



<b>Policy Name</b>	Safeguarding Policy
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<b>Senior Responsible Officer</b>	Chief Executive Officer

## **OBJECTIVE**

The purpose of this document is to outline Coding with CodeX's Safeguarding Policy and Procedures, and set out the ways of working we use as a business to show our commitment to ensuring our safeguarding practices reflect our statutory responsibilities, government guidance and best practice.

This policy establishes a framework to support all those who come into contact with Coding with CodeX, protect them from abuse and maltreatment of any kind and clarifies the organisation's expectations.

We will apply robust risk management processes for the identification of situations which may require the organisation to make professional judgements to protect students from harm.

The organisation will collectively manage risks and reduce the likelihood of abuse by:

- The provision of up-to-date safeguarding policies and procedures that reflect current safeguarding legislation and guidance
- Have robust safer recruitment, selection and appointment procedures for staff and tutors
- Promote and use safer working practices for Directors, staff, tutors and students
- The provision of induction and ongoing training for staff and tutors
- Developing and maintaining a culture of vigilance within all areas of the organisation's work
- Protecting students from harm
- Making sure people can raise safeguarding concerns
- Handling allegations or incidents in accordance with policies and procedures
- Report any allegations or incidents to the relevant authorities

It is the responsibility of all directors, staff and tutors to read this policy and supporting procedures and know what to do in the event of a safeguarding concern.

## **WHO IS THIS POLICY FOR?**

This policy applies to anyone working on behalf of Coding with CodeX, including senior managers and the board of trustees, paid staff, volunteers, sessional workers, agency staff and students.

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## **DEFINITIONS OF ABUSE**

All staff are aware of indicators of abuse and neglect, and understand that children can be at risk of harm inside and outside of their school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

All staff are prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

All staff are aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

Knowing what to look for is vital to the early identification of abuse and neglect. All staff are aware of indicators of abuse and neglect through their experience and training to enable them to be able to identify cases where children may be in need of help or protection. If staff are unsure, they understand they should always speak to the Designated Safeguarding Lead (DSL), or deputy.

All staff are aware that children 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. For example, children may feel embarrassed, humiliated, or may face threats not to report what is happening to them. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL or deputy if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

All staff have an awareness of wider safeguarding issues that can put children at risk of harm and that behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude

and semi-nude images and/or videos (also known as youth produced sexual imagery) put children in danger.

Safeguarding and promoting the welfare of children and young people is defined as:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

The term 'children' refers to any person under the age of 18.

(Keeping Children Safe in Education (KCSIE), DfE, September 2023)

Whilst all children should be protected, Coding with CodeX recognises that some groups of children are potentially at greater risk of harm than others (both online and offline). The list below is not exhaustive, but highlights some of those groups:

- Children who need a social worker
- Electively Home Educated (EHE) children
- Children requiring mental health support
- Looked after children and care leavers
- Children with Special Educational Needs or Disabilities (SEND) or with health issues - children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. These can include:
  - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
  - These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
  - The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs .
  - Communication barriers and difficulties in managing or reporting these challenges
  - Cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Coding with CodeX requires all schools to send a redacted summary of a child's EHCP needs so that this can be shared with the tutor to enable them to understand the individual needs of the child and any safeguarding concerns in relation to their disability or learning difficulty.

#### **4.1 Abuse**

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children 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. Children may be abused by an adult or adults or by another child or children. (KCSIE, 2023, para 26).

If abuse of a child is reported, Coding with CodeX Designated Safeguarding Lead (DSL) will follow the process laid out in the 1989 Children Act with reference to whether a child is suffering or at risk of suffering significant harm (section 47) or if they are a 'child in need' (section 17). This may involve a referral into Children's Social Care and/or the police, or a referral into early help services, depending on the severity of the risk posed.

## **4.2 Types of abuse and neglect**

### **4.2.1 Physical abuse**

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (KCSIE, 2023, para 27).

