



School of Coding & AI

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HIGHER EDUCATION

Safeguarding Policy

Policy Owner: Mandeep Athwal

Full Name	Position	Signature	Date	Review Cycle
Mandeep Athwal	CEO		01.09.2025	Annual



Mission Statement

School of Coding & AI Higher Education is a safe, well ordered and caring environment for learning. It delivers high quality education to all its students and supports them to develop their individual potential for growth, self-worth and self-control.

High quality outstanding teaching, and clear and consistent guidance and support facilitates students in succeeding in education. Our broad and balanced academic and vocational curriculum will provide students with access to a broad range of accredited qualifications as well as educational and social experiences, which will address their learning and emotional needs. Our purpose is to support every student to develop their true potential, make positive contributions to their families and find fulfilment in employment.

Values

1. The college allows educators to make reasonable adjustments for individual students' needs.
2. Learning is about a journey and there is more than one way to get to the destination
3. Qualifications, manners, respect and opportunity should be the foundations for all students.

High Expectations– students are pushed to achieve beyond their potential, and staff work to ensure everything that we do is better than people expect.

Daring to Dream – at School of Coding & AI Higher Education we challenge students to reach their potential and go on to further education and employment.

Traditional Values – some things often get forgotten in education, at School of Coding & AI Higher Education we pride ourselves on mutual respect, good manners, making a positive contribution, supporting one another and an orderly, litter free environment

Success – can come in many virtues, at School of Coding & AI Higher Education we celebrate the small steps every day and tell students when they are doing well. We ensure that students can have a successful future.

Personalised Support - all students at School of Coding & AI Higher Education have a tutor who guides them, sets them bespoke targets and supports them in making social and academic progress.



Policy Introduction

This policy applies to all staff, volunteers and visitors to School of Coding as safeguarding is everyone's responsibility. Our belief is that **"it could happen here"** and **"we have the interest of the student"** as our priority.

School of Coding & AI Higher Education is aware of and assesses the risks/issues in the wider community when considering the well-being and safety of our students. We are aware of indicators of abuse and neglect, and understand that students can be at risk of harm inside and outside of the School of Coding & AI Higher Education, inside and outside of home and online.

We facilitate a whole approach to safeguarding meaning that we ensure safeguarding and student protection is at the forefront and underpin all relevant aspects of process and policy development. We know that ultimately, all systems, processes and policies should operate with the best interests of the student at their heart.

Our belief that "it could happen here" for all aspects of safeguarding and bullying supports us to address any underlying bias in order to achieve equality for all students and staff within School of Coding & AI Higher Education.

We encourage students to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject in School of Coding & AI Higher Education and where political issues are brought to the attention of the students, reasonably practicable steps are taken to offer a balanced presentation of opposing views to students.

It is vital that we ensure student's wishes and feelings are taken into account when determining what action to take and what services to provide. We strive for a culture where students can confidently report abuse, know their concerns will be treated seriously, and know they can safely express their views and give feedback

We are aware that students may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. We know students may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This does not prevent our staff from having a professional curiosity and speaking to the Designated Safeguarding Lead if they have concerns about a student.



Our staff determine how best to build trusted relationships with students in School of Coding & AI Higher Education that helps facilitate communication.

At School of Coding & AI Higher Education we acknowledge the negative experiences and distressing life events associated with COVID –19 and this can still affect the mental health of our students and their parents. We are well prepared to offer the right help at the right time.

School of Coding & AI Higher Education provides additional support to students where necessary, contributing to resources, lunch and trip costs to ensure all students have equal opportunities at School of Coding & AI Higher Education. This is looked at on an individual basis. The commissioning college may also help with transport costs.

This policy is shared with parents/carers at the student's admission meeting and paper copies are available. Our students understand our responsibility to keep them safe.

All staff (this includes volunteers) are aware of the safeguarding procedures at School of Coding & AI Higher Education and these are explained as part of staff induction.

This includes:

- the student protection policy
- the behaviour policy
- the staff behaviour policy
- the safeguarding response to students who go missing from education
- the role of the Designated Safeguarding Lead (including the identity of the Designated Safeguarding Lead, any deputies and the MAT Safeguarding Lead)

School of Coding & AI Higher Education staff, volunteers and visitors will:-

- be familiar with and understand our student Protection and Safeguarding policies
- be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers
- be involved in the implementation of individual education programmes
- be alert to signs and indicators of abuse



Safeguarding and Promoting the Welfare of students

Safeguarding and promoting the welfare of students is defined as:

Safeguarding and promoting the welfare of students is everyone's responsibility. Everyone who comes into contact with students and their families has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is student-centred. This means that they should consider, at all times, what is in the best interests of the student.

Safeguarding and promoting the welfare of students is:

- protecting student from maltreatment
- preventing impairment of student's mental and physical health or development
- ensuring that students are in circumstances consistent with the provision of safe and effective care
- taking action to enable all students to have the best outcomes.

School of Coding & AI Higher Education staff are particularly important as they are in a position to identify concerns early, provide help for students, and prevent concerns from escalating.

School of Coding & AI Higher Education staff have a responsibility to provide a safe environment in which students can learn.

School of Coding & AI Higher Education has a Designated Safeguarding Lead who will provide support to staff members to carry out their safeguarding duties and who will liaise closely with other services such as student's social care.

All School of Coding & AI Higher Education staff are prepared to identify students who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a person's life.

Any staff member who has a concern about a student's welfare should follow the referral processes. Staff may be required to support social workers and other agencies following any referral.

Named staff in School of Coding are as follows:

Designated Safeguarding Lead: Suki Gill

Deputy Safeguarding: Kellonie Cousins-Sessi and Sandeep Kaur



ROLE OF THE DESIGNATED SAFEGUARDING LEAD

School of Coding & AI Higher Education have appointed Suki Gill as the School of Coding & AI Higher Education Designated Safeguarding Lead as they are the appropriate **senior member** of staff with the authority to perform the role and form part of the School of Coding & AI Higher Education leadership team. The designated safeguarding lead takes **lead responsibility** for safeguarding and student protection (including online safety and understanding the filtering and monitoring systems and processes in place).

The designated safeguarding lead or a deputy will always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. You should consider speaking to a member of the senior leadership team and/or take advice from local student's Services. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

The DSL has responsibilities as follows:-

- refer cases of suspected abuse to the local authority student's Services as required
- support staff who make referrals to local authority student's Services
- refer cases to the Channel programme where there is a radicalisation concern as required
- support staff who make referrals to the Channel programme
- refer cases where a crime may have been committed to the Police as required liaise with staff (especially pastoral support staff, nurses, IT Technicians SENCO) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- act as a source of support, advice and expertise for all staff
- be aware of students who have a social worker
- help promote educational outcomes by sharing the information about the welfare, safeguarding and student protection issues with teachers and leadership staff
- liaise with management to inform him or her of issues- especially ongoing enquiries under section 47 of the student Act 1989 and police investigations. This includes being aware of the requirement for students to have an Appropriate Adult.

If the Designated Safeguarding Lead is not available you must refer your concerns to someone else who is named as a deputy for this role.

