

## HARASSMENT, RACISM, BULLYING, SEXUAL MISCONDUCT AND VIOLENCE INCIDENT HANDLING PROCEDURE

### 1. Introduction

#### 1.1 Purpose

School of Coding & AI (SOC), along with its university partners, has a zero tolerance of the following behaviours:

- Sexual violence or sexual misconduct
- Violent or threatening behaviour
- Harassment and bullying
- Discriminatory behaviour

This procedure sets out how School of Coding & AI (SOC), as an educational delivery partner, responds to relevant reports.

Definitions and further information are provided at **Annex A** of this document.

This procedure is designed to complement and align with those of SOC's University Partners:

- Harper Adams University (HAU) - [Sexual Violence, Violent Behaviour, Racism, Bullying and Harassment Incident Handling Procedure, Respect Policy](#).
- University of Wolverhampton (UoW) - [Dignity at Work and Study, Sexual Misconduct, Bullying & Harassment, and Hate Crime Policy](#)

### 2. Our Commitment to students

SOC commits to:

- **Creating a safe, respectful, and inclusive learning environment** for all students, reflecting the zero-tolerance stance taken by University Partners.
- **Taking all reports of harassment and sexual misconduct seriously**, responding in a trauma-informed, nonjudgemental, and student-centred manner.
- **Responding promptly, proportionately, and sensitively** to all reports, ensuring that students feel heard, supported, and empowered.
- **Ensuring all staff understand their responsibilities**, including recognising signs of harm, responding appropriately to reports, and complying with reporting protocols detailed in section 5.
- **Working in partnership with University Partners, local agencies, and emergency services** to ensure coordinated, effective responses to incidents to safeguard student wellbeing.
- **Promoting a culture of respect, dignity, inclusion, and wellbeing.**
- **Acting in the best interests of students at all times**, taking seriously their wishes, feelings, lived experiences, and feedback.
- **Recognising that harm can occur in any setting** ("it could happen here"), and expecting staff to exercise professional curiosity, challenge inappropriate behaviour, and act promptly on reports.
- **Championing equality, diversity, and inclusion**, acknowledging that some students—such as disabled students, care experienced students, international students, LGBTQ+ students, and those from minority ethnic backgrounds—may face additional barriers to seeking help. SOC works proactively to identify and reduce these barriers.
- **Prioritising early help and prevention**, identifying reports at the earliest opportunity and providing support or referring to specialist services before issues escalate.

- Promoting **active bystander behaviour** by equipping students and staff with the confidence and skills to safely challenge inappropriate conduct and positively reinforce appropriate behaviour.
- **Ensuring transparency and fairness in all investigations**, following processes that are consistent with standards and practices of University Partners, and ensuring that both reporting and responding parties receive appropriate support.
- **Rejecting the use of non-disclosure agreements (NDAs)** to silence students or staff in cases involving harassment, bullying, or sexual misconduct.

### 3. Academic freedom and freedom of speech

This procedure will be interpreted and applied in a manner compatible with SOC's Freedom of Speech and Academic Freedom Code of Practice (Code). In particular, no member of academic staff will be subject to disciplinary action as a consequence of exercising their right to freedom of speech or academic freedom within the law. For the avoidance of doubt, if there is a conflict between this policy and the Code, the Code will prevail.

The Code sets out SOC's values relating to freedom of speech, the procedures to be followed by staff, students and members of SOC when arranging events on SOC-controlled premises, SOC's expectations regarding conduct at such meetings, and the criteria SOC uses when considering event approval.

### 4. Scope

This procedure applies to:

- All HAU and UoW students taught or supported at SOC
- All SOC staff, contractors, and volunteers
- Visitors, guest speakers, and placement providers
- Any incident occurring:
  - On SOC premises
  - Online
  - Offsite during SOC-related-activity
  - In student accommodation linked to SOC delivery, for example, on exchanges or overseas trips.

### 5. Principles for handling reports and incidents

- **Confidentiality** - Information is shared only on a need-to-know basis.
- **Non-judgemental, trauma-informed response** - Staff will respond with empathy, avoid blame, and avoid leading questions.
- **Support for all parties** - Both reporting and responding parties will receive access to support.
- **Fairness and procedural transparency** - Investigations will be timely, impartial, and clearly communicated.

- **Zero tolerance for retaliation** - Retaliation or victimisation will be treated as misconduct and dealt with under the SOC's Student Conduct and Disciplinary Policy.

## 6. Reporting

Reports may be made:

- In person to any SOC staff member
- Directly to the Safeguarding Team: [safeguarding@schoolofcoding.co.uk](mailto:safeguarding@schoolofcoding.co.uk)

Staff receiving reports will:

- Listen without judgement
- Explain confidentiality
- Record the report using the SOC Incident Report Form
- Notify the Designated Safeguarding Lead immediately

## 7. Triage and Managing Safety

The Designated Safeguarding Lead will:

- Acknowledge the report
- Conduct an initial risk assessment
- For sexual violence cases, complete a Sexual Violence Risk Assessment
- Determine immediate safety needs
- Implement relevant interim measures related to the student disciplinary policy and/or staff disciplinary policy.
- Notify the University Partner if the case is deemed relevant to the student disciplinary policy
- Contact emergency services if required
- Discuss with the reporting student whether they wish to take the matter further. If so, a formal investigation is undertaken as set out in section 9 below.
- Discuss referral to external agencies (Police, Sexual Assault Referral Centre (SARC), Independent Sexual Violence Adviser (ISVA) with the reporting student

## 8. Support Pathways

SOC will ensure students can access:

- SOC wellbeing and academic support services and relevant additional resources or services provided by the relevant University Partner
- External specialist services (Rape Crisis, SARC, NHS, Police)

Support is available to:

- Reporting parties
- Responding parties

- Witnesses

## 9. Investigation and Outcomes

When a report 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.

