a safeguarding matter.

Appropriate language

Staff must not:

- Use inappropriate names or terms of endearment.
- Allow or partake in conversations, enquiries or comments of a sexual nature.
- Subject students to humiliation, profanity, vilification or unkind humour.
- Allow or partake in suggestive humour, banter, jokes or innuendos of a sexual nature.
- Use obscene or inappropriate gestures or language.
- Take personal phone calls in the presence of students.

7. Physical Contact with Students

All staff will respect the personal space and privacy of students and avoid situations that unnecessarily result in close physical contact.

Alma works with young people who may be experiencing significant emotional or personal difficulties. There will be occasions when a student needs comfort or reassurance during or after a session. Staff will respond with warmth and care while remaining self-aware at all times.

Where physical contact is appropriate, for example when applying first aid or supporting a student in distress, it must be:

- Responsive to the student's needs and wishes; permission will be sought where possible before initiating contact.

- Of limited duration and appropriate to the student's age, stage of development and background.
- Never secretive; if a staff member believes an action could be misinterpreted, this will be reported to the Director of Education immediately and recorded.
- Conducted with extra caution and sensitivity where it is known that a student has previously suffered abuse or neglect.

Staff will:

- Ensure any physical reassurance is brief, appropriate and, where possible, visible to others.
- Be alert to the possibility that a student's distress may involve or lead to a disclosure of abuse, neglect or harm.
- Record any incident in which significant comfort or reassurance was needed and inform the Director of Education at the earliest opportunity.

Staff must not:

- Touch a student in a way that is indecent, threatening or intrusive.
- Engage in rough play, tickling or play fights with students.
- Allow a distressed student to remain alone with them in circumstances that are not transparent.
- Offer physical comfort in a way that could be misunderstood or misinterpreted.

Alma does not use physical intervention, physical restraint or reasonable force in any circumstances. If a student's behaviour presents an immediate risk to themselves or others and cannot be managed safely, the session will be ended and the Director of Education contacted without delay. Where persistent distress is linked to safeguarding concerns, this must be escalated to the Director of Education and recorded on CPOMS without delay.

8. Sexual Harassment

Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that has the purpose or effect of violating a person's dignity, or of creating an intimidating, hostile, degrading, humiliating or offensive environment.

Examples include but are not limited to:

- Unwanted physical contact of a sexual nature.
- Unwelcome sexual advances or suggestive behaviour.
- Sexually suggestive comments, jokes or innuendo.
- Sending or displaying material that is pornographic or sexually offensive.
- Sexual propositions or advances.
- Offensive communications of a sexual nature via any medium.

- Sexually suggestive looks, gestures or staring.

Under the Worker Protection (Amendment of Equality Act 2010) Act 2023, Alma has a positive duty to take reasonable steps to prevent sexual harassment in the workplace. All staff contribute to this duty.

Staff will:

- Help create an environment in which sexual harassment does not occur and is not tolerated.
- Report any instance of sexual harassment they experience or witness to the Director of Education without delay.
- Support colleagues who raise concerns and not victimise anyone who makes a report.

If the concern involves the Director of Education, it must be reported to the Local Authority Designated Officer (LADO) for the relevant local authority without delay. LADO contact details are held in Alma's Safeguarding and Child Protection Policy.

Sexual harassment of a student by a staff member is a safeguarding matter and will be reported to the DSL and, where appropriate, referred to the LADO. All reports will be investigated in a timely, respectful and confidential manner.

9. Working in Students' Homes

Home sessions require the same professional standards as any other Alma setting. The presence of a parent or carer provides an important safeguarding layer for both the student and the learning mentor, and staff will conduct themselves accordingly.

Alma expects that staff will:

- Arrive at the agreed time only; if unexpectedly early, wait outside and contact the family before entering.
- Conduct sessions in the area of the home agreed with the family and not move to other areas without being invited.
- Behave with the same professionalism in a student's home as in any other setting.
- Report anything observed in the home that gives rise to a safeguarding concern immediately via CPOMS and notify the Director of Education.

Staff must not:

- Enter the home if no parent or carer is present on arrival; if no adult is present, remain outside and contact the Director of Education immediately.
- Attend a student's home outside formally arranged Alma sessions under any circumstances.
- Use household facilities unless necessary and with the family's invitation.
- Comment on or discuss the family's home, possessions or personal circumstances with anyone outside Alma.

- Remain in the home beyond the agreed session time unless there is a safeguarding reason to do so, in which case the Director of Education must be contacted without delay.

If a parent or carer unexpectedly needs to leave during a session, the learning mentor will pause the session and contact the Director of Education for guidance before continuing.

10. Transporting Students

Alma staff never transport students in personal or any other vehicle. This is an absolute prohibition with no exceptions.

Transport to and from sessions is the responsibility of the parent, carer or commissioning body. Any request for a learning mentor to transport a student must be declined and reported to the Director of Education immediately.

11. Appearance and Dress

Alma expects that staff will:

- Ensure their appearance is clean, neat and professional in all session settings.
- Dress in a manner appropriate to their role and to the specific setting.
- Not wear clothing that could cause embarrassment to students, families or colleagues.
- Not wear clothing that carries offensive or political slogans.
- Ensure that visible tattoos do not cause offence; where they might, tattoos must be covered during sessions.
- Wear minimal jewellery that does not present a risk of catching or injury during sessions.

Alma will make reasonable adjustments to dress expectations to accommodate disabilities, medical conditions and religious or cultural beliefs.

12. Attendance

Alma expects that staff will:

- Attend work in accordance with their contract of employment.
- Notify the Director of Education as early as possible when unable to attend a session, giving as much notice as practicable to allow alternative arrangements to be made for the student.
- Comply with Alma's absence reporting procedures when absent due to illness or injury.
- Make routine medical and dental appointments outside session time where possible.

13. Smoking, Alcohol and Substances

Staff must not smoke, vape or use e-cigarettes during any Alma session or in the presence of students. This applies in all session settings including students' homes, community settings and Alma hubs.

Staff must not attend work or conduct any session under the influence of alcohol, illegal drugs or any substance that could impair their judgement or affect their behaviour.

Staff who are prescribed or take over-the-counter medication that could affect their capacity to work safely with students will inform the Director of Education. This does not require disclosure of a diagnosis, only of the potential impact on work.

14. Mobile Phones and Personal Devices

Personal mobile phones and devices must not be used during any Alma session. This applies throughout the session including any breaks.

Alma expects that staff will:

- Keep personal mobile phones out of sight and not use them during sessions.
- Use a personal phone in a genuine emergency only; any emergency use during a session must be recorded on the Staff Portal and reported to the Director of Education.
- Use Alma-issued devices only for Alma-related purposes and return them when employment ends.

Staff must not:

- Use a personal phone or device to photograph, film or audio-record a student at any time.
- Store images, recordings or personal data relating to students on personal devices.
- Use personal devices to contact students directly or their families.
- Allow students to use their personal devices.

15. Photography and Images

No photographs, images or video recordings of students may be taken without the explicit prior written consent of the student's parent or carer and the approval of the Director of Education.

Where consent has been given and photography is approved, staff will:

- Use Alma-issued or Alma-approved equipment only; personal devices must never be used.
- Store all images securely in line with the Data Protection and Privacy Policy.
- Not upload images to social media or share them outside Alma without further explicit consent.

Staff must not:

- Photograph a student in a state of undress or in any situation that could be considered indecent.
- Take images of injuries, bruising or marks consistent with harm, even if requested by another agency.
- Make audio recordings of any disclosure made by a student.

All photographs and images will be available for scrutiny. Staff will be prepared to explain and justify any images taken.

16. Social Media

Staff will maintain the highest standards of conduct on personal social media accounts and be aware that their online conduct can have an impact on their role and reputation at Alma.

Alma expects that staff will:

- Ensure personal social media profiles are set to the highest available privacy settings.
- Exercise professional judgement before posting any content that relates to their work at Alma, even without naming individuals.

Staff must not:

- Post content that could identify, embarrass or cause harm to a student, family or colleague.
- Contact students directly through any social media platform or personal account.
- Accept or send friend or follow requests to students or their family members.
- Post content that could bring Alma into disrepute.

Content posted in a personal capacity can still reflect on Alma and on a staff member's suitability to work with children. Posts perceived as discriminatory, threatening, harassing or sexualised may be treated as a disciplinary matter.

17. Use of AI Tools

Staff may use artificial intelligence (AI) tools to support session planning and resource creation. When doing so, staff must not:

- Enter personally identifiable information about students, families or colleagues into any AI tool.
- Use AI tools to generate session records, safeguarding notes or other official Alma documentation.
- Present AI-generated content to students without first verifying its accuracy.

Any uncertainty about the appropriate use of AI must be raised with the Director of Education.

18. Confidentiality and Data Protection

All staff will be aware of their responsibilities under Alma's Data Protection and Privacy Policy and in line with the UK GDPR and the Data Protection Act 2018.

Alma expects that staff will:

- Handle all personal data in accordance with Alma's Data Protection and Privacy Policy.
- Record all session information on the Staff Portal using their individual secure login.

- Record all safeguarding concerns on CPOMS without delay.
- Not discuss student information in public spaces or in ways that could be overheard.
- Not share student information with anyone who does not have a legitimate need to know.
- Return all documentation and Alma-issued devices containing student information when employment ends.

Confidentiality is not absolute. Where a staff member has a safeguarding concern, information must be shared with the DSL regardless of any expectation of privacy. Safeguarding always takes precedence over confidentiality.

19. Conflicts of Interest, Gifts and Hospitality

Alma expects that staff will act in the best interests of students at all times and not allow personal interests to conflict with their professional duties.

Staff will:

- Declare to the Director of Education any situation in which a personal, financial or professional interest might influence or appear to influence their decisions or conduct.
- Familiarise themselves with and comply with the Bribery Act 2010.

If in doubt about whether a conflict exists or requires declaration, staff will declare it. No one will be disadvantaged for raising a concern about a potential conflict in good faith.

Gifts from students or families must not be accepted beyond very modest tokens of low value, such as a card or small gift at the end of a placement. Any gift of greater value must be declined politely and reported to the Director of Education.

Staff must not solicit gifts, hospitality or financial advantage from students, families, commissioners or contractors. Accepting a bribe or corrupt payment is a criminal offence under the Bribery Act 2010.

Relatives and relationships

Staff must declare to the Director of Education any pre-existing personal or family relationship with a prospective Alma colleague before any recruitment process begins. This includes close friendships and family connections.

Staff must not participate in any appointment, pay or disciplinary decision involving a person with whom they have a close personal or family relationship. Where such a relationship comes to light after a decision has been made, it must be declared immediately.

At Alma's scale, existing relationships between staff and potential recruits are not unusual. The obligation is not to avoid all prior connections but to declare them and step back from any decision-making where they could create a conflict.

20. Other Employment

Staff may undertake paid work outside Alma provided that:

- It does not conflict with their Alma duties or the interests of Alma's students.
- It does not bring Alma into disrepute.
- It does not cause them to exceed their permitted working hours under the Working Time Regulations 1998 (as amended).

Any other employment must be declared to the Director of Education. Any outside work involving children or young people must be declared and approved in advance.

21. Whistleblowing and Raising Concerns

Alma expects all staff to raise genuine concerns about any aspect of Alma's practice without fear of harassment, victimisation or detriment. Fear about sharing information must never stand in the way of a child's safety.

Staff will:

- Report concerns about a colleague's conduct to the Director of Education without delay.
- Report concerns about the Director of Education directly to the Local Authority Designated Officer (LADO) for the relevant local authority. LADO contact details are held in Alma's Safeguarding and Child Protection Policy.

Staff who feel unable to raise a concern internally may contact:

- NSPCC whistleblowing helpline: 0800 028 0285 (Monday to Friday, 8am to 8pm) or help@nspcc.org.uk
- Government whistleblowing service: gov.uk/whistleblowing

22. Probity of Records

The deliberate falsification of any document is unacceptable. This includes session records, safeguarding records, referral information, DBS declarations, qualification certificates and any other record held by Alma.

Where a staff member falsifies records, this will be regarded as a serious disciplinary matter and may constitute a criminal offence.

23. Monitoring and Review

This policy is reviewed annually by the Director of Education and the Advisory Board, or sooner if required by changes in legislation or statutory guidance. Any necessary amendments will be communicated to all staff. This policy was approved by Melanie Steel, Director of Education, in August 2026 and is due for review in August 2027.