All staff are aware of the process for making referrals to student's Services and for statutory assessments.



TRAINING

All staff and volunteers will receive Safeguarding student and Young People training.

All staff and volunteers will receive Induction Training – this is mandatory and will include:

- Our student protection policy (inclusive of procedures to deal with peer on peer abuse)
- Our behaviour policy for students/students
- Our staff behaviour policy
- Our safeguarding response to students who go missing from education
- Our online safety policy
- Online Safety which amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- The role of our designated safeguarding lead and deputy designated safeguarding lead
- Explanation of the role of the designated safeguarding lead (including the identity of the designated
- Safeguarding lead and any deputies).

Our Designated Safeguarding Leads (and deputies) will attend training every two years and in addition to formal training, their knowledge and skills will be refreshed at regular intervals, at least annually.

All of our other staff will receive regular safeguarding and student protection updates as required to provide them with relevant skills and knowledge to safeguard students effectively.

Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.

SAFEGUARDING AND PROMOTING THE WELFARE OF student

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Safeguarding and promoting the welfare of student is:-

- protecting students from maltreatment
- preventing impairment of student's mental and physical health or development
- taking action to enable all students to have the best outcomes.



DEALING WITH CONCERNS AND DISCLOSURES

All staff are trained and aware that:-

- a student may disclose something that has upset or harmed them
- someone else might report something that a student has told them, or that they believe that a student has been or is being harmed
- a student might show signs of physical injury for which there appears to be no explanation
- a student's behaviour may suggest he or she is being abused
- the behaviour or attitude of one of the workers towards a student may cause concern
- a student demonstrates worrying behaviour towards other student
- a student may display indicators of mental health

We know that being professionally curious is not simply about asking the question. It is about the language used, creating a trusting relationship, a safe space in which to disclose and giving time to students and young people so they do not feel pressured.

All staff and volunteers are alert to the potential need for early help/referral to the Designated Safeguarding Lead for a student who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- is a young carer
- is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking or exploitation
- is in a family circumstance presenting challenges for the student, such as substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from care
- is showing early signs of abuse and/or neglect
- is at risk of being radicalised or exploited
- is a privately fostered student.

We are aware that to consult with our designated safeguarding lead does not mean a referral has been made. This decision is mainly the responsibility of the designated safeguarding lead for student protection who will contact the appropriate agency as and when required.



Our staff know that if they are unhappy with the response received from our designated safeguarding all staff/volunteers have the right to contact Walsall or Wolverhampton student's Services

Our staff will always discuss concerns with parents/carers unless to do so would:

- place the student at risk of significant harm or further risk of significant harm.
- place a vulnerable adult at risk of harm
- compromise and enquiries that need to be undertaken by student's Services or the police

School of Coding & AI Higher Education will endeavour to ensure that parents have an understanding of the responsibilities placed on School of Coding & AI Higher Education and staff for safeguarding students.

UNDER NO CIRCUMSTANCES WILL STAFF LEAVE School of Coding & AI Higher Education WITHOUT DISCUSSING SAFEGUARDING CONCERNS WITH SOMEONE.

Only a minority of students actively disclose abuse. Most students abuse is disclosed accidentally or through observation by an adult of a student's behaviour, words and physical appearance.

When a student does disclose abuse, this needs to be taken very seriously. It is important that any disclosure is dealt with appropriately, both for the wellbeing of the student and also to ensure that our actions do not jeopardise any legal action against the abuser.

PROCEDURES FOR WHEN SOMEONE IS CONCERNED ABOUT A STUDENT OR YOUNG PERSON INCLUDING EARLY HELP

- all concerns for student and young people will be recorded
- all concerns will be recorded as soon as possible (and within one hour)
- all concerns will be referred to the designated safeguarding lead/deputy designated safeguarding lead or SENCo in their absence
- All concerns of allegations in relation to staff and volunteers' harmful behaviour will be referred to the head/principle (if the concern is in relation to the head/principle the chair of governors should be informed without delay)

Remember records should include:

- a clear and comprehensive summary of your concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.

If you are in doubt about recording requirements, you should discuss this with the designated safeguarding lead (or deputy).



Principles for School of Coding & AI Higher Education

“Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 we may share information without consent if, in our judgement, there is a lawful basis to do so, such as where safety may be at risk.”

At School of Coding & AI Higher Education we recognise that when a student has a social worker, it is an indicator that the student is more at risk than most students.

This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We consider these needs when making plans to support students who have a social worker.

In offering advice and information to workforces that have relationships with students with social workers, virtual School of Coding & AI Higher Education heads will identify and engage with key professionals, helping them to understand the role they have in improving outcomes for students. This should include Designated Safeguarding Leads, social workers, Director of Education and Qualities, governors, Special Educational Needs Co-ordinators, mental health leads and other local authority officers.



WHAT INFORMATION WILL YOU NEED WHEN MAKING A REFERRAL

We will be asked to provide as much information as possible such as the student's full name, date of birth, address, school, GP, languages spoken, any disabilities the student may have, details of the parents, other siblings, chronology of previous concerns. If we do not have all these details, we will still make the call.

Early Help

If early help is appropriate, our designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases are kept under constant review and consideration given to a referral to student's Services for assessment for statutory services, if the student's situation does not appear to be improving or is getting worse.

Student suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make an enquiry if they have reasonable cause to suspect that a student is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the student's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra- familial threats like radicalisation and sexual exploitation.



RESPONDING TO A CONCERN – THE “6 R’s RESPONSE”

Receive Reassure React Record Refer Reflect

RECEIVE

- If a student wants to talk to you, never ask them to come back later. Ask them what they want to talk to you about and, if you are concerned about their welfare, give them the time to speak to you.
- Never promise confidentiality, inform the student that you are happy to talk to them but if they tell you anything that you believe may be putting them at harm that you will have to talk to someone.
- Listen carefully to the student. Do not stop a student who is freely recalling information

RE-ASURE

- Ensure the child is aware they are doing the right thing in talking to you and that they have not done anything wrong.
- If you have any concerns that the child has been, or is at risk of harm, you must tell them that you will speak to someone to get help.

REACT

- If you need to clarify information ask open-ended questions e.g. “*Is there anything you'd like to tell me?*”, “*Can you explain to me...*”, “*Can you describe to me*”
- **Never** ask leading or suggestive questions e.g. “*Did he/she do anything that they shouldn't have done?*”
- **Never** ask 'accusing' questions e.g. “*Why didn't you tell someone earlier?*”
- **Never** criticise the alleged perpetrator, it may be someone that they will continue to live with.
- **Never** ask the pupil to repeat their disclosure for any other member of staff, it is your responsibility to share the information
- These four factors may compromise enquiries that need to be made later by Children's Services or Police.

RECORD

- Make notes as soon as possible afterwards using the words that the child has used.
- Do not record your assumptions and interpretations, just what you heard and saw.
- Do not destroy original notes even if you later write things up more neatly and fully.
- Record the date, time and place of the disclosure.



- Immediately inform the Designated Senior Person (Suki Gill) or in their absence the Deputy Designated Senior Person who will be responsible for following the appropriate procedures.

