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SAFEGUARDING POLICY



SAFEGUARDING POLICY

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1.0 PURPOSE OF POLICY

The University of Ghana (UG) is fully committed to the protection all of people that we work with, particularly children and adults at risk, from harm or abuse of any kind that may be caused by our operations or the conduct of our staff and associated personnel and affiliates.

This policy lays out commitments made by UG and informs staff and associated personnel of their responsibilities in relation to safeguarding of children and at-risk adults.

This policy provides for child safeguarding, adult safeguarding, and protection from exploitation and abuse. It does not deal principally with sexual harassment in the workplace – this is dealt with under UG's Sexual Harassment and Misconduct Policy.

2.0 POLICY STATEMENT

The University of Ghana believes that everyone within its sphere of influence, either in-person or virtually, regardless of age, gender, identity, disability, race, religious belief, or ethnic origin has the right to be protected from all forms of harm, abuse, neglect, and exploitation. UG is fully committed to meeting the requirements of safeguarding children and adults at risk, to ensure that they have opportunities to develop their full potential. UG does not tolerate abuse and exploitation by staff and associated personnel in any form under any circumstance. It recognizes its responsibility to protect the welfare of all by a commitment of practice which protects them.

The policy aims to:

- i. Promote and prioritise the safety and wellbeing of children and adults at risk.

- ii. Raise awareness that everyone who encounters children/ adults at risk (and their families) has a role to play. To fulfil this responsibility effectively, all staff should make sure their approach to work is centred around the vulnerable individual. This means that they should always consider what is in the best interests of the child and/or the adult at risk.
- iii. Provide assurance to parents, caregivers and other parties that the University will take reasonable steps to manage risks and keep children and adults at risk safe. The University cannot act 'in loco parentis,' so the ultimate responsibility for children rests with those who have parental responsibility.
- iv. Ensure that everyone understands their roles and responsibilities in respect of safeguarding and is provided with the necessary information, training, and support on safeguarding matters.
- v. Ensure that appropriate action is taken in the event of any allegations or suspicions regarding harm to children or adults at risk arising from contact with University staff, students, apprentices, or volunteers, whether the harm has taken place on University premises or not.
- vi. Ensure all staff can reassure victims of abuse that they are being taken seriously and will be supported.

3.0 DEFINITION OF TERMS

Term	Definition (with examples if required)
Child	Any person below the age of 18.
Harm	Psychological, physical, emotional and any infringement of an individual's rights.

Psychological harm	Emotional or mental abuse, including (but not limited to) humiliating and degrading treatment such as name calling, constant criticism, stigmatization, belittling, persistent shaming, and isolation.
Safeguarding	<p>Taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse, and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.</p> <p>This definition pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power or trust, or the exploitation of vulnerability, especially for sexual purposes.</p>
Sexual abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. The term also covers any behaviour by an adult or older adolescent towards a child to stimulate sexual involvement. The use of a child, or adults at risk for sexual stimulation is sexual abuse. This includes live streaming and sharing of images of a pornographic nature.

Sexual exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. Sexual exploitation may be a form of human trafficking and modern slavery.
Human trafficking	The process of trapping people using violence, deception or coercion and exploiting them for financial or personal gain.
Survivor	The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience, and the capacity to survive. However it is the individual's choice on how they wish to identify themselves.
At-risk adult	Also referred to as vulnerable adult: A person who is or may need care by reason of mental or other incapacity, age, or illness; and who is or may be unable to take care of him- or herself, or unable to protect him- or herself against significant harm or exploitation.

4.0 APPLICATION AND SCOPE

This policy is applicable to the University's internal and external stakeholders. The internal stakeholders include all members of the University of Ghana community (teaching and non-teaching), students (graduates, undergraduates and visiting research

students), applicants, researchers, volunteers, interns, and official(s) representing the interest of the University. External stakeholders include UG affiliated institutions, visitors, partners and collaborators, research community, funders, and other third parties who are associated with the university's business or serve the University as its agents and are under the control of the University in all its locations and facilities.

The policy also applies to all activities (whether in-person or virtual) involving contact with children and adults who may be at risk, and aims to provide some level of protection for such persons.

