

ACG Safeguarding Policy

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The American College of Greece (hereinafter referred to as “the College” or “ACG”), founded in 1875, is an independent, not for profit, nonsectarian, co-educational academic institution. Its divisions are three:

- Pierce (secondary education: Gymnasium; Lyceum; International Baccalaureate Program)
- Deree (undergraduate and graduate)
- Alba Graduate Business School

1. Policy Statement

ACG recognizes the duty to create a community of care for all ACG Community members, and to promote and safeguard the welfare of its students, faculty and staff, as well as third parties involved in College activities. ACG commits to taking appropriate measures and action to prevent the risk of suffering significant harm for any ACG Community member and to comply with the duty to protect minors under the Greek law, that is, the applicable legislation as in effect from time to time. In doing so, discrimination against individuals or groups on the basis of sex, gender and/or gender identity or expression, sexual orientation, disability, age, race, ethnicity, color and membership of a national minority, nationality or national origin, creed, religion or belief, social origin, birth and property, language, political or other opinion, pregnancy, genetic information, marital status, citizenship status, veteran or military status, or on any other legally prohibited basis is unlawful and will not be tolerated. ACG acknowledges that, particularly in multicultural communities, discrimination on any of the aforementioned bases may result in the vulnerability of individuals and groups, and is committed to assessing and taking steps to ensure the appropriate campus climate at ACG. Safeguarding concerns about the safety and wellbeing of minors or vulnerable adults who are members of the ACG Community or associated with students, faculty and staff may arise, and this Policy defines how these are to be addressed and decided upon.

2. Principles of the policy

ACG is committed to safeguarding students, faculty and staff, as well as third parties involved in College activities, to maintaining a campus ethos of mutual respect, care and responsible action and to providing a safe learning environment in which all students can learn and develop.

The Policy particularly applies to current and prospective students under 18 years old, and vulnerable adults who are registered as students or prospective students as well as children/vulnerable adults who are connected to ACG directly or indirectly.

This Policy aims to ensure that students and all ACG Community members are equipped with information and an understanding of safeguarding, radicalization, extremism and an awareness of keeping safe; to maintain clear procedures to identify students who are at risk of harm to self or others, are suffering or likely to suffer, and to report suspected cases of abuse; to establish clear referral protocols for students, especially minors, that go missing to help identify the risk of abuse or neglect and prevent the risk of repeated occurrences; to ensure that designated College employees are appointed to promote the welfare of students; to support appropriately students who have suffered significant harm and to employees involved in safeguarding; create a culture of safer employee recruitment by adopting recruitment procedures that help deter, reject or identify people who might abuse others; establish procedures for reporting abuse against faculty or staff, and dealing with such allegations; care for students who have been abused; ensure all members of the ACG Community, in particular faculty and staff, receive safeguarding training appropriate to their roles; monitor and review this policy and safeguarding practices and activities.

The Policy applies to:

- All current and prospective students under 18 years old. The fact that a minor is living independently or is in higher education does not change their status for the purpose of this policy.
- Vulnerable adults registered as students or prospective students. Vulnerable adults are persons aged 18 or over who are, or may be, in need of services by reason of mental or other disability, age or illness, and who are, or may be, unable to take care of themselves, or unable to protect themselves against significant harm, abuse or exploitation.
- ACG Employees (faculty and staff) in the course of their duties.

The Policy does not apply to:

- Students or any ACG Community member experiencing mental health difficulties who may pose a risk of harm to themselves or others, but are not vulnerable. Provision for addressing such incidents is made in the ACG First Aid Protocols and the ACG SEPP.

Abusive conduct can take many forms, such as:

- Physical abuse
- Emotional or psychological abuse
- Sexual abuse
- Neglect
- Domestic abuse
- Financial abuse

- Discriminatory abuse

3. Responsibility

The Vice President of Administration (hr@acg.edu) and the Dean of Students (incident@acg.edu) take lead responsibility for safeguarding and the protection of minors at ACG, including online safety and act as Designated Safeguarding Officers for The American College of Greece.

It is the responsibility of the Designated Safeguarding Officers to ensure safeguarding concerns reported to them are processed and referred on, as appropriate. Designated Safeguarding Officers are not responsible for making judgments about safeguarding concerns.

Information and data received as part of reports of safeguarding concerns are handled in confidence, on a need-to-know basis and in accordance with the provisions of the applicable legislation on personal data, namely the Regulation (EU) 2016/679 of the European Parliament and of the Council (“General Data Protection Regulation”) as well as the applicable Greek legislation on personal data protection, as in effect from time to time (hereinafter collectively referred to as “the Data Protection Legislation”).

The consent of a subject of a safeguarding concern is sought when possible or appropriate prior to sharing information with an external agency, such as social services or the local authorities.