### **4.2.2 Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child 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 child 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 children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child 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 children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person (KCSIE 2023, para 28).

### **4.2.3 Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child 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 children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child 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 children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff are aware of it and of their organisation's policy and procedures for dealing with it (KCSIE 2023, para 29)

#### **4.2.4 Neglect**

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child 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 child 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 child's basic emotional needs.

#### **4.2.5 Child Exploitation**

All staff are trained to understand that both child sexual exploitation and child criminal exploitation are forms of child abuse, and in how to recognise the signs and symptoms that may indicate a child could be at risk of exploitation, reporting any concerns in line with Coding with CodeX's safeguarding procedures.

#### **4.2.6 Child on Child Abuse**

All staff are aware that children can abuse other children at any age (often referred to as child-on-child abuse) and that it can happen both inside and outside of their school or college and online.

All staff are trained to recognise the indicators and signs of abuse and know how to identify it and respond to reports, in line with Coding with CodeX's safeguarding procedures.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence - for the purposes of this policy and procedures when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 specifically, rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent (KSCIE 2023 Part 5: para 451)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment



Child on child sexual violence and sexual harassment can happen both inside and outside of education settings. Coding with CodeX are clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated.

#### **4.2.7 Honor-Based Abuse (HBA)**

So-called 'honour'-based abuse (HBA) encompasses incidents or 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. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. All staff are trained in spotting the signs of HBA and in how to report this.

##### **4.2.7.1 Female Genital Mutilation (FGM)**

All staff have a legal obligation to report to the DSL any cases where it is known that FGM has been carried out on a child, in line with our safeguarding procedures.

##### **4.2.7.2 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 perpetrators use perceived cultural practices to coerce a person into marriage. (KCSIE, 2023).

Since February 2023, it has become illegal for anyone under the age of 18 to marry, or for anyone to conduct the marriage or be complicit in enabling the marriage to take place. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages (KCSIE, 2023)

## **SAFER RECRUITMENT**

The Safeguarding Vulnerable Groups Act 2006 requires Coding with CodeX to carry out specific vetting (enhanced DBS and barred list checks) on staff or tutors if they work with anyone under the age of 18.

In order to deter and prevent unsuitable individuals and inappropriate behaviour on the platform, Coding with CodeX has a rigorous and robust recruitment process which incorporates the specific “Safer Recruitment” requirements highlighted in KCSIE 2023.

### **5.1 Interview**

All tutors must successfully pass an interview before being admitted onto the platform. Each tutor is also subject to lesson observations periodically as a secondary control

#### **5.1.1 ID Verification**

Tutors will be required to provide proof of two types of identification during their interview. The first will be their UK passport and the second can be one of the following UK issued documents: biometric residence permit, birth certificate, adoption certificate, marriage or civil partnership certificate. For the second identity document we also can also accept driving licences which can be from any country. These documents will be verified by the Coding with CodeX interviewer.

#### **5.1.2 Health Declaration**

Coding with CodeX requires that all tutors self declare they are physically and mentally fit to deliver lessons, by asking them to sign the Terms and Conditions.

#### **5.1.3 Verified Employment history**

Coding with CodeX discusses with candidates their employment history from the age of 16 at the interview. Their university placement is discussed and we use a tutors declaration of Grades, and obtain valid references as a secondary control. Any gaps or inconsistencies are noted and explained.

### **5.2 Criminal Background Checks**

We require all tutors to have a valid enhanced Criminal Background check to tutor on the platform.

Coding with CodeX considers a criminal background record check to be valid if it:

- Is an up to date enhanced DBS check
- Is issued in the UK
- Details Children’s Barred List Information
- Is relevant to the tutor’s place of work and previous address history
- In line with safeguarding requirements tutors need to have a valid, enhanced DBS check, which is renewed every 3 years.

An enhanced DBS check can be updated by: Applying for a new enhanced DBS Certificate

When a DBS check reaches 2 years and 11 months old, a tutor will be blocked from seeing new work, until they have had an updated DBS completed and this has been checked by Coding with CodeX.

