



Safeguarding in Research and International Activities Policy

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1. Policy statement

- 1.1 The London School of Economics and Political Science (LSE) is committed to ensuring the safety of everyone involved in School activities. The School has a **Safeguarding Policy**¹ that sets out its overarching approach to safeguarding. Whilst that Safeguarding Policy sets out the School's general responsibilities in ensuring the protection of vulnerable groups, it also notes that it will be necessary for appropriate local provisions to be made for certain activities.
- 1.2 The purpose of this policy is to provide detailed information on safeguarding procedures and processes for staff, students, Consultants and Associates involved in research or international activities. The School promotes safeguarding through its engagement with partners, collaborators and the wider community, acknowledging the importance of raising awareness of safeguarding to promote well-being, prevent harm and address incidents appropriately in the event of an allegation being made.
- 1.3 The School takes a person-centred approach to safeguarding as outlined in the UK Care Act 2014, which puts the rights, identity, needs, safety, security, and well-being of individuals first and ensures decisions regarding steps that might need to be taken are made with their participation as far as possible, considering their capacity, cultural context and maturity. The School acknowledges its responsibility to provide access to reporting mechanisms and support for staff, students and affected individuals where it is within its remit to do so whilst ensuring confidentiality, safety, respect and non-discriminatory practices.
- 1.4 The School recognises that the nature of harm can be difficult to recognise and, left unaddressed, can result in a culture that tolerates such behaviour. This can lead to individuals feeling isolated and unsafe where there is a power differential. The School commits to dealing with behaviour, intentional or unintentional, that results in a breach of this Policy and will not tolerate any form of harm perpetrated by or against members of the LSE Community within its research and school activities. For the avoidance of doubt, this Policy will apply to any such behaviour arising in relation to the School's research and international activities in accordance with other related policies and procedures.

2. Policy scope

- 2.1 This Policy applies to staff, students and Consultants who may be working with children, young people or vulnerable adults through the School's teaching, research and international activities and other initiatives or outreach programmes, either in person or virtually, irrespective of location or duration. Its principles should be upheld by Associates.

2.2 Terminology

Under this Policy the terms below have the following meanings:

¹ <https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/safPol.pdf>

- **“Associates”** include but is not limited to partner organisations/collaborators and their employees/sub-contractors and individuals who have entered partnership, subgrant or sub-recipient agreements with LSE, as well as community partners.
- **“Consultants”** include local or international Consultants or sub-contractors, directly engaged by LSE on School activities.
- **“child”** is defined under The UK Children Acts 1989 & 2004 as being anyone who has not yet reached their 18th birthday. The United Nations Convention on the Rights of the Child (UNCRC) defines it as *“all human beings under the age of 18 years unless, under the law applicable to the child, majority is attained earlier.”* This is included in this policy within the term “vulnerable groups” along with “young people”.
- **“LSE Community”** is used in this document to refer to both staff and students
- **“safeguarding”** is the protection of a person’s health, wellbeing and right to live and work in safety free from harm, abuse and neglect.
- **“School activities”** include research that occurs in the UK or abroad as well international activities, including but not limited to events related to work or studies, internships, fieldwork and School trips abroad.
- **“staff”** means anyone who works (paid or unpaid) for the School, including employees, workers, interns, and volunteers, but this is not an exhaustive list;
- **“students”** are those pursuing a programme of study for which they are receiving teaching and/or supervision, or from which they are on an authorised temporary absence that does not require interruption or an extension to the length of the programme of study; or they are on a period of authorised interruption or have been suspended from their programme of study.
- **“vulnerable groups”** encompasses children under the age of 18 and persons belonging, or perceived to belong, to groups that are in a disadvantaged or marginalised position.² However, it is important to note that individuals may not be conventionally ‘vulnerable’, and that ‘vulnerability’ may also be a temporary state and/or due to situational factors.³ Moreover, participants involved in research or other School activities may be vulnerable due to being in an unequal relationship. Notwithstanding the above, given the propensity to consider vulnerability as aligning with a complete lack of agency we caution against such an assumption. Participants who show considerable agency in decision making may still be vulnerable and, conversely, assuming that all vulnerable participants have no agency and must be spoken for can harm them further.

3. The School’s responsibilities

3.1 The School will:

¹ The UK Collaborative for Development Research, define it as *“Preventing and addressing any sexual exploitation, abuse and harassment of research participants, communities and research staff, plus any broader forms of violence, exploitation and abuse relevant to research such as: bullying, psychological abuse, and physical violence.”*

² Examples include, but are not limited to: those often targeted with abuse or discrimination based on characteristics such as race, gender, sexuality, disability, religion, or people in need of care. More generally, vulnerable groups may include: people with learning or communication difficulties or serious mental health problems; patients in hospital or those with a physical health condition; individuals under the care of social services; people in custody or on probation; individuals engaged in illegal activities; those affected by drug use; refugees and social minority groups.

³ See ‘Vulnerability Can Affect Anyone’ in MRS Best Practice Guide on Research Participant Vulnerability:

<https://www.mrs.org.uk/pdf/MRS%20Researching%20Vulnerable%20Participants%20best%20practice%20note.pdf>

- Seek to engage staff who are aligned with our Ethics Code and in compliance with applicable laws, prevent known perpetrators of harm from being engaged⁴;
- Risk assess whether background and due diligence checks should be undertaken where staff or students will be undertaking research or other School activities involving vulnerable groups;
- Ensure that staff and students are aware of their responsibilities and receive appropriate guidance and training;
- Promote awareness of School safeguarding commitments, reporting mechanisms and available support for the LSE Community, research participants and vulnerable groups whilst continuously reviewing and strengthening measures to prevent harm;
- Undertake due diligence with Associates to ensure adequate safeguarding policies and procedures are in place;
- Work with third party organisations to promote safeguarding best practice with partners, local communities, organisations, donors, governments and global civil society networks;
- Take appropriate steps to deal with behaviour, intentional or unintentional, that results in a breach of this Policy. This can include but is not limited to investigating an incident and where applicable applying disciplinary sanctions where an allegation is upheld or initiating a similar process with an Associate. Referrals may also be made to relevant authorities where there is a risk of further harm.

4. Responsibility of the LSE Community and Consultants

4.1 All members of the LSE Community and Consultants have a responsibility to:

- Read and familiarise themselves with the LSE Safeguarding Policy and LSE Safeguarding in Research and International Activities policy;
- Know that everyone has a responsibility for safeguarding and take all reasonable steps to protect others from undue harm. This involves identifying and mitigating risk as far as possible, identifying violations when they occur, and supporting individuals;
- Discourage harmful behaviour by others by making it clear that such conduct is unacceptable, and supporting colleagues and peers who are taking steps to stop it;
- Report incidents through any of the School reporting channels should they occur (see Annex 1).

4.2 Managers have an additional obligation to ensure that this policy is applied, to report any potential or actual incidents of harm that may be reported to them and ensure that the reporting individual is signposted to suitable support.

5. Researcher specific responsibilities

5.1 In addition to the responsibilities outlined in section 4, when designing their research, researchers must give due consideration to the underlying principles of safeguarding, including the balancing of power dynamics and protection of the vulnerable. Researchers must risk assess and mitigate for safeguarding

⁴ <https://info.lse.ac.uk/staff/divisions/Human-Resources/Assets/Documents/DBS-Policy-Statement-2019.pdf>

implications when planning research projects involving human participants or which involve placing researchers in a potentially vulnerable situation. Researchers must recognise that participants can be placed in potentially vulnerable situations by taking part in research, particularly where there may be unequal relationships between the researcher and participant by virtue of their location, economic, social or health status (examples include but are not limited to: refugees, benefit claimants, illegal migrants, activists in complex political circumstances, dissenters and conscientious objectors, trafficked individuals or those blowing the whistle on misconduct).

5.2 Research team leaders are responsible for ensuring that processes are in place to recognise and respond to any safeguarding issues that may arise during research. They must ensure that all members of the research team are aware of the issues that may arise and the processes that they must follow. Researchers must ensure they take all reasonable measures to prevent harm to those they will be working with as part of their research.