REFLECT

- Ask yourself if you have done everything you can within your role.
- Refer any remaining concerns to the Designated Safeguarding Lead (Suki Gill) or Deputy Designated Senior Person.

Remember you have a statutory duty under the Education Act 2002 to pass on any student protection concerns about the student.

We understand that information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting student's welfare, including their educational outcomes. We have clear powers to share, hold and use information for these purposes as reflected in our Information Sharing policy and procedure and privacy notices.

The Data Protection Act 2018 and General Data Protection Regulation (GDPR) places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, this is **not** a barrier to sharing information where the failure to do so would result in a student being placed at risk of harm. Fears about sharing information **will not** be allowed to stand in the way of the need to promote the welfare and protect the safety of students.

Definitions of Abuse and Neglect

Abuse: A form of maltreatment of a student. Somebody may abuse or neglect a student by inflicting harm, or by failing to act to prevent harm. Students may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. A student may be abused by an adult or adults, or another student or student.

Safeguarding incidents and/or behaviours can be associated with factors outside School of Coding & AI Higher Education. Our staff, especially the designated safeguarding lead will be considering the context of such incidents and/or behaviours. Such contextual safeguarding means our assessments of students will consider whether wider environmental factors are present in a student's life that are a threat to their safety and/or welfare.



Additionally student Services assessments should consider where students are being harmed in contexts outside the home, so it is important that we provide as much information as possible as part of the referral process. This allows any assessment to consider all the available evidence and enable a contextual approach to address such harm.

<https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>

All staff are aware of safeguarding issues and aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put students in danger.

Physical abuse: A form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a student. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a student.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape
- Bruises that carry an imprint, such as a hand or a belt
- Bite marks
- Round burn marks
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks
- An injury that is not consistent with the account given
- Changing or different accounts of how an injury occurred
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying or
- Isolation from peer

Emotional Abuse: The persistent emotional maltreatment of a student such as to cause severe and adverse effects on the student's emotional development. It may involve conveying to a student that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the student opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on students. These may include interactions that are beyond a student's developmental capability as well as overprotection and limitation of exploration

and learning, or preventing the student from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing students frequently to feel frightened or in danger, or the exploitation or corruption of students. Some level of emotional abuse is involved in all types of maltreatment of a student, although it may occur alone.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The student consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self harming, drug or solvent abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Appetite disorders - anorexia nervosa, bulimia or
- Soiling, smearing faeces, enuresis.

Sexual abuse: involves forcing or enticing a student or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the student is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving students in looking at, or in the production of, sexual images, watching sexual activities, encouraging students to behave in sexually inappropriate ways, or grooming a student in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other students. The sexual abuse of student by other student is a specific safeguarding issue in education.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness

- Refusal to communicate
- Thrush, persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia nervosa and bulimia
- Attention seeking behaviour, self-mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusual compliance
- Regressive behaviour, enuresis, soiling
- Frequent or open masturbation, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming or
- Bruises or scratches in the genital area.

We understand that staff need support when managing cases of sexual abuse and will access materials from CSA Centre of Expertise on student Sexual Abuse which has free evidence-based practice resources to help professionals working with student and young people to identify and respond appropriately to concerns of student sexual abuse.

Supporting Practice in tackling student sexual abuse

Neglect: The persistent failure to meet a student's basic physical and/or psychological needs, likely to result in the serious impairment of the student's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a student is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a student from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers) or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a student's basic emotional needs. The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger
- Stealing, scavenging and/or hoarding food
- Frequent tiredness or listlessness
- Frequently dirty or unkempt
- Often poorly or inappropriately clad for the weather
- Poor attendance or often late
- Poor concentration
- Affection or attention seeking behaviour
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones, for example growth, weight



- Failure to develop intellectually or socially
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- The student is regularly not collected or received from the site or
- The student is left at home alone or with inappropriate carer

FURTHER SPECIFIC RISKS

All staff will have an awareness of safeguarding issues that can put students at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put students in danger.

Student MISSING FROM EDUCATION

Knowing where students are during learning hours is an extremely important aspect of Safeguarding. Students missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and student sexual and criminal exploitation. We have procedures in place in response to students missing from education which support identification of such abuse, and in the case of absent students, help prevent the risk of them becoming a student missing education in the future. We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with students who are not present at University. This means we need to have at least two up to date contact numbers for the student and their next of kin.

School of Coding & AI Higher Education has:

- Staff who understand what to do when student does not attend regularly
- Appropriate policies, procedures and responses for students who go missing from education (especially on repeat occasions)
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Procedures to inform the local authority when we plan to take students off-roll when they:
 - leave School of Coding & AI Higher Education to be home educated
 - move away from School of Coding & AI Higher Education's location
 - remain medically unfit to attend lectures
 - are in custody for four months or more

We will ensure that students who are expected to attend School of Coding & AI Higher Education.

When a student leaves School of Coding & AI Higher Education, we will keep a record of the



student's next educational institute or work placement.

STUDENTS WITH FAMILY MEMBERS IN PRISON

These students are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We will work with the student and their families as much as possible to mitigate the harm by offering early help and emotional wellbeing support where necessary and recognise additional risks such as witnessing arrests, trauma of prison visits, concerns regarding an offender's release and return home.

STUDENT SEXUAL EXPLOITATION

Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving students in the production of sexual images, forcing students to look at sexual images or watch sexual activities, encouraging students to behave in sexually inappropriate ways of grooming a student in preparation for abuse including via the internet.

Indicators of student sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation
- Gang-association and/or isolation from peers/social networks
- Exclusion or unexplained absences from school, college or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infections
- Evidence of/suspicious of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being

Potential vulnerabilities include:

(Although the following vulnerabilities increase the risk of student sexual exploitation, it must be remembered that not all students with these indicators will be exploited. Student sexual exploitation can occur without any of these issues).

- Having a prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment, now or in the past (domestic abuse or



- parental substance misuse, mental health issues or criminality, for example)
- Recent bereavement or loss
- Social isolation or social difficulties
- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Homelessness or insecure accommodation status
- Connections with other student and young people who are being sexually exploited
- Family members or other connections involved in adult sex work
- Having a physical or learning disability
- Being in care (particularly those in residential care and those with interrupted care histories
- Sexual identity.

STUDENT CRIMINAL EXPLOITATION:

Our staff/volunteers are aware that some specific forms of exploitation can include students being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

The victim may have been criminally exploited even if the activity appears consensual. Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

Our staff have been alerted to the fact that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same however, we are aware that girls are at risk of criminal exploitation too. We know that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some of the following can be indicators of student Criminal Exploitation:

- student who appear with unexplained gifts or new possessions
- student who associate with other young people involved in exploitation
- student who suffer from changes in emotional well-being
- student who misuse drugs and alcohol
- student who go missing for periods of time or regularly come home late
- student who regularly miss school or education or do not take part in education



County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with student and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Students can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

STUDENT MENTAL HEALTH

All our staff are aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation.

