

## University of Greenwich Safeguarding Policy

### 1. Introduction

- 1.1 The University is committed to supporting and promoting the welfare of staff, students (including apprentices) and visitors and is committed to the provision of a safe environment conducive to work, study and the enjoyment of a positive experience for all members of its community.
- 1.2 The University recognises that within the course of its activities its staff and students may come into contact with children (individuals who are under 18 years old) or adults at risk (those over 18 who are rendered vulnerable to harm or exploitation due to their personal situation and/or social circumstances). There may also be situations where a student or staff member falls into these categories.
- 1.3 The University wishes to ensure that it maintains the highest possible standards to meet its responsibilities to protect and safeguard the welfare of children and adults at risk. The University is committed to working in partnership with other organisations (as appropriate) to facilitate this.
- 1.4 In the discharge of its functions, and in implementing this policy and procedure, the University will remain mindful of its duty of care and other legal obligations, such as those it owes under the [Health and Safety at Work Act 1974](#); the [Data Protection Act 2018](#); safeguarding legislation and requirements such as the [Safeguarding Vulnerable Groups Act 2006](#), the [Children Act 2004](#), the [Care Act 2014](#) and [Keeping Children Safe in Education 2023](#); the [Equality Act 2010](#), and the [Counter Terrorism and Security Act 2015](#).
- 1.5 This Policy and associated guidance are designed to assist the University to achieve the commitments set out above and to take reasonable steps to safeguard those who are vulnerable by ensuring there are clear guidelines and procedures for identifying risk, reporting concerns and that appropriate action is taken.
- 1.6 Examples of areas where the University may have contact with children and adults who may be at risk may include (this is not an exhaustive list):
  - Teaching, supervision and support of students;
  - Summer schools, school visits, and other events such as work experience;
  - Apprenticeships;
  - Outreach or widening participation activities taking place on or off campus;
  - Online events and interactions;
  - Student accommodation and residential events;
  - Research subjects;
  - Attendance at private functions run commercially by the University;
  - On placements and in other professional and clinical settings;
  - Field trips, excursions and other activities such as volunteering and other social activities;
  - The activities of student societies and networks.

1.7 This policy sets out how the University will deal with concerns that are raised that an individual may be at risk of exploitation, harm or abuse, including radicalisation, county lines and modern slavery, and the type of action that the University may take to manage such matters and provide support. Examples of the type of situations which may result in the University implementing this policy and procedure may include where:

- A child or adult raises an allegation of abuse, harm or other inappropriate behaviour;
- A student or staff member discloses information involving themselves or family members which gives rise to possible concerns that a potential perpetrator may be harming or abusing vulnerable individuals;
- There are suspicions or indicators that a child or adult is being abused or harmed or is at risk of exploitation, harm or abuse (including radicalisation);
- There are observable changes in a child or adult's appearance or behaviour that may be related to exploitation, harm or abuse (including radicalisation)
- Concerns arise that a student or member of staff has been the subject of sexual violence or harassment
- Concerns arise that a student or member of staff is vulnerable to radicalisation (the process by which an individual becomes vulnerable to terrorism and the extremist ideologies associated with terrorist groups);
- Concerns arise that a student or member of staff is vulnerable to county lines (a violent and exploitative form of drug distribution) or modern slavery (where people are exploited for criminal gain, including slavery, servitude, forced and compulsory labour and human trafficking).

1.8 As the above list indicates, concerns may relate to the behaviour of students and staff, or to how students and staff are affected by the behaviour of others. It is important to note that the indicators of abuse or harm or risk of abuse or harm or radicalisation can be very difficult to recognise. It is not a staff member's responsibility to decide whether a child or adult has been abused or harmed or subjected to abuse or harm, but to raise concerns that they may have, so that concerns can be addressed through the appropriate mechanism.

1.9 The policy recognises that specific areas of activity - for example recruitment of students, activities on placement, and the organisation of summer schools – may have local procedures designed to promote safeguarding practices and which adhere to this policy. This includes relevant Disclosure and Barring Service and Occupational Health processing.

1.10 It is important to note that the Greenwich Students' Union (GSU) is an independent charity with its own policies and procedures which need to have a relationship with this policy, but are the responsibility of the trustees of the Students' Union.

## **2. Our Approach**

2.1 The University will take all safeguarding concerns including suspicions and allegations of exploitation, harm or abuse (including radicalisation) seriously and will report concerns promptly.

2.2 The University will nominate two Lead Safeguarding Officers to oversee implementation of this policy and ensure appropriate and effective responses to incidents reported under it. These shall be the University Secretary and the Executive Director of Student and Academic Services.

- 2.3 The University will nominate [Local Safeguarding Officers](#) within faculties, directorates or campuses as deemed appropriate. They will oversee implementation of any local arrangements and will report concerns to the Lead Safeguarding Officers where necessary. They will also work with the Lead Safeguarding Officers to address concerns. In some circumstances it may be appropriate for a faculty or directorate or campus to appoint more than one Local Safeguarding Officer. The exact model of Local Safeguarding Officers will be agreed by the Lead Safeguarding Officers in discussion with senior staff in faculties and directorates, to ensure that all areas are covered. The names and contact details for Lead and Local Safeguarding Officers will be published on the staff and student portals.
- 2.4 This policy and local procedures will be reviewed on an annual basis, taking into account relevant data, policy developments and feedback from key stakeholders via Local Safeguarding Officers.