### **5.2.1 New Tutors**

All new tutors joining the platform will be required to have an updated Enhanced DBS Check with Child Barring Service, unless they are registered on the DBS Update Service prior to starting on the platform. Tutors who teach or reside in Scotland, Wales, NI or abroad may be subject to additional checks at the request of Coding with CodeX.

Section 243 of KCSIE 2023 states *“Once the checks are complete, the DBS will send a DBS certificate to the applicant. The applicant **must** show the original paper DBS certificate to their potential employer before they take up the post, or as soon as practicable afterwards.”*

All tutors must send a copy of their DBS certificate to the member of staff who has sent them their offer.

Tutors will not be allowed to partake in work until we have received the results of their DBS check from an DBS online screening partner.

Tutors on the Update Service will be expected to provide a copy of the original DBS certificate to Coding with CodeX so a check can be conducted before they gain access to the platform.

For Tutors requiring a new check, Coding with CodeX will cover the initial cost during onboarding. Tutors will have the option to pay upfront or repay the cost in instalments over 10 lessons. If tutors do not repay the full cost within 1 year, they will be expected to make a one off payment of the outstanding amount.

As an organisation using disclosure information for the purpose of assessing an applicant’s suitability for employment purposes we undertake to treat all applicants fairly. We undertake not to discriminate unfairly against any subject of a disclosure on the basis of a conviction or other information revealed.

We are committed to the fair treatment of our staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

A disclosure should only be requested after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a disclosure is required, all application forms, job adverts, and recruitment briefs will contain a statement that a Disclosure will be requested.

Unless the nature of the position allows us to ask questions about your entire criminal record, we will only ask about “Unspent” convictions as defined in the Rehabilitation of Offenders Act 1974.

We ensure that all those within the company who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. The Rehabilitation of Offenders Act 1974.

Having a criminal record will not necessarily bar individuals from working in specific industries. It will depend on the nature of the position and the circumstances and background of your offences.

Checks will also be made on the applicant’s academic and vocational qualifications and further checks made on TRA Teacher Services system to ensure they are not prohibited from teaching under a teacher prohibition order.

### **5.3 Reference Checks**

All tutors are required to submit a minimum of 2 reference checks before gaining access to the platform.

Reference checks must be:

- Either from previous employment, an academic source or a recognised professional who has been known to the applicant for a minimum of 6 months
- Confirm dates of employment
- Confirm that the candidate is suitable to work with children

### **5.5 Safeguarding Training (including Prevent and Online Safety training)**

Coding with CodeX believes that training and raising awareness of safeguarding issues, policies and procedures is fundamental to the development and maintenance of a safer environment, safer organisation and safer staff/ tutors.

We ensure that appropriate safeguarding training is provided to all staff and tutors to assist them in:

- Preventing abuse
- Recognising abuse
- Recording concerns
- Responding appropriately to allegations of abuse
- Knowing who to tell, and
- When information can be shared.

Safeguarding training at the appropriate level to the role and responsibilities held is a mandatory element of all inductions for staff and tutors and this knowledge is refreshed on an annual basis. Furthermore, safeguarding training is not regarded as

a 'once only' activity, but as an ongoing development of skills and knowledge of safeguarding practices, via bulletins, safeguarding meetings and awareness training. Coding with CodeX takes their duty under section 26 of the Counter-Terrorism and Security Act 2015 seriously, and has due regard to the need to prevent people from being drawn into terrorism. We deliver annual mandatory Prevent training to all our tutors and staff, refreshed each August ahead of the new academic year.

Coding with CodeX also understands that the online world is intrinsic to young people's lives and, whilst the internet can be an incredibly positive experience for young people, there is potential for it to be a cause of harm. As such, all staff are trained to recognise online harms and how to report these concerns to the DSL, as well as understanding how Coding with CodeX protects children and staff using the platform.

