

School of Coding and AI STATEMENT OF COMPLIANCE WITH THE OFFICE FOR STUDENTS' (OfS) CONDITION E6

School of Coding & AI (SOC) is committed to meeting the expectations of the Office for Students (OfS) Condition of Registration E6: Harassment and Sexual Misconduct. As a delivery partner supporting its University Partners Harper Adams University (HAU) and the University of Wolverhampton (UoW), SOC ensures that students studying receive equivalent protection, support, and procedural fairness to those studying directly at either university.

SOC demonstrates compliance with OfS Condition E6 through:

- A **zero-tolerance approach** to harassment and sexual misconduct.
- A **Single Comprehensive Source of Information (SCSI) (this document)** that brings together all relevant definitions, reporting routes, procedures, support pathways, and governance arrangements
- Clear, accessible **reporting mechanisms**, including anonymous reporting
- **Trauma-informed, student-centred responses** to all reports
- Coordinated partnership working with HAU and UoW, including shared risk assessment and aligned disciplinary processes
- **Support for all parties**, including reporting students, responding students, and witnesses
- Transparent, fair, and timely **investigation processes**
- Clear rules on **staff–student relationships** in dedicated policy – see section 8 below.
- A commitment to **not using NDAs** to silence students in cases involving harassment or sexual misconduct
- Annual **training, monitoring**, and **governance oversight**.
- A culture that promotes **respect, dignity, inclusion, and active bystander behaviour**

This SCSI forms part of SOC's governance arrangements and is reviewed annually to ensure continued compliance with OfS Condition E6.

1. Introduction

SOC is dedicated to providing a safe, respectful, and inclusive learning environment. This SCSI brings together all relevant information relating to harassment and sexual misconduct.

It explains how students can report concerns, what support is available, how incidents are handled, and how SOC works with HAU, UoW, and external agencies.

2. Our Commitment

SOC adopts a **zero-tolerance** approach to all forms of harassment, bullying, racism, sexual misconduct, and violence. Our approach reflects:

- Harper Adams University - [Sexual Violence, Violent Behaviour, Racism, Bullying and Harassment Incident Handling Procedure](#), [Respect Policy](#).

- University of Wolverhampton - [Dignity at Work and Study, Sexual Misconduct, Bullying & Harassment, and Hate Crime Policy](#)
- OfS [Condition E6](#) requirements.

We commit to:

- Responding promptly, sensitively, and fairly
- Providing support to all parties
- Ensuring confidentiality except where safety requires disclosure
- Working in partnership with HAU, UoW, and external agencies
- Promoting a culture of respect, dignity, inclusion, and active bystander behaviour
- Ensuring no NDAs are used to silence students

3. Definitions

SOC uses definitions consistent with both HAU and UoW for harassment and sexual misconduct.

Full definitions appear in **Annex A** of the SOC Harassment, Racism, Bullying, Sexual Misconduct and Violence Incident Handling Procedure.

4. Reporting Concerns

Reports may be made:

- In person to any SOC staff member
- Directly to the SOC Designated Safeguarding Leads (DSLs), Jasmine Tabeni , Kellonie Cousins-Sessi and Sandeep Kaur (safeguarding@schoolofcoding.co.uk)
- Via SOC's online reporting form - <https://schoolofcodinguk.com/report-a-concern/>
- Via the anonymous reporting system of the relevant university partner.

4.1 Emergency Situations

If someone is at immediate risk of harm, call **999** and then notify the SOC DSL.

4.2 What Happens After a Report

- The DSL acknowledges the report
- A risk assessment is completed
- Immediate safety measures are put in place if required
- The relevant university partner is notified within 24 hours
- Students are offered support and options

5. Support for Students

SOC ensures students can access:

5.1 Internal Support

- SOC safeguarding and wellbeing team
- Academic adjustments
- Pastoral support
- 24/7 web-based and telephone support services (covering counselling, wellbeing, legal, financial and other advice) via HAU's Student Assistance Programmes
- Specialist sexual misconduct advisors provided by the relevant university partner

5.2 External Support

- Sexual Assault Referral Centre (SARC)
- Independent Sexual Violence Adviser (ISVA)
- NHS
- Police
- Local authority safeguarding team
- Specialist charities such as Rape Crisis

Support is available to reporting parties, responding parties, and witnesses.

6. Investigation Process for Harassment and Sexual Misconduct Reports

When a report of harassment or sexual misconduct is made, SOC treats it with the utmost seriousness. All reports are managed through a trauma-informed, fair and transparent process that protects the rights of everyone involved and reflects the principles of natural justice. SOC follows a four-stage process aligned with policies of University Partners, including UoW's trauma-informed approach.

