

THE AMERICAN COLLEGE OF GREECE

Safeguarding Policy

Responsible Office(s)	Office of the Senior Vice President of Administration and Pierce, Office of the Dean of Students
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This Policy is available in alternative formats to ensure accessibility for all members of the ACG community, including those with disabilities or specific needs. If you require this document in an alternative format, such as large print, Braille, or an accessible electronic version, please contact the Responsible Offices (see above).

ACG is committed to providing accessible materials and ensuring that everyone has the support they need to engage with this Policy effectively.

1. Introduction

The American College of Greece [henceforth, “ACG”], founded in 1875, is an independent, not for profit, nonsectarian, co-educational academic institution. ACG includes the Pierce, Deree, and Alba divisions, as well as affiliated entities such as the ACG Research Center, Deree College Athletic Club (sports academy, afternoon programs, and summer camps, athletic programs), and all US-based affiliates of the institution.

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 all activities of the institution. ACG commits to taking appropriate measures and action to prevent the risk of suffering significant harm for any ACG community member, as well as 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 age, sex, gender and/or gender identity, reassignment or expression, including non – binary, sexual orientation, race, nationality or national origin, ethnicity, language, religion or belief, pregnancy, genetic information, bodily appearance, movement, disability, social origin, property, political or other opinion, family situation, marital status, dependency or caring for dependents, citizenship status, veteran or military status , or on any other legally prohibited basis is unlawful and will not be tolerated (see ["4.4. Protected Characteristics"](#)). 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 students, faculty and staff or, in general, members of the ACG community may arise, and the ACG Safeguarding Policy [henceforth, "this Policy"] defines how these are to be addressed and decided upon. ACG is committed to maintaining a campus ethos of mutual respect, care and responsible action and to providing a safe learning environment.

2. Purpose

This Policy aims to ensure that all members of the ACG community, including students, faculty and staff, are equipped with the necessary information and understanding to address safeguarding concerns, including radicalization, extremism, and safety awareness. This Policy establishes provisions for:

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- reporting incidents involving students at risk of harm to themselves or others, or who are suffering or likely to suffer harm, and suspected cases of abuse or neglect,
- activating the implementation of referral protocols for students, particularly minors, who are at risk, to internal support services (indicatively: the ACG Health & Wellness Center and the ACG Counseling Center),
- appointing designated ACG Safeguarding Offices (see "[4.3. Designated Safeguarding Offices](#)") to handle reports, promote the welfare of students and provide appropriate support to those who have suffered significant harm, as well as coordinate safeguarding efforts,
- fostering a culture of proactive measures for community safety, by adopting procedures that deter, reject, or identify individuals who may pose a risk to others,
- establishing robust processes for reporting allegations of abuse against faculty or staff, as well as processes for reporting allegations of abuse against students, and addressing such cases effectively,
- providing care and support for students, faculty and staff who have experienced abuse,
- ensuring that all ACG community members, particularly faculty and staff, receive safeguarding training tailored to their roles.

3. Scope

This Policy applies particularly to current and prospective students under 18 years old of Deree - regardless of whether they

are living independently or enrolled in higher education - as their status as minors remains unchanged for the purposes of this Policy. It also applies proportionately to current and prospective students who are adults, faculty and staff, and all vulnerable members of the ACG community (see "[4.2. Vulnerable Adult](#)").

Recognizing that safeguarding concerns such as radicalization and extremism can affect any individual, this Policy extends to all students, faculty, staff, and ACG community members regardless of age or vulnerability status. The institution is committed to fostering a safe and inclusive environment by addressing risks of radicalization, extremism, and harm that may impact anyone within the ACG community.

This Policy does not apply to students, faculty or staff or any ACG community member experiencing mental health difficulties who may pose a risk of harm to themselves or others but are not considered vulnerable as defined in "[4.2. Vulnerable Adult](#)." Provision for addressing such incidents is made in the ACG First Aid Protocols and the ACG Security and Emergency Procedure Protocol.

