

# Safeguarding Policy

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Ownership	Registrar and Secretary
Policy contact	Registrar and Secretary
Approval	Council
Protective Marking	Public
Policy Unique ID	XXXXX
Last review date	February 2022
Next review date	September 2022

## **1 Introduction**

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- 1.1 Goldsmiths is committed to ensuring the safety of everyone involved in its activities and aims to provide a safe environment for all students and staff studying and working at the College and for those individuals visiting the College.
- 1.2 Goldsmiths believes that students, staff and visitors of the College have the right to learn and work in a positive environment that is free from harm and all forms of prejudice, harassment, discrimination and bullying.
- 1.3 This includes the College's duty of care to safeguard children, young people and adults at risk of harm and exploitation during the course of any activity relating to the College, irrespective of duration or location.
- 1.4 All universities have a duty to take reasonable and necessary steps to ensure that children and adults at risk are safe and that reasonably foreseeable harm does not occur as a result of careless acts, deliberate acts or omissions of the institution. These measures are in addition to those required under general Health and Safety requirements and legislation.
- 1.5 This Policy sets out the College's responsibilities in ensuring the protection of these groups in accordance with the Safeguarding and Vulnerable Groups Act 2006<sup>1</sup>. It applies to all staff, students and volunteers (irrespective of whether they act in a paid or unpaid capacity), who may be working with children, young people or adults at risk of harm through the College's teaching, research or other activities, including outreach programmes.
- 1.6 It is expected that all individuals will conduct themselves whilst on College business in a professional manner, with integrity, upholding the reputation of the College at all times and in line with the College's published regulations, policies and guidance.
- 1.7 It is expected that all staff will be aware, through effective communication of this Policy and associated training, of how to recognise and respond appropriately to safeguarding concerns.
- 1.8 Those with specific responsibilities as set out in this Policy are expected to have read and understood their responsibilities, to attend training, to ensure that appropriate records are kept relating to safeguarding matters and to ensure that local procedures/arrangements for meeting safeguarding responsibilities are kept up to date and are in line with this Policy.

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<sup>1</sup> The Policy is informed by a collection of legislation and guidance, including: Children Act 1989, Data Protection Act 1998, General Data Protection Regulation 2016, Sexual Offences Act 2003, Safeguarding Vulnerable Groups Act 2006, Equality Act 2010, Protection of Freedoms Act 2012, Counter-Terrorism and Security Act 2015, Protecting Vulnerable Adults 2017, Enhanced Due Diligence: Safeguarding for External Partners 2018, Working Together to Safeguard Children 2018, Safeguarding and protecting people for charities and trustees Guidance 2019

## **2 Context**

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- 2.1 Goldsmiths is a diverse and predominantly adult learning environment. However, there are circumstances when children, young people and adults at risk may interact with staff and students of the College in the course of its activities. These include, but are not limited to:
- teaching, supervision and support of students
  - summer schools, school visits, and other activities
  - outreach or widening participation activities taking place on or off campus
  - student accommodation
  - research activities
  - public events and conferences
  - placements and other professional activities
  - field trips, excursions and other volunteering activities
  - Goldsmiths Nursery
  - Goldsmiths Students' Union
- 2.2 The College has a duty of care to its staff, students and visitors and is responsible for ensuring appropriate policy, procedures, guidance, risk assessment, action planning and training are in place to facilitate effective safeguarding of children, young people and adults at risk. This includes ensuring we take reasonable steps to ensure that contractors understand, accept and are responsible for their, or their employees' conduct in connection with these groups on College premises.
- 2.3 Anyone undertaking a paid or unpaid role at the College has a responsibility to be aware of this Policy and to understand how and where to raise safeguarding concerns.
- 2.4 The College has a Designated Safeguarding Lead (DSL) and a Designated Prevent Lead (DPL) who are responsible for ensuring legal and regulatory compliance and for ensuring this Policy is implemented. Designated Safeguarding Officers (DSOs) take the lead in responding to safeguarding concerns.
- 2.5 Safeguarding Co-Ordinators (SCOs) are identified for specific College activities who ensure appropriate safeguarding arrangements are in place relating to those activities. When working with an organisation with more stringent safeguarding requirements, SCOs will ensure that the policies work in tandem.