Coding with CodeX keeps a record of all training completed and has a "pass rate" record to confirm the status of all courses.

### **5.6 Online Searches**

As part of Coding with CodeX's due diligence and commitment to safeguarding, we may conduct online searches on shortlisted candidates and tutors to ascertain information that may need to be explored further at interview or pre-appointment. All information logged will be in line with GDPR and data protection laws.

## ONLINE SAFETY

Coding with CodeX takes a holistic approach to online safety that aims to protect staff, tutors and students in their use of technology, and specifically, on our site. The platform has been developed with the aim of ensuring that lessons take place in a safe environment. This is reflected in a number of key built-in features and a defined set of policies and procedures for the students, parents/responsible adults and tutors who use this service. We also have established mechanisms to identify, intervene in and escalate any concerns where appropriate, in line with the filtering and monitoring standards set out by the DfE and KCSIE 23.

We have established mechanisms to identify, intervene in and escalate any concerns where appropriate.

As outlined in KCSIE 2023 (para 136) Coding with COodeX recognise the considerable breadth of issues classified within online safety, which have been categorised into the following four areas:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, islamaphobia, anti-Semitism, radicalisation and extremism
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying)
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams

Coding with CodeX ensures online safety is a constant running and interrelated theme through the development and implementation of all our services, policies and procedures.

## **SOCIAL MEDIA ACCEPTABLE USE**

Social media is a broad term for any kind of online platform which enables people to directly interact with each other. It allows people to share information, ideas and views, and can be considered both mainstream and non-mainstream. Examples of mainstream social media include Facebook, LinkedIn, Twitter, Google+, Instagram, Snapchat and YouTube, which are all moderated to prevent extremist material being uploaded. Non-mainstream social media however, such as Bitchute, 4chan, and Reddit do not have much, if any, moderation and this can lead to young people being exposed to extremist material and susceptible to being radicalised.

### **7.1 Acceptable Use**

Coding with CodeX staff and tutors should be aware that content uploaded to social media is not private. Even if you restrict it to 'friends', there is still capacity for it to be re-posted or distributed beyond the intended recipients. Therefore, staff and tutors using social media should conduct themselves with professionalism and respect.

Staff and tutors should not upload any content on to social media sites that:

- Is confidential to the Company or its staff
- Amounts to bullying
- Amounts to unlawful discrimination, harassment or victimisation
- Brings the Company into disrepute
- Contains lewd, sexually explicit, threatening or similarly inappropriate or offensive comments, images or video clips
- Undermines the reputation of the school and/or individuals
- Is defamatory or knowingly false
- Breaches copyright
- Is in any other way unlawful.
- 

Staff and tutors on the platform should be aware of both professional and social boundaries and should not accept or invite 'friend' requests from students or ex-students under the age of 18, or from parents on their personal social media accounts such as Facebook. All communication with parents should be via the Coding with CodeX team, and never directly with parents.

Any content or online activity which raises a safeguarding concern must be reported to the Coding with CodeX safeguarding team through contacting the DSL within 24 hours.

Following any report of inappropriate use of social media, the Company will conduct an investigation, this may lead to removal from the platform or disciplinary action taken.

## **SAFEGUARDING STUDENTS OF DIFFERENT AGES**

Coding with CodeX recognises that it provides tuition across a wide range of age groups.

Coding with CodeX is committed to ensuring their staff and tutor's are adequately trained and prepared to recognise the different types of abuse that can impact the different age groups.

In addition, Coding with CodeX recognises their safeguarding responsibilities towards their tutors. Coding with CodeX provides support and advice to all tutors, by providing open and easy methods of communication and supporting tutors through lesson observations and feedback.

## **SAFEGUARDING INTERNATIONAL STUDENTS**

Coding with CodeX recognises that international students use and access the platform. Coding with CodeX uses the same reporting approach to international students as it does to the UK.

The Coding with CodeX safeguarding team will always endeavour to follow the same policy and procedures and notify the relevant local authority equivalent where possible.

