

School of Coding & AI  
**SAFEGUARDING AND PREVENT POLICY**

## 1. Introduction

### 1.1 Purpose

School of Coding & AI (SOC) is committed to providing a safe, supportive, and inclusive environment for all students, staff, and visitors. Higher education institutions are not subject to the same statutory duty to safeguard and protect children that applies to schools and further education colleges. However, SOC acknowledges its common law duty to prevent reasonably foreseeable harm occurring to its community. This policy sets out how SOC meets its safeguarding responsibilities during SOC-related activities, including the protection of children and Adults at Risk (defined below) engaging with its activities, the wellbeing of all students, and compliance with statutory duties such as the Prevent Duty.

SOC's safeguarding arrangements complement and align with the policies of our University Partners:

- Harper Adams University - [Safeguarding Policy](#) and [Prevent Policy Statement](#)
- University of Wolverhampton – [Safeguarding Policy](#) and [Prevent Policy](#)

### 1.2 Scope

This policy applies to:

- All students enrolled on University programmes delivered by SOC
- All SOC staff, contractors, and volunteers
- Visitors, guest speakers, and external partners, including staff and representatives from Partner Universities
- SOC related activities taking place on SOC premises, online, or offsite

It covers safeguarding concerns relating to:

- Abuse, neglect, exploitation, or harm
- Mental health crises or wellbeing concerns
- Radicalisation or extremism (Prevent Duty)
- Online safety
- Sexual misconduct or harassment
- Bullying or discrimination
- Any behaviour posing a risk to self or others

In implementing this Policy, the SOC has regard to relevant legislation and guidance, including (as applicable):

- Care Act 2014
- Children Acts 1989 and 2004
- Education Act 2002
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR
- Safeguarding Vulnerable Groups Act 2006
- Prevent Duty Guidance 2015 and any sector-specific HE guidance
- Counter-Terrorism and Security Act 2015
- Keeping Children Safe in Education (KCSIE) 2023 (as relevant to under-18s)
- Office for Students (OfS) Regulatory Framework, including Condition C5 (ongoing compliance with consumer protection law and protecting students' interests).

### 1.3 Definitions

- **Adult at Risk:** A person aged 18 or over who has care or support needs and is unable to protect themselves from harm or exploitation.
- **Safeguarding:** Actions taken to promote the welfare of students and protect them from harm.
- **Prevent Duty:** A statutory duty requiring providers to prevent individuals from being drawn into terrorism.
- **DSL (Designated Safeguarding Lead):** The senior person responsible for safeguarding at SOC.

### 2. Policy Principles

SOC operates the following policy principles and approaches:

- We create and maintain a safe, supportive, and inclusive learning environment for all students.
- We take every safeguarding concern seriously and respond promptly, proportionately, and with sensitivity.
- We ensure all staff understand their safeguarding responsibilities and are equipped to act on them.
- We work collaboratively with our University partners, local agencies, and emergency services to protect students from harm.
- We ensure safeguarding arrangements remain active and effective during any disruption to teaching or campus operations.
- We promote a culture of respect, inclusion, wellbeing, and positive relationships across the organisation.
- We always act in the best interests of students, taking their wishes, feelings, and feedback seriously.
- We operate on the principle that safeguarding concerns can arise in any setting; staff are expected to exercise professional curiosity and act promptly on any concerns.
- We recognise that some students - such as disabled students, care-experienced students and international students - may face additional barriers to seeking help, and we work proactively to identify and reduce those barriers.
- We prioritise early help and prevention, identifying concerns at the earliest opportunity and providing support or referring to specialist services before issues escalate.
- We implement the Prevent Duty in a proportionate way that upholds academic freedom and freedom of speech.

### 3. Roles and Responsibilities

| Role               | Responsibility   |
|--------------------|--|
| Board of Governors | <ul style="list-style-type: none"> <li>● Receive an assurance report on at least an annual basis detailing how the policy principles and procedures are operating, within the wide OfS C5 compliance report.</li> <li>● Receive the Annual Prevent Report.</li> <li>● Receive by exception details of remedial action or change to the procedures in light of individual cases.</li> </ul> |