5.3 Researchers are required to:

- Submit for full review by the Research Ethics Committee any research that involves contact with research participants who may be vulnerable, whether face-to-face or online.⁵ Please refer to the Research Ethics Committee guidance '*Research with children and other vulnerable groups*'⁶. Researchers may be required to show evidence of requisite background checks;
- Treat all research participants, with fairness and equality, and in ways that maintain their dignity and rights;
- Ensure that participation in research is voluntary and that they obtain fully informed consent for the participation of research participants. To this end, participant information materials must take account of the literacy levels and understanding of vulnerable subjects⁷;
- Obtain consent from the carers or guardians of vulnerable research participants, unless it can be demonstrated that this step is not in the best interests of participants;
- Make participants aware of their entitlement to refuse or withdraw at any stage of the research, and ensure that their collected data is destroyed if consent is withdrawn;
- Be aware of this policy and demonstrate, as part of the ethics review procedure, an understanding of when a safeguarding concern might need to be reported;
- Maintain participants' anonymity and confidentiality unless a clear conflicting issue of safeguarding is involved. To this end, the consent process must make vulnerable participants aware of the *limits of confidentiality* and the reasons for these limits.

5.4 Where an issue of safeguarding has arisen during research or is suspected by the researcher, researchers must follow the reporting process outlined below to prevent further harm from occurring. However, confidentiality agreed with research participants must be respected, and disclosures should only be reported where the researcher feels the participant is unable to act for themselves and there is a significant risk of harm to that participant or others. Even in these circumstances researchers should

⁵ See <https://info.lse.ac.uk/staff/divisions/research-and-innovation/research/research-ethics/research-ethics>

⁶ <https://info.lse.ac.uk/staff/divisions/research-and-innovation/research/Assets/Documents/PDF/guidance-working-with-children-and-vulnerable-groups-v1.pdf>

⁷ See the LSE Guidance on Informed Consent <https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/infCon.pdf>

maintain confidentiality as far it is possible, and any action should first be discussed with the participant. Researchers can seek further advice on working with children and vulnerable adults from the Research Ethics Committee.

6. Due diligence

6.1 Due Diligence is the investigation, or exercise of care, which is undertaken prior to entering into an agreement with another party. Whilst the School expects all Associates to take all reasonable and adequate steps to prevent harm and take swift and appropriate action when it does occur, it recognises the need to carry out due diligence on any potential Associate. As such, the Due Diligence questionnaire (which can be requested from the Legal team) is intended to assist with the School's risk management in assessing whether any risks may be present and if so consider if they can be mitigated against. Where applicable, Departments, Divisions, Institutes and Research Centres are responsible for undertaking due diligence.

6.2 Safeguarding should be discussed with potential Associates at an early stage in order to establish a joint understanding of safeguarding risks. The questions relating to safeguarding within the Due Diligence Questionnaire should ascertain what organisational procedures are in place directly and within their delivery chain to:

- Identify, prevent and address any potential harm caused by any of its employees, workers, sub-contractors engaged and controlled by the Associate;
- Enable the reporting of harm that may have occurred and outlining how this will be managed and addressed and what policies and procedures (including but not limited to safeguarding, bullying, harassment, discrimination, disciplinary, grievance) are in place. Where the Associate does not have an applicable policy or procedure, departments/divisions should supply copies of the relevant LSE policies and procedures, including the LSE Supplier Code of Practice⁸, as a guide to our expectations and the standards partners are expected to maintain. Compliance with our own codes, policies and procedures could also be outlined within any subsequent Agreement made with an Associate.

6.3 When considering working with Consultants; Departments, Institutes and Research Centres should aim to ensure that all potential Consultants are asked to confirm (before entering into an Agreement with them) if they have ever been subject to any disciplinary, administrative or criminal sanctions arising from an investigation in relation to harm and related abuse of power, or left employment pending an investigation and refused to cooperate in such an investigation.

⁸ <https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/codSupPra.pdf>

7. Responding to safeguarding concerns and support available

7.1 The School takes a robust approach to reports of safeguarding incidents and is committed to ensuring that anyone suffering from or who has suffered harm or abuse is responded to and supported appropriately.

7.2 The School's reporting mechanisms are person-centred and based on the principles of safety, confidentiality, respect and non-discrimination. Support is provided to individuals by focusing on in-country reporting and response readiness closest to the context of the incident. LSE staff and students carrying out research or participating in activities organised by the School also have the benefit of travel and medical insurance in the case of an immediate emergency. Our expectation is that our Associates will take a similarly serious response to any such incidents that are raised with them.

7.3 Anyone can report safeguarding concerns or incidents to the School. Reports can be made to key individuals across the School in several ways: in person, via email, voice call (e.g. Teams) or online via the School's Report It Stop It tool⁹. Online reports can be made anonymously. Individuals may also raise concerns via the School's Speak Up (whistleblowing) Policy [lsePubIntDisPro.pdf](#). Please see Flowcharts at Annex 1.

