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Introduction

This policy informs staff, learners and visitors about Northcoders Group's commitment to safeguarding all our learners. The policy has been reviewed in light of Keeping Children Safe in Education (2024) from the Department for Education and Prevent Duty Guidance: England and Wales (2023).

All staff at Northcoders are expected to have read and understood the information within this policy and follow it as part of carrying out their role at Northcoders.

Northcoders Group's safeguarding arrangements are inspected by Ofsted under all the key judgements. Our core safeguarding principles are:

- Safeguarding and promoting the welfare of all our learners is of paramount importance.
- All our learners regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a learner is at risk of harm.
- All staff must escalate concerns immediately if they believe a learner is at immediate risk of harm, or at risk of harming themselves or others.
- There is a culture of transparency, openness and, if needed, challenge with regard to maintaining high standards in safeguarding.
- All learners involved in safeguarding issues will receive individualised support where necessary and be supported in accessing external support.
- All staff involved in safeguarding issues will receive appropriate support and supervision where necessary.
- This policy will be reviewed annually, unless an incident or new legislation or guidance indicates the need for an interim review.

Policy Statement

Northcoders Group takes seriously its duty to safeguard and promote the welfare of all our learners. Although all our learners are over 18, this policy has been written to reflect our commitment to safeguard with the same level of mindfulness as any policy which has based its foundations off of Keeping Children Safe in Education.

Northcoders Group will take all reasonable measures to ensure that any risk of harm to learners' health is minimised and will take all possible action to address concerns about the welfare of any learner or learners, in full partnership with local Safeguarding Boards where appropriate.

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Northcoders Group recognises the moral and statutory responsibility to safeguard and promote the welfare of all learners. We endeavour to provide a safe and welcoming environment where our learners are respected and valued. All staff are trained so they are alert to the signs of abuse and neglect and understand their duty to follow our procedures to ensure that the learners receive effective support, protection and justice.

Northcoders Group is committed to safeguarding and it aims to create a culture of vigilance. Northcoders will always work in the best interests of our learners. This policy endeavours to meet the needs of all learners across multiple regions and recognises the importance of contextual safeguarding due to the diversity of our cohorts of learners.

This policy covers the legislative requirements and recommendations pertaining to the protection of adults at risk in the UK, in accordance with statutory guidance on safeguarding and promoting the welfare of learners in education.

This policy has been developed in accordance and under the guidance of the:

- Keeping Children Safe in Education: Statutory guidance for schools and colleges (September 2024)
- Counterterrorism and Security Act (2015)
- Education Act (2002)
- Prevent Duty Guidance (2023)
- Revised Prevent duty guidance: for Scotland (2015)
- The Care Act (2014)
- The Adult Support and Protection (Scotland) Act (2007)
- Safeguarding Vulnerable Groups Act (2006)

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Policy Aims

This policy applies to all members of staff who work at Northcoders Group and aims to:

- Provide all staff with the necessary information to enable them to meet their safeguarding responsibilities.
- Demonstrate Northcoders' commitment with regard to safeguarding all learners, staff and other partners.
- Ensure consistent good practice and continuous improvement.
- Ensure all staff understand their collective and individual duty to provide a caring, safe and supportive environment that positively promotes the health and wellbeing of each individual learner, along with their social, physical and moral development.
- Demonstrate our responsibility to protect our learners from harm by ensuring a consistent learner-centred approach.
- Encourage all staff to have a clear understanding of learners' individual needs and view and of the Northcoders' Safeguarding Procedures.

Key Terminology

Safeguarding and promoting the welfare of adults is defined for the purposes of this guidance as 'protecting a person's right to live in safety - free from abuse and neglect.'

Section 43 of the Care Act requires every Local Authority to establish Safeguarding Adults Boards. The purpose of these is to 'help and protect adults in its area from abuse and neglect through coordinating and reviewing a multi-agency approach across all member organisations'.

Throughout this policy we will refer to the role of Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL). The DSL is the person who takes lead responsibility for safeguarding our learners and ensuring that this policy is followed, and they are supported within their role by the DDSL.

A further role that is referred to is Prevent Single Point of Contact (SPoC). The Prevent SPoC is the first point of contact for concerns around learners being at risk

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of radicalisation.

Review and Monitoring Procedures

This policy is reviewed annually by our Designated Safeguarding Lead, with guidance where necessary from our Safeguarding Governor. The policy will be reviewed sooner if there is a change in National guidance, or if we have a major Safeguarding incident that requires a review of our policies and procedures.

Procedures will be monitored and evaluated by the Safeguarding Governance, learner satisfaction surveys and key safeguarding incidents.

Vulnerable Adults

Note: this Safeguarding Policy is guidance for safeguarding all our learners, whether they are classed as a 'vulnerable adult' or not.

A vulnerable adult is defined as 'anyone over the age of 18 years who may be unable to protect themselves from abuse, harm or exploitation, which may be by reason of illness, age, mental illness, disability or other types of physical or mental impairment.'

It is important when safeguarding vulnerable adults that the basic principles are followed:

- Empowerment - Supporting them to make their own decisions
- Prevention - Where possible action will be taken before harm takes place
- Proportionality - Safeguarding concerns will be responded to in the least intrusive way possible
- Protection - Concerns will be responded to immediately and appropriate action will be taken
- Partnership - Local services will work with their communities to safeguard the vulnerable adults within them
- Accountability - Services will be answerable for things that are within their power.

Northcoders Group is aware that due to the broad range that the definition of a vulnerable adult covers, that some of our learners may fall under this. However, at Northcoders we safeguard all learners, meaning whether or not they have disclosed

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vulnerabilities, we will ensure when they are studying with us we do everything possible to protect them from harm.

Adult Safeguarding Referrals

In the instance where an adult safeguarding referral is required, this will be completed by the Designated Safeguarding Lead (DSL). Before making the referral they will assess:

- does the learner concerned fit the criteria for 'an adult at risk'
- if the learner has capacity to consent to the referral

In situations where the learner does not have capacity, or where the risk to themselves or others is imminent, the DSL can still make a referral if they believe it is in the learner's best interests. If you believe an adult safeguarding referral should be made for one of our learners, please speak with the DSL.