### **3. Training, development and communication**

- 3.1 The University will ensure that appropriate training is given to Lead and Local Safeguarding Officers, including training in the Prevent duty. All members of this group will be supported as a network and contribute to development of consistent procedures across the university. Lead and Local Safeguarding Officers will meet periodically to share best practice and develop procedures as appropriate.
- 3.2 Lead and Local Safeguarding Officers are required to complete the University's online Safeguarding training<sup>1</sup> on their appointment and thereafter as a refresher every two years. Safeguarding Officers should attend as far as possible development and briefing sessions which are organised relating to their role. GSU staff involved in the approval of external speakers under the GSU's External Speaker Policy should receive appropriate training on their appointment and thereafter as a refresher every two years.
- 3.3 All staff are strongly encouraged to complete the University's online Safeguarding training. The Lead Safeguarding Officers will ensure that there are regular communications to staff each year to promote awareness of the University's Safeguarding Policy and reporting procedures and to highlight any significant developments or changes.

### **4. Responding to a Concern**

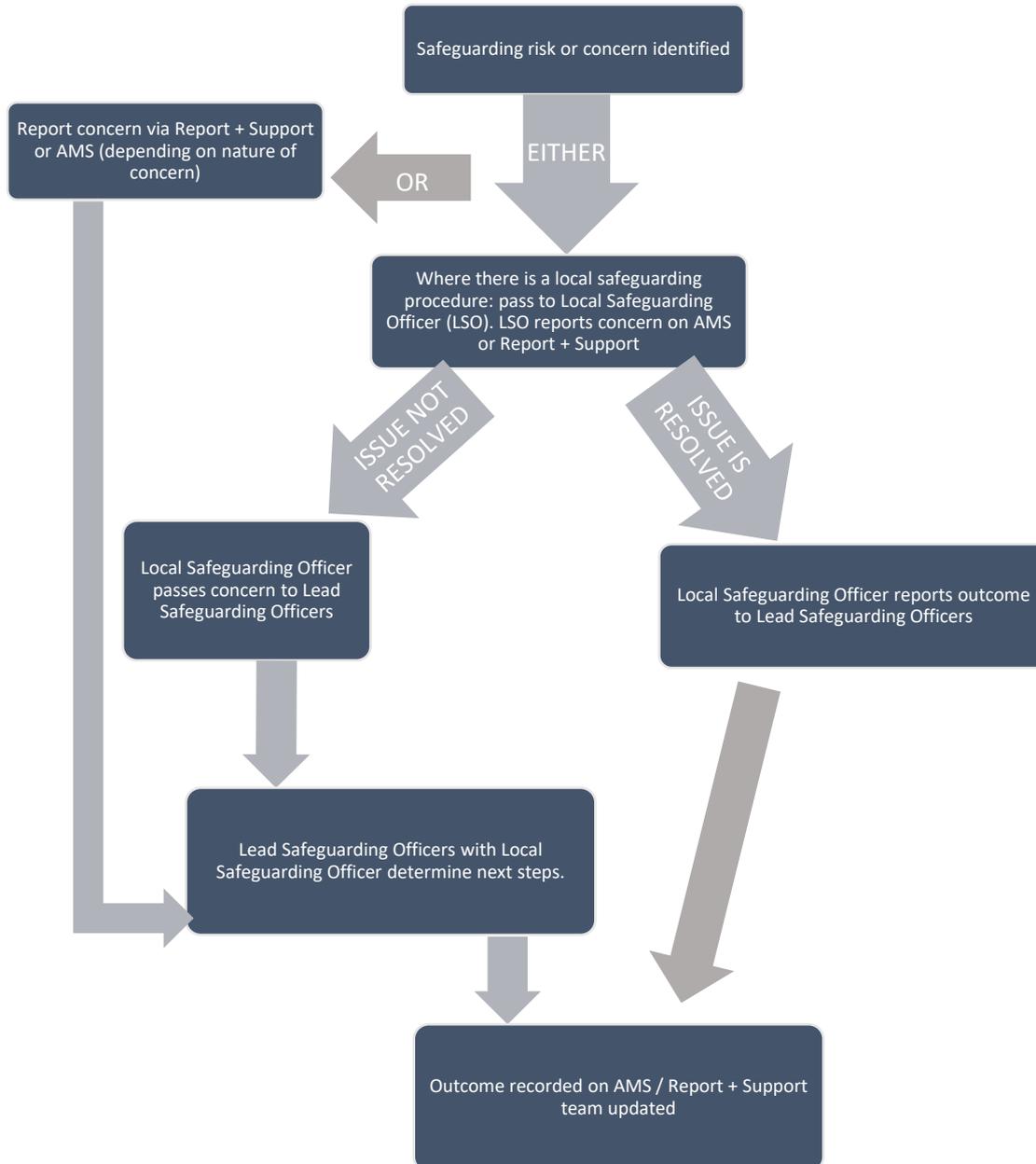
- 4.1 Concerns related to [bullying and harassment](#), [hate crime](#), [discrimination](#), [sexual misconduct](#), [county lines](#) or [modern slavery](#) should be reported immediately via the University's [Report + Support](#) portal. All other types of safeguarding concerns (e.g. Prevent-related concerns, child protection concerns, risks to adults who are vulnerable) should be reported immediately via the University's [Accident Management System](#) (AMS) or via the relevant local safeguarding procedure if there is one.
- 4.2 If the situation is not urgent and you wish to discuss a referral before reporting the concern, you may contact your [Local Safeguarding Officer](#) or either of the Lead Safeguarding Officers or discuss with your line manager or Academic Lead. However, it is better to refer any safeguarding concern and enable further