ACG is committed to maintaining a safe and supportive environment for all members of the community. This commitment is reflected in both our [Child Protection Policy](#) and Safeguarding Policy, which are designed to address the well-being and safety of all individuals under the care of the institution.

The [Child Protection Policy](#) specifically acknowledges the presence of Pre-K to K12 classes within ACG, emphasizing the unique needs of children and young people. The Policy applies institution-wide and includes all members of the community –



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employees, faculty, staff, students, parents, guardians, and third parties – who may interact with or impact the safety and welfare of children.

The Safeguarding Policy provides protection measures that apply to all members of the higher education divisions at ACG, with an emphasis on protecting vulnerable adults and students of all ages.

This Policy applies, additionally, to off-campus locations where scheduled ACG programs and activities take place. Incidents occurring within virtual spaces, in the context of electronic communications, also fall within the scope of this Policy. ACG will actively encourage and commit, where appropriate, all external partners and stakeholders to adherence to this Policy.

4. Definitions

4.1. Safeguarding

Safeguarding refers to the policies, procedures, and practices implemented to protect students, faculty, staff, and all ACG community members from harm, abuse, exploitation, and risks associated with radicalization and involvement in terrorism.

Safeguarding concerns may include, but are not limited to:

- physical abuse: Inflicting physical harm or injury,
- emotional or psychological abuse: Causing emotional distress, humiliation, or intimidation,
- sexual abuse: Any non-consensual sexual activity, harassment, or exploitation,
- neglect: Failing to meet basic needs, including educational,

emotional, or physical care,

- discriminatory abuse: Treating individuals unfairly, harassing, or excluding them based on their attributes or identities that are legally protected against discrimination (see "[4.4. Protected Characteristics](#)"),
- domestic abuse: Patterns of controlling, coercive, or threatening behavior in a relationship,
- financial abuse: Misusing or exploiting someone's financial resources.

Safeguarding also includes proactive measures to maintain a safe, respectful, and inclusive campus environment, uphold the welfare of all ACG community members, and address risks to safety and well-being.

4.2. Vulnerable Adult

An individual aged 18 or older who may require additional support or protection due to a disability, an illness or their age, is currently experiencing, or is at risk of, harm such as physical, emotional, sexual, or financial abuse, neglect, exploitation, or coercion, and may be unable to care for themselves or protect themselves under the circumstances.

4.3. Designated Safeguarding Offices

Appointed ACG Offices responsible for overseeing and implementing safeguarding protocols, including handling reports of potential abuse or harm and acting as a liaison with local authorities, social services, law enforcement, and other relevant parties as needed.

4.4. Protected Characteristics

Attributes or identities legally protected against discrimination and harassment, such as age, sex, gender and/or gender identity, reassignment or expression, including non – binary, sexual orientation, race, nationality or national origin, ethnicity, language, religion or belief, pregnancy, genetic information, bodily appearance, movement, disability, social origin and birth, property, political or other opinion, family situation, marital status, dependency or caring for dependents, citizenship status, veteran or military status, and other categories that, under law, require equitable treatment and protection within ACG policies.

5. Responsibility of Designated Safeguarding Offices

The Office of the Senior Vice President of Administration and Pierce (hr@acg.edu) and the Office of the Dean of Students (incident@acg.edu) take lead responsibility for safeguarding and the protection of minors at ACG, including online safety (see "[16. Online Safety](#)") and act as Designated Safeguarding Officers (see "[4.3. Designated Safeguarding Offices](#)") for ACG.

It is the responsibility of the Designated Safeguarding Officers to ensure safeguarding concerns reported to them are processed and referred on, as appropriate to local authorities, social services, law enforcement, and other relevant parties. Designated Safeguarding Officers are not responsible for making judgments about safeguarding concerns.

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

- refer cases of suspected abuse or radicalization to the local

authorities and law enforcement as required,

- refer cases where a crime may have been committed to the police as required,
- liaise with faculty and staff on matters of safety and safeguarding and act as a source of support, advice and expertise for the ACG community.