7.4 At the same time, it is recognised that any member of staff may potentially receive a disclosure or report in relation to a safeguarding incident. As such it is important to note the following:

- Always offer reassurance, listen to and take seriously what an individual is saying;
- Make a full and accurate record of any allegations and ensure you have clarified your understanding of what has happened;
- It is not your job to investigate the allegation or concern and you need to clearly explain this to the individual and ask their consent to escalate the matter to the correct individuals within the School who are able to speak to the individual and initiate precautionary measures if required and or investigate the matter.

7.5 It is important to supply as much detail as is immediately available to you, but do not attempt to obtain additional details from, or about, anyone involved in the concern/allegation. Do not include any assumptions or details that are not explicitly stated by or observed about the person about whom you have a concern. Any additional line of questioning, no matter how well intentioned, may further jeopardise the welfare of the persons involved.

7.6 It is recognised that dealing with a safeguarding issue as a member of staff may be upsetting and challenging for you. Staff are encouraged to seek support at any time, including but not limited to the following:

- Confidential LSE Employee Assistance¹⁰
- Confidential LSE Staff Counselling¹¹

⁹ <https://info.lse.ac.uk/Making-a-choice/Report-an-incident>

¹⁰ <https://info.lse.ac.uk/staff/divisions/Human-Resources/Wellbeing-Pages-2020/Employee-Assistance-Programme>

¹¹ <https://info.lse.ac.uk/staff/services/staff-counselling>

- LSE The 10 Minute Mind¹²
- Support from your own Line Manager;
- The Listening Service helplines operated by the mental health charity, Mind¹³

7.7 The School's Reporting and Supporting booklet at Annex 2 also lists various sources of internal and external support.

8. Procedure for the investigation of safeguarding incidents

8.1 The School has remit to investigate any safeguarding incident that is reported to it where the alleged perpetrator is a member of the LSE Community under its own grievance and disciplinary policies. A different procedure will apply depending on who is making the allegation and the status of the individual who it is alleged has committed the safeguarding incident.

8.2 Risk Assessment and Precautionary measures

8.2.1 The School has a Harassment Management Group ('the Group') which is chaired by the Deputy Chief Operating Officer or their nominee and includes individuals from key areas of the School who attend 'on a need to know basis'. The purpose of the Group is to consider potential high risk, major misconduct allegations made against a member of staff or student via a risk assessment and consider what proportionate and reasonable temporary precautionary measures may need to be put in place, if any, whilst a potential investigation is undertaken or triggered. High risk incidents are where there may be a continued risk to a reporting party, to a member of staff, any other member of the LSE Community or to a third party,

8.2.2 Types of precautionary measures that may be put in place can include but are not limited to suspension, exclusion, conditions and restrictions being imposed on the individual. The Group will also ensure the parties are signposted to relevant support and refer the matter to the Human Resources Division (for staff cases) or the Legal Team (for Student cases) to investigate and make contact with the reporting and reported parties if that process has not begun already. Any member of staff can trigger this Group.

8.2.3 In cases where allegations are made against an Associate or their personnel, a Consultant or any other third party, the Group can meet to consider what measures it considers necessary to take to protect the reporting party and progress a matter including considering what support is suitable and might be available internally and externally (considering the local context). Where applicable, the Group may consult with the Human Resources Division and the Legal Team to consider the impact of the alleged incident on a reporting party and their work and studies and whether it would be in the best interests of a reporting party to remove them from a situation or location relating to any research or international activities that they are involved in.

¹² <https://the10minutemind.com/lse>

¹³ <https://www.mind.org.uk/information-support/guides-to-support-and-services/crisis-services/helplines-listening-services/>

8.2.4 In all cases where an allegation is raised concerning research undertaken within the UK, the Group will need to consider whether the allegation brought before it will need to be referred to the Police for a police investigation into a possible criminal offence. It must also consider whether a referral should be made to the Local Authority Designated Officer (LADO). The LADO is responsible for managing allegations made against adults who work with children and must be contacted within one working day in respect of all cases where it is alleged that a person who works with children has:

- behaved in a way that has harmed or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child/children in a way that indicates they may pose a risk of harm to children.

Child protection agencies may also need to be notified. In such cases, the Group will consult the Head of Widening Participation or their Nominee on first notification of an alleged safeguarding incident involving children within the U.K. context.