## **WHAT TO DO IF YOU HAVE A SAFEGUARDING CONCERN**

### **10.1 Reporting**

It's vital that you report any safeguarding concerns to Coding with CodeX so our Safeguarding Team can investigate fully. All Safeguarding concerns will be investigated within 24 hours of Coding with CodeX receiving the report.

- When the child is disclosing this information, take detailed notes so you can share these with the DSL at Coding with CodeX. This should include:
  - the child's name, age and address
  - what the child said or did that gave you cause for concern e.g. if they made a verbal disclosure, write down their exact words
  - any information the child has given you about the alleged abuser
- Sharing information:
  - timely information is key to safeguarding and promoting the welfare of children and we may need to share information about the children or families we are involved with for a number of reasons, such as:
    - making a referral to arrange additional support for someone
    - someone from another agency has asked for information
    - someone in the family has asked to be referred for further help



- a statutory duty or court order requires information to be shared
- you are concerned that a child or member of their family is at risk of significant harm
- you think a serious crime may have been committed or is about to be committed which involves someone in the family
- We must have a clear and legitimate purpose for sharing a child's personal information and must **keep a record** of the reasons why we are sharing information about them
- Always **seek consent** to share information about a child and their family.
- If **consent isn't given**, you can still share information with relevant professionals under certain circumstances e.g. when protecting a child from significant harm. The Data Protection Act 2018 and GDPR do not affect this principle.
- If a child is suffering or at risk of suffering serious harm, you can share information with appropriate agencies or professionals without the child's or their parent's consent:
  - If the child is in immediate danger, please call a director (emergency contacts listed at the bottom) so they can call 999. If not director is available, please call 999 yourself.
- Process for reporting a concern:
  - Immediately contact an emergency contact, listed at the end of this document.
  - Take notes whilst the child is disclosing or report your concerns at the end of a lesson/contact with the child.
  - Be as detailed as possible when reporting this to the DSL.

To report a safeguarding concern to Coding with CodeX:

Coding with CodeX staff and tutors - all concerns need to be reported via the internal Safeguarding Concern Form.

Parents/carers/schools - please use our external [Coding With CodeX Safeguarding Reporting Form](#).

If you cannot access the reporting form, please get in touch via live chat or phone.

+44 (0) 750 810 5509 - 24/7 Safeguarding line

## 10.2 Disclosure

Once a disclosure has been made or a concern has been shared, the Safeguarding Team will consider the information, if necessary, taking advice, and will make a decision to either:

- Keep detailed records of the concern with no further action at this time
- Liaise with the host school's Designated Safeguarding Lead.
- Make a child protection referral to Children's Social Care
- Make a police referral
- Make a referral into an Early Help service (consent from the child/family will always be sought before any referral into an Early Help service is made)

***Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.***

Once the decision is made to make a referral the Safeguarding Team will contact the relevant Children's Social Care Team and make a telephone referral. This must be followed up in writing within 24 hours.

## 10.3 Emergency responses

Where a child is identified at immediate risk of harm then tutor will immediately contact the Designated Safeguarding Lead who will in turn contact the Police for the areas where the risk is located using 999. This is especially important when the child is being tutored at home and there is no independent school teacher present.

Within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required.

Where tutors are delivering tuition to children and young people in a school or college, the Coding with CodeX DSL/ Deputy must inform the school's DSL of any safeguarding concern.

## 10.4 Allegations against Staff

Coding with CodeX recognises its duty to report concerns or allegations against its directors, staff, tutors, volunteers or contractors. All directors, staff, tutors, volunteers or contractors must comply with the relevant Code of Conduct when performing their role in order to promote safer working practices.

Allegations of abuse against directors, staff, tutors, volunteers or contractors can be made by either a child or an adult and are made immediately to Coding with CodeX DSL. Allegations made against the DSL should instead be made to another member of the leadership team who will arrange for a suitable senior member of staff to be appointed to take the place of the DSL in response to the allegation.