2.6 Responsibilities of Goldsmiths staff and students are set out below:

Body	Responsibilities
<p><b>Council</b> Goldsmiths' governing body</p>	<p>Has ultimate responsibility/accountability, including for putting things right. It does so by:</p> <ul style="list-style-type: none"> <li>• approving the Safeguarding Policy</li> <li>• receiving assurance that staff are trained to the appropriate levels</li> <li>• receiving risk registers</li> <li>• receiving their own training</li> <li>• receiving the outcomes of periodic reviews</li> <li>• reviewing which posts require DBS checks</li> <li>• receiving risk assessment for posts which do not qualify for DBS check but still have contact with children or adults at risk</li> <li>• approving the College's Prevent return prior to submission to the Office for Students (OfS)</li> </ul>
<p><b>Audit and Risk Committee</b></p>	<p>Receives reports from the Safeguarding Steering Group</p>
<p><b>Warden</b> Goldsmiths' Accountable Officer</p>	<p>Responsible for:</p> <ul style="list-style-type: none"> <li>• submission of reports to the Office for Students (OfS) as requested by the Designated Safeguarding Lead or Designated Prevent Lead</li> <li>• (as Chair of Academic Board) recommending the Safeguarding Policy to Council for approval</li> </ul>
<p><b>Designated Safeguarding Lead</b> Registrar and Secretary</p>	<p>Responsible for:</p> <ul style="list-style-type: none"> <li>• ensuring the Safeguarding Policy is kept up to date, is accompanied by appropriate formal procedural arrangements and is implemented across the College</li> <li>• oversight of investigations of allegations and other disclosures in conjunction with Designated Safeguarding Officers, Safeguarding Co-Ordinators and other relevant external agencies</li> <li>• the appointment of Designated Prevent Lead, Designated Safeguarding Officers, Safeguarding Co-Ordinator's for each area identified in this Policy</li> <li>• investigating and remedying any apparent non-compliance with this Policy at the College</li> <li>• ensuring effective communication of the Safeguarding Policy and Procedure, including for communicating changes to it</li> <li>• ensuring appropriate training is provided to all staff, commensurate with their role and responsibilities, and for ensuring the training is evaluated and kept up to date</li> </ul>

Body	Responsibilities
	<ul style="list-style-type: none"> <li>• ensuring appropriate mechanisms are in place for recording and reporting safeguarding incidents and near misses (in accordance with the College’s Data Protection Policy)</li> <li>• holding the central records of safeguarding incidents</li> <li>• ensuring required risk assessments are conducted and appropriate and acted upon</li> <li>• attending high level training commensurate with the responsibilities of the DSL</li> <li>• chairing the Safeguarding Steering Group</li> <li>• providing reports to Council and its subcommittees as necessary</li> <li>• ensuring reports are made to the OfS when required, through the College’s Accountable Officer</li> </ul>
<p><b>Designated Prevent Lead</b></p> <p>Associate Director: Student Support Services</p>	<p>Responsible for taking action to ensure the College remains compliant with its duties under the Prevent Duty by:</p> <ul style="list-style-type: none"> <li>• ensuring the delivery of appropriate training for all staff and that attendance at training is recorded in line with OfS requirements</li> <li>• maintaining the College’s risk register regarding Prevent and for taking actions identified within it</li> <li>• establishing and maintaining working relationship with external agencies in delivery of Prevent duty</li> <li>• making referrals to external agencies when required</li> <li>• preparing the submission of the College’s Prevent return for approval by Council</li> </ul>
<p><b>Designated Safeguarding Officers</b></p> <p>Associate Director, Student Support Services – safeguarding of students</p> <p>Deputy Director of Human Resources – safeguarding of staff</p>	<p>In respect of each group, each Designated Safeguarding Officer is responsible for:</p> <ul style="list-style-type: none"> <li>• investigating causes for concern when raised under the Safeguarding Policy</li> <li>• management of safeguarding incidents, including referrals to local agencies and/or referrals to internal procedures as appropriate</li> <li>• chairing any investigation meetings</li> <li>• providing advice to Safeguarding Co-Ordinators and others on safeguarding concerns and handling of incidents</li> </ul>

