

UNIVERSITY OF HEALTH AND ALLIED SCIENCES



# **SAFEGUARDING POLICY**

October 22, 2021

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## **1. INTRODUCTION**

The University of Health and Allied Sciences (UHAS/The University) provides services to a wide range of people, some of whom are likely to be Children and Vulnerable Adults. As part of its commitment to equality, diversity and inclusivity and the provision of a safe working environment, UHAS has put in place policies and procedures designed to protect children, young people and vulnerable adults. This policy sets out the University's approach to adopting the highest possible standards for safeguarding children and vulnerable adults, and preventing students and staff from being drawn into radicalism.

## **2. PURPOSE**

The purpose of the UHAS Safeguarding Policy is to emphasize the University's commitment to providing a safe environment that safeguards the welfare and protection of all children, young people aged under 18, and vulnerable adults who access its activities, facilities and services as students, staff, volunteers or visitors through teaching, research, outreach, or other activities.

The University recognises and attaches high importance to its obligations to promote the welfare of children, young people and vulnerable adults, and its responsibility to take reasonable steps to ensure their safety and protect them from the risk of radicalisation.

## **3. SCOPE**

3.1 This policy sets out the University's approach to safeguarding Children and Young People, Vulnerable Adults, all students, and staff employed by the University, volunteers and visitors of the University, and any person who may be at risk of being radicalised by any extremist group or ideology working for and/or on behalf of the University, and those who the University encounters through its teaching, research and community service or outreach programmes.

3.2 This policy covers students and staff who have access to children through the delivery of service. For instance, those working in Hospitals/Clinics, the University Basic School or during outreach activities.

3.3 The policy sets out the University's structures, guidance, and procedures for identifying potential risks, abuse, harm or neglect, and for reporting concerns internally. It also provides generic guidance to all members of the University community.

3.4 All University staff and volunteers have a duty of care towards the student body and should always operate under the safeguarding policies of the University, thereby remaining appropriate in their conduct towards, and in the company of, children and vulnerable/at-risk adults.

3.5 The University cannot act "in loco parentis", and ultimate responsibility for children rests with those who do have parental responsibility. UHAS recognises that some vulnerable/at-risk adults may have an appointed representative, e.g., mental health advocate, legal/enduring power of attorney.

3.6 Part of the scope of this policy is to seek to support activities involving children and vulnerable/at-risk adults and to provide assurance to all students, staff, volunteers and visitors that safeguarding is treated seriously by the University, and

that the requirements of this policy will be undertaken/discharged in an effective and timely manner.

## **4. DEFINITIONS**

The following definitions apply:

### **4.1 Children and Young People**

The University defines a child or young person as a person who is under the age of 18. The fact that a Child or Young Person has reached 16 years of age, is living independently or is in further/higher education does not change his or her status for the purpose of this Policy.

### **4.2 Vulnerable Adult**

The University defines a vulnerable adult as a person aged 18 or above who is, or may be, in need of services by reason of mental or other disability, age or illness (including an addiction to alcohol or drugs) or is living in a sheltered or residential care home and who is, or may be, unable to take care of him or herself, or unable to protect him or herself against significant harm, abuse or exploitation, including being drawn into terrorism.

### **4.3 Abuse**

Abuse is defined by the University as a violation of human and civil rights by another person or persons either in person or online. It may consist of a single act or repeated acts either planned or unplanned. It may be the result of deliberate intent, negligence or ignorance.

Abuse may happen when a vulnerable adult or a young person under 18 years is persuaded to enter into a situation that they are unable to consent to or have not consented to as a result of a learning or physical disability; a physical or mental illness; or a reduction in physical or mental capacity.

Abuse may vary, from treating someone with disrespect in a way that significantly affects the person's quality of life, to causing actual physical or mental suffering.

Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to the abuse. Abuse is usually carried out by person/s or institution/s that are in a position of power, trust or authority, and can be perpetrated by a wide range of people including relatives and family members, neighbours, friends, professional staff and volunteers.