Students may report incidents to the Dean of Students. For urgent concerns, the Aghia Paraskevi Campus Main Gate (+302106009800 ext. 1100), and the Downtown Campus Front Desk (+302108964531) are staffed 24/7 and will provide immediate response and referrals to on and off campus resources. College Nurses can be reached during ACG Health & Wellness Center operating hours (+30600980 ext. 1500, 1093, 1193). Regarding off-campus resources: 24-hour Victims of Violence hotline (197) provides assistance to victims of sexual assault and rape.

ACG Employees may report incidents to the Office of the Vice President of Administration.

Third parties to whom the Policy applies may report incidents to Campus Security (Main Gate, Aghia Paraskevi Campus; Front Desk, Downtown Campus).

Anonymous reporting occurs when the Complainant does not disclose their name or identity or that of other parties involved, nor requests any action by the College. Action by the College shall depend on the nature of the information shared. The privacy of individuals shall be protected to the extent permitted by law and this Policy.

Individuals who are survivors/victims of abuse have the right to request protection and confidentiality regarding their name or identity. Information conveyed through anonymous reporting assists the College and the police to track patterns of prohibited conduct and crime, and may assist other similar investigations.

The Dean of Students and the Vice President of Administration are the Designated Safeguarding Officers at ACG.

Designated Safeguarding Officers to whom these incidents are reported are expected to:

- Refer cases of suspected abuse or radicalization to the local authorities as required.
- Refer cases where a crime may have been committed to the police as required.
- Liaise with employees on matters of safety and safeguarding and act as a source of support, advice and expertise for the ACG Community.

'Responsible Employees', who are required to report incidents involving ACG students or any other community member or third party without delay, are:

- (a) ALL faculty
- (b) ALL administrators/staff in supervisory position, including supervisors of student employees (student assistants and on campus interns)
- (c) ALL administrators/staff who have specific responsibility for the welfare of students or employees, such as campus security and senior staff members in Student Affairs and ACG Health & Wellness Center, Educational Counseling Services, Residence Life, International Student Services, and Athletics
- (d) Instructors, teaching assistants, coaches, advisors, program counselors, such as the Study Abroad Program, who teach, advise, coach or mentor students

Students can disclose in confidence to Responsible Employees. Students must understand the reporting obligation of Responsible Employees before they reveal any information.

Confidential Resources at ACG are:

- (a) For Students:** The **ACG Counseling Center**, providing confidential short-term emotional support, and ongoing individual counseling, and helping students access further off-campus resources and support teams, including hotlines and psychological support/psychiatric care.
- (b) For Faculty and Staff:** The **Heads of the ACG Counseling Center**, providing professional confidential short-term emotional support to faculty/staff, and helping faculty/staff access further off-campus resources and support teams, including hotlines and psychological support/psychiatric care.

4. What to do if you have a safeguarding concern about a student, especially a minor

If ACG faculty or staff have any concerns about a student's welfare they should follow this Safeguarding Policy and contact the Designated Safeguarding Officers immediately as well as complete an Incident Report Form, including '*Safeguarding Alert*' in the description of the incident and providing as much detail as possible.

Early information sharing is vital for effectively addressing a safeguarding concern.

Whether the incident or conduct triggering concern is disclosed in a conversation, written assignment or posting on a forum, an ACG Community member is expected to:

- Listen calmly
- Respect the right to privacy but do not promise confidentiality
- Reassure the person that they have done the right thing to share this information
- Note down, as soon as possible, the exact words used to describe the incident that triggered the safeguarding concern
- If concerned that a minor/young person/vulnerable adult is in possible **immediate** danger, contact Campus Security (+302106009800 ext.1100)

5. What to do if a student, especially a minor, is in immediate danger or is at risk of harm

If a student is in **immediate** danger or is at risk of harm a referral should be made to the student's declared emergency contact person and/or the police immediately. ACG Policies prescribe the appropriate communication channels for such referrals by the Dean of Students.

6. Allegations against faculty or staff

Allegations of abuse involving a member of the faculty or staff will be taken seriously by ACG (see 3. Responsibility).

7. Record Keeping

Safeguarding concerns and decisions made, and the reasons for those decisions, should be recorded in writing. The Office of the Vice President of Administration, the Dean of Students and the Office of Student Affairs are responsible for guiding ACG Community members through the incident reporting process and keeping records on the College's record-keeping platform. Incidents reported to Campus Security shall be forwarded to the Office of the Vice President of Administration.

When it comes to students who are still minors at the time of admission, ACG will aim to collect more than one emergency contact numbers so as to ensure that contacting a responsible adult will be possible in case of safety/safeguarding concerns.

8. Confidentiality

Records kept will be stored confidentially in the College's record keeping platform (servers are within the College). The storage of personal data records by the College is a classified activity and, as such, is conducted by specifically authorized employees and executives of the College. The appropriate technical and security measures have been taken to ensure that non-authorized persons do not have access to the stored records, such as password protected computers with block entry to anyone who does not have a password.