|                                    |  |
|------------------------------------|--|
| SOC Executive Team                 | <ul style="list-style-type: none"> <li>● Maintain a safe environment for students</li> <li>● Ensure all staff receive safeguarding and Prevent training</li> <li>● Provide clear reporting routes for concerns</li> <li>● Maintain safeguarding records securely</li> <li>● Ensure safeguarding continuity during disruptions (e.g., campus closure, online delivery)</li> </ul>   |
| University Partners                | <ul style="list-style-type: none"> <li>● Provide overarching safeguarding oversight</li> <li>● Provide advice and guidance for serious concerns</li> <li>● Ensure alignment with University’s safeguarding and Prevent procedures</li> <li>● Support SOC in managing complex or high-risk- cases</li> </ul>  |
| Designated Safeguarding Lead (DSL) | <ul style="list-style-type: none"> <li>● Receive and manage safeguarding concerns</li> <li>● Maintain safeguarding records securely and accurately</li> <li>● Ensure staff training, awareness, and compliance with safeguarding and Prevent duties</li> <li>● Act as a source of support, advice, and expertise for all staff</li> <li>● Liaise with staff (including pastoral teams, wellbeing staff, IT technicians, SENCO, and others) on matters of safety, safeguarding, and online/digital safety</li> <li>● Liaise with Designated Safeguarding Leads at University Partners</li> <li>● Notify University Partners of any safeguarding concerns involving their students</li> <li>● Refer cases of suspected abuse to the local authority student services as required</li> <li>● Refer cases where a crime may have been committed to the Police as required</li> <li>● Refer cases to the Channel programme where there is a radicalisation concern as required</li> <li>● Contact external agencies where required to ensure appropriate safeguarding responses</li> <li>● Be aware of students who have a social worker and understand their specific needs</li> <li>● Promote educational outcomes by sharing relevant safeguarding, welfare, and student protection information with teachers and leadership staff on a confidential, need-to-know basis</li> </ul> <p>A Deputy DSL will act in the DSL’s absence.</p> |

### 3.1 Key Contacts:

- o Designated Safeguarding Lead: Jasmine Tabeni
- o Deputy Designated Safeguarding Lead: Kellonie Cousins-Sessi and Sandeep Kaur

## 4. Reporting Safeguarding Concerns

Any member of staff, student, or visitor who becomes aware of a safeguarding concern must report it immediately to the SOC DSL.

## 4.1 Internal Reporting Route

These steps should be followed without delay (preferably within the same working day):

- Report the concern to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL): by emailing: [Safeguarding@schoolofcoding.co.uk](mailto:Safeguarding@schoolofcoding.co.uk) or via our anonymous reporting link: <https://schoolofcodinguk.com/report-a-concern/>  
Please submit factual details - dates, times, what was said/observed, who was present. Concerns may involve a child, Adult at Risk, student, or staff member.
- The DSL/DDSL will assess risk and determine next steps, which may include:
  - Internal management (e.g., wellbeing support, reasonable adjustments, academic mitigation).
  - Advice/referral to local authority children's/adult services.
  - Referral to police, Channel (for PREVENT-related concerns), or other external agencies.
  - Partner notification: If the concern involves University Partner students, the SOC DSL will inform the University Partner DSL.

Staff must explain that information may need sharing to protect the individual or others.

## 4.2 Emergency Situations

If a person is at immediate risk of harm, staff must contact emergency services (999) and then notify the DSL.

## 5. Prevent Duty

Prevent forms part of SOC's overarching safeguarding approach, fulfilling our statutory duty under section 26 of the Counter Terrorism and Security Act 2015 to have due regard to preventing students, staff and visitors from being drawn into terrorism.

SOC implements Prevent proportionately as a safeguarding measure to identify and support individuals vulnerable to radicalisation-treating it as a form of harm or exploitation, alongside abuse, self-harm or extremism from any ideology. This aligns with government guidance for Higher Education providers, embedding Prevent within welfare, pastoral care and student protection processes without compromising academic freedom or freedom of speech (Higher Education (Freedom of Speech) Act 2023).

As part of induction, all students receive a brief introduction to safeguarding, wellbeing support, online safety, and the Prevent Duty. This includes information on how to recognise concerns, how to seek help, and how to contact the Designated Safeguarding Lead. Prevent is presented as part of our wider safeguarding approach and is delivered in a proportionate, non-stigmatising way that upholds academic freedom and freedom of speech. Additional reminders and signposting are provided through the student handbook, digital resources, and ongoing pastoral support.

## 5.1 Governance arrangements relating to Prevent

Prevent concerns follow the same reporting route as general safeguarding, assessed by the DSL with input from the Prevent Lead where needed. The Director of Academic Affairs is the lead for Prevent reporting to the Executive and Board of Directors at least annually on risks, referrals and training.

## 5.2 Key Processes relating to Prevent

- **Risk Assessment:** Annual Prevent risk assessment (informed by quarterly national threat levels and local intelligence), published on request and reviewed by the Governing Body.
- **Training and Staff Vigilance:** All staff receive Prevent awareness training at induction (online module + face-to-face updates), covering vulnerability indicators (e.g. isolation, grievance, exposure to extremist narratives) across all ideologies.
- **Student Support:** Concerns trigger welfare interventions first (e.g. Student Assistance Programme, academic adjustments); escalation to Channel only if evidence of risk (via DSL referral to local authority panel).
- **External Speakers and Events:** Risk-assessed via booking form; speakers promoting terrorism or unlawful activity excluded; lawful debate protected.
- **IT and Online Safety:** Monitoring of College systems for extremist material, balanced with privacy; online radicalisation risks covered in digital literacy sessions.