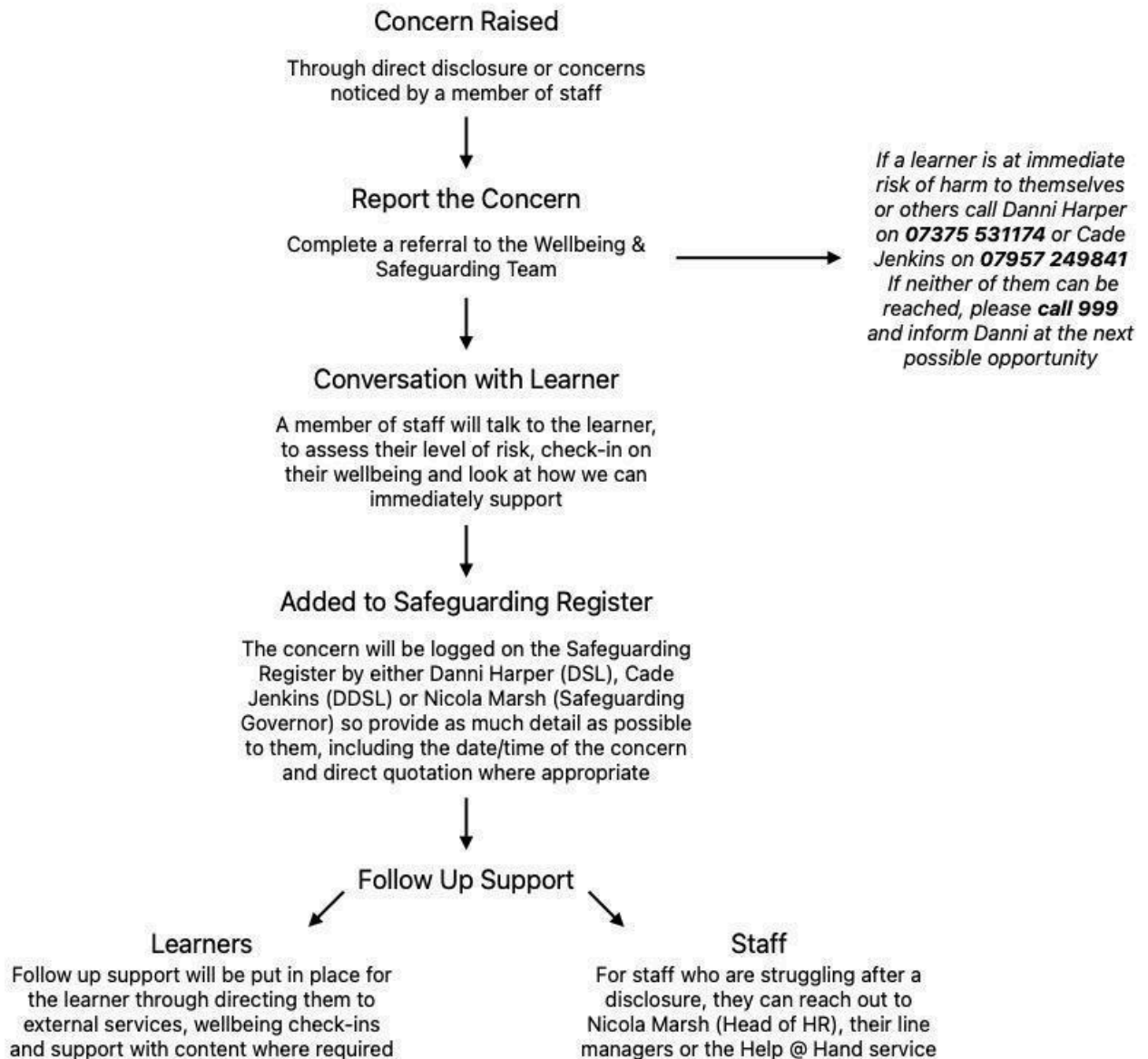
Staff Responsibilities

All Staff

All members of staff working for Northcoders Group have a responsibility to safeguard our learners, meaning any concerns are promptly shared with a relevant member of safeguarding trained staff, and treated in a confidential and respectful manner. Below is a process outlining how to raise a concern and the next steps that will happen following the concern being raised.

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Northcoders Safeguarding Process



Referrals to the Safeguarding & Wellbeing Team are to be made by adding a new comment on the Learner's LMS and then selecting 'I want to add a wellbeing or safeguarding note about the student'. This will notify the Wellbeing & Safeguarding Team, who will add a summary, as the note will be confidential to all other staff.

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Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) for Northcoders is Danni Harper.

The Designated Safeguarding Lead is responsible for:

- Maintaining the appropriate qualifications for the role, renewing training every two years
- Encouraging a culture of listening to students and taking account of their wishes and feelings
- Keeping detailed written records of all concerns and ensuring that such records are stored securely
- Staying informed of key safeguarding information (including trends around extremism and radicalisation) taking place within key catchment areas of our learners
- Developing effective links with relevant statutory and voluntary agencies
- Ensuring that all staff have read the Safeguarding Policy and relevant parts of Keeping Children Safe in Education (KCSIE)
- Monitoring the completion of mandatory safeguarding & Prevent training for all staff and ensuring staff receive relevant updates regularly
- Ensuring that the Safeguarding Policy is regularly reviewed and updated annually
- Having procedures for allegations made against staff, including themselves
- Following safer recruitment procedures that include DBS checks on staff members
- Delivering supervision sessions to relevant staff to support best practice
- Ensuring that any temporary staff and volunteers are made aware of Northcoders arrangements for safeguarding

Deputy Designated Safeguarding Lead (DDSL)

The Deputy Designated Safeguarding Lead for Northcoders is Cade Jenkins.