This guidance should be followed when any Coding with CodeX representative has:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have occurred inside or outside of Coding with CodeX

(KCSIE 2023 para 355-356)

Coding with CodeX will deal appropriately and promptly with all allegations or concerns and refer all safeguarding concerns or allegations about its directors, staff or tutors immediately to the appropriate local authority designated officer (LADO) in accordance with local safeguarding procedures and practical guidance, in accordance with the statutory guidance [Working Together to Safeguard Children, 2018](#).

Coding with CodeX will consider immediate suspension (without prejudice) if a safeguarding allegation is made against any director, staff member or tutor pending investigation when there is cause to suspect that another child(ren) is /are at risk of harm from their continued contact with children, in line with KCSIE 2023 recommendations.

Suspension will also be considered even if the allegation is not linked to their role or activity with Coding with CodeX

### **10.5 DBS Requirement and Duty to Report**

Under legal duties to make referrals to the Disclosure and Barring Service, Coding with CodeX will report any concerns about unsafe practice by any of its directors, staff or tutors to the Disclosure and Barring Service (DBS). This applies where an individual has engaged in conduct that has either harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. (KCSIE 2023, para 403).

### **10.6 Learning Lessons**

Coding with CodeX are committed to learning any lessons, alongside support and guidance with the LADO to determine whether there are any improvements to be made to our procedures, or to help prevent similar events in the future. This includes lessons learned about suspension, reinstatement after suspension. (KCSIE 2023, para 420 - 421).

## **10.7 Low Level Concerns**

We aim to create a culture where all concerns about all adults working on behalf of Coding with CodeX are dealt with promptly and appropriately.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any 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

Coding with CodeX may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

If at any time Coding with CodeX dismisses a director, member of staff or tutor due to relevant conduct, risk of harm or receiving a caution or conviction for a relevant offence (or the person has resigned or left that post in circumstances where they may have been removed), then a referral to the Disclosure and Barring Service will be made by the DSL.

## **ANTI-BRIBERY AND CORRUPTION**

Bribery is, in the conduct of the Company's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust. Bribery is a criminal offence.

The Company prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Coding with CodeX employees or by third parties acting for or on behalf of Coding with CodeX.

### **11.1 Offence**

It is a criminal offence to:

- offer a bribe
- accept a bribe
- bribe a foreign official
- as a commercial organisation,
- to fail to prevent a bribe

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. The Company could also face prosecution and be liable to pay a fine.

## **11.2 Definitions of Bribery and Corruption**

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business giving or receiving money, gifts, meals, entertainment or anything else of value as an inducement to a person to do something which is dishonest or illegal.

## **11.3 Scope**

This policy applies to all employees of Coding with CodeX regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement. We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

## **11.4 Gifts and Hospitality**

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from Faisal Patel (CEO). Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from Faisal Patel (CEO).

A record will be made of every instance in which gifts or hospitality are given or received.

## **11.5 Policy**

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact [insert name/position] so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to contact [insert name/position]. You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules. The Company will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

Coding with CodeX takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise. We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self employed, an agency worker, contractor etc.

## **WHISTLEBLOWING**

Staff and tutors should feel able to raise concerns about poor or unsafe practice and potential failures in Coding with CodeX's safeguarding regime. Appropriate whistleblowing procedures, which are suitably reflected in staff and tutors' induction, training and the code of conduct, are in place for such concerns to be raised with Coding with CodeX's leadership team.

Where a staff member or tutor feels unable to raise the issue with their manager or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- general guidance on whistleblowing can be found via: [Advice on Whistleblowing](#); and
- The [NSPCC's What you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff and tutors can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **SAFEGUARDING GOVERNANCE**

Coding with CodeX is committed to providing support to all those involved with the organisation. A clear structure of safeguarding accountability supports everyone to understand their individual and collective responsibilities for safeguarding children and young people.