Stage 1 – Report and Initial Response

When a report is received:

- A trained member of staff listens without judgement and ensures the reporting party is treated with dignity and respect.
- Immediate safety needs are assessed, and any urgent safeguarding concerns are addressed.
- The Designated Safeguarding Lead (DSL) is notified.
- A written record of the report is made in line with data-protection requirements.
- The reporting party may be invited to provide further information or a written statement to help clarify what has happened.

Stage 2 – Triage and Risk Assessment

The DSL undertakes an initial assessment to determine the most appropriate next steps:

- Risk is assessed, including any immediate or ongoing safety concerns.
- The DSL determines whether external agencies (e.g., Police, social services) should be involved.
- The relevant university partner is notified within 24 hours where required.
- Interim protective measures may be implemented. These can include:
 - No-contact arrangements
 - Adjustments to timetables, teaching locations or accommodation
 - Temporary suspension where necessary to protect the safety of those involved

Stage 3 – Support and Options

Students involved in the report, whether reporting or responding, are offered appropriate support and information:

- Access to specialist support services, including wellbeing, counselling and external agencies
- Clear information about the options available for taking the matter forward
- Guidance on reporting to the Police, should the student wish to do so
- Academic or pastoral adjustments to minimise the impact on studies

The University ensures that individuals understand their rights, the process, and the support available throughout.

Stage 4 – Investigation and Outcomes

Where a formal investigation is appropriate:

- Investigations may be led by SOC (where the responding party is a SOC student or member of staff).
- Investigations may be led by the relevant university partner for academic-related matters or where University staff or students directly taught by the University are involved.
- If a criminal investigation is ongoing, the University may pause its internal process until the Police have concluded their enquiries.

All investigations are carried out by trained, impartial staff who have no prior involvement in the case. Individuals directly affected are kept informed of progress and supported throughout.

Possible outcomes include:

- No further action
- Informal resolution
- Disciplinary action under the relevant student or staff conduct procedures

Where decisions are made, the SOC ensures that:

- Those directly affected are informed of the outcome in writing
- The reasons for the decision are clearly explained
- Any actions and next steps are set out

7. How we ensure investigations are credible and based on fairness and natural justice

We ensure that all investigations undertaken by SOC are robust, impartial and grounded in verifiable evidence through the following mechanisms:

- **Independent Investigators:** Cases are allocated to trained investigators who have no prior involvement with the parties associated with the investigation.
- **Standardised Procedures:** All investigations follow prescribed procedures.
- **Evidence Triangulation:** Investigators review documentary evidence, system records, and witness statements to ensure findings are supported by multiple sources wherever possible.

Our processes are explicitly designed to uphold the principles of natural justice, including the right to be heard, the right to a fair process, and the right to an unbiased decision-maker. We achieve this through:

- **Right to Respond:** Students are given the opportunity to review and respond to relevant evidence before a decision is made.
- **No Predetermination:** Decision-makers must confirm they have no conflict of interest and have not been involved in earlier stages of the case.
- **Proportionality:** Outcomes reflect the severity of the issue and the evidence available.

8. Confidentiality and Information Sharing

SOC handles information sensitively and confidentially. Information is shared only:

- With consent
- On a need-to-know basis
- Where required to protect someone from harm
- With HAU where an HAU student or member of staff is involved
- With UoW where their students or staff are involved
- With external agencies where legally required

SOC does **not** use NDAs to silence students.

9. Staff–Student Relationships

SOC follows the following principles:

- Teaching and support staff must declare any intimate relationship with a student
- Staff must not teach, assess, or support a student with whom they have such a relationship
- Conflicts of interest must be managed transparently

Detailed guidance is provided in the SOC Staff and Student Relationships Policy.

10. Training and Awareness

SOC ensures:

- Annual mandatory training for all staff
- Specialist training for DSLs, Deputy DSLs and investigators
- Student induction (at the beginning of each year of study) covers the content of this document, reporting routes and expectations
- Awareness campaigns promoting respect, dignity, and active bystander behaviour

11. Monitoring and Governance

- The DSL maintains anonymised incident logs
- Themes and learning points are shared with university partners
- SOC's Board of Directors receives annual reports
- Policies are reviewed annually

- Student feedback informs improvements

12. Related Policies

- SOC Safeguarding and Prevent Policy
- SOC Harassment, Racism, Bullying, Sexual Misconduct and Violence Incident Handling Procedure
- SOC Staff and Student Relationships Policy
- Harper Adams University - [Sexual Violence, Violent Behaviour, Racism, Bullying and Harassment Incident Handling Procedure, Respect Policy](#)
- University of Wolverhampton - [Dignity at Work and Study, Sexual Misconduct, Bullying & Harassment, and Hate Crime Policy](#)