The Deputy Designated Safeguarding Lead is responsible for:

- Supporting the DSL to fulfil their duties
- Maintaining the appropriate qualifications for the role, renewing training every two years
- Being another point of contact for staff and students to raise their concerns to
- Staying informed of key safeguarding information (including trends around extremism and radicalisation) taking place within key catchment areas of our learners

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- Supporting the DSL with opportunities to share good practice across Northcoders, through meetings and sharing of key information
- Ensuring safeguarding and wellbeing support documents are kept up to date

The Governing Body

The Safeguarding Governor for Northcoders is Nicola Marsh.

The Governing Body ensures:

- A DSL is appointed and that the DSL's role is explicit in the role holder's job description
- Safer recruitment procedures are followed that include DBS checks on staff members
- They facilitate a whole Northcoders approach to safeguarding. This means ensuring safeguarding is at the forefront and underpins all relevant aspects of process and policy development
- Any allegations against the Designated Safeguarding Lead are handled by the Governing Body
- Northcoders follows and maintains robust safeguarding, recruitment and managing allegations procedures

Procedures

It is the responsibility of all staff to report their concerns to the Safeguarding Team or another member of safeguarding trained staff if the DSL/DDSL is uncontactable (see *Appendix 3 for further information*). This can be any member of staff who has concerns that a learner may be at risk, they do not need concrete 'proof'. Staff should not promise confidentiality and it is not their responsibility to investigate concerns.

All staff are made aware of the indicators of abuse or neglect - through mandatory training and safeguarding updates - and are aware that the impact of abuse should not be underestimated. Staff should always maintain an attitude of "it could happen here".

Key points for staff to remember for taking action are:

- Raise your concern by the end of the working day at the very latest
- Do not start your own investigation

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- Share information on a need-to-know basis only – do not discuss the issue unnecessarily with colleagues or with friends/family
- Seek support for yourself if the disclosure has impacted you
- In an emergency take the action necessary to help the learner, such as, calling 999

Appropriate follow up support will be put in place for learners following a Safeguarding concern. **For staff involved there is also support available through the People Team and the Help@Hand Service.**

During the student induction, both Safeguarding and Prevent are discussed and details are provided for how learners can access support and raise a concern. Students are made aware of their responsibilities with regards to reporting absences, so we are able to safeguard them effectively. Details of Northcoders Acceptable Use Policy (for IT) is also covered within the student handbook, which is provided during the induction.

For further guidance on how to deal with a safeguarding issue refer to the 'reporting an incident' information in Appendix 2.

The 5 R's of Safeguarding

The 5 R's of Safeguarding are a way for staff to remember the steps they need to take to protect our learners from abuse and neglect. They are: Recognise, Respond, Report, Record and Refer:

Recognise

- Due to their day-to-day contact with learners, Northcoders' staff are well placed to observe changes in behaviour and to spot the outward signs of abuse. Learners may also turn to a trusted staff member in Northcoders when they are in distress or at risk. It is vital that staff are alert to the signs of abuse and understand the procedures for reporting their concerns.
- The ability to recognise possible indicators of abuse is of fundamental importance, as the abuse may occur on the premises or in any other setting. All those playing a role in meeting the learners' needs should be aware and informed so that possible abuse can be recognised, investigated and acted on seamlessly and effectively.

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- Signs and symptoms of abuse may include direct disclosure. All staff working at Northcoders will be trained to understand the signs of abuse and know how, where and who to report concerns to.

Respond

- An appropriate response is vital. No report of, or concern about, possible abuse should be ignored. To determine the most appropriate response, find out whether you are dealing with an allegation from a learner against a member of staff, another learner or an external person. Clarity is vital.
- Do not lead or probe with questions and remain calm during the conversation.
- Listen well. Inform the person sharing a concern with you that what they have raised must be recorded and passed on and that this will be done on a limited "need to know" basis. It is important that learners know this information can be kept 'private, but not secret'.
- Reassure them that they have done the right thing in reporting their concerns. Do not make unrealistic promises. Ensure that testimony is recorded and reported, and that anyone involved is treated in line with Northcoders' safeguarding policy and procedures.

Report

- You should report directly to the Safeguarding Team or another member of Safeguarding trained staff if they cannot be contacted. If this is not possible you should report your concern to a relevant member of the Northcoders' Senior Management Team. Once you have reported the cause for concern, the responsibility resides with them.
- The Safeguarding Team will log the concern on the Safeguarding Register and ensure any action and follow up is recorded.

Record

- You should record precisely what has been alleged, using direct quotation where possible. It should also, if appropriate, include factual observations about the physical and emotional state of the individual sharing their concerns with you. Please record all safeguarding incidents as a Wellbeing and

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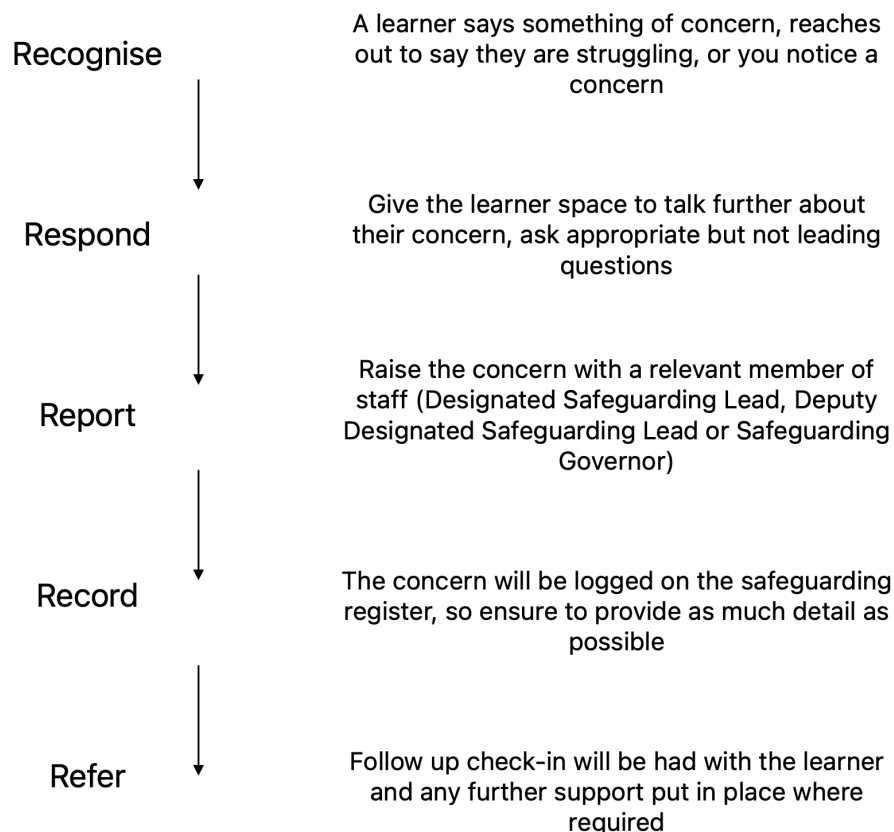
Safeguarding note on the LMS, which will alert the Safeguarding Team so they can action this accordingly.