Abuse can take many forms and includes but is not limited to:

- Physical abuse – for example, hitting, pushing, shaking, over-medicating or otherwise causing physical harm;
- Sexual abuse – for example, unwanted touching, kissing or sexual activity, where the at-risk individual cannot or does not give their consent;
- Emotional abuse – including verbal abuse, humiliation, bullying or the use of threats;
- Financial abuse – the illegal, dishonest or improper use of a person's money, property, bank account or other belongings;
- Neglect or acts of omission – the repeated deprivation of help that a vulnerable adult needs, which, if withdrawn, will cause that vulnerable adult to suffer;

- Discriminatory abuse – including racist or sexist abuse, and abuse based on a person's disability, and other forms of harassment, slurs or similar treatment;
- Honour based violence, human trafficking and radicalisation;
- Forced marriage;
- Genital mutilation;
- Radicalisation, including incitement to extreme acts.

## **5. POLICY STATEMENTS/PROVISIONS**

5.1 The University of Health and Allied Sciences is committed to safeguarding the welfare of all children and young people aged under 18 and vulnerable adults who access its activities, facilities and services. The University aims to adopt the highest possible standards and take all reasonable steps in relation to the safety and welfare of children, young people, vulnerable adults and others who study at, work at and visit the University.

5.2 UHAS recognises its obligations to promote the welfare of children, young people and vulnerable adults, and its' responsibility to take reasonable steps to ensure their safety. The University has an obligation to protect its staff, students and volunteers against unfounded allegations of abuse. The University also has an obligation to protect all its members from the risk of radicalisation.

5.3 This policy and its associated procedures provide guidance to all staff, students and others working on behalf of the University on the expected standards of behaviour when working with children, young people and vulnerable persons, and sets out the responsibilities and processes for reporting concerns. This policy and procedures should be read in conjunction with other policies and statutes of the University.

5.4 The University is an adult environment. However, children, young people and vulnerable adults may access the University's activities and services in the following ways:

- as a registered student
- visiting campus (for example on Open Day or School visit)
- using the University Basic School
- through engagement in off-campus activities in which University staff and/or students are engaged
- through research
- through vocational training placement of students
- through the teaching hospital (where our staff and students provide services)
- through field trips, excursions and other activities such as volunteering and other social activities

## **6. GENERAL POLICY PRINCIPLES**

The University of Health and Allied Sciences:

- a) Is committed to providing a safe environment for all its employees, students and people who access its activities, facilities and services;
- b) Recognises that children, young people and vulnerable adults may require additional protection in accordance with its statutory duties and common law duty of care;

- c) Recognises its responsibility to have due regard to preventing people from being drawn into terrorism, in accordance with the Anti-Terrorism Act, 2008 (Act 762), Anti-Terrorism (Amendment) ACT, 2012 and associated statutory guidance;
- d) Recognises its responsibility with regards to the National Gender Policy (2015);
- e) Recognises its responsibility with regards to the Children's Act 1998, (Act 560);
- f) Recognises its responsibility with regards to the Government of Ghana; National Social Protection Strategy: Investing in People. Accra: Ministry of Employment and Social Welfare;
- g) Recognises its responsibility with regards to the Government of Ghana. 2015; Ghana National Social Protection Policy. Accra: Ministry of Gender, Children and Social Protection;
- h) Recognises its responsibility to raise awareness of staff and students of this policy and the relevant procedures;
- i) Recognises that the safeguarding and protection of children and adults at-risk is the shared responsibility of all staff and students of the University;
- j) Will provide adequate training and guidance on its policy and procedures to protect children, young people and vulnerable adults;
- k) Will ensure that appropriate procedures are in place to enable it to discharge its duties and to ensure that cases of suspected abuse or neglect of children, young people or vulnerable adults are dealt with sensitively and effectively in accordance with the law and relevant guidance;
- l) Will ensure that investigations into reports of suspected and alleged abuse, inappropriate behavior or neglect are carried out in a fair and timely manner;
- m) Will work in conjunction with other agencies (for example, Department of Social Welfare, Ghana Police Service, etc.) to safeguard children, young people and vulnerable adults, in the implementation and monitoring of this policy and its associated procedures;
- n) Will ensure that all allegations of abuse or neglect of children, young people or vulnerable adults are reported;
- o) Will take all reasonable steps to establish that all employees, students whose work or study involves contact with at-risk individuals do not present an unacceptable risk;
- p) Will ensure that children and adults at risk will be free to learn, work and develop their potential, without fear of violence, abuse or exploitation;
- q) Will ensure that the Policy is kept up to date and periodically reviewed to ensure that any changes in legislation or guidance are taken into account.

## **7. MINIMISING RISKS OF HARM**

7.1 All University staff will be made aware of the University's commitment to the Safeguarding Policy through induction processes to enable them to know what to do if a concern arises.

7.2 All students will be made aware of the University's commitment to the Safeguarding Policy, and also made to understand that any legitimate suspicions or concerns will be reported to appropriate agencies. Breaches of the Code of Conduct may lead to disciplinary action.

7.3 The Admissions Office at the point of admission to a programme of study will ensure that the parents or guardians of students who are under the age of 18 are aware that their child is studying alongside adults in a higher education environment which is not as regulated and supervised as second-cycle schools.

7.4 The University will work in partnership with the Students' Representative Council to promote the safeguarding and protection of at-risk groups.

7.5 No images in any format will be circulated or stored involving young students, school pupils, visitors under 18, or vulnerable adults without first gaining explicit written informed consent of those involved and their parents/guardians/carers.

7.6 Detailed and accurate written records of referrals/concerns will be kept securely and confidentially when concerns arise, in line with the relevant statutory requirements and the University's policies on data protection.

## **8. ACTION ON OCCURRENCE OR SUSPICION OF ABUSE**

8.1 It is mandatory for all UHAS staff, students, volunteers and visitors to report concerns, suspicions, allegations and incidents which indicate actual or potential abuse or exploitation of children and vulnerable adults, or suggest that this policy may have in any other way been breached. Those reporting suspicions or concerns of abuse must follow the protocols set out in Appendix 2.

8.2 It is not the responsibility of the staff, student, volunteer or visitor to decide whether or not abuse has taken place; however, concerns should be raised with a designated safeguarding officer who will initiate the procedure for dealing with suspected or actual incidents of abuse (see Appendix 2).

8.3 Designated Safeguarding Officers are responsible for ensuring that the reporting procedure is followed so that suspected or actual cases of abuse are responded to appropriately and consistently, and referred to the relevant statutory authority.

8.4 UHAS is not an investigative authority. Referrals will therefore be made to the relevant law enforcement agencies to ensure that the vulnerable individual is given appropriate protection and support, and that any evidence is collected in accordance with the law.

8.5 All sensitive and personal data must be kept confidential (including the names of anyone who makes a report of abuse), and be shared on a strictly 'need to know basis', that is, access must be necessary for conducting one's official duties.

## **9. DESIGNATED SAFEGUARDING OFFICER**

9.1 **Principal Safeguarding Officer (PSO):** The Vice Chancellor shall be the PSO. He/she has overall accountability and strategic responsibility for safeguarding children and vulnerable adults at-risk within the University.

9.2 **Lead Safeguarding Officer (LSO):** The Registrar of the University shall be the LSO. He/she has responsibility for overseeing the implementation of the Safeguarding Policy within the University and to provide leadership and support to School/Institute/Directorate Safeguarding Officers.

9.3 **School/Institute/Directorate Safeguarding Officers (SSO/ISO/DSG):** Deans/Directors shall be the School Safeguarding Officers (SSO)/Institute Safeguarding Officers (ISO)/Directorate Safeguarding Officers (DSO). The

SSO/ISO/DSG may appoint a Deputy Safeguarding Officer (DSSO/DISO/DDSG) to support the SSO/ISO/DSG.

## 10. ROLES AND RESPONSIBILITIES

Effective safeguarding requires key role holders to understand their responsibilities and to ensure these are carried out. These roles and responsibilities are set out in this document. Unless otherwise stated, an individual with a particular responsibility may devolve the tasks associated with this responsibility to others. The overall responsibility remains the role holder's.

### 10.1 **Principal Safeguarding Officer:**

- Has responsibility for overseeing the implementation of the Safeguarding Policy within the University and providing leadership and support to designated Safeguarding Officers.
- As part of his/her report to the University's Council, the Principal Safeguarding Officer will present a Safeguarding Report to the University Council half yearly.

### 10.2 **Lead Safeguarding Officer** is responsible for:

- Ensuring compliance in this area;
- Oversight and management of the Safeguarding Policy;
- Implementing and promoting this Policy;
- Ensuring this Policy is easily accessible to staff and students;
- Ensuring that the Policy is monitored and reviewed in accordance with changes in legislation and guidance on the protection of children;
- Ensuring that appropriate University staff are provided with information, advice and training about safeguarding.