Coding with CodeX will ensure it has arrangements in place to fulfil its commitment and duty to safeguard children and young people in accordance with legislation and statutory guidance.

### **13.1 Coding with CodeX Board of Directors**

Directors play a vital role in ensuring that they are legally compliant in order to manage the organisation's resources effectively and provide a long-term vision and protect the organisation's reputation and values.

In order to fulfil these responsibilities, the Board of Directors may delegate some or all of these responsibilities' individual directors or members of the leadership team.

Directors are responsible for:

- Approving all safeguarding policies and supporting procedures
- Ensuring adequate resources are available for effective safeguarding practices and training
- Ensuring effective reporting and auditing processes are in place and that the same are regularly reviewed
- Receiving regular safeguarding reports from the leadership team
- Developing a culture within the organisation that promotes effective safeguarding practices

### **13.2 Coding with CodeX Leadership Team**

The leadership team will ensure a commitment to safeguarding is integral in the delivery of all its services, activities and contracts. They will assist in the safer recruitment and selection of staff and tutors.

The Leadership Team will ensure that:

- Safeguarding and a culture of vigilance is promoted and embedded in all areas of the organisation including with the organisation's partners and contractors
- Clear and effective communication pathways for safeguarding are shared with all staff, tutors and customers
- Proposed changes to safeguarding policies and supporting procedures are presented to the Board in accordance with the agreed cycle of policy review
- The Named Designated Safeguarding Officer and Deputy Designated Safeguarding Officers have sufficient resources in order that they may discharge their functions detailed below
- Safe recruitment and selection practices of staff and tutors are implemented in accordance with the safer recruitment policy and procedures
- They coordinate the investigation of concerns and allegations against staff members or tutors

### **13.3 Coding with CodeX Named Designated Safeguarding Lead and Deputies**

The Named Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL) will be provided with the appropriate level of training to enable them to fulfil their responsibilities in supporting and guiding staff and tutors on safeguarding matters. Their training is updated every two years. They are responsible for responding to initial concerns or disclosures.

The Named Designated Safeguarding Lead and Deputies will:

- Provide ready and accessible support and guidance to all staff, tutors and directors on safeguarding matters
- Manage all safeguarding reports and act as liaison for statutory services during any criminal or safeguarding investigation
- Ensure that serious incidents relating to safeguarding are reported immediately and managed effectively
- Report allegations against directors, staff, or tutors to the relevant Local Authority and Disclosure and Barring Service as appropriate
- Ensure accurate records of all safeguarding concerns and the secure storage of all safeguarding records
- Provide a quality assurance and review function for all safeguarding concerns
- Work with all the above governance bodies to inform of serious or untoward safeguarding incidents as appropriate
- Ensure the adoption, implementation and auditing of all policies and strategies in relation to safeguarding
- Liaise with school Designated Safeguarding Leads on matters of safety and safeguarding, in particular online and digital safety involving Coding With CodeX tutors, when deciding whether to make a referral to the relevant agencies



## **Designated Safeguarding Lead**

Name: Faisal Patel

Phone: +447508105509

Email: faisal@codingwithcodex.co.uk

## **Deputy Designated Safeguarding Lead**

Name: Fore Obatusin

Phone: +44 7539 904321

Email: fore@codingwithcodex.co.uk

Further information on the role and responsibilities of the Designated Safeguarding Lead and Deputies in the context of schools can be found in the statutory guidance KCSIE 2023, Annex C.

### **13.4 Coding with CodeX Staff and Tutors**

All Coding with CodeX staff and tutors have a shared responsibility to safeguard and promote the welfare of children and young people. They should know how to recognise, respond to, report and record any safeguarding concerns.

All staff and tutors are responsible for following the organisation's safeguarding procedures for reporting any concerns relating to abuse or neglect or suspected abuse or neglect of any child or young person immediately.

In an emergency staff and tutors will be expected to report urgent concerns directly to the relevant statutory agency.