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<sup>1</sup> The two modules which safeguarding officers are currently required to complete are [Safeguarding Against Extremism](#) (covering the Prevent duty and radicalisation) and [Safeguarding Essentials](#) (concerns about children and adults at risk).

investigations to take place than not to make one because you are not yet certain. **In emergency situations, contact campus security or the police and then make a report according to the process below.**

4.3 Flowchart of actions:



4.4 Where a concern is dealt with under a local safeguarding procedure, the Local Safeguarding Officer must report the concern on Report and Support (concerns related to bullying and harassment, hate crime, discrimination, sexual misconduct, county lines or modern slavery) or the AMS (all other concerns) to ensure that all concerns are centrally recorded. If the concern is resolved under the local procedure, the Local Safeguarding Officer must inform the Lead Safeguarding Officers of the

outcome of the concern and must log that on the AMS/update the Report + Support team. If the concern cannot be resolved under the local safeguarding procedure, the Local Safeguarding Officer must pass the concern to the Lead Safeguarding Officers as soon as possible. Local Safeguarding Officers dealing with concerns under local safeguarding procedures should seek guidance from the Lead Safeguarding Officers where there is any uncertainty over the correct course of action.

- 4.5 The Local or Lead Safeguarding Officers may take a number of actions to ascertain the appropriate next steps when a concern is reported. These may include seeking further information; referral to an appropriate University procedure (such as the [Student Disciplinary Procedure](#) or the [Student Harassment and Sexual Misconduct Policy](#)); referring on to an appropriate internal service or support mechanism, such as the People Directorate or the Student Wellbeing Service; seeking external advice; or contacting external agencies.
- 4.6 If a Local Safeguarding Officer identifies that the Police, Social Services or any other agency need to be contacted in relation to a referral then they must pass that to one of the Lead Safeguarding Officers to approve and action. This includes any potential referrals to Channel (see 4.7 below).
- 4.7 Channel is a voluntary multi-agency programme intended to support individuals who are at risk of radicalisation. Either Lead Safeguarding Officer may refer a concern to Channel if they consider it to be the most appropriate way to support the individual, and may seek external advice (e.g. from a Prevent co-ordinator) before doing so. Where a referral is made, the referral will normally be made to the relevant local authority Channel panel, which will determine whether support through the Channel programme is appropriate. If so, the individual referred will be informed at that stage and offered support by the local authority Channel panel.

## **5. Monitoring and Reviewing**

- 5.1 The implementation of this policy will be monitored by the Safeguarding and Compliance Committee, which will recommend changes to the Health, Safety, Sustainability and Wellbeing Board. The Policy will be reviewed annually by the Committee.
- 5.2 The Safeguarding and Compliance Committee exists to oversee arrangements in the University to ensure compliance and best practice in respect of the Prevent duty; safeguarding under 18 year olds and adults at risk; the safeguarding aspects of students engaged in regulated activities; sexual violence and harassment and hate crime.

## **6. Related Policies and Procedures**

- 6.1 This policy should be read in conjunction with the following University policies and procedures:
  - [University of Greenwich Student and Academic Services Framework Policy for Students Under the Age of 18](#)
  - [Children on Campus Policy](#)
  - [University of Greenwich Research Ethics Policy and Procedures](#)
  - [University of Greenwich Bullying and Harassment Policy](#)
  - [University of Greenwich Grievance Policy and Procedure](#)
  - [University of Greenwich Accident Reporting and Investigation Procedure](#)
  - [University of Greenwich Health and Safety Policy](#)

- [University of Greenwich Students Giving Cause for Concern Procedure](#)
- [University of Greenwich Student Harassment and Sexual Misconduct Policy](#)
- [University of Greenwich Natural Resources Institute \(NRI\) safeguarding reporting guidance](#)
- [Report and Support portal and guidance](#)
  
- List of [Local Safeguarding Officers](#)

**Updated April 2024**

**Approved by the Health, Safety, Sustainability and Wellbeing Board: 30 April 2024**

**Policy owners: University Secretary and Executive Director of Student & Academic Services**