### 10.3 **School/Institute/Directorate Safeguarding Officers** are responsible for:

- Providing support, advice and guidance to staff and students about this Policy;
- Ensuring appropriate risk assessments are carried out for relevant activities;
- Monitoring the welfare of students who are aged under 18 (in conjunction with the Dean of Students);
- Referring cases of suspected abuse or allegations to the Lead Safeguarding Officer;
- Liaising with the Lead Safeguarding Officer to inform her/him of any issues;
- Ensuring detailed and accurate written records of concerns are kept and that they are secure and confidential;
- Ensuring appropriate levels of training are provided to staff within their school/institute /directorate;
- Assisting in the review of safeguarding policies and procedures.

### 10.4 **Dean of Students** is responsible for:

- Advising on the admission and support of students who are aged under 18 (in conjunction with the Director of Academic Affairs);
- The Dean of Students is responsible for:



- Monitoring the welfare of students who are aged under 18 (in conjunction with the relevant Deans of Schools);
- Providing advice and guidance about risk assessments for activities with groups of young people on campus.

10.5 **All staff and/or students** are responsible for:

- Reporting any concerns about safeguarding individuals to their Deans, Directors or designated Safeguarding Officers;
- All staff and/or students who intend to, or may be put in the position of, working with children, young people or vulnerable adults at-risk are responsible for ensuring that they understand the implications of this Policy before commencing any programme, event, visit or other activity.

## **11. ACKNOWLEDGEMENTS AND WORKS CONSULTED**

- University of Bradford Safeguarding Policy and Procedures, 2019.
- University of Southampton Safeguarding Policy, 2017.
- University of Suffolk Safeguarding Policy and Code of Conduct (Version 3.0), 2019.
- University of Hull, Safeguarding Policy, 2021.

## **12. APPROVAL DATES**

This policy was originally approved by the University Council on October 22, 2021.

## **APPENDIX 1: CODE OF CONDUCT FOR STAFF, STUDENTS AND VOLUNTEERS**

The following Code of Conduct applies to all University staff, students and volunteers working with children, young people or adults at risk, whether acting in a paid or unpaid capacity:

1. Avoid unnecessary physical contact.
2. Avoid taking members of vulnerable groups alone in a vehicle on journeys, however short.
3. Unless circumstances make it impossible to comply, do not take members of vulnerable groups to the toilet unless either (a) another adult is present or (b) another adult is aware (this may include a parent).
4. If you find yourself in a situation where you are alone with a member of a vulnerable group, wherever practicable, make sure that others can clearly observe you.
5. Avoid close personal relationships with members of vulnerable groups in relation to whom you are in a position of trust.
6. If a member of a vulnerable group accuses a student or member of staff of abuse or inappropriate behaviour, you should report this immediately to your line manager and/or the designated Safeguarding Officer
7. Those dealing with any allegations of abuse or misconduct should adhere to the principles set out in this policy. Any information received should be acted upon sensitively, effectively and efficiently. Wherever possible, those making allegations should be given some information about the outcome. If the person making the allegation feels they need counselling or other appropriate support from the University, they are encouraged to seek it.

## **APPENDIX 2: PROCEDURE FOR REPORTING AND DEALING WITH ALLEGATIONS OF ABUSE OR SUSPICIONS OF ABUSE**

1. All allegations of abuse or suspicion of abuse must immediately be reported to the designated Safeguarding Officer of the School/Institute/Directorate.
2. The designated Safeguarding Officer who receives a report of an allegation or suspicion of abuse should immediately seek the advice of the Lead Safeguarding Officer (LSO) on the most appropriate way to deal with the allegation or suspicion of abuse.
3. The LSO will advise whether the allegation or suspicion should be reported immediately to external agencies (Police, Department of Social Welfare, etc.) or referred to an appropriate University disciplinary committee (Junior Members Disciplinary Committee, Senior and Junior Staff Disciplinary Committee, or Senior Members Disciplinary Committee) for further investigations and appropriate sanctions to be applied to the culprit(s).
4. The LSO will then inform the relevant line manager and the Director of Human Resource if the allegation or suspicion is against a University employee. In the case of students, the Dean of School and Pro-Vice Chancellor will be informed.

## REFERENCES

- Anti-Terrorism Act, 2008 (Act 762), Anti-Terrorism (Amendment) ACT, 2012 and associated statutory guidance.
- Government of Ghana. National Gender Policy (2015)
- Government of Ghana. Children's Act 1998, (Act 560)
- Government of Ghana. "National Social Protection Strategy": Investing in People. Accra: Ministry of Employment and Social Welfare.
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