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Safeguarding Policy and Procedure

Policy Statement

The institution recognizes its responsibility to ensure a duty of care for vulnerable adults who work, study or are involved in any activities with it. The institution is dedicated to keeping student, staff, faculty, as well as vulnerable adults safe and this is of paramount importance to its day-to-day activities. It promotes safeguarding values through its commitment to equality, diversity and respect for the dignity of all humans, especially those who are vulnerable. The Safeguarding Policy outlines the procedure to follow if there is safeguarding issue, all the steps involved, and how decisions are made.

Scope

The policy applies to all members of the community and in the course of all duties on and off campus. That means:

- All current and prospective students of all ages
- Interns and Fellows of any employment base
- Vulnerable adults registered as students or prospective students
- Staff and faculty
- Study Abroad students in off-site accommodations and during transportation services
- External partners/individuals engaged with official activities
- Visitors, including individuals under 18 years old
- Children/vulnerable adults with a connection to institution-related business directly or indirectly

The above scope abides with the Anatolia Institution non-discrimination, data protection, diversity, equity and inclusion policy as outlined in Appendix A.



Safeguarding Team

Designated Safeguarding Officer: Name, Phone number, safeguarding@act.edu

Deputy Safeguarding Officer: Name, Phone number, safeguarding@act.edu

The Deputy Safeguarding Officer assumes responsibility when the Designated Officer is unable to fulfill their duties, due to annual leave or other extenuating circumstances.

Definitions

Vulnerable Adults

A person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or exploitation. A person who is or may be in need of community care services due to mental or other disability, age or illness. A person who is, or may be, unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.

Whilst it is recognized that some people will be vulnerable due to their learning disability or Mental Health needs, others are at risk due to a specific circumstance they may find themselves in. It also includes those who are deemed at risk due to their gender, religious beliefs, or social and economic background. See **Appendix B** for a detailed definition according to the Greek law.

Harm and Abuse

We recognize that abuse can take place in any context including the home, community, online and that anyone may be the abuser.

Abuse is when a child or vulnerable adult is intentionally harmed by another adult or child. According to the Washington State Department of Social and Health Services, it may take the following forms: Physical, sexual, mental mistreatment or emotional, exploitation, neglect, or financial abuse as outlined in **Appendix C**. There is often presence of grooming behaviors on the part of the abuser. Abuse can take place face-to-face and/or digitally. It may often also be a criminal offence.



Key principles

This Safeguarding Policy seeks to ensure that the institution upholds an empathetic, open, and nurturing environment for students, staff, and anybody else who is involved with its operations. The policy aims:

- To ensure processes and procedures support and promote safeguarding
- To ensure all members of the community understand the importance of prevention in responding proactively and efficiently to all concerns
- To ensure all members of staff have the responsibility to report concerns of abuse and/or harm to the relevant channels
- To ensure that students are aware of this policy and procedure through information widely distributed and provided at the institution
- To ensure everyone understands how to report any concerns
- To ensure our teaching encourages respectful communication patterns within class
- To share information about concerns with agencies or organizations who need to know in a timely manner
- To ensure pertinent legislation is taken into account.

Associated Documents

The above key principles should be read in conjunction with those relating to our associated documents. Safeguarding is embedded throughout other policies:

[Equality & Diversity Policy](#)

[Academic Misconduct Policy](#)



Safeguarding Commitments

Safeguarding is the responsibility of everyone. All members of staff who meet vulnerable individuals are in positions of trust and have a duty of care to act if there is a cause for concern. All members of staff should therefore:

- Participate in appropriate safeguarding training as mandated by the institution
- Understand what constitutes abuse and how it may be recognised
- Listen carefully to vulnerable individuals, who may be trying to voice concerns
- Take action in consultation with the Safeguarding Officer when there is cause for concern
- Sharing relevant information with agencies, when appropriate to do so and in line with our procedures
- At all times, treat others with dignity and respect, as required by the Equality and Diversity Policy
- Recording, storing and using information professionally and securely, in line with data protection legislation and guidance
- Keeping our policies and procedures under a cycle of regular review and promoting a culture of learning

It is not the responsibility of a member of staff to investigate, make judgements or provide a response on safeguarding matters, but to follow the Reporting Procedure if they believe there is cause for concern.