6. Responsible Employees

Responsible Employees, required to report incidents - including personally identifying details and all prohibited conduct under this Policy - involving ACG students, faculty and staff or any other community member or third party without delay, are:

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

All ACG members disclosing information on a safeguarding matter must understand the reporting obligation of Responsible Employees before they reveal any information.

7. Confidential Resources at ACG

Confidential Resources at ACG cannot share information without an individual's express consent unless there is imminent risk of serious harm to self or others; or to avert a serious threat to health or safety; or as part of law enforcement activities such as investigations of criminal conduct or of victims of crime, in response to court orders, in emergencies, or as required by law; or in response to a subpoena or a lawful order from a court. The ACG will take reasonable steps to notify anyone reporting prohibited conduct under this Policy about the disclosure of the information confided in a Confidential Resource.

7.1. 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.

7.2. For Faculty and Staff

The Heads of the ACG Counseling Center, providing professional confidential short-term emotional support to faculty and staff, and helping faculty and staff access further off-campus resources and support teams, including hotlines and psychological support/psychiatric care.

8. Reporting

8.1. Students

Students may report safeguarding concerns or incidents through the following channels:

- Email: Students can contact the Office of the Dean of Students directly at incident@acg.edu.
- Online Form: Complete the online [Incident Report Form](#), which is securely collected and managed by the Office of the Dean of Students, including "Safeguarding Alert" in the description of the incident and providing as much detail as possible.
- By mailing/dropping off an [anonymous report](#) to the Office of the Dean of Students, Deree The American College of Greece, Gravias 6, Aghia Paraskevi, 15342 (see "[8.4. Anonymous Reporting](#)").

8.2. Faculty and Staff

ACG faculty and staff may report incidents to the Office of the Senior Vice President of Administration and Pierce directly at hr@acg.edu.

Members of the Pierce community are informed about the relevant procedures for child protection as outlined in the respective [Child Protection Policy](#).

8.3. Third Parties

Third parties to whom the Policy applies may report incidents to Campus Security:

- Aghia Paraskevi Campus:
 - In person: at Main Gate,

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- Phone: +302106009800 ext. 1100,
- Email: security.servives@acg.edu,
- Downtown Campus:
 - In person: at Front Desk,
 - Phone: +302108964531,
 - Email: security.servives@acg.edu

8.4. Anonymous Reporting

Anonymous reporting occurs when the concerned party does not disclose their name or identity or that of other parties involved, nor requests any action taken by the institution. Action by the institution 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 or victims of abuse have the right to request protection and confidentiality regarding their name or identity. Anonymous reporting, while limiting the ability to directly address specific cases, still holds significant value. Such reports can help the institution or the law enforcement identify patterns of prohibited conduct or criminal activity, contributing to broader efforts to prevent and address similar incidents in the future.

9. Urgent Concerns

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.

ACG Nurses can be reached during ACG Health & Wellness Center's 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.

10. What to Do if you Have a Safeguarding Concern about a Student, especially a Minor

If an ACG faculty member or staff has any concern about a student's welfare they should contact the Designated Safeguarding Offices immediately, as well as complete the online [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 faculty member or staff is expected to:

- Listen calmly,
- Respect the right to privacy but explicitly state their reporting duties as a Responsible Employee (see "[6. Responsible Employees](#)"),

- 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).

11. 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 declared emergency contact person of the student and/or the police immediately.

The Office of the Dean of Students and the Office of the Senior Vice President of Administration and Pierce are responsible to liaise with local authorities, law enforcement, social services and other relevant parties as appropriate.

12. Allegations against Faculty or Staff

Allegations of abuse involving a member of the faculty or staff are reported in accordance with the procedures outlined in Section "[8. Reporting](#)" of this Policy. The institution is committed to handling such allegations with the utmost seriousness, ensuring a fair and thorough investigation while prioritizing the safety and well-being of all parties involved.

13. Record Keeping

Safeguarding concerns and decisions made, and the reasons

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

When it comes to students who are still minors at the time of admission (see "[Admissions Policy and Process](#)", paragraph "Applicants Under 18"), ACG will aim to collect more than one emergency contact number so as to ensure that contacting a responsible adult will be possible in case of safeguarding concerns.