We are clear at School of Coding & AI Higher Education that only appropriately trained professionals will attempt to make a diagnosis of a mental health problem. Our staff are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. We understand that when students have suffered abuse and neglect, or other potentially traumatic adverse studenthood experiences (especially in the context of Covid 19), this can have a lasting impact throughout studenthood, adolescence and into adulthood. We know that early help is critical when supporting students and young people who are suffering trauma, depression, anxiety, low mood and other indicators of mental health.

If our staff have a mental health concern about a student they know that it is also a safeguarding concern, immediate action will be taken as with all other vulnerabilities. Records will be made and reported immediately to our Designated Safeguarding Lead and Special Educational Needs Coordinator.

At School of Coding & AI Higher Education we offer additional support by:

- allocating each a student a tutor
- Weekly keyword sessions
- Additional adult support in every lesson
- Mental Health Nurses in school
- Music, Art and Drama Masters student psychotherapy placements

School of Coding & AI Higher Education promotes resilience as part of a whole college approach to social and emotional wellbeing, and this is tailored to our students.



STUDENT WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

At School of Coding & AI Higher Education we understand that students with special educational needs and disabilities can face additional safeguarding challenges because:

- There may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration
- Students with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs
- Difficulties may arise in overcoming communication barriers.

When working with student with disabilities staff are aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant student such as the shin, might be of concern on a non-mobile student
- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries
- Unwillingness to try to learn a student's means of communication
- Ill-fitting equipment. for example callipers, sleep boards, inappropriate splinting
- Misappropriation of a student's finances
- Inappropriate invasive procedures.

Further information can be found in the department's:

- SEND Code of Practice 0 to 25 years, and

And from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS) – SENDIASS offers information, advice and support for parents and carers of student and young people with SEND. All local authorities have such a service: Find your local IAS service (councilfordisabledstudent.org.uk)
- Mencap – Represents people with learning disabilities, with specific advice and information for people who work with students and young people.



STUDENTS WHO ARE LESBIAN, GAY, BI, OR TRANS (LGBT)

We know the fact that a student may be LGBT is not in itself an inherent risk factor for harm. However, we know that students who are LGBT can be targeted by other students.

In some cases, a student who is perceived by other students to be LGBT (whether they are or not) can be just as vulnerable as a student who identifies as LGBT.

We are aware that risks can be compounded where students who are LGBT lack a trusted adult with whom they can be open. We therefore endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

DOMESTIC ABUSE

We know that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Students can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Our staff/volunteers understand that exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on students. In some cases, a student may blame themselves for the abuse or may have had to leave the family home as a result.

Domestic Abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse, and can be perpetrated by intimate partners or family members regardless of gender or sexuality.



Controlling behaviour

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Further information can be accessed via:- Domestic violence and abuse
Refuge what is domestic abuse/effects of domestic abuse on student Safelives: young people and domestic abuse

Additional support is available from Operation Encompass and provides advice and helpline services for all staff members from educational settings who may be concerned about students who have experienced domestic abuse.

The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

HOMELESSNESS

Our staff/volunteers understand that being homeless or being at risk of becoming homeless presents a real risk to a student's welfare. Our designated safeguarding lead (and deputies) are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

We are aware that indicators may be:

- household debt
- rent arrears
- domestic abuse
- anti-social behaviour
- the family being asked to leave a property

Further explanation is found at Homeless Reduction Act Factsheets Homeless reduction factsheet



HONOUR BASED ABUSE (FORCED MARRIAGE, FEMALE GENITAL MUTILATION AND BREAST IRONING)

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called honour based abuse are serious (regardless of the motivation) and will be handled and reported as such.

If our staff/volunteers have a concern regarding a student that might be at risk of HBA or who has suffered from HBA, they will speak to our designated safeguarding lead (or deputies).

Female Genital Mutilation

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- Low level of integration into UK society
 - Mother or a sister who has undergone FGM
 - Girls who are withdrawn from PSHE
 - Visiting female elder from the country of origin
 - Being taken on a long holiday to the country of origin
 - Talk about a 'special' procedure to become a woman
- Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or Celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their student from learning about FGM. Staff will not assume that FGM only happens outside the UK.



Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

Mandatory reporting of FGM factsheet

- Forced Marriage

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. We can play an important role in safeguarding student from forced marriage, our staff have been briefed on the indicators of possible forced marriage and honour based abuse and will refer any concerns to the Designated Safeguarding Lead immediately. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. 1.9

Guidance for forced marriage

ONLINE SAFETY

We know students increasingly work online, it is essential that students are safeguarded from potentially harmful and inappropriate online material. Our Designated Safeguarding Lead takes responsibility for online safety at School of Coding & AI Higher Education.

The use of technology has become a significant component of many safeguarding issues. student sexual exploitation, radicalisation, sexual predation: technology often provides the platform that facilitates harm.



The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful material for example pornography, fake news, racist or radical and extremist views
- contact: being subjected to harmful online interaction with other users for example commercial advertising as well as adults posing as student or young adults and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm for example making, sending and receiving explicit images, or online bullying
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your students, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

To assist colleges, the Department for Education has issued guidelines on filtering and monitoring standards, which outline the following expectations for colleges:

- Identify and designate roles and responsibilities for the management of filtering and monitoring systems
- Conduct an annual review of filtering and monitoring provisions
- Block harmful and inappropriate content while ensuring that it does not unreasonably disrupt teaching and learning
- Implement effective monitoring strategies that align with safeguarding requirements

Whilst considering our responsibility to safeguard and promote the welfare of students and provide them with a safe environment in which to learn, our governing body will do all that they reasonably can to limit student's exposure to the above risks from the college's IT system. As part of this process, our governing body ensures School of Coding & AI Higher Education has appropriate filters and monitoring systems in place and regularly reviews their effectiveness. They ensure that our leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

When our students use School of Coding & AI Higher Education's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems. Students do not have access to personal mobile phones or computers during the day to minimise risk.

School of Coding & AI Higher Education is directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.



STUDENT ON STUDENT ABUSE

Staff are aware that safeguarding issues can manifest themselves via student on student abuse. This is most likely to include, but not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between student
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- initiation/hazing type violence and rituals

Abuse is abuse and will never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with peer on peer abuse.

At School of Coding & AI Higher Education we believe that all students have a right to attend college and learn in a safe environment. Students should be free from harm by adults at School of Coding & AI Higher Education and other students. We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under School of Coding & AI Higher Education's Behaviour Policy, Anti- Bullying policy and Online Safety policy.

Allegations may be made against students by others in the college which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a student, some of the following features will be found.

The allegation:

- is made against an older student and refers to their behaviour towards a younger student or a more vulnerable student
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other students in School of Coding & AI Higher Education
- indicates that other students may have been affected by this student
- indicates that young people outside School of Coding & AI Higher Education may be affected by this student



All victims will be taken seriously and offered appropriate support. Staff are aware that some groups are potentially more at risk. Evidence shows girls, students with SEND and LGBT students are at greater risk.

Our staff will record and report all issues of peer on peer abuse to our designated safeguarding lead (or deputies) and ensure the best action is taken to safeguard students at School of Coding & AI Higher Education.