13. Contact Information

Designated Safeguarding Lead (DSL) Name: Jasmine Tabeni

Deputy DSL Name: Sandeep Kaur

Deputy DSL Name: Kellonie Cousins-Sessi

Email: safeguarding@schoolofcoding.co.uk

Harper Adams University Safeguarding Team Phone: 01952 676500 **Online Form:** [LINK](#)

University of Wolverhampton Safeguarding / Speak Up

Email: safeguarding@wlv.ac.uk **Online Form:** [LINK](#)

Annex A – Definitions

Harassment

Harassment is unwanted conduct that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment includes conduct related to any protected characteristic under the Equality Act 2010 and harassment as defined under the Protection from Harassment Act 1997. It may occur as a single incident or as a pattern of behaviour and may take place in person, online or through other forms of communication.

Racism

Racism is behaviour, language, actions or policies that discriminate against, demean, exclude or disadvantage an individual or group because of their race, colour, nationality, ethnic or national origin. Racism may be direct or indirect, intentional or unintentional, and includes racial harassment, racial abuse, stereotyping, microaggressions and hate incidents.

Bullying

Bullying is offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, intended or having the effect of undermining, humiliating, denigrating or injuring the recipient. Bullying may be carried out by an individual or a group, may occur face-to-face or online, and may consist of a single serious incident or repeated behaviour.

Sexual Misconduct

Sexual misconduct means any unwanted or attempted unwanted conduct of a sexual nature. It includes, but is not limited to:

- sexual harassment;
- sexual assault;
- rape;
- unwanted sexual touching;
- coercive or controlling sexual behaviour;
- sharing intimate images without consent;

- stalking of a sexual nature; and
- any other unwanted sexual behaviour.

Sexual misconduct may occur in person or online and does not require physical contact.

Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Examples include unwanted sexual comments, jokes, gestures, messages, requests for sexual favours, displaying sexually explicit material and unwanted physical contact.

Violence

Violence is the intentional use or threat of physical force against another person that results in, or is likely to result in, injury, harm, intimidation or fear. Violence includes physical assault, threats of violence, coercive behaviour and acts intended to cause psychological harm.

Domestic Abuse

Domestic abuse includes any incident or pattern of controlling, coercive, threatening, degrading or violent behaviour between individuals aged 16 or over who are personally connected. Abuse may be psychological, physical, sexual, financial, emotional or involve controlling or coercive behaviour.

Stalking

Stalking is a pattern of unwanted, repeated and obsessive behaviour directed at a person that causes fear, alarm or substantial emotional distress. It may include following someone, monitoring their activities, persistent unwanted communication, surveillance or cyberstalking.

Hate Incident

A hate incident is any incident perceived by the victim or any other person to be motivated by hostility or prejudice based on a protected characteristic or perceived protected characteristic, whether or not it amounts to a criminal offence.

Hate Crime

A hate crime is a criminal offence motivated wholly or partly by hostility or prejudice towards a person's protected characteristic, including race, religion, disability, sexual orientation or transgender identity.

Online Abuse

Online abuse refers to any behaviour carried out through digital technologies that amounts to harassment, bullying, sexual misconduct, discrimination or threats. It includes abusive emails, social media posts, messaging, image sharing, impersonation, doxing and cyberstalking.

Consent

Consent is the voluntary, informed and freely given agreement by a person with the capacity to make that decision. Consent can be withdrawn at any time and cannot be assumed because of previous sexual activity, a relationship, silence or lack of resistance.

Victim-Survivor

A victim-survivor is any person who has experienced harassment, bullying, racism, sexual misconduct or violence, regardless of whether they choose to report the incident or whether a formal finding has been made.

Respondent

A respondent is a person alleged to have engaged in conduct that may constitute harassment, bullying, racism, sexual misconduct or violence. The use of this term does not imply responsibility before any investigation or decision has been completed.

Reporting Person

A reporting person is anyone who reports an incident, including the person directly affected, a witness or a third party acting on behalf of another individual.

Precautionary Measures

Precautionary measures are temporary actions taken to reduce risk and protect those involved while an incident is being assessed or investigated. Such measures are neutral, proportionate and do not imply that any allegation has been upheld.

Name of provider: School of Coding & AI Ltd
Name of nominated accountable officer: Suki Gill
Designation: Principal

Signature: 

Date: 18th June 2026