14. Data Processing and Information Sharing

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 [henceforth, "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 the local authorities, law enforcement and social services.

Information sharing between ACG and local authorities, law enforcement and social services is important when addressing

safeguarding concerns. Such communication, when necessary, is undertaken solely by the Office of the Senior Vice President of Administration and Pierce, the Office of the Dean of Students, the Controller, and Campus Security. Faculty and staff are expected to be proactive in sharing information as early as possible with the Designated Safeguarding Offices (see "[4.3. Designated Safeguarding Offices](#)") to help identify, assess, and respond to risks or concerns about the safety and welfare of students, faculty and staff. Information sharing involves only the release of information vital to the safeguarding and in accordance with the provisions of the Data Protection Legislation.

15. Confidentiality

Records kept will be stored confidentially in the institution's record keeping platform (servers are within ACG). The storage of personal data records by ACG is a classified activity and, as such, is conducted by specifically authorized employees and executives of the institution. 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.

ACG 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 ACG faculty and staff 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.

16. 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.

Security and data protection policies are in place to ensure the preservation of confidentiality, integrity and availability of ACG data, such as but not limited to:

- the Password Policy,
- the Acceptable Use of College Technology Resources Policy,
- the Computer Ethics Policy,
- the E-Mail Policy,
- the Personal Data Protection Policy,
- the Student Privacy Policy.

Additionally, the following measures are in place:

- regular 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,
- Business Impact Analysis exercises, to help ACG identify critical activities and operations of ACG Divisions/Departments and the requirements in relation to the availability of the institution's IT services, resources and infrastructure in case of negative incidents,

- continuous update of the official security policies that are part of the institution's information security framework.

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

- all servers and Clients have Antivirus Softwares that protect against the latest threats (Virus, Malware, Cryptolocker software etc.). Clients have Trend Micro Antivirus installed and servers have Cisco Antivirus installed,
- access to systems is controlled and Fauthorized 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 (central control of which Internet based applications are permitted to run),
- protection from outside attacks to ACG's systems is provided at different level through:
 - Cloudflare, one of the world's largest security company. Cloudflare provides performance, reliability and advanced security services for almost all known types of attacks,
 - Forthnet, the Internet provider of ACG, through the ARBOR volumetric attack prevention system,
 - firewall systems.

Considering today's continuous increase in IT threats, risks and



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vulnerabilities, no protection solution can be considered 100% secure and ACG is continuously seeking and investing on the latest protection technologies.

The protection of critical information requires a collaborative, interdisciplinary approach in which all ACG community members share responsibility for the proper handling and secure storage of personal data. 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 members who are interested in learning how to protect their personal and corporate information resources.

The protection of confidential information is vital for every organization and even more vital for academic institutions of Higher Education –like ACG– that shape student personalities and prepare them for the workforce. For that reason, appropriate security awareness training campaigns, complemented by online courses have been established. Their purpose is to develop digital competence against 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 and digital spaces,
- working out of the office,

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- mobile threats,
- social awareness,
- guarding personal information.

17. Training

ACG is committed to ongoing training, prevention and awareness-raising to disseminate this Policy to:

17.1. Students

With actions such as, but not limited to:

- orientations,
- study abroad pre-departure orientation sessions,
- co-curricular programming,
- online materials,
- newsletters,
- on-campus campaigning,
- information posters,
- graphics,
- stickers and
- Facebook advertisements.

17.2. 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 faculty and staff include:

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- 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,
- understanding of responsible ACG Officials in cases requiring collaboration with the Prosecutor,
- victim/survivor advocacy and support services,
- victim/survivor notification procedures,
- explaining forensic science in layman's terms,
- intersection of this Policy with other relevant ACG Policies and Procedures,
- special emergency response training for ACG Nurses.

18. Review

ACG regularly monitors and reviews this Policy, every two (2) years, and seeks to remain aligned with safeguarding best practices and maintain high standards of safety and welfare.