Students and young people who abuse others will be responded to in a way that meets their needs as well as protecting others within the School of Coding & AI Higher Education community through a multi-agency risk assessment. We ensure that the needs of students and young people who abuse others will be considered separately from the needs of their victims. Risk assessments will be recorded (paper or electronic) and will be kept under review. At all times we will be actively considering the risks posed to all our students and students and put adequate measures in place to protect them and keep them safe. Our risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments will be used to inform our approach to supporting and protecting our students and students and updating our own risk assessment.



PREVENTING RADICALISATION

Our staff are aware that students can be vulnerable to extremist ideology and radicalisation. Similar to protecting students from other forms of harm and abuse, protecting students from this risk is part of School of Coding & AI Higher Education's safeguarding approach.

As part of the Counter Terrorism and Security Act 2015, we have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Where our staff are concerned that students and young people are developing extremist views or show signs of becoming radicalised, they will discuss this with the Designated Safeguarding Lead.

Our Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

Staff are alert to changes in student's behaviour, which could indicate that they may be in need of help or protection. Staff use their judgement in identifying students who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

Recognising Extremism

Early indicators of radicalisation or extremism may include

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

The Director of Education and Quality, Single Point of Contact and the Designated Safeguarding Lead will assess the level of risk within School of Coding & AI Higher Education and put actions in place to reduce that risk.



Channel

School of Coding & AI Higher Education's Designated Safeguarding Lead (and any deputies) are aware of local procedures for making a Channel referral. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation.

Channel guidance

School of Coding & AI Higher Education refers to Educate Against Hate, a website launched by the His Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people.

If a member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they will speak with the SPOC and to the Designated Safeguarding Lead (if this is not the same person).

Sergeant Lisa Bird is the Wolverhampton Counter Terrorism Prevent Officer

l.bird@west-midlands.pnn.police.uk

07825 112401

REASONABLE FORCE

There are circumstances when it is appropriate for our staff to use reasonable force to safeguard students and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain students. This can range from guiding a student to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom.

When using reasonable force in response to risks presented by incidents involving students with SEN or disabilities or with medical conditions we will consider the risks carefully and recognise the additional vulnerability of these students.



Our procedures are clear that any member of staff who uses reasonable force completes a report immediately and share the report with the Designated Safeguarding Lead (or their deputies) to ensure that:-

- The student was not harmed
- That first aid has been considered
- That the parents/carers of the student or young person have been informed
- That reasonable force was the best and most proportionate response to the situation

SERIOUS VIOLENCE

Our staff are aware of the indicators, which may signal students are at risk from, or are involved with serious violent crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with individuals associated with criminal networks or gangs and also may be at risk of criminal exploitation.

Staff are aware of the range of risk factors which increase the likelihood of involvement in serious violence

- such as being male
- having been frequently absent or permanently excluded from school
- having experienced student maltreatment
- having been involved in offending, such as theft or robbery

Further information

Preventing youth violence and gang involvement

SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN STUDENT/PEER ON PEER ABUSE

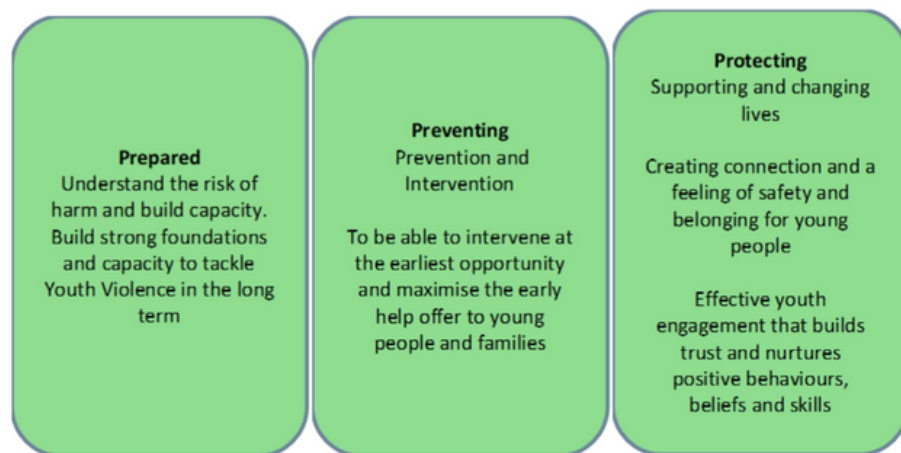
All of our staff and volunteers are aware that sexual violence and sexual harassment can occur between two students of any age and sex in colleges. It can occur through a group of students sexually assaulting or sexually harassing a single student or group of students. Sexual violence and sexual harassment exist on a continuum and may overlap they can occur online and face to face (both physically and verbally) and are never acceptable. We know this abuse may be driven by wider societal factors beyond School of Coding & AI Higher Education such as everyday sexist stereotypes and everyday sexist language and adapt our curriculum as below to overcome this wherever we can.

We make it clear that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable, and it will not be tolerated and it will never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”. We will challenge physical behaviour (potentially criminal in nature), such as grabbing bottoms,

breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

It is vital that we deliver a curriculum that is balanced in supporting student and young people to understand what peer on peer sexual abuse is, and this needs to be delivered to all key stages to ensure that we are:-



All staff at School of Coding & AI Higher Education are regularly provided with updated and appropriate safeguarding training that enables them to understand:

- Their role in preventing peer-on-peer abuse
- How to identify the indicators of abuse
- What to do if they have a concern about a student
- How to respond to a report of abuse
- How to offer support to the victim(s) and alleged perpetrator(s)
- Where to go if they need support
- That student can abuse other student inside and outside of college as well as online, and that online abuse can take the form of:
 - Abusive, harassing and misogynistic messages
 - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
 - Sharing of abusive images and pornography to those who don't want to receive such content
- That they need to maintain an attitude of **'it could happen here'**
- That even if there are no reports in college, **it doesn't mean it's not happening**
- The importance of challenging inappropriate and abusive behaviour



- That girls are more likely to be victims and boys are more likely to be perpetrators
- student with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers
- To keep in mind that certain students may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation
- Abuse may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of School of Coding & AI Higher Education

We teach our students:

- what sorts of boundaries are appropriate in friendships with peers and others (including in a digital context)
- about the concept of privacy and the implications of it for both student and adults including that it is not always right to keep secrets if they relate to being safe
- that each person's body belongs to them, and the differences between appropriate and inappropriate or unsafe physical, and other, contact
- how to ask for advice or help for themselves or others, and to keep trying until they are heard
- how to report concerns or abuse, and the vocabulary and confidence needed to do so
- where to get advice e.g. family, college and/or other sources
- they will be taken seriously
- never be given
- they will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment
- They will never be made to feel ashamed for making a report.

Sexual violence is defined as:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (We are aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.) Causing someone to engage in sexual activity without consent:



A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

Consent is defined as:

Having the freedom and capacity to choose.

Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual consent

- the age of consent is 16
- sexual intercourse without consent is rape

Sexual harassment is defined as:

- unwanted conduct of a sexual nature that can occur online and offline and both inside and outside of college
- Sexual harassment is likely to: violate a student's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment
- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (we consider when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence
- consensual and non-consensual sharing of nude and semi-nude images and videos
- sharing of unwanted explicit content is an offence
- upskirting (is a criminal offence)
- sexualised online bullying is an offence
- unwanted sexual comments and messages, including, on social media
- sexual exploitation coercion and threat



Harmful sexual behaviour (HSB):

Student's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face to face and can also occur simultaneously between the two.

When considering HSB, ages and the stages of development of the student are critical factors. Sexual behaviour between students can be considered harmful if one of the students is much older, particularly if there is more than two years' difference or if one of the students is pre-pubescent and the other is not. However, a younger student can abuse an older student, particularly if they have power over them, for example, if the older student is disabled or smaller in stature.

Online:

Sexual violence and sexual harassment occurring online (either in isolation or in connection to face to face incidents) can introduce a number of complex factors. These include the potential for the incident to take place across a number of social media platforms and services, and for things to move from platform to platform online. It also includes the potential for the impact of the incident to extend further than a schools local community (e.g. for images or content to be shared around neighbouring schools/colleges) and for a victim (or alleged perpetrator(s)) to become marginalised and excluded by both online and offline communities. There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online.

The Legal status:

It is unlawful for School of Coding & AI Higher Education to act in a way that is incompatible with the European Convention on Human Rights. These rights include:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination
- Protocol 1, Article 2: protects the right to an effective education

School of Coding & AI Higher Education procedures for responding to reports of sexual violence and sexual harassment:

Our starting point regarding any report will always be that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not



be tolerated. It is especially important, not to pass off any sexual violence or sexual harassment as 'banter', 'just having a laugh', part of growing up' or 'boys being boys' as this can lead to a culture of unacceptable behaviours and an unsafe environment for student.

Procedures for online abuse

Our procedures for dealing with the concerns are:-

- We will never view, download or share the imagery, or ask a student to share or download –
- this is illegal
- If we have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), we will report this to the Designated Safeguarding Lead (or their deputies)
- We will not delete the imagery or ask the young person to delete it
- We will not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the Designated Safeguarding Lead and/or our statutory partners.
- We will not share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents and/or carers unless advised by the Designated Safeguarding Lead and/or our statutory partners to do so.
- We will not say or do anything to blame or shame any young people involved
- We will recognise the importance of understanding intra familial harms and any necessary support for siblings following incidents
- We will explain to them that you need to report it and reassure them that they will receive support and help from the Designated Safeguarding Lead

Confidentiality:

As a matter of effective safeguarding practice we will do all we reasonably can to protect the anonymity of any student involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the student involved. We will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities. If required we will provide a physical space for victims to withdraw.

Gillick competence - Fraser guidelines



Risk assessment:

When there has been a report of sexual violence our designated safeguarding lead will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.

The risk and needs assessment will consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)
- all the other student (and, if appropriate, adult students and staff) in school especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harm

Risk assessments will be recorded and be kept under review. At all times we will be actively considering the risks posed to all students and students and put adequate measures in place to protect them and keep them safe.

Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required also.

The wishes of the victim, the nature of the allegations and the protection of all students in school will be especially important when considering any immediate actions such as teaching timetables, break times and travelling to and from college.

Manage internally:

- In some cases of sexual harassment, for example, one-off incidents, we may take the view that the student concerned are not in need of early help or require referrals to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising our behaviour and bullying policies and by providing pastoral support.
- All concerns, discussions, decisions and reasons for decisions will be recorded

Early help:

- We may decide that the students involved do not require referral to statutory services but may benefit from early help, meaning providing support as soon as a problem emerges, at any point in a student's life. Providing early help is more effective in promoting the welfare of students than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.
- Early help and the option to manage a report internally do not need to be mutually exclusive: colleges may manage internally and seek early help for both the victim and perpetrator(s).
- All concerns, discussions, decisions and reasons for decisions will be recorded



Referrals to Student Services:

- Where a student has been harmed, is at risk of harm, or is in immediate danger we will make a referral to student's Services
- At the point of referral to student's Services we will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the student at additional risk). Any such decision will be made with the support of student's Services.
- If a referral is made student's Services will then make enquiries to determine whether any of the students involved are in need of protection or other services.
- Where statutory assessments are appropriate we will work alongside, and cooperate with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other student that requires support.
- We will not wait for the outcome (or even the start) of a student's Services investigation before protecting the victim and other students in college. It is important for School of Coding & AI Higher Education to work closely with student's Services (and other agencies as required) to ensure any actions we take do not jeopardise a statutory investigation.
- In some cases, Student Services will review the evidence and decide a statutory intervention is not appropriate. We will be prepared to refer again if we believe the student remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, we will consider other support mechanisms such as early help, specialist support and pastoral support.
- All concerns, discussions, decisions, and reasons for decisions will be recorded



Referrals to Police:

Where a report of rape, assault by penetration or sexual assault is made, the starting principle is that we will refer on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice approach in these cases.

Referrals to the police will often be a natural progression of making a referral to student's Services. Our designated safeguarding lead (or deputy) will liaise closely with the local police presence.

The police will consider what action to take to manage the assessed risk of harm. This could involve the use of police bail with conditions, prior to a suspect appearing in court, or court bail with or without conditions after the first appearance.

Alternatively, the person suspected of an offence could be 'released under investigation' (RUI). People released under RUI can have no conditions attached to their release from custody and it is possible for a person on bail also to have no conditions.

Whatever arrangements are in place we will consider what additional measures may be necessary to manage any assessed risk of harm that may arise.

Particular regard will be given to the additional stress and trauma that might be caused to a victim and the potential for the suspected person to intimidate the victim or a witness. We will ensure that any risk management measures strike a balance between management of risk and the rights of an unconvicted person (e.g. rights to privacy, family life, etc).

If a student is convicted or receives a caution for a sexual offence we will update the risk assessment, ensure relevant protections are in place for all students in college and, (if we have not already done so) consider any suitable action in line with our behaviour policy. This process will include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator(s) remain(s) in college and the victim is still a registered student, we will be very clear as to our expectations regarding the perpetrator(s) now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions we think are reasonable and proportionate with regard to the perpetrator(s)' timetable.

Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other students in School of Coding & AI Higher Education. We will ensure both the victim and alleged perpetrator(s) remain protected, especially from any bullying or harassment (including online).

If the case is classed as "no further action" (NFA'd) by the police or Crown Prosecution



Service, or where there is a not guilty verdict, we will continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. We will discuss any decisions with the victim in this light and continue to offer support. We understand the alleged perpetrator(s) is also likely to require ongoing support for what will have likely been a difficult experience.

Working with all partners:

We acknowledge that we should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of our local arrangements.

Walsall Safeguarding Partnership and Wolverhampton Safeguarding Together both publish their local threshold document which includes the process for the local early help assessment and the type and level of early help services to be provided, our DSLs (and their deputies) are familiar with this document.

Victims:

We know it is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe.