## **COMPLAINTS**

If a complaint is identified as a potential safeguarding concern, then the Safeguarding Procedures will be followed.

## **QUALITY ASSURANCE AND REVIEW**

Coding with CodeX is committed to striving for excellence in the provision of all its services. We do this by actively reviewing the safeguarding systems in place.

We use an electronic recording system to capture all relevant data that supports the evidencing and monitoring of compliance in safeguarding. This quality assurance mechanism is a crucial and integral part of the governance structure.

The leadership team will review the safeguarding policy and supporting procedures annually to ensure they continue to reflect legislation and guidance. Any amendments to the policy and supporting procedures will be submitted to the Directors for approval.

# UNDERPINNING LEGISLATION AND GUIDANCE

## 16.1 Legislation

Children Act 1989  
Human Rights Act 1998  
United Nations Convention on the Rights of the Child, 1991  
Sexual Offences Act 2003  
Female Genital Mutilation Act 2003  
Children Act 2004  
Safeguarding Vulnerable Groups Act 2006  
The Forced Marriage (Civil Protection) Act 2007  
The The Mental Capacity Act 2005  
The Equality Act 2010  
Children and Families Act 2014  
Anti-Social Behaviour, Crime and Policing Act 2014  
Modern Slavery Act 2015  
Counter Terrorism and Security Act 2015  
Children and Social Work Act 2017  
Data Protection Act 2018  
Voyeurism (Offences) Act 2019  
Domestic Abuse Act 2021  
Children's Code (issued under S125 DPA 2018, effective Oct 2021)  
The Marriage and Civil Partnerships Act 2022

## 16.2 Guidance

[What to do if you're worried about a Child is being Abused, 2015](#)  
[Child Sexual Exploitation Guidance 2017](#)

[Information Sharing Advice for Safeguarding Practitioners 2018](#)

[Working Together to Safeguard Children 2018](#) places a general duty on schools to work and cooperate with other agencies to safeguard and promote the welfare of children. Coding with CodeX is committed to do this by having an open, honest and transparent line of communication.

[Children's Code](#) is a statutory code of practice that articulates how online services likely to be accessed by children should comply with the UK GDPR when using children's data. The code was prepared under s121 of the DPA 2018 and issued under s125 of DPA 2018, coming into effect on 5 October 2021.

[Guidance for Safer Working Practice for those working with children and young people in education settings](#) , February 2022 - this document is an update by the Safer Recruitment Consortium of a document previously published for schools by the Department for Education and Skills (DfES). It was initially issued as those working with children had expressed concern about their vulnerability and requested clearer advice about what constitutes illegal behaviour and what might be considered as misconduct. Education staff asked for practical guidance about which behaviours constitute safe practice and which behaviours are avoided. This safe working practice document is NOT statutory guidance from the Department for Education (DfE); it is for employers, local authorities and/or the Three Safeguarding Partners to decide whether to use this as the basis for their code of conduct / staff behaviour guidelines.

[Keeping Children Safe in Education](#) 2023 (KCSIE) is statutory guidance issued from the Department for Education under Section 175 of the Education Act 2002. Schools and colleges must have regard to this when carrying out their duties to safeguard and promote the wellbeing of children.

## **Appendix A**

### [Safeguarding Concern Form](#)

## **Appendix B**

### **Guidance on completing the Safeguarding Concern Form**

It is important that this concern form is fully completed in a timely manner. The details are important. To help the Designated Safeguarding team respond and refer appropriately you should follow the guidance below.

- Only write about one child on each form
- Remember that concern forms are used in court cases and inquests as evidence.
- Make sure you use the Coding with CodeX Safeguarding Concern Form to record your concerns/disclosure.
- If you cannot access a copy of the Safeguarding Concern Form then contact the Designated Safeguarding Officer (or Deputy) as soon as you are able to who will supply the form for you
- Please alert the team as soon as possible. It can take several hours to deal with even urgent concerns and the earlier we start the better