Body	Responsibilities
<p>Deputy Director of Estates – safeguarding of visitors</p>	<ul style="list-style-type: none"> <li>• assisting in the promotion of the Safeguarding Policy and written procedure</li> <li>• attending required training and assisting in the delivery of training to staff where appropriate</li> <li>• establishing and maintaining links with relevant local agencies</li> <li>• ensuring appropriate recording and onward internal reporting of safeguarding concerns and incidents takes place and is provided to the Designated Safeguarding Lead</li> </ul>
<p><b>Safeguarding Co-ordinators</b></p> <p>Named postholders relevant to activity including:</p> <p>Student Recruitment- applicant visits on campus outreach/WP activity summer school activity</p> <p>Accommodation – Deputy Head of Accommodation Services</p> <p>Academic departments – in respect of placement activities for students</p> <p>Careers Department – in respect of placement activities, centrally organised</p> <p>Conference Services – in respect of events taking place on campus</p>	<p>In respect of specific College activities involving children and young people who are not members of Goldsmiths:</p> <ul style="list-style-type: none"> <li>• ensuring that all staff, students and volunteers familiarise themselves with the College’s Safeguarding Policy and that of the organisation involved in the activity ensuring that all staff, students and volunteers involved in these activities understand their responsibilities, and are appropriately trained to deal with safeguarding incidents</li> <li>• acting as the identified contact for responding to safeguarding concerns or allegations raised in the course of the College’s activity</li> <li>• ensuring any safeguarding concerns and incidents are appropriately recorded (and reported to the Designated Safeguarding Lead where appropriate)</li> <li>• ensuring any locally held safeguarding procedures relating to these activities are compliant with the College’s Policy and have been confirmed by the Safeguarding Steering Group</li> <li>• on occasion, Safeguarding Co-Ordinators may be asked by the Designated Safeguarding Lead to respond to particular safeguarding concerns or incidents outwith these specific activities</li> <li>• attending training commensurate with these responsibilities</li> </ul>

Body	Responsibilities
<p><b>Director of Human Resources</b></p>	<p>Responsible for:</p> <ul style="list-style-type: none"> <li>• appointing Designated Safeguarding Officer for responding to safeguarding incidents involving staff</li> <li>• ensuring that the recruitment of staff includes the required checks including DBS checks where applicable</li> <li>• ensuring that the related policies as listed in this Policy are kept updated and refer appropriately to the Safeguarding Policy</li> </ul>
<p><b>Director of Estates</b></p>	<p>Responsible for:</p> <ul style="list-style-type: none"> <li>• appointing Designated Safeguarding Officer for responding to safeguarding incidents involving visitors</li> <li>• ensuring contractors of the College comply with the provisions of this Policy</li> <li>• ensuring an appropriate policy is in place for the management of events and conferences in compliance with the provisions of the Safeguarding Policy, including Prevent</li> </ul>
<p><b>All staff</b></p> <p>Includes all Goldsmiths staff, students, freelance practitioners, student ambassadors, alumni, volunteers and any associated personnel acting as representatives of the College</p>	<p>Responsible for:</p> <ul style="list-style-type: none"> <li>• helping to ensure the College is a safe environment, free from prejudice, discrimination, bullying and harassment by ensuring compliance with the expected behaviours and values of the College</li> <li>• ensuring they understand the Safeguarding Policy and how to raise a safeguarding concern or disclosure under it</li> <li>• attending training relating to safeguarding as requested ensuring safeguarding responsibilities are reflected in event planning and risk assessments for College activities in accordance with Health and Safety procedures</li> <li>• co-operating fully with any internal or external investigations carried out into reported concerns</li> <li>• reporting any concerns, suspicions or information regarding safeguarding violations to the appropriate staff</li> <li>• maintaining the confidentiality of any suspected or actual incidents</li> <li>• ensuring they are aware of local safeguarding policies and procedures for the premises they are</li> </ul>