Abuse that occurs online or outside of University will not be downplayed and will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report. We ensure that we explain that the law is in place to protect students and young people rather than criminalise them, and this will be explained in such a way that avoids alarming or distressing them.

We understand that victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with our duty and responsibilities to protect other students.



SAFER RECRUITMENT PRACTICE AND MANAGING ALLEGATIONS AGAINST STAFF

OUR SAFER RECRUITMENT PROCESSES

As part of our culture of a commitment to safeguarding our governing body, senior leaders adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with students from applying for or securing employment, or volunteering opportunities in School of Coding & AI Higher Education.

Key staff involved in recruitment processes will undertake Safer Recruitment Training offered by High Speed Training via online learning.

Our recruitment and selection process

Our adverts make clear that safeguarding checks will be undertaken and make clear our commitment to safeguarding by

- outlining the safeguarding responsibilities of the post as per the job description and personal specification
- whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. Which means that when an individual is applying for certain jobs and activities certain spent convictions and cautions are 'protected', so they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. For clarity and further information about filtering offences can be found in the DBS filtering guidance

Where a role in School of Coding & AI Higher Education involves engaging in regulated activity relevant to student we will include a statement in the application form or elsewhere in the information provided to applicants that it is an offence to apply for the role if they are barred from engaging in regulated activity relevant to student,

We require applicants to provide:

- personal details, current and former names, current address and national insurance number
- details of their present (or last) employment and reason for leaving
- full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment
- qualifications, the awarding body and date of award
- details of referees/references
- a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification



Shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with students. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records. The information will only be requested from applicants who have been shortlisted. The information will not be requested in the application form to decide who should be shortlisted. Our procedures are clear that applicants will be asked to sign a declaration confirming the information they have provided is true. Where there is an electronic signature, the shortlisted candidate will physically sign a hard copy of the application at the point of interview.

When shortlisting at least two people carry out the shortlisting exercise, we consider any inconsistencies, look for gaps in employment and reasons given for them. We explore all potential concerns and as part of the shortlisting process we carry out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview.

When shortlisting at least two people carry out the shortlisting exercise, we consider any inconsistencies, look for gaps in employment and reasons given for them. We explore all potential concerns

We seek references for all potential candidates (including volunteers) to allow us to obtain factual information to support appointment decisions. Wherever possible we request references before interview, this allows any concerns raised to be explored further with the referee and taken up with the candidate at the interview. As part of our commitment to safeguarding:

- we do not accept open references e.g. to whom it may concern
- we do not rely on applicants to obtain their reference
- we ensure any references are from the candidate's current employer and have been completed by a senior person with appropriate authority
- we obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed
- we secure a reference from the relevant employer from the last time the applicant worked with student (if not currently working with student), if the applicant has never worked with student, then ensure a reference from their current employer
- we always verify any information with the person who provided the reference
- we ensure electronic references originate from a legitimate source
- we contact referees to clarify content where information is vague or insufficient information is provided
- we compare the information on the application form with that in the reference and take up any discrepancies with the candidate



- we establish the reason for the candidate leaving their current or most recent post
- we ensure any concerns are resolved satisfactorily before appointment is confirmed

We ensure the information confirms whether we are satisfied with the applicant's suitability to work with students and provide the facts (not opinions) of any substantiated safeguarding allegations but do not include information about allegations which are unsubstantiated, unfounded, false, or malicious.

Our interview questions will always include:

- finding out what attracted the candidate to the post being applied for and their motivation for working with student
- exploring their skills and asking for examples of experience of working with students which are relevant to the role
- probing any gaps in employment or where the candidate has changed employment or location frequently, asking about the reasons for this

Our interviews will always be used to explore potential areas of concern to determine the applicant's suitability to work with students. Areas that may be concerning and lead to further probing will include:

- applicants implication that adults and student are equal
- applicants lack of recognition and/or understanding of the vulnerability of student
- applicants inappropriate idealisation of student
- applicants inadequate understanding of appropriate boundaries between adults and student
- applicants indicators of negative safeguarding behaviours

Any information about past disciplinary action or allegations will be considered in the circumstances of the individual case.

School of Coding & AI Higher Education believes students and young people should be involved in the recruitment process in a meaningful way. Observing short listed candidates and appropriately supervised interaction with students/students is common and recognised as good practice in School of Coding & AI Higher Education.

All information considered in decision making will be clearly recorded along with decisions made.

School of Coding & AI Higher Education pre-appointment vetting checks, regulated activity and recording information



Such checks will help us identify whether a person may be unsuitable to work with students (and in some cases is legally prohibited from working with students and/or working as a teacher). They are seen as part of a wider safeguarding regime in School of Coding & AI Higher Education, which will carry on following appointments.

All offers of appointment will be conditional until satisfactory completion of the mandatory pre-employment checks.

School of Coding & AI Higher Education:

- verifies a candidate's identity because it is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Wherever possible and as part of best practice we check the name on their birth certificate. We use government guidance for these checks.
- obtains (via the applicant) an enhanced DBS check (including student's barred list information, for those who will be engaging in regulated activity with student). When using the DBS update service we still obtain the original physical certificate
- obtains a separate student's barred list check if an individual will start work in regulated activity with student before the DBS certificate is available
- verifies the candidate's mental and physical fitness to carry out their work responsibilities (as defined in Education (Health Standards) (England) Regulations 2003)
- verifies the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, then we follow advice on the right to work website
- checks if the person has lived or worked outside the UK, and make any further checks considered appropriate
- verifies professional qualifications, as appropriate. The Teaching Regulation Agency's (TRA) Employer Access Service is used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation
- ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State

When obtaining an enhanced DBS if an applicant is moving from a previous post which ended not more than three months before the person's appointment within School of Coding & AI Higher Education we will follow guidance as set out in Keeping student Safe in Education 2021.



We use DfE guidance DBS and barring checks to ensure that the right level of DBS and barring checks are completed in School of Coding & AI Higher Education. Once complete we will be able to compare any information disclosed on the certificate with any information shared by the applicant during the recruitment process. When assessing any disclosure information on a DBS certificate we will take into consideration the explanation from the applicant, including:

- the seriousness and relevance to the post applied for
- how long ago the offence occurred
- whether it was a one-off incident or a history of incidents
- the circumstances around the incident
- whether the individual accepted responsibility for their actions

We will also consider the incident in the context of the Teachers' Standards and Teacher misconduct guidance, if the applicant is applying for a teaching post.

When using the Update Service we will:

- obtain consent from the individual to carry out an online check to view the status of an existing standard or enhanced DBS check
- confirm the DBS certificate matches the individual's identity
- examine the original certificate to ensure that it is valid for School of Coding & AI Higher Education
- ensure that the level of the check is appropriate to the job they are applying for

We maintain a single central record of pre-appointment checks, this is checked for accuracy by senior members of staff and nominated governors. We keep evidence of all safer recruitment checks. Our single central record includes all staff, including trainees on salaried routes, agency and third-party supply staff, (even if they work for one day, all members of the governing body and volunteers. We also record safer recruitment checks for contractors where necessary.