College employees (faculty and staff) must not, under any circumstances, discuss or disclose information to any person other than those immediately involved in any safeguarding issue. All College employees are bound to absolute secrecy regarding personal data and are fully cognizant of all the stipulations of the law and all the procedures, terms and conditions pertaining to compliance with the Data Protection Legislation, including with respect to the legal storage and processing of personal data.

9. Information Sharing

Information sharing between ACG and local authorities is important when addressing safety/safeguarding concerns. Such communication, when necessary, with local authorities is undertaken solely by the Vice President of Administration, the Controller, the Dean of Students and Campus Security. Faculty and staff are expected to be proactive in sharing information as early as possible with the responsible officers to help identify, assess and respond to risks or concerns about the safety and welfare of students or ACG Community members. Information sharing involves the release only of information vital to the safeguarding and in accordance with the provisions of the Data Protection Legislation.

10. Online Safety

Information security and online safety at ACG is integral to all aspects of its operation and extra effort is made for the protection of information from unauthorized access, disclosure, disruption, modification or destruction. Measures and policies are in place to ensure the preservation of confidentiality, integrity and availability of ACG data.

More specifically, the following measures are in place:

- Regularly undertakes risk assessments in order to create a risk register, evaluate the design and effectiveness of controls and plan for possible improvements.
- Established additional procedures and controls in order to provide a higher level of security in the ways departments and offices handle data.
- Conducts Business Impact Analysis exercises, to help ACG identify critical activities and operations of College Divisions / Departments and the requirements in relation to the availability of College IT services, resources and infrastructure in case of negative incidents.
- Continuous update of the official security policies that are part of the college information security framework.

Systems protection is provided at multiple levels using the following technical measures:

- All Servers, PC's and Clients have Antivirus Clients that protect against the latest in (Virus, Malware, Cryptolocker software etc.). Clients have Trend Micro Antivirus installed and Servers have Cisco Antivirus installed.
- The school uses a college wide password policy that affects students, faculty, staff and contractors. All passwords must be strong and must change every 180 days.

- Access to systems is controlled and authorized by the respective data owner.
- At the central firewall level with two enterprise firewalls installed in failover mode and the required plugins for antivirus, content filtering, antimalware and application control (centrally control which Internet based applications are permitted to run).
- Protection from outside attacks to college systems is provided at different level through:
 - o Cloudflare, one of the world's largest security company. Cloudflare provides performance, reliability and advanced security services for almost all known types of attacks.
 - o Fortnet, our Internet provider, through the ARBOR volumetric attack prevention system.
 - o The firewall systems

Taking into account today's continuous increase in IT threats, risks and vulnerabilities, no protection solution can be considered 100% secure and the college is continuously seeking and investing on the latest protection technologies.

The protection of critical information (although it plays an important role) is not the sole responsibility of the IT department, and is essentially an interdisciplinary team approach where a large number of non-IT related people must act in an appropriate way. Since the use of information technology is an essential requirement for all businesses today, appropriate awareness efforts have been designed in such a way to support the needs of the ACG community who are interested in learning how to protect their personal and corporate information resources.

Educational institutions find themselves stuck in a maze as they attempt to modify their security posture and deploy new tools for mitigating the latest hacks. At the same time, adversaries are coming up with ways around the security defences. Hence, security defences can only protect data to a certain extent. No matter how robust a higher education institute's cybersecurity software may be, its end users would lead the line of defence during an attack.

The protection of confidential information is vital for every organization and even more vital for academic institutions –like ACG– that shape student personalities and prepare people for the workforce. For that reason, appropriate security awareness training campaigns, complemented by online courses have been established. Their purpose is to develop competence and school culture that saves money and creates a human firewall guarding against an ever increasing threat of reputational and actual damage and data loss. The campaigns are targeted towards the following broad categories complemented by appropriate short training:

- Security essentials
- Email
- Internet and safe browsing
- Working at the online office
- Working out of the office
- Mobile threats

- Social awareness
- Guarding personal information

11. Staff Training

ACG is committed to ongoing training, prevention and awareness-raising to disseminate the Policy to students (orientations, study abroad pre-departure orientation sessions, co-curricular programming, online materials, newsletters, on-campus campaigning incl. information posters, graphics, stickers and Facebook ads), faculty and staff. Trainings to proactively address safety and safeguarding concerns take place at least twice yearly.

Indicative training and awareness-raising topics for ACG Employees include: response to radicalization and crime; response to an incident of active shooting; strategies/role plays to respond to individuals – especially minors – in crisis; working with survivors from marginalized and/or multicultural populations; self-care for notification personnel; collaboration between College and Prosecutor on cold cases; victim advocacy and support services; victim notification procedures; explaining forensic science in layman's terms; intersection of the Policy with other ACG Policies and Procedures; special emergency response training for College Nurses.