5.0 IMPLEMENTATION AND COMPLIANCE INSTITUTIONS

5.1 The Vice-Chancellor

The Vice-Chancellor, as Chief Disciplinary Officer of the University, is ultimately, responsible for safeguarding at the institution. The Vice-Chancellor is responsible for ensuring that UG provides and maintains a harm-free, safe, and conducive environment that fosters teaching, learning and research, and therefore must ensure compliance with the Safeguarding Policy. The Vice-Chancellor shall:

- i. Appoint a Safeguarding Team headed by the Director, Careers and Counselling Centre, and at least 6 persons including the Head of HR, a representative of the Basic Schools within the University, a member of the UG legal team, the Dean of Students' Affairs, and an expert in child/vulnerability psychology. This team shall be the official point of contact for addressing issues related to safeguarding. They can be reached via email at careers@ug.edu.gh.
- ii. Appoint, upon the recommendation of the Safeguarding Team, Designated Safeguarding Officers to special units that often deal with children and vulnerable adults, and to appoint some for special events that involve children and are held within the university.

- iii. The Careers and Counselling Centre shall be the focal point for receiving any reported suspicions and allegations of abuse of children or adults at risk within the University.

5.2 Designated Safeguarding Officers

The Safeguarding Officers attached to a unit must be trained to be able to act as a first point of contact for all staff, students, and affiliates if they are concerned about a child or a vulnerable adult.

5.3 The Safeguarding Team

The Safeguarding Team, led by the Director, Careers and Counselling Centre, (on behalf of the Vice Chancellor) shall:

- Have overall responsibility for the University's Safeguarding Policy, its sensitization, promotion, and implementation;
- Ensure that the UG Safeguarding Policy is periodically reviewed and updated to reflect local or national changes and good practice.
- Ensure that UG complies with safe recruitment procedures for new members of staff and their induction.
- Investigate allegations of abuse or non-compliance occurring on university premises or involving UG staff or students.
- Make vulnerable adult and child protection referrals to the relevant agencies as appropriate.

5.3.1 Responsibilities of Designated UG Safeguarding Officers

- a) To ensure that accurate child and vulnerable adult protection records and complaints are logged and stored securely in line with UG's safeguarding policy.
- b) To promote a safe environment for children and young people within the units or events to which they are designated.
- c) To manage and facilitate formal referrals of incidents/ complaints of violation of safeguarding policies to the Registrar's Office.

6.0 ROLES AND RESPONSIBILITIES

UG is committed to addressing safeguarding concerns in its work and will do so by adopting the three pillars of prevention, reporting and response.

6.1 Prevention

6.1.1 UG's Responsibilities

UG will:

- Ensure all staff and students have access to, are familiar with, and know their roles and responsibilities within this policy.
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their encountering UG. This includes the way in which information about individuals in our institution is gathered and communicated.
- Implement stringent safeguarding procedures when recruiting, managing, and deploying staff and associated personnel for all our programmes, including research activities.
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organization (e.g., staff who work in communities should be trained annually; all others once every two years).
- Continuously update procedures and rules for safeguarding to meet the requirements of its rapidly evolving stakeholder community.
- Follow up on reports of safeguarding concerns promptly and according to due process.
- Liaise with stakeholder state institutions to provide technical and professional assistance to constantly monitor compliance and develop a robust prevention system.

6.1.2 Staff Responsibilities

UG staff, in accordance with the Safeguarding Policy, must NOT engage in activities that harm or can be potentially harmful to children and adults at risk. Accordingly,

UG staff, students and affiliates must not:

- Engage in sexual activity with anyone who is either under the age of 18 or unable to legally consent.
- Sexually abuse or exploit children or at-risk adults.
- Subject a child to physical, emotional, or psychological abuse, or neglect.
- Engage in any commercially exploitative activities with children including child labour or trafficking.
- Use abusive language when communicating with people, especially children and vulnerable adults.
- Engage in bullying activities.
- Use discriminatory, derogatory, or stigmatizing language in relation to children or at-risk adults
- Take, make, share, or possess, indecent images and pseudo-photographs of people under 18 or at-risk adults.
- Exchange money, employment, goods, or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance.
- Engage in any sexual relationships with beneficiaries of assistance since they are based on inherently unequal power dynamics.