- If you believe the learner is at immediate risk of harm, you must contact the Wellbeing & Safeguarding Team **immediately**, either through Slack or by phone. If they cannot be reached, call 999 and make the DSL aware of this at the next possible opportunity.
 - **DSL (Danni Harper) - 07375 531174**
 - **DDSL (Cade Jenkins) - 07957 249841**

Refer

- The Safeguarding Team will decide an appropriate course of action for following up the concern and ensuring ongoing support is in place for the learner.
- Only the DSL, DDSL or Safeguarding Governor should look into complaints, allegations or suspicion of abuse. An enquiry may include questioning colleagues or other learners where necessary. Actions of these sorts carried out by someone other than the appropriate members of staff could be construed as unjustified interference which could jeopardise an enquiry and any possible subsequent actions.

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Confidentiality and Sharing Information

Northcoders Group understands that information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting learners welfare, including their educational outcomes.

If a member of staff deems a learner to be at risk of harm, they have grounds to share this information with or without the consent of the learner.

All staff will understand that safeguarding concerns warrant a high level of confidentiality, not only out of respect for the learner and staff involved but also to ensure that evidence is not compromised by being released into the public domain.

The Designated Safeguarding Lead will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

It is important for staff to follow the 'seven golden rules of information sharing', ensuring that information that is shared is:

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- Necessary
- Proportionate
- Relevant
- Adequate
- Accurate
- Timely
- Secure

Safeguarding information will be stored and handled in line with Data Protection Act 2018 principles. All information is:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Not kept for longer than is necessary
- Processed in line with legal rights
- Not transferred to other countries without adequate protection

Sensitive information should not be directly stored on personal devices due to their portability and chance of getting lost. Safeguarding information will be stored separately from the learner's Northcoders file. Every effort will be made to prevent unauthorised access.

Safeguarding records are normally exempt from the disclosure provisions of the Data Protection Act, which means that learners do not have an automatic right to see them. If any member of staff receives a request from a learner to see safeguarding records, they will refer the request to DSL.

The Data Protection Act does not prevent Northcoders staff from sharing information with relevant agencies, where that information may help to protect a learner. Ideally information sharing will be done in writing so that there is an evidence trail however there may be occasions in safeguarding proceedings where this method is too slow. In cases where agencies contact Northcoders requesting information, staff will inform the DSL immediately, the DSL will ensure they can identify who is requesting the information before sharing and then record what has been shared, when, why and with whom.

Prevent Duty

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The Prevent Single Point of Contact (SPoC) for Northcoders is Danni Harper.

As part of our safeguarding requirements under the Prevent Duty, it is the responsibility of all Northcoders' staff to help protect our learners from all types of radicalisation and extremism. We will provide our learners with information around Prevent, radicalisation and extremism throughout their time at Northcoders.

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, go on to participate in terrorist activity.

The Prevent Duty aims to safeguard people from becoming terrorists or supporting terrorism. It aims to tackle the ideological causes of terrorism and be proactive around support to people who are vulnerable to radicalisation. It also aims to rehabilitate and disengage those individuals who are already involved in terrorism.

Northcoders' understands that as an education provider we have a due regard to the need to prevent people from being drawn into terrorism. There are several push and pull factors that can make a learner vulnerable to being drawn into extremist behaviours or radicalisation:

Push Factors

Push factors may include a learner feeling:

- Isolated
- They do not belong
- They have no purpose
- Low in their self-worth or self-esteem
- Anger or frustration
- A sense of injustice
- They can't meet their aspirations
- Confusion about life/current events/the world
- Real or perceived grievances

Pull Factors

Pull factors could come from a person, organisation or extremist/terrorist group. They may:

- Offer a sense of community and a support network

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- Promise excitement or fulfilment
- Make the learner feel special and part of something
- Encourage conspiracy theories
- Promote an 'us vs them' mentality
- Blame specific people or communities for grievances
- Encourage hatred and violent actions to get justice
- Encourage ideas of supremacy

Advice to Staff on When to Take Action and How

It is the responsibility of all staff working within Northcoders to record and refer concerns regarding the safeguarding of learners even if they are just suspicions or overheard rumours. This must not be discussed with anyone apart from the Prevent SPoC, or the Safeguarding Governor in their absence.

If a learner comes to you with a concern over radicalisation or extremism, you should listen carefully to them, using the following guidelines:

When listening staff must:

- Allow them to speak without interruption
- Never trivialise or exaggerate the issue
- Never make suggestions
- Reassure them, let them know you are glad they have spoken up and that they are right to do so
- Always ask enough questions to clarify your understanding, but do not probe or interrogate - no matter how well you know the learner - spare them having to repeat themselves over and over
- Be honest - let the learner know that you cannot keep this a secret; you will need to tell the Prevent SPoC
- Try to remain calm - remember this is not an easy thing for them to do
- Not show their emotions - if you show anger, disgust or disbelief, they may stop talking. This may be because they feel they are upsetting you or they may feel your negative feelings are directed towards them
- Let the learner know that you are taking the matter very seriously
- Make the learner feel secure and safe without causing them any further anxiety

Once you suspect any risk of extremism/radicalisation you should immediately (within a maximum of two hours) contact the Prevent Single Point of Contact (SPoC)

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either on slack or by telephone (**07375 531174**), outlining what has been disclosed, what you have overheard or your suspicions.