Body	Responsibilities
	<p>visiting when representing the College, for example when visiting schools</p>
<p><b>Heads of academic departments</b></p>	<p>In addition to the responsibilities for all staff, Heads of academic departments are expected to:</p> <ul style="list-style-type: none"> <li>• assist in ensuring the Safeguarding Policy is received and understood by all staff</li> <li>• ensure that all departmental activities that have safeguarding implications are reported to the DSL so that the appropriate risk assessment and arrangements can be put in place</li> <li>• supporting the allocation of Safeguarding Co-ordinators where required (as relates to departmental activity) and ensuring they attend training</li> <li>• ensure that all departmental staff attend required training</li> </ul>
<p><b>Directors of Professional Services</b></p>	<p>In addition to the responsibilities for all staff, in respect of their own areas Directors of Professional Services are expected to:</p> <ul style="list-style-type: none"> <li>• ensure that all staff receive and understand the Policy and how to report safeguarding concern</li> <li>• ensure that all staff attend training as appropriate to their roles</li> </ul>
<p><b>Goldsmiths Nursery</b></p>	<p>Required to have own Safeguarding Policy and Designated Safeguarding Lead</p>
<p><b>Goldsmiths Students' Union</b></p>	<p>Required to have own Safeguarding Policy and Designated Safeguarding Lead</p>
<p><b>Safeguarding Steering Group</b></p>	<ul style="list-style-type: none"> <li>• To review and update Goldsmiths' Safeguarding Policy for approval by Council on the recommendation of Academic Board</li> <li>• To maintain an annual Action Plan to implement the Safeguarding Policy. That Action Plan will always include (but is not limited to) the following: <ul style="list-style-type: none"> <li>- arrangements for data collection, processing and reporting are in place as set out in the Safeguarding Policy and in accordance with the College's Data Protection Policy</li> <li>- arrangements to ensure training for staff is delivered in accordance with the roles set out in the Safeguarding Policy</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>- arrangements to ensure the provisions of the Safeguarding Policy, and related activities, are clearly and regularly communicated to the College's staff and students</li> <li>- arrangements to ensure effective working with external partners as required under the Safeguarding Policy</li> <li>• To oversee the implementation of the Safeguarding Action Plan, and to report progress against it annually to Audit &amp; Risk Committee</li> <li>• To keep under review the related procedures required to implement the Safeguarding Policy</li> <li>• To maintain an understanding of the regulatory environment in regard to safeguarding, including relevant government legislation and Office for Students requirements</li> <li>• To oversee annual returns relating to safeguarding matters submitted to the OfS for approval by Council, including the annual Prevent return</li> <li>• To report to the Audit &amp; Risk Committee annually on the effectiveness of safeguarding arrangements in place at the College</li> </ul>
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### 3 Policy aims

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- 3.1 This Policy aims to ensure reasonable and effective steps are taken by the College to safeguard children, young people and adults at risk, both through the provision of a safe environment and through the provision of effective and supportive mechanisms for responding to safeguarding concerns, disclosures and allegations. At times additional measures may be required, for example, in regard to activities relating to any PSRB accredited programmes at the College or in instances where a safeguarding report is made concerning someone who is not a member of the College. The provisions set out in this Policy will be considered in the context of any additional measures necessary.
- 3.2 The Policy is designed to support the activities of the College involving children, young people and adults at risk and demonstrates that the College takes safeguarding seriously.
- 3.3 The College will do so by taking the following actions:
- seeking to make Goldsmiths a safe and welcoming environment for

all that is free from harm and all forms of prejudice, harassment, discrimination and bullying

- giving all staff information, training and guidance about how to recognise potential harm when it has occurred, how to respond appropriately and how to report it
- making sure anyone can raise safeguarding concerns about any child, young person or adult at risk involved in the activities of the College
- ensuring that staff are suitable to act in their roles, through the provision of relevant checks (including DBS) and appropriate training
- ensuring there are staff with designated safeguarding responsibilities that are trained in responding to safeguarding concerns and disclosures and take a survivor-focused approach
- having an appropriate referral system in place for dealing appropriately and effectively with serious safeguarding incidents, including reporting to the relevant external organisations
- providing accessible support services for students and staff