School of Coding & AI (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:
  - o No-contact arrangements
  - o Adjustments to timetables, teaching locations or accommodation
  - o 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

## 10. Criminal Offences

SOC will not normally report to the Police without the reporting student's consent, except where:

- There is risk of serious harm
- Others may be at risk
- A child or vulnerable adult is involved

Where criminal investigations and/or a judicial process are ongoing, SOC will make a case-by-case decision on whether to continue its own investigation and any disciplinary action, or to pause it pending the outcome of the judicial process.

## 11. Training and Awareness

SOC will ensure:

- Annual mandatory training for all staff
- Specialist training for DSLs and investigators
- Student induction (each year of the course) covering the content of the single comprehensive source of information, reporting routes and expectations
- Awareness campaigns promoting respect, inclusion, and bystander intervention

## 12. Monitoring and Review

- The DSL maintains anonymised incident logs
- Themes and learning points are shared with University Partners

- This procedure is reviewed annually by the DSL and updates are communicated to staff and students
- Annual report to SOC's Board of Directors

## Annex A: Definitions

### 1. Harassment

Harassment is **unwanted conduct** related to a protected characteristic that has the purpose or effect of:

- Violating a person's dignity, or
- Creating an intimidating, hostile, degrading, humiliating, or offensive environment for a person

where in the circumstances it is reasonable for the conduct to have that effect.

Harassment may also arise where a course of conduct (i.e. two or more instances of verbal or non-verbal conduct and/or speech) causes alarm or distress which the person knows or ought to know amounts to harassment.

Harassment may be:

- Verbal
- Non-verbal
- Written
- Physical
- Online or digital

Examples include: derogatory comments, intrusive questions, unwanted jokes, intimidation, or repeated unwanted contact.

This definition reflects the Equality Act 2010 and the Protection from Harassment Act 1997.

### 2. Sexual Harassment

Sexual harassment is **unwanted conduct relating to a someone's sex** that violates their dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

Examples include:

- Sexual comments, jokes, or gestures
- Unwanted sexual advances
- Sending or requesting sexual images
- Sexualised messages or online harassment
- Inappropriate touching or invasion of personal space

### 3. Sexual Misconduct

Sexual misconduct means **any unwanted or attempted unwanted conduct of a sexual nature**, and includes a broad range of behaviours that are **exploitative, coercive, abusive, or violent**.

It includes, but is not limited to:

- Sexual assault
- Rape
- Non-consensual sexual touching
- Coercion or pressure to engage in sexual activity
- Sharing sexual images without consent (“image-based abuse”)
- Recording or distributing sexual content without consent
- Sexual exploitation

### 4. Consent

Consent is **a clear, voluntary, and informed agreement** to participate in a specific sexual act.

Key principles:

- Consent must be freely given
- Consent can be withdrawn at any time
- Consent cannot be given when a person is asleep, unconscious, intoxicated, coerced, threatened, or manipulated
- Silence or lack of resistance does not equal consent

### 5. Bullying

Bullying is **offensive, intimidating, malicious, or insulting behaviour** that:

- Misuses power or influence,
- Undermines, humiliates, or injures another person, or
- Causes physical or emotional harm.

Bullying may be persistent or a single serious incident.

Examples include:

- Ridiculing or demeaning someone
- Spreading rumours
- Excluding someone from activities
- Misuse of authority
- Online bullying (cyberbullying)

## 6. Racism and Racial Harassment

Racism includes any behaviour, action, or practice that:

- Discriminates against someone based on race, ethnicity, colour, nationality, or cultural background
- Reinforces racial inequality or prejudice

Racial harassment includes:

- Racial slurs or insults
- Stereotyping
- Mocking accents or cultural practices
- Excluding or targeting someone because of race
- Sharing racist content online
- Microaggressions that cumulatively cause harm

## 7. Hate Incidents and Hate Crime

A hate incident is **any incident perceived by the victim or any other person** to be motivated by hostility or prejudice based on:

- Race
- Religion or belief
- Sexual orientation
- Disability
- Gender identity

A hate crime is a hate incident that constitutes a criminal offence.

## 8. Violent or Threatening Behaviour

Violent behaviour includes:

- Physical assault
- Threats of violence
- Intimidation
- Stalking
- Coercive or controlling behaviour

Threatening behaviour includes actions or communications that cause someone to fear harm.

## 9. Online and Digital Misconduct

Online misconduct includes:

- Harassment or bullying via digital platforms
- Sharing harmful, abusive, or discriminatory content
- Image-based abuse
- Threatening messages
- Impersonation or doxxing
- Encouraging self-harm or violence

## 10. Victimisation

Victimisation occurs when someone is treated unfairly because they:

- Made a complaint of discrimination
- Supported someone else's complaint of discrimination
- Acted as a witness in a complaint about discrimination

Victimisation is prohibited under the Equality Act 2010.

## 11. Retaliation

Retaliation is any adverse action taken against someone because they reported misconduct or participated in an investigation.

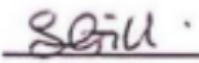
## 12. Malicious or Vexatious Complaints

A malicious complaint is one made **knowingly without basis** and with intent to harm.

A vexatious complaint is one made **repeatedly or unreasonably** without grounds.

SOC and its University Partners treat malicious or vexatious complaints as misconduct.

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

Signature:   
Date: 18th June 2026