If the Prevent Single Point of Contact (SPoC) cannot be contacted within two hours of the initial concern, the person making the report should refer the matter to the Safeguarding Governor or DDSL.

Northcoders' Prevent Single Point of Contact will ask the referring member of staff to produce a full written record within 24 hours, which should:

- Include the name and role of the person who reported the matter
- Identify if the matter is a direct disclosure from a learner or a suspicion/an overheard conversation
- Provide a factual account of what has happened, including any questions they needed to ask to clarify understanding
- Contain as much detail as possible, including observations (such as physical signs of apparent abuse). It must not include opinions or personal interpretation of the facts
- Be signed, dated and given to the Prevent SPoC who will store it in a secure place

Detailed information about a case will be confined to the safeguarding team and the reporting member of staff will be kept informed on the progress of the case on a 'need to know' basis only.

If a member of staff wishes to report a concern anonymously, they can do so at the link below, however we encourage where possible that the member of staff informs the Prevent SPoC, so that support can be put in place for the member of staff and any learners affected.

<https://act.campaign.gov.uk/>

Learner Absence

When onboarded to Northcoders, learners are made aware of their obligation to attend lectures and seminars due to the fast-paced nature of the course. However, we are aware that learners will not always be able to attend, due to illness, appointments or other life events. If a learner is going to be absent for whatever

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reason, they are informed they must contact their mentor or a member of the teaching team to let them know.

If a learner has been absent for a full day of teaching and then does not arrive for the next morning's lecture, a member of the teaching team must notify the Wellbeing & Safeguarding team. They will then reach out to the learner via text or call and if deemed necessary, call their emergency contact.

For some learners, there may be a safety plan requiring staff to contact the Wellbeing & Safeguarding Team sooner if a learner does not arrive. Staff will be made aware of this on a case by case basis.

Part-Time Course

If a learner has not attended either **seminar** session during the week, and has not reached out to provide a reason for this, please raise this through the referral form, and we will contact the learner via text/phone call.

Safer Recruitment

Northcoders endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in Keeping Children Safe in Education 2024, including keeping an up to date Single Central Register.

Safer recruitment means that all applicants will:

- Complete an application form, to identify gaps in employment
- Provide evidence of identity and qualifications
- Provide evidence of their right to work in the UK
- Provide a minimum of two references, satisfactory to Northcoders, one of which should be from a previous employer
- Be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role
- Not be subject to lone working with learners if a DBS check is delayed for any reason. Should the DBS check be considered unsatisfactory, their position may be terminated
- Be subject to a face to face interview
- Be interviewed by recruitment panel where at least one member of staff will be Safer Recruitment Trained
- Be subject to a search of social media, carried out by the People Team.

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All new members of staff will undergo an induction that includes familiarisation with the safeguarding policy, and appropriate mandatory safeguarding training. All staff sign to confirm they have received a copy of the safeguarding policy. More information can be found in Northcoders Recruitment Policy.

Staff Training

It is important that all staff have training, including online safety training, to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern.

All staff and governors receive safeguarding awareness training. New staff and governors are expected to complete safeguarding training during the initial days of their induction period. New staff and governors will also receive Northcoders disciplinary process.

Updates are provided to all staff periodically throughout the year in line with key guidance updates. In addition, staff receive regular safeguarding and Prevent updates, as appropriate to their role.

Filtering & Monitoring

All staff are made aware that technology is a significant component in many safeguarding and wellbeing issues, particularly as all learners use mobile phones, tablets and computers on a daily basis. As of April 2024, we have also passed the Cyber Essentials Plus audit, which means we are fully GDPR compliant.

The breadth of issues can be classified into 4 areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content
- Contact: being exposed to harmful interactions with others
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm
- Commerce: risks such as online gambling, inappropriate advertising, phishing or online scams

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The harm might range from sending hurtful or abusive communications, to enticing others to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

Northcoders e-safety guidance (which is part of the Acceptable Use of IT Policy) explains how we aim to keep learners safe in Northcoders. Northcoders filtering and monitoring procedures are reviewed annually unless there is a safeguarding incident or new technology is brought in.

Staff regularly receive practical advice towards acceptable and professional use regarding the use of social networking and electronic communication. All staff are made aware of our Acceptable Use of IT Policy. Also within Northcoders' Cyber Security Policy it clearly states that the use of company property is for business use only.

Northcoders has a filtering service that takes effect within our office spaces. Our filtering system ensures that harmful and inappropriate content is blocked, such as child pornography and terrorist content.

Cyberbullying by learners, communicated via messaging and emails, will be treated as seriously as any other type of bullying and appropriate disciplinary procedures will be followed.

Roles & Responsibilities

Governing bodies and proprietors have overall strategic responsibility for filtering and monitoring and need assurance that the standards are being met. Northcoders' DSL is responsible for ensuring these standards are met.

The Senior Management Team are responsible for:

- Procuring filtering and monitoring systems
- Documenting decisions on what is blocked or allowed and why
- Reviewing the effectiveness of Northcoders' provision
- Overseeing reports

They are also responsible for making sure that all staff:

- Understand their role
- Are appropriately trained
- Follow policies, processes and procedures
- Act on reports and concerns

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The DSL works closely together with Northcoders IT Department. The DSL takes lead responsibility for safeguarding and online safety, which includes overseeing and acting on:

- Filtering and monitoring reports
- Safeguarding concerns
- Checks to filtering and monitoring systems

The IT department should have technical responsibility for:

- Maintaining filtering and monitoring systems
- Providing filtering and monitoring reports
- Completing actions following concerns or checks to systems
- Procuring systems
- Identifying risks
- Carrying out reviews
- Carrying out checks

Safeguarding Code of Behaviour and Conduct, Good Practice Guidelines and Staff Code of Conduct

Northcoders' staff are aware that inappropriate behaviour towards learners is unacceptable. This is clarified in the Staff Code of Conduct.