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## **4 Safeguarding situations**

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4.1 Types of situations from which children, young people and adults at risk should be safeguarded include, but are not limited to, the following:

- criminal exploitation
- financial exploitation
- sexual harassment, abuse or exploitation
- physical, emotional, psychological abuse
- recruitment to radical extremist organisations
- enticement into illegal activities
- domestic violence
- cyber abuse
- modern day slavery
- human trafficking

- bullying or harassment
- negligent treatment
- self-neglect
- forced marriage
- female genital mutilation
- discrimination
- data breaches

4.2 Identifying abuse or exploitation can be difficult, but there are a number of ways in which this might become apparent:

- disclosure of the abuse – self disclosure or disclosure by a third party. This might be full disclosure or that which raises suspicions of abuse
- signs of abuse, including physical injury for which there appears to be no satisfactory explanation
- particular behaviour that leads to a suspicion that someone is being or has been abused or exploited

4.3 It is not a staff member's responsibility to decide whether a child, young person or adult at risk has been abused or harmed or subjected to abuse or harm, only to raise concerns that they may have.

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## **5 Responding to safeguarding concerns relating to Goldsmiths staff, student or visitor**

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5.1 The safeguarding procedure is to be followed whenever a concern is raised or a disclosure made that a child, young person or adult at risk is a victim of abuse or exploitation. It should not be used if someone is in immediate danger, when the emergency services should be called.

5.2 Where any member of the College becomes aware of a possible safeguarding concern or receives a disclosure or an allegation they should:

- make a written report of all the relevant details: name, student number (if relevant), detail(s) of the person raising the concern, reasons for the cause for concern including any specific incidents, actions or observations

- contact the relevant Designated Safeguarding Officer without delay and send them the written report
- 5.3 The Designated Safeguarding Officer will be responsible for responding to the concern and should usually:
- Inform the Designated Safeguarding Lead or, where appropriate, the Designated Prevent Lead
  - wherever possible and appropriate, meet with the person about whom the concerns have been raised, either alone or with an appropriate professional member of staff or external agency in order to obtain their views of the situation
  - take a written record of any such meeting
  - reach a decision on what action is required appropriate to the person's safeguarding needs and the situation, including referral to external agencies where appropriate
- 5.4 Depending on the circumstances of the case and who is involved, the Designated Safeguarding Officer may also need to refer the matter under the relevant Goldsmiths' Regulations and Policies (see Appendix for list of related policies).
- 5.5 If the matter is the subject of a criminal investigation, Goldsmiths is entitled to pursue its own or complementary confidential enquiries and disciplinary action. The Designated Safeguarding Lead will consult with the relevant agencies in such cases.
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## **6 Responding to safeguarding concerns relating to children, young people or adults at risk who are not members of the College**

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- 6.1 The College is involved in a range of activities involving children, young people and adults at risk that are not members of the College.
- 6.2 For these activities, such as the College's outreach activity, it is likely that the Safeguarding Policy of another organisation will need to be followed.
- 6.3 Where any member of Goldsmiths staff or student becomes aware of a possible safeguarding concern or receives a disclosure in these circumstances they should:
- make a written report of all the relevant details: name, student

- number (if relevant), detail(s) of the person raising the concern, reasons for the cause for concern including any specific incidents, actions or observations
- contact the relevant Safeguarding Co-Ordinator without delay and send them the written report
- 6.4 The Safeguarding Co-Ordinator will be responsible for responding to the concern, primarily in the first instance by referring the matter to the relevant organisation's named contact (for example, by contacting the Safeguarding Lead of the school where this relates to a school visit at the College).
- 6.5 If the organisation's Safeguarding Lead cannot be contacted immediately, the Safeguarding Co-Ordinator will need to take a decision as to whether the matter can wait or whether urgent action needs to be taken to safeguard the individual concerned. The Safeguarding Co-Ordinator should seek advice from the relevant Designated Safeguarding Officer and Designated Safeguarding Lead where appropriate.
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## **7 Reporting**