Disclosure and how to make a safeguarding referral

All members of the community have a responsibility for the well-being of staff, students and visitors. The institution recognises that staff, students and visitors have an ethical duty to report suspected abuse of any child, young person or vulnerable adult. Therefore, as soon as someone become aware of an issue or any other behaviour or sign, which prompts a concern, they should follow the guidelines in **Appendix D** and, if deemed necessary, proceed with contacting the Safeguarding Officer using one of the following methods:

- E-mail details about the incident to safeguarding@act.edu
- Or call +30231039838, and leave a message

If you are concerned that a student or vulnerable adult is in possible immediate danger, please contact the Emergency Services by calling 100 or 112 from outside Greece.

- However, you still need to contact the Safeguarding Officer using one of the methods listed above.



Safeguarding Procedures

- When the Safeguarding Officer is approached about a concern, they may seek further information from the referrer in order to best approach the case. It may be that this conversation and some advice would suffice with the particular case. That means, there is no further requirement for the Safeguarding Team to be involved.
- Where a safeguarding issue is referred, the Safeguarding Officer may seek advice and expertise from a number of internal services e.g. Health and/or Counselling Services, Legal Advisor as well as external professional collaborates e.g. a Psychiatrist.
- The Safeguarding Officer can provide guidance on how to manage concerns following the established policy. Staff, students and visitors are strongly encouraged to seek support on any topic that could affect the health and safety of a member of the institution.
- The Safeguarding Officer keeps electronic records of all cases and the people involved, securely and confidentially on a designated folder adhering to the Greek and EU GDPR Law as detailed in Appendix A.

Training

The institution ensures that the Safeguarding Officer, with the support of OUVF, receives the appropriate level of safeguarding training for their role and responsibilities. Moreover, it will ensure staff will annually receive appropriate training in accordance to the guidelines of the Human Resource Office training policy.

Confidentiality

The institution respects the privacy of those involved in all aspects of child and vulnerable adult protection. The identities of all parties involved in an incident will be kept confidential to the greatest extent possible. However, those involved must understand that certain information may be shared, strictly on a need-to-know basis.

Further Clarifications

If you have any questions about the content provided within this document with regard to safeguarding young people or vulnerable adults, please contact:

safeguarding@act.edu



APPENDIX A

Non-discrimination

We admit students of any race, colour, religion, national and ethnic origin to all the rights, privileges, programs, and activities generally accorded or made available to students at the school. It does not discriminate on the basis of race; colour; religion or belief; national, social or ethnic origin; sexual orientation; gender identity and/ or expression; family medical history or genetic information; or any other factors of identity, in administration of its educational policies, admission policies, scholarship programs, athletic and other school administered programs. The institution will make reasonable efforts and accommodations for qualified students with known disabilities unless the school cannot adequately accommodate the student in specific areas. Anyone found to be engaging in any type of discrimination will be subject to disciplinary action.

Data Protection

We are committed to protecting and respecting your privacy in compliance with EU- General Data Protection Regulation (GDPR) 2016/679, dated April 27th 2016, and especially Greek law 4624/2019 for the Protection of Individuals with regard to the Processing of Personal Data [Especially the main provisions of Greek law 4624/2019 for the harmonization of Greek legislation with GDPR]. This privacy statement explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure. This Privacy Statement applies to the use of our services and our customer contract fulfilment activities. It also applies to individuals seeking a job at the institution.

Diversity, Equity & Inclusion

We value diversity, equity, and inclusion (DEI) and understands that each student's experience in the world is shaped by many factors, including age, ethnicity, family structure, sex, gender identity, nationality, ability, race, religion, sexual orientation, and socio-economic background. Furthermore, exposing students, faculty, and staff to a wide range of ideas, experiences, and cultures, examining and challenging preconceptions, and exploring different ways of thinking and knowing enhance the learning experience and reflect the school's vision of educating students for reaching their full potential as adaptable global citizens. More importantly, our faculty and staff are committed to contributing to diverse, equitable, and inclusive practices. We aim to establish and maintain a welcoming, supportive, and healthy school community on all levels that both embraces differences and promotes respect.



APPENDIX B

Vulnerable Groups

According to the Greek law 4430/2016, article 2 par. 8 1:

As “vulnerable” are defined those groups of the population whose integration into social and economic life is hindered by physical and mental causes or by delinquent behaviour. These include:

- (a) people with any form of disability (physical, mental, intellectual, sensory)
- (b) people with substance abuse problems or those who have been rehabilitated
- (c) juveniles with delinquent behaviour, prisoners and released persons

In the same law, as ‘special’ are defined those groups of the population who are disadvantaged in their smooth integration into the labour market for economic, social and cultural reasons. These include:

- (a) victims of domestic violence
- (b) victims of trafficking in human beings
- (c) homeless people
- (d) persons living in poverty
- (e) economic migrants
- (f) refugees and asylum seekers for as long as the examination of the asylum application is pending
- (g) heads of single-parent families
- (h) persons with cultural particularities
- (i) long-term unemployed persons up to twenty-five years of age and over fifty years of age



APPENDIX C

Categories of Abuse

The word abuse covers many different ways someone may harm a vulnerable individual.