In addition, staff should understand that, although all learners at Northcoders are over 18, due to our Duty of Care over them, a relationship forming with a new learner is strongly advised against. If a member of staff has a partner/family member accessing the course it must be raised with the DSL and the People Team, to ensure both the member of staff and learner are able to access the course in a safe and professional manner.

Non disclosure can lead to disciplinary action.

To meet and maintain our responsibilities towards learners we need to agree on the standards of good practice which form a code of conduct for all staff.

Good practice includes:

- Treating all learners with respect

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- Setting a good example by conducting ourselves appropriately
- Involving learners in decisions that affect them
- Encouraging positive, respectful and safe behaviour among learners
- Challenging inappropriate or discriminatory language or behaviour
- Being alert to changes in learners' behaviour and to signs of abuse and neglect
- Recognising that challenging behaviour may be an indicator of abuse
- Avoiding favouring one learner over others
- Avoiding any behaviour which could lead to suspicions of anything other than a professional relationship with learners
- Reading and understanding Northcoders' Safeguarding Policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, appropriate IT use
- Maintaining appropriate standards and boundaries of conversation and interaction with and between learners
- Avoiding the use of sexualised or derogatory language, even in joke
- Being clear on professional boundaries and conduct with other staff when learners are present
- Being aware that the personal and family circumstances and lifestyles of some learners lead to an increased risk of abuse
- Referring all concerns about a learners safety to the DSL
- Following Northcoders' rules with regard to communication with learners and use of social media and online networking
- Avoiding unnecessary time alone with learners and risk managing any time alone or 1:1 working
- Avoiding sharing excessive personal information with learners

Photography & Images

As some people carry out abuse through taking or using images, we must ensure that we are cautious when it comes to photographic materials. To protect students, Marketing asks students to sign a consent form when their photo and name is to be used for promotional purposes.

Allegations Against Members of Staff

Northcoders take allegations against any member of staff seriously and believe it is essential that all cases of suspected maltreatment or significant harm are investigated quickly and professionally whatever the validity. All staff must remember that the welfare of our learners is paramount.

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Northcoders' Whistleblowing Policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. All concerns, no matter how small, must be reported and dealt with.

Our Whistleblowing key contact at Northcoders is Sarah Byrne (HR Director), who you can contact through Slack or at sarah.byrne@northcoders.com

Further information regarding allegations includes:

- Members of staff should take care not to place themselves in a vulnerable position with a learner or a situation which could be misconstrued.
- If a member of staff has a partner or family member joining the course, they should notify the DSL and the People Team.
- As our staff regularly work alone with learners, it is important that the Designated Safeguarding Lead is made aware of any potential concerns that arise.
- If a member of staff suspects any other member of the team of safeguarding malpractice, it is their responsibility to immediately bring these concerns to the DSL in the interest of the learner and the business.
- If the DSL is unavailable, then this concern should be immediately reported to the Safeguarding Governor or the Northcoders Senior Management Team instead.

The Designated Safeguarding Lead will:

- Provide support and advice to the reporting member of staff including referring to and adhering to Northcoders' Whistleblowing Policy.
- Ask the reporting member of staff to provide a written record of their concern, following the procedures for reporting concerns, which will be housed in the secure safeguarding single central file.
- Consult with a member of the Senior Management Team
- Efficiently act on advice, whether this is to take further investigative action or not.

Any allegation made against the Designated Safeguarding Lead should be reported directly to the Safeguarding Governor (Nicola Marsh), who will act as above, without notifying the Designated Safeguarding Lead.

Allegations against staff will be reported to the board. Allegations and complaints against the DSL should be reported to the Chair of Governors. Staff may also report

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their concerns directly to police if they believe direct reporting is necessary to secure action.

All members of staff should be aware of their responsibility to immediately raise concerns, where they exist, about any member of staff, including the Designated Safeguarding Lead.

We are aware a learner may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to learners, and we must act on every allegation. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that learners are protected.

Staff and governors are reminded that the publication of material that may lead to the identification of a Staff member who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites. This will be communicated to all parties.

Concerns may arise if an individual has behaved in a way that indicates that they may not be suitable to work with learners. There is a transferable risk, for example, a member of staff may be involved in an incident outside of Northcoders which may not include a learner but have an impact on their suitability to work with them.

Support for staff

We understand that Safeguarding concerns and allegations not only have an impact on the learner involved but also any involved member of staff.

We will support our staff by:

- Taking all suspicions and disclosures seriously
- Nominating a link person (for example, the DSL) who will keep all parties informed and be the central point of contact
- Ensuring that when a member of staff is the subject of an allegation made by a learner, separate link people will be nominated to avoid any conflict of interest

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- Responding sympathetically to any request from staff for time out to deal with distress or anxiety
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- Maintaining and storing records securely
- Offering details of helplines, counselling or other avenues of external support
- Following the procedures laid down in our whistleblowing, complaints and disciplinary procedures
- Cooperating fully with relevant statutory agencies

Complaints Procedure

As a company, Northcoders understands that a lot can be learnt from a complaint. When a complaint is raised, it is important that it is not taken personally and handled in a calm and composed manner, to avoid the situation escalating.

Our complaints procedure will be followed where a learner raises a concern about poor practice towards themselves or another learner.

Poor practice examples include unfairly singling out a learner, belittling a learner or discriminating against them in some way. Complaints are managed by senior management team staff. A copy of Northcoders' Complaints Policy & Procedure is available on our website or BrightHR for staff.