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- 7.1 The College is responsible for ensuring it maintains accurate records of safeguarding concerns, allegations and disclosures in accordance with the College Data Protection Policy. The Designated Safeguarding Lead is responsible for ensuring mechanisms for appropriate recording are in place and for onward (anonymised) reporting into the College's governance structures as required.
- 7.2 Safeguarding concerns, allegations and disclosures are treated in confidence.
- 7.3 To ensure the safety and welfare of all children, young people and adults at risk, information is shared with organisations who will be involved in addressing the safeguarding concern (this may include other educational organisations, the local authority, the police). Every effort will be made to gain the consent of the individual prior to sharing information but information may be shared without consent where there is good reason to do so. The child, young person or adult at risk should be advised that the information will be shared with those who will address the concern. The College's record will include who has been given the information and why.
- 7.4 In line with the Charity Commission Guidance on Reporting Serious Incidents, the College has a duty to report incidents of abuse or mistreatment of vulnerable groups to the Charity Commission. As an exempt

charity, these reports must be made in the first instance to the College's principal regulator, the Office for Students.

- 7.5 The Designated Safeguarding Lead, or where appropriate the Designated Prevent Lead, is responsible for notifying the OfS if there has been a safeguarding allegation or any breach of policies that puts at risk children, young people or adults at risk. This notification should include an explanation of next steps.

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## 8 Appendix A – Definitions

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Term	Definition
Child /children	a person / people under the age of 18
Young people	children who are 16 or 17 years old
Adults at risk	<p>an adult is any person aged 18 or over. Some adults may be deemed at risk and therefore, entitled to be safeguarded because they are unable to protect themselves against harm or exploitation.</p> <p>An adult at risk is anyone aged 18 or over who<sup>2</sup>:</p> <ul style="list-style-type: none"> <li>• has needs for care and or support</li> <li>• as a result of care and support needs is unable to protect themselves from abuse</li> <li>• is currently experiencing or is at risk of abuse.</li> </ul> <p>Adults at risk may:</p> <ul style="list-style-type: none"> <li>• have a mental or physical illness</li> <li>• have a learning disability</li> <li>• have addiction problems</li> <li>• be frail</li> </ul>
Age of consent	in the UK, a person can legally consent to sexual activity if they are 16 years old or over. However, it is illegal under the Sexual Offences Act 2003 for an adult in a position of trust to engage in sexual activity with a person under the age of 18. Staff employed by the College are in a position of trust when working with children and young people.

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<sup>2</sup> Definition taken from Safeguarding and protecting people for charities and trustees 2019

Term	Definition
Safeguarding	<p>taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially adults at risk and children, from that harm; and to respond appropriately when harm does occur.</p> <p>Safeguarding applies consistently and without exception across all activities associated with the College. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until a decision is made.</p>

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## 9 Appendix B – Goldsmiths Related Policies

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- DBS Policy
- Staff Disciplinary Policy
- Policy and Procedure on Sexual Violence, Sexual Harassment, Stalking, Domestic Violence and Sexual Misconduct
- Hate Crime Reporting Policy and Procedure
- Complaints Policy
- Goldsmiths' Academic Regulations
- Admissions Policy
- Criminal Declaration by Applicants Policy
- Whistleblowing Policy
- Fitness to Study Policy and Procedures
- Freedom of Speech Policy and Procedures
- Venue Booking Policy for Non-Teaching Events
- Acceptable Use of IT Services Policy
- Data Protection Policy
- Research Ethics Statement
- Admission of under 18s Policy
- Guidance for the Safety of Children on Campus
- Discrimination, Bullying and Harassment Policy
- Health and Safety Policy and Procedure
- Working with Minors and Vulnerable Adults Policy
- Personal Relationships Policy
- Statement of Commitment on Equality and Diversity
- Missing Persons Policy
- Freedom of Information Policy

- Accommodation Agreement