Additionally, UG staff, students and affiliates are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Report any concerns or suspicions regarding safeguarding violations by a UG staff member, student, or affiliate to the Safeguarding Team Head (Director, Careers and Counselling Centre).

- Submit to training and capacity building programmes on safeguarding, as may be necessary, to ensure optimal compliance with the Safeguarding Policy.

7.0 REPORTING A SAFEGUARDING CONCERN

7.1 Enabling Reporting

- a) UG will ensure that safe, appropriate, and accessible means of reporting safeguarding concerns are made available to staff and the people it works with.
- b) Any staff reporting concerns or complaints will be protected by UG's Whistleblower Policy (See the Council Approved Financial Regulations Manual). UG will also accept complaints from external sources such as members of the public, partners, and official bodies, so long as such complaints relate to UG staff, students, affiliates or assigns as victims or perpetrators.

7.2 How to Report a Safeguarding Concern

- a) Staff members who have a complaint or concern relating to safeguarding must submit a formal report in writing to the Safeguarding Team Head using the Incident Reporting Form in Annex 1.
- b) If the staff member does not feel comfortable reporting to their Safeguarding Team Head, they may report to the Human Resources (HR) Manager or the Vice-Chancellor.
- c) External individuals can report a concern by emailing the Vice-Chancellor (vcoffice@ug.edu.gh).

7.3 Receiving Reports

Staff who receive the report should first and foremost ascertain whether the child or adult in question is still potentially at risk of harm and take immediate action on that risk.

UG's Safeguarding Team Head shall write to the reporter acknowledging that the concern has been received and detailing the steps that will be followed.

UG's Safeguarding Team Head shall report to the Senior Management Team (SMT) who will assess whether a breach has occurred and if there is sufficient information to act on the report.

The following measures will be taken:

- a. If the report alleges a minor offence and it is so established by UG's Safeguarding Team and SMT, SMT will establish what disciplinary action is to be taken.
- b. If the report alleges a serious safeguarding violation, UG will institute a formal investigation and follow UG's Procedures for Conducting Investigations of Serious Policy Violations and Malpractice. UG may also co-opt external experts where necessary.
- c. For all concerns relating to children under 18 years, UG will seek expert advice (e.g., from children's or social services).
- d. UG's disciplinary measures include censure, formal warning, suspension without pay, demotion, and dismissal. This list is not exhaustive. Measures will be applied as appropriate in accordance with the gravity of the case, taking into consideration such factors as the nature of the concern and the prior behaviour of the perpetrator. These disciplinary measures do not preclude formal legal action by the survivor.
- e. UG will fully cooperate with authorities (e.g., the police, health officials, and social services) investigating safeguarding issues that concern our staff, students, or affiliates.
- f. UG will formally write to the staff member or external individual

who reports safeguarding issues. If the reporter is not satisfied with UG's response, they can request that the issue to be brought to the attention of the Chair of the University Council.

- UG will inform all stakeholders who need to know of any safeguarding violations, while ensuring that only information that is needed is shared. Examples include:
Senior Management Team
Funding agencies (if applicable)

7.4 RESPONDING TO SAFEGUARDING CONCERNS

- a) UG will follow up on safeguarding reports and concerns in an appropriate and timely way, in accordance with policy and procedure, and legal and statutory obligations (see Annex 1 for procedures for reporting and response to safeguarding concerns).
- b) UG will apply appropriate disciplinary measures to staff, students and affiliates found in breach of this Policy.
- c) UG staff, students and affiliates who offend the Safeguarding Policy shall submit to mandatory training in addition to the prescribed disciplinary action.
- d) Conduct found to constitute harm to a child or at-risk adult will be subject to appropriate disciplinary action in accordance with the gravity of the case.
- e) UG will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response (such as internal investigation) is carried out. Decisions regarding support will be led by the survivor or their representative.