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Appendix 1: Key Safeguarding Contact Information

Designated Safeguarding Lead & Prevent Single Point of Contact

Danni Harper

Wellbeing & Safeguarding Lead

Phone: 07375 531174

Email: danni.harper@northcoders.com

Deputy Designated Safeguarding Lead

Cade Jenkins

Wellbeing & Safeguarding Officer

Phone: 07957 249841

Email: cade.jenkins@northcoders.com

Safeguarding Governor

Nicola Marsh

HR Advisor

Phone: 07946 081074

Email: nicola.marsh@northcoders.com

Appendix 2: Reporting an Incident

If you know or suspect that a learner is at risk, then you must report this to the Safeguarding Team. If you do not feel it is an immediate risk, then this can be made by adding a new comment on the Learner's LMS and then selecting 'I want to add a wellbeing or safeguarding note about the student'. This will directly notify the Safeguarding Team so appropriate action can be taken.

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If you feel that the learner is at immediate risk then it is your responsibility to ensure that you speak directly to the DSL or DDSL within Northcoders and that they acknowledge this. It is not acceptable to leave a message. Report such concerns by phoning your DSL or DDSL. If they are unavailable contact a member of the Safeguarding Governor or a member of Safeguarding Trained Staff.

If the learner is at immediate risk of harm to themselves or others and you cannot contact the DSL/DDSL, please call 999 and ensure you inform the DSL at the earliest opportunity.

It is vital that all information reported is factual, timely and accurate. When reporting a safeguarding concern, please include the following information:

- Name of learner
- Nature of concern (Please provide as much relevant detail as possible)
- Have you spoken to the learner?
- Your full contact details (name, job role, email and phone number)
- Any further information that you feel is necessary/relevant

Appendix 3: A Guide to Safeguarding Learners

It is a requirement of all our staff to be aware of their safeguarding responsibilities and report any concerns that they might have regarding the welfare of our learners.

Safeguarding aims to protect the welfare of learners from harm or abuse. This involves putting in place a number of measures to create a safe environment in which learners can thrive and achieve, as well as creating a safe, transparent and professional environment for all members of staff.

All learners have a right to be believed when reporting a concern and to go at a pace they feel comfortable with. Staff should not ask leading questions and should remain calm and reassure the learner throughout. The member of staff should respect the learner's privacy and treat the concern raised confidentially, sharing only on a 'need to know basis'. Staff should communicate to the learner that they will keep their concern 'private but not secret' as we must follow safeguarding procedures.

All concerns will be treated as truth, unless there is sufficient evidence that compromises this. If this is the case we will handle this situation sensitively and still provide support for the learner where necessary.

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Northcoders has a dedicated Designated Safeguarding Lead, who is Level 5 Safeguarding qualified. There are further staff within Northcoders, not just the Safeguarding team, who have Safeguarding qualifications.

The qualified staff are listed below, all are Level 3 safeguarding qualified unless specified otherwise:

- Cade Jenkins - **DDSL**
- Danni Harper - **DSL & Prevent SPoC** (Level 5)
- Darren Holland
- Joe Reilly
- Keely Madgin (Level 5)
- Nikki Gething
- Nicola Marsh - **Safeguarding Governor**
- Sue Lappage
- Tracy Kirchin

Please report any safeguarding concerns around a learner to the Safeguarding Team, unless they are unavailable then please seek advice from one of the staff members listed above.

Appendix 4: Definitions of Abuse

There are 10 categories of abuse to be aware of when safeguarding adults. These include:

Physical Abuse

Physical abuse is defined as physical injury inflicted on a person by any means other than accidental. This can mean the person intended to cause injury, or they knowingly, carelessly or recklessly engaged in behaviour that could be dangerous to another person.

Some examples of this are:

- Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing.
- Making someone purposefully uncomfortable (e.g. making an environment cold, removing blankets and opening the window)
- Misuse of medication (e.g. over-sedation)
- Withholding food/overfeeding someone
- Restricting someone's movement

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- Rough handling
- Involuntary isolation/confinement

Sexual Abuse

This is sexual behaviour or sexual acts forced upon another person without their consent and includes any sexual activity a person lacks the capacity to consent to.

Some examples of this are:

- Rape, attempted rape or sexual assault
- Non-consensual penetration or attempted penetration of the vagina, anus or mouth
- Sexual teasing/sexual Harassment
- Sexual photography/making someone watch something sexual (such as pornography) when they don't want to
- Indecent Exposure
- Upskirting
- FGM (Female Genital Mutilation)

Psychological/ Emotional Abuse

The ongoing emotional mistreatment of a person through non-physical behaviours.

Some examples of this are:

- Enforced social isolation
- Removing mobility or communication aids
- Preventing someone from meeting their religious and cultural needs
- Failure to respect privacy
- Threats of harm or abandonment
- Infantilising someone
- Preventing stimulation or meaningful occupation
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse
- Preventing someone accessing services, educational and social opportunities

Financial or Material Abuse

A pattern of controlling, threatening and degrading behaviours relating to money and finances. The perpetrator uses money to control the person's freedom.

Some examples of this are:

- Fraud/Scamming

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- Denying assistance to access benefits
- Arranging less care than someone needs to maximise inheritance
- Someone living in a person's home rent free without agreement or under duress
- False representation - using someone's bank account/bank card
- Misuse of power of attorney (or equivalent legal authority)

Domestic Violence

The term Domestic Violence is used when there is a close relationship between the offender and the victim, the offender being someone in the victim's domestic circle. It is controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are intimate partners or family members.

These behaviours typically fit within the below categories of abuse:

- Physical
- Sexual
- Psychological/Emotional
- Financial

Modern Slavery

Situations where a person is exploited for personal or commercial gain. The person cannot refuse or leave because of threats, violence or coercion.

Some examples of this are:

- Human Trafficking
- Forced Labour
- Domestic Servitude - A person is expected to work around someone's home 24/7 but they are unable to leave
- Sexual Exploitation
- Debt Bondage - being forced to work to pay off unrealistic debts

Discriminatory Abuse

Discriminatory abuse is unequal or unfair treatment of somebody on the basis of a 'protected characteristic' – age, disability, gender/gender reassignment, sexual orientation, pregnancy/maternity, race, religion or belief.