Emotional, mental and psychological abuse

Often closely linked terms that can be used interchangeably. The aim of emotional abuse in relationships is to reduce confidence and esteem to make their victim increasingly reliant on them. They use tactics such as intimidation, bullying, constant criticism and keeping someone isolated from family and friends in order to exert control.

Financial abuse

This involves a perpetrator using or misusing money which limits and controls their partner's current and future actions and their freedom of choice. It can include using credit cards without permission, putting contractual obligations in their partner's name, and gambling with family assets.

Financial abuse can leave individuals with no money for essentials such as food and clothing. It can leave them without access to their own bank accounts.

Sexual abuse

Includes rape, forced sexual acts and sexual degradation. Any sexual act that involves force (including emotional blackmail) is abuse – this includes pestering, name calling and threatening to get sex from 'elsewhere' in order to manipulate someone who does not want to have sex at that time into having sex. Sexually abusive relationships can include being forced to watch pornography as well as being forced into having sex with the perpetrator's friends or engaging in prostitution.

Physical abuse

The most visible form of domestic abuse. It includes such behaviour as slapping, burning, beating, kicking, biting, stabbing and can lead to permanent injuries and sometimes death. Strangulation, Non-Fatal strangulation, along with suffocation are also categorized as physical abuse.

Online abuse

Online domestic abuse can include behaviours such as monitoring of social media profiles or emails, abuse over social media, sharing intimate photos or videos without consent, using GPS locators or spyware.



Stalking

It is a pattern of persistent and unwanted attention that makes the victim feel pestered, scared, anxious or harassed. Some examples of stalking are: Regularly giving unwanted gifts, making unwanted communication, damaging property, repeatedly following or spying on a victim, and making threats. Taken in isolation, some of these behaviours may seem like small acts, but together they make up a consistent pattern of behaviour that is frightening and upsetting. It is important to know that stalking is a criminal offence.

Harassment

Any unwanted conduct which has the purpose or effect of violating the dignity of an individual, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them, related to their gender, sexual orientation, or gender identity.

Institutional Abuse

Institutional abuse, also known as organisational abuse, is when an individual or group of individuals are neglected or suffer because of poor care practices within an organisation or care setting. It can be a one-off incident or happen regularly over a long period.



APPENDIX D

Recording Steps

To ensure that everyone is safe, it is important to record relevant information- you will find guidance on how to manage a disclosure and questions to ask further down in this document.

Please take record of:

- Student's name as well as names of any people who are present during the disclosure (remember other individuals or vulnerable adults may be involved and at risk too)
- Date, time and location of the conversation.
- Make notes or a brief outline, using the exact words that you can remember. Brief description of any injuries which are visible or alleged any nonverbal signs that you noticed
- Are there any services already involved?
- Did you or anyone else contact emergency services?

Actions to take if an individual makes a disclosure

- React calmly so as not to make the individual more anxious or discourage them from telling more.
- Listen carefully to what the individual says without interruption.
- Use open questions to encourage further information, but do not probe.
- It is OK to have periods of silence.
- Take what the individual says seriously.
- Reassure the individual that they have done the right thing in telling you this information.
- Reassure the individual that there are many sources of help and that you will help and support them in seeking help.
- Ensure that the individual is safe from the situation reported by asking specific questions such as, are you currently worried about your safety, have you reported this to the police?
- Explain to the individual that you will need to report this to the Safeguarding Officer.
- Mention that you may have to pass on information if a vulnerable adult is at significant risk of harm.
- If you think anyone is at imminent danger, please contact 100 immediately.
- Report the matter by e-mailing the Safeguarding Officer without delay.



Actions to avoid during a disclosure

- Panic – it may be difficult for you, however it is likely far more difficult for the student. If you are distressed by the disclosure, inform the Safeguarding Officer for advice and support.
- Allow your shock to show.
- Probe for more information than is offered.
- Speculate or make assumptions.
- Make negative comments about the alleged abuser.
- Approach the alleged abuser.
- Respect the person's right to privacy but do NOT promise confidentiality or any other promise that you will be unable to keep.
- Discuss the matter with colleagues/friends.