8.0 CONFIDENTIALITY

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management will be shared strictly on a need-to-know basis, and will always be kept secure.

9.0 BREACH OF POLICY

Any breach of this Safeguarding Policy shall attract disciplinary measures as may be defined by the University of Ghana.

10.0 ASSOCIATED POLICIES AND GUIDELINES

The University of Ghana has a number of established policies, procedures and practices which provide guidance to protection of members of staff and students. As such, this policy must be read in conjunction with them, especially with the following policies and national Acts:

- UG Code of Conduct for Academic Staff
- UG Sexual Harassment and Misconduct Policy
- UG Risk Management Policy
- UG Research Policy and Associated Guidelines
- UG Ethics Policy
- UG Council Approved Financial Regulations Manual
- UG Customer Service Policy
- Ghana Whistleblower Act (ACT 720)

The guidance and legislative framework that underpins this document include:

- The Ghana Labour Act, 2003 (Act 651)
- Ghana Labour Regulations, 2007 (L.I. 1833)
- Republic of Ghana, Children's Act, 1998 Act 560
- Republic of Ghana, Persons with Disability Act, 2006 Act 715

11.0 REVIEW OF POLICY

Periodic review and updating of this Safeguarding Policy will be handled by the Quality Assurance and Planning Unit at the University of Ghana. The policy document will be subject to review every three (3) years or when necessary, as directed by the Vice-Chancellor or the University Council to ensure that it is kept up to date with local or international standards.

12.0 VERSION CONTROL AND CHANGE HISTORY

Version Control	Date Effective	Approved By	Amendment
1	April 11, 2022	Business and Executive Committee	

ANNEX 1 - INCIDENT REPORTING FORM



Safeguarding - Incident Reporting Form

Please use this form to record basic information of an allegation, suspicion, incident or disclosure of a potential safeguarding concern and submit it to UG's Safeguarding Team Head (Registrar) for processing

Safeguarding Children and At-Risk Adults	
Your name:	Your position:
Workplace Address:	Contact details (phone number, email):
Details of the Child or At-Risk Adult	
Name of child/at-risk adult:	
Contact details: Date of birth:	
Parents/guardian's details (name, contact information):	
Details of the allegations/suspicious	
Are you reporting? <input type="radio"/> Disclosures made directly to you by the child/at-risk adult? <input type="radio"/> Disclosures from a third party? <input type="radio"/> Your suspicions or concerns?	
Date and time of the disclosure: Date and time of the incident: Name of alleged perpetrator:	
Details of the allegation/suspicion	
State exactly what you were told/observed and what was said. Use the person's own words as much as possible. Include details of where and when the incident occurred.	
Action taken so far:	
Signed	Date
Please save this form securely and submit to UG's Safeguarding Focal Point (i.e. Office of the Registrar). If sending electronically, encrypt or mark as "Confidential" and send to registrar@ug.edu.gh	

ANNEX 2: ACKNOWLEDGEMENT OF POLICY**Acknowledgement:**

I

First Name

Middle Name

Surname

of University of Ghana

Do hereby declare the following:

1. I affirm that I have read and understood the provisions of the Safeguarding Policy.
2. I undertake to abide by the letter and spirit of the Policy.
3. I understand that UG may take disciplinary action for any act or omission on my part that contravenes the Policy.
4. I affirm that I have an obligation to ensure that UG is a safe environment for everyone to work in.
5. I append my name and signature onto this form, of my own free will and agree to be bound by it.

Signature:

Date:

ANNEX 3: GUIDELINES FOR KEEPING CHILD AND VULNERABLE ADULT PROTECTION RECORDS AND COMPLAINTS

1. Child and Vulnerable Adult Protection Records shall be kept in both hard and soft copies.
2. Based on the sensitivity of the reports, hard copy reports shall be stored in physical files and kept in a secure room under lock and in line with UG's Records Management Policy. Electronic copies shall also be stored on a secure online storage platform to allow for ease of access and traceability.
3. Incident reports logged shall be accessed by only authorized personnel as and when necessary.
4. Received reports will be time stamped and logged into an Incident Register which shall be maintained and stored at the Office of the Registrar.