Some examples of this are:

- Verbal abuse, derogatory remarks or inappropriate language related to a protected characteristic

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- Harassment of deliberate exclusion on the ground of a protected characteristic
- Denying access to communication aids, not allowing access to an interpreter, signer or lip reader
- Denying basic rights to healthcare, education, employment and criminal justice

Organisational/Institutional Abuse

The mistreatment of people, typically in their workplace, brought about by poor or inadequate care or support, or systematic poor practice that affects the whole care setting.

Some examples of this are:

- Lack of respect for dignity or privacy
- Failure to respond to complaints
- Not providing adequate food or drink
- Not taking into account an individual's' cultural, religious or ethnic needs
- Failure to respond to complaints
- Interference with personal correspondence/ communication

Neglect and Acts of Omission

When a person deliberately withholds, or fails to provide, suitable and adequate care and support needed by another adult.

Some examples of this are:

- Preventing access to food, shelter, medical care, glasses, hearing aids etc
- Ignoring or isolating a person
- Refusal of access to visitors
- Failure to ensure privacy or dignity
- Not taking into account cultural, religious, ethnic, educational, social or recreational needs
- Preventing a person from making their own decisions

Self-Neglect

Lack of self-care to an extent that it threatens personal health and safety.

Some examples of this are:

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- Inability to avoid self-harm
- Neglecting your personal hygiene, health or surroundings
- Failure to seek help or access services to meet health and social care needs
- Unwillingness/inability to manage personal affairs

Additional Safeguarding Terms & Definitions:

Cyber Bullying

Repeated behaviour aimed at scaring, angering or shaming those who are targeted. It involves the use of electronic communication devices, such as mobile phones, tablets, laptops. Social media platforms are commonly used by cyberbullies however it can also occur on messaging platforms and gaming platforms.

Some examples of this are:

- Pretending to be someone else to spread hurtful messages online
- Spreading rumours about someone online
- Hacking into someone's gaming/social media profile

Forced Marriage

A forced marriage is where one or both people do not or cannot consent to the marriage and pressure or abuse is used to force them into marriage. It is also when anything is done to make someone marry before they turn 18, even if there is no pressure or abuse.

It is important to note that forced marriage is not the same as an arranged marriage, as an arranged marriage will only go ahead with the full consent of both parties

Peer-on-Peer Abuse

Peer-on-peer is a term used to describe abuse when it happens from a child, to another child. Peer-on-peer abuse can take many different forms, but can include things such as bullying (including online), physical abuse or emotional abuse.

Harmful Sexual Behaviour (HSB) can be a form of peer-on-peer sexual abuse. This is where developmentally inappropriate sexual behaviour is displayed by children/young people which is harmful or abusive.

Sexting

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Consensual sexting between adults is not a sexual offence. However, if an intimate image is taken or shared without someone's consent, under the Criminal Justice and Courts Act 2015, this is a crime. It prohibits: 'sharing, or threatening to share, private sexual images of someone else without their consent and with the intent to cause distress or embarrassment to that person.'

It is against the law for anyone under the age of 18 to possess, share, or send explicit or sexual images, even of themselves. Further to this, it is illegal for anyone over the age of 18 (legally an adult) to be in possession of or share, explicit or sexual images of someone under the age of 18 (legally a child).

Appendix 5: Online Safety

In simple terms, online safety refers to the act of staying safe online. It is also commonly known as internet safety, e-safety and cyber safety. It encompasses all technological devices which have access to the internet from PCs and laptops to smartphones and tablets.

Being safe online means individuals are protecting themselves and others from online harms and risks which may jeopardise their personal information, lead to unsafe communications or affect their mental health and wellbeing.

People are more engaged online than they've ever been. Ownership of smart devices is increasing and the range of content they are viewing is expanding. In an ever-changing world, ensuring our learners safety online has never been more important. It's an all-encompassing duty and something every member of the staff must be vigilant of.

What are the risks?

Aside from the more obvious risks such as online bullying, grooming or device addiction, the way our learners are engaging with the online world means that we have to take stock of their mental health and wellbeing, the type of content they are viewing and what they are posting online.

This includes the heightened concern around 'fake news' and the impact social media may be having on people's behaviour. It also includes the ongoing debate as to whether online gaming and certain features of online gaming, such as loot boxes and skins, are categorised as gambling and are encouraging gambling habits.

What should we do?

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It is important for all members of staff to stay up to date on the latest risks and ensure we are doing all we can to keep our learners safe online. Any concerns must be raised to the DSL or DDSL and treated with the same level of concern as an 'offline' safeguarding risk.

Appendix 6: COVID-19

Coronavirus disease (COVID-19) is an infectious disease first identified late in 2019. Most people infected with the COVID-19 virus will experience mild to moderate respiratory illness and recover without requiring special treatment. Older people, and those with underlying medical problems like cardiovascular disease, diabetes, chronic respiratory disease, and cancer are more likely to develop serious illness.

There are currently no COVID-19 restrictions in the UK, however if you believe you have COVID-19 you should try to stay at home, to avoid spreading the virus. We are still learning about the short- and long-term effects of the disease, so it is important for Northcoders to adhere to all the government advice to keep our learners safe. Northcoders will continue to stay informed and will work at all times to ensure a supportive and flexible approach is taken with our learners at all times. For further information and advice please visit <https://www.gov.uk/coronavirus>

Appendix 7: Bereavement by Suicide

Bereavement by suicide is a specific risk factor for suicide attempts among young bereaved adults, whether they are related to the deceased or not. People are 65% more likely to attempt suicide if the deceased died by suicide than by natural causes*. They are also 80% more likely to drop out of education or work.

The Designated Safeguarding Lead, must be notified immediately if a learner discloses a friend/family member has died by suicide, so a sufficient support plan can be put in place.

Cruse Bereavement Support - <https://www.cruse.org.uk/>
Survivors of Bereavement by Suicide - <https://uksobs.org/>

*Study: <https://bmjopen.bmj.com/content/6/1/e009948>

Appendix 8: Self-Neglect Clutter Scale

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It is important to be mindful of self-neglect and the ways it can manifest, one of which being hoarding. Below is the Clutter rating scale. The higher the number, the higher the level of concern.



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