## 5.3 Prevent Training and Assurance

- Mandatory: [Level 1 \(awareness\) for all provided by the Home Office](#); Level 2 (operational) for DSL/DDSLs and key student-facing staff. This is delivered by West Midlands Police Prevent Coordinator.
- Monitoring: DSL maintains Prevent referral log (anonymised data to the Board of Governors); effectiveness is reviewed annually against OfS student protection expectations (C5).

## 6. Safer Staff Recruitment

Through its HR practices, SOC will ensure:

- Appropriate background checks (DBS where required)
- Verification of identity and qualifications
- Clear role descriptions and safeguarding responsibilities
- Induction training covering safeguarding and Prevent

## 7. Staff Training

All SOC staff will receive:

- Annual safeguarding training
- Prevent Duty training – see section 5.3 above.
- Training on recognising and responding to mental health concerns

- Training on reporting routes and record-keeping

Specialist training will be provided to the DSL and Deputy DSL at least every two years.

## 8. Online Safety

SOC recognises that online environments present unique safeguarding risks, including exposure to extremist content, grooming, cyberbullying, harassment, and data breaches. These risks are managed as part of our integrated safeguarding and Prevent approach.

SOC will ensure:

- **Safe use of digital platforms:** All SOC IT systems (e.g. VLE, email, collaboration tools) have age-appropriate filtering and monitoring to block harmful, illegal or extremist content, proportionate to our HE context and balancing academic freedom. SOC will seek assurance from University Partners that the systems they operate have comparable online safety mechanisms.
- **Monitoring of online learning environments:** Staff with designated responsibilities (DSL, IT lead) oversee platforms for welfare risks; automated alerts flag potential issues (e.g. repeated access to flagged sites), with human review before escalation.
- **Guidance for students on safe online behaviour:** Mandatory digital literacy sessions at induction cover recognising online harms, reporting grooming/radicalisation, privacy settings, and avoiding sharing personal data; resources linked to Student Assistance Programme.
- **Secure handling of personal data:** Compliance with UK GDPR/Data Protection Act 2018 via data protection policies, staff training, and annual audits; breaches reported to ICO within 72 hours if required.
- **Reporting:** Online safeguarding concerns (e.g. cyberbullying, exposure to extremism, sexting) follow the same process as in-person concerns (section 7): Report immediately to DSL/DDSL/DSO using the Safeguarding/Incident Form.

The DSL liaises with IT and external partners (e.g. National Crime Agency for online CSE) as needed, ensuring welfare support precedes any disciplinary action

## 9. Safeguarding During Disruption or Emergency

If teaching is disrupted (e.g., building closure, public health emergency, move to online delivery), SOC will ensure:

- Safeguarding reporting routes will remain active
- DSL will remain contactable
- Students continue to receive wellbeing support
- Safeguarding risk assessments will be completed for any temporary relocation or online only- delivery
- University Partners will be informed of any safeguarding risks arising from the disruption

This aligns with OfS expectations for continuity of student support (Condition C5).

## 10. Confidentiality and Record -Keeping

Information and records will be:

- Stored securely for six years
- Shared only on a need-to-know basis
- Managed in accordance with data protection legislation
- Shared with University Partner DSL where appropriate

## 11. Working with External Agencies

SOC will work with:

- Local Authority Adult Safeguarding Teams
- Police and emergency services
- NHS mental health services
- Prevent Channel panels
- University Partners' safeguarding teams

## 12. Student Support and Wellbeing

SOC will provide or signpost students to:

- Mental health support
- Counselling services
- Disability support
- Academic support
- External specialist services

Support will be adapted for students with additional needs, including:

- Disabled students
- Students with mental health conditions
- Care-experienced students
- Students with caring responsibilities

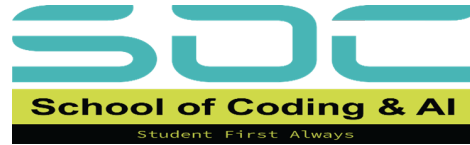
This ensures compliance with Office for Students (OfS) Condition of Registration C5: Treating Students Fairly.

## 13. Policy Review

This policy will be reviewed annually or immediately if legislation/OfS guidance changes by:

- SOC DSL
- DSL at University Partners
- SOC senior leadership

**SCHOOL OF CODING LIMITED**  
(Company No. 10808021)



Student feedback will be considered as part of the review.

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

Signature: Suki Gill

Date: 18th June 2026