For agency and third party supply staff we include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, the date this confirmation was received and whether details of any enhanced DBS certificate have been provided in respect of the member of staff.

The details of an individual will be removed from the single central record once they no longer work at School of Coding & AI Higher Education. We know that we do not have to keep copies of DBS certificates in order to fulfil the duty of maintaining the single central record. If we choose to retain a copy of DBS checks we will comply



with requirements of the Data Protection Act 2018, by recording a valid reason for doing so and that it will not be kept for longer than six months. When the information is destroyed we may keep a record of the fact that vetting was carried out, the result and the recruitment decision taken if they choose to. A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept on their personnel file.

School of Coding & AI Higher Education procedures for other checks that may be necessary for staff, volunteers and others

In School of Coding & AI Higher Education individuals who have lived or worked outside the UK undergo the same checks as all other staff. This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition we make any further checks we think appropriate so that any relevant events that occurred outside the UK can be considered. Following the UK's exit from the EU we apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world.

To consider suitability of the applicant where available we:

- obtain criminal records checks for overseas applicants
- obtain a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach.



We are aware and consider that not all countries provide criminal record information, and where they do, the nature and detail of the information provided varies from country to country. We are mindful that the criteria for disclosing offences in other countries often have a different threshold than those in the UK.

When employing third party or agency/supply staff we obtain written notification from any agency, or third party organisation, that they have carried out the checks on an individual who will be working in School of Coding & AI Higher Education. In respect of the enhanced DBS check, we ensure that written notification confirms the certificate has been obtained by either the employment business or another such business. Where the agency or organisation has obtained an enhanced DBS certificate before the person is due to begin work in a college, which has disclosed any matter or information, or any information was provided to the employment business, we obtain a copy of the certificate from the agency. We always check that the person presenting themselves for work is the same person on whom the checks have been made.

We ensure that any contractor, or any employee of the contractor, who is to work at School of Coding & AI Higher Education, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity relating to students will require an enhanced DBS check (including student's barred list information). For all other contractors who are not engaging in regulated activity relating to students, but whose work provides them with an opportunity for regular contact with students, an enhanced DBS check (not including student's barred list information) will be required. Under no circumstances will a contractor on whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity relating to students. We check the identity of contractors on arrival at School of Coding & AI Higher Education.

We know that whilst external organisations can provide a varied and useful range of information, resources and speakers that can help School of Coding & AI Higher Education and enrich student's education, careful consideration is given to the suitability of any external organisations.

In School of Coding & AI Higher Education under no circumstances will a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity. We complete risk assessments for volunteers and these consider:

- the nature of the work with student, especially if it will constitute regulated activity, including the level of supervision
- what we know about the volunteer, including formal or informal information offered by staff, parents and other volunteers



- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on their suitability and
- whether the role is eligible for a DBS check and if it is, what level is appropriate bearing in mind DBS checks for volunteers are free.

Details of the risk assessment will always be recorded.

Ongoing vigilance in School of Coding & AI Higher Education

Senior leaders, DSL's and our governing body ensures we have processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour. This includes regular safeguarding training/briefings, audits of our safeguarding recording systems, promotion and challenge of staff's understanding of our safeguarding ethos supported by safeguarding policies.

Our senior leaders have created the right culture and environment so that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace, which may have implications for the safeguarding of students. This can assist us to support staff, where there is a need, and help them manage student's safety and welfare, potentially providing them with information that will help them consider whether there are further measures or changes to procedures that need to be put in place to safeguard students in their care.

School of Coding & AI Higher Education is alert to the requirements of referring an individual to the DBS if we believe they have:

- engaged in relevant conduct in relation to student and/or adults which should result in them being unable to perform regulated activity
- satisfied the harm test in relation to student and/or vulnerable adults
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence

SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS

Despite our commitment to safer recruitment processes we are aware there may still be occasions when there is an allegation against a member of staff or volunteer. Allegations against those who work with students, whether in a paid or unpaid capacity, cover a wide range of circumstances.



All allegations of abuse of students by those who work with students or care for them must be taken seriously.

In these circumstances all allegations against other members of staff or volunteers will be referred to the Director of Education and Quality. In their absence you should seek to speak with the Deputy DSL or a member of staff from the Senior Leadership Team. If your concern is about the Director of Education and Quality, you need to speak to the Chair of Governors.

Some allegations may be less serious and at first sight might not seem to warrant consideration of a police investigation or enquiries by Student Services. However, it is important to ensure that even apparently less serious allegations are followed up and examined objectively by someone independent of the organisation.

Where such allegations are made consideration must be given to the following three strands:

1. The police investigation of a possible criminal offence
2. Enquiries and assessment by student's Services as to whether the student is need of protection or in need of services
3. Consideration by an employer of disciplinary action in respect of the individual

The definitions that will be used when we determine the outcome of an allegation are set out below:

- Substantiated: there is sufficient evidence to prove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation
- False: there is sufficient evidence to disprove the allegation
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead will consider whether the student and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Student Services may be appropriate. If a report is shown to be deliberately invented or malicious we will consider whether any disciplinary action is appropriate against the individual who made it as per behaviour policies.



When an adult makes an allegation to School of Coding & AI Higher Education that they were abused as a student, the individual will be advised/supported to report the allegation to the police. Non-recent allegations made by a student will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with student's Services and the police.

Abuse can be reported no matter how long ago it happened.

If a concern has not reached the harm threshold:

Concerns may arise in several ways and from a number of sources. For example suspicion, complaint or disclosure made by a student, parent or other adult within or outside School of Coding & AI Higher Education or as a result of vetting checks undertaken.

As part of School of Coding & AI Higher Education's approach to safeguarding, we ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of School of Coding & AI Higher Education (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. By creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. When implemented correctly, this will enforce our open and transparent culture enable us to identify concerning, problematic or inappropriate behaviour early minimise the risk of abuse and ensure that adults working in or on behalf of School of Coding & AI Higher Education are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of School of Coding & AI Higher Education as set out in part one of the policy.

A low level concern is still a concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of School of Coding & AI Higher Education may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work



Examples of such behaviour could include, but are not limited to:

- being over friendly with student
- having favourites
- taking photographs of student on their mobile phone
- engaging with a student on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language

Our training helps staff understand that such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Our procedure for sharing confidentiality such concerns as above is clear:-

If low-level concerns are shared initially with the DSL or with the Director of Education and Quality it is a matter for School of Coding & AI Higher Education to decide. If the former, then our DSL will inform the Director of Education and Quality of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern.

Our Director of Education and Quality will be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in School of Coding & AI Higher Education the Director of Education and Quality may wish to consult with the DSL and take a more collaborative decision making approach.

Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Our records for such level of concern will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). This allows for records to be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Whistleblowing

All staff and volunteers are able to raise concerns about poor or unsafe practice and potential failures in School of Coding & AI Higher Education safeguarding regime concerns are taken seriously by the senior leadership team.

If there are concerns about the way that safeguarding is carried out in School of Coding & AI Higher Education staff will refer to the Whistle-blowing Policy.



A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed