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 This policy sets out the University's safeguarding framework. For the purposes of this policy, **safeguarding** is defined as concerns relating to one or more of the following:

- **Children** (individuals who are under 18 years old);
- **Adults at risk**, also known as vulnerable adults (as defined in the Care Act 2014, any person aged 18 years or older who has care and support needs; is experiencing, or is at risk of, abuse or neglect; and because of their care and support needs, is unable to protect themselves against abuse or neglect or the risk of it);
- **County lines** (a violent and exploitative form of drug distribution) and **modern slavery** (where people are exploited for criminal gain, including slavery, servitude, forced and compulsory labour and human trafficking);
- **Radicalisation** (the process by which an individual becomes vulnerable to terrorism and the extremist ideologies associated with terrorist groups).

1.3 For the avoidance of doubt, 'safeguarding' does not cover disclosures of harassment, bullying, discrimination, hate crime or sexual misconduct, which are dealt with under other University policies (the Student Harassment and Sexual Misconduct Policy for students and the Prevention of Bullying, Harassment and Sexual Misconduct Policy for staff). These disclosures can be reported through the University's Report + Support portal. Concerns about an individual's wellbeing (e.g. their mental or physical health) are not safeguarding concerns unless they fall within the definition of safeguarding above[1].

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] Wellbeing concerns can be reported through the accident and incident reporting system (Evotix) (NB please select the wellbeing form).

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 safeguarding concerns, 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 at risk 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 children or adults at risk;
- There are suspicions or indicators that a child or adult at risk 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 at risk's appearance or behaviour that may be related to exploitation, harm or abuse (including radicalisation);
- Concerns arise that a student or member of staff is vulnerable to radicalisation;
- Concerns arise that a student or member of staff is vulnerable to county lines.

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 person 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 and directorates as deemed appropriate. They will oversee implementation of any local arrangements and will report concerns to the Lead Safeguarding Officers. They may also be asked by the Lead Safeguarding Officers to work with them address concerns. In some circumstances it may be appropriate for a faculty or directorate 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 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 Lead Safeguarding Officers are responsible for ensuring that appropriate training is given to Safeguarding Officers, including training in the Prevent duty, and that there is compliance with training requirements. The Lead Safeguarding Officers shall produce an annual safeguarding training and awareness communications plan for approval by the Safeguarding and Compliance Committee, and shall report to the Committee on a termly basis on the completion of mandatory training by Safeguarding Officers.

3.2   Safeguarding Officers will be supported as a network and contribute to the development of consistent procedures across the university. The Lead Safeguarding Officers shall organise periodic meetings of Safeguarding Officers to share best practice and develop procedures as appropriate.

3.3   Lead and Local Safeguarding Officers are required to complete the University's online Safeguarding training[2] on their appointment and thereafter as a refresher every two years. Safeguarding Officers will be added to the Safeguarding Officers learning community on Horizon and will receive reminders to complete the online training through Horizon. Safeguarding Officers should attend as far as possible development and briefing sessions which are organised relating to their role. GSU

---

[2] 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).

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.

3.4   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.   Reporting Concerns

4.1   Safeguarding concerns should be reported immediately to the Lead Safeguarding Officers via the University's <u>accident and incident reporting system</u> (Evotix) (NB please select the safeguarding form) or by contacting either or both of the Lead Safeguarding Officers directly. This includes concerns which may arise under any local safeguarding arrangements.

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. However, it is better to refer any safeguarding concern and enable further 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.**

4.3   The Lead Safeguarding Officers will oversee the management of concerns according to a standard operating procedure approved by Safeguarding and Compliance Committee. Concerns relating to students which are reported through Evotix will normally be logged by Student and Academic Services on the Student Lifecycle Management system which will be used to record any further actions.

4.4   Other than in emergency situations, only the Lead Safeguarding Officers (jointly or individually) are authorised to refer a safeguarding concern to the Police, Social Services or any other external agency. Local Safeguarding Officers or other staff who believe that external reporting is necessary should contact the Lead Safeguarding Officers.

4.5   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.

4.6   The Lead Safeguarding Officers shall provide the Safeguarding and Compliance Committee with an anonymised termly report on safeguarding concerns reported under this policy, including any themes or lessons learnt, and performance against safeguarding KPIs agreed by the Committee.

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,

Safeguarding and Wellbeing Board. The Policy will be reviewed annually by the Committee.

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
- Research Ethics Policy and Procedures
- Prevention of Bullying, Harassment and Sexual Misconduct Policy
- Grievance Policy and Procedure
- Accident and Incident Reporting and Investigation Procedure
- Health and Safety Policy
- Students Giving Cause for Concern Procedure
- Student Harassment and Sexual Misconduct Policy
- Personal Relationships at Work Policy
- Natural Resources Institute (NRI) safeguarding reporting guidance
- Report and Support portal and guidance

- List of Local Safeguarding Officers

Document Reference Number	NA
Title	**Safeguarding Policy**
Owning Department	**University Secretary's Office**
Version	**2.0**
Approved Date	**9 April 2025**
Approving Body	**Health, Safety, Safeguarding and Wellbeing Board**
Review Date	**April 2026**
Classification	**Public**

Version Control

Version	Last Modified	Last Modified By	Document Changes
2.0	April 2025	University Secretary	Definition of safeguarding added and other updates