8.2.5 In relation to international activities, reporting to law enforcement or other agencies overseas should be risk assessed to avoid doing unintended harm. The Group would refer such incidents to relevant individuals to progress taking into consideration the social, cultural, legal, customary and religious context.

8.3 Investigations

8.3.1 Where an allegation is brought forward against a member of the LSE Community, the School will conduct confidential and impartial investigations into allegations made. For staff cases, an investigation will be carried out within the Human Resources Division under the relevant Grievance Policy, Disciplinary and Dismissal procedures, or Academic Annex. For student cases, an investigation will be carried out by the Legal Team under the Disciplinary Procedure for Students. Where an allegation is upheld, this will normally result in disciplinary action up to and including dismissal or expulsion in more serious cases. For the avoidance of doubt, the School would not ordinarily pursue disciplinary action against a member of the LSE Community while they are the subject of a Police investigation, it reserves the right to do so; such as in cases where the safety of one or more members of the School is at risk.

8.3.2 Where an allegation of a safeguarding incident concerns an Associate or their personnel/others they engage against a member of the LSE Community, then the School would inform the Associate and liaise with them on the matter. The Associate would be asked to investigate the matter and put in place any precautionary measures whilst an investigation is pending. They will also be expected to inform the School of the progress and outcome of any investigation.

8.3.3 Where an allegation is brought forward against a Consultant engaged by the School, then this will be investigated and resolved in accordance with the contract that is in place with that Consultant and can result in an immediate suspension or termination of that contract.

8.3.4 Where an allegation is made by a member of the LSE Community against a third party who is not an Associate or a Consultant, then the School will consider such cases on a case by case basis taking into consideration the local context when considering how to advise an individual on their options.

Annex 1 outlines four detailed flow charts for each scenario mentioned above.

8.4 Malicious and/or vexatious allegations

8.4.1 Disciplinary action may be taken if allegations are found to be malicious or vexatious. However, individuals will not be subject to disciplinary action or to any other detriment simply because their complaint is not upheld and will only face disciplinary action if it is found both that the allegation is false and made in bad faith (that is, without an honest belief in its truth).

8.5 Confidentiality and Data Protection

8.5.1 The School will conduct confidential and impartial investigations into allegations made relating to unacceptable behaviour or conduct as outlined in this Policy. It will at all times comply with The Data Protection Act 2018, UK General Data Protection Regulation (GDPR). Any information provided in relation to safeguarding shall be kept confidential and will only be shared with others within the School on a 'need to know' basis. The School will use its reasonable endeavours to ensure that the wishes of a reporting party is adhered to at all times i.e. in cases where they disclose something but do not wish an investigation to be carried out. However, where an individual makes an anonymous disclosure/report of concern or where an individual discloses concerning information but does not want to make a formal report, the School has a discretion to investigate such matters or request that such matters be investigated by Associates (where applicable) and/or notify the police in exceptional circumstances where the School considers that there may be a risk to that individual or the wider LSE Community.

8.5.2 There may also be instances where the School may have to disclose confidential information to the police (where in exceptional circumstances the School considers that there is a high risk of continuing harm to the reporting individual or others within the LSE community or to prevent a further incident which constitutes a criminal offence from occurring), the civil and criminal courts if requested formally.

8.5.3 The School may also use anonymous data on cases internally for reporting, learning, training and evaluating or externally with regulators in the higher education sector.

8.6 Use of data where safeguarding concerns have been identified

8.6.1 Where a safeguarding concern has been identified, it is possible that this may have implications for data that has been collected, if the safeguarding concern raises questions as to whether data has been obtained in a coercive or abusive way. Where such a situation arises, the Chair of the School's Research Ethics Committee should be consulted as to whether or not it is ethical for a research team to continue to use data collected thus far.

8.7 Monitoring of incidents

8.7.1 The School monitors the number, nature and outcomes of, safeguarding, discrimination, harassment and bullying incidents each academic year, with a view to keeping the Ethics Management Board, the

Harassment and Safeguarding Forum and the HR Management Board updated. This Policy will also be reviewed at regular intervals to monitor its effectiveness.

9. Training

9.1 The School recognises that staff and students may work with children or vulnerable groups and therefore, it is essential that they receive appropriate safeguarding training. The aim of training is to ensure that everyone involved in research or school activities understands their responsibilities towards safeguarding and is equipped with the necessary knowledge and skills to identify and respond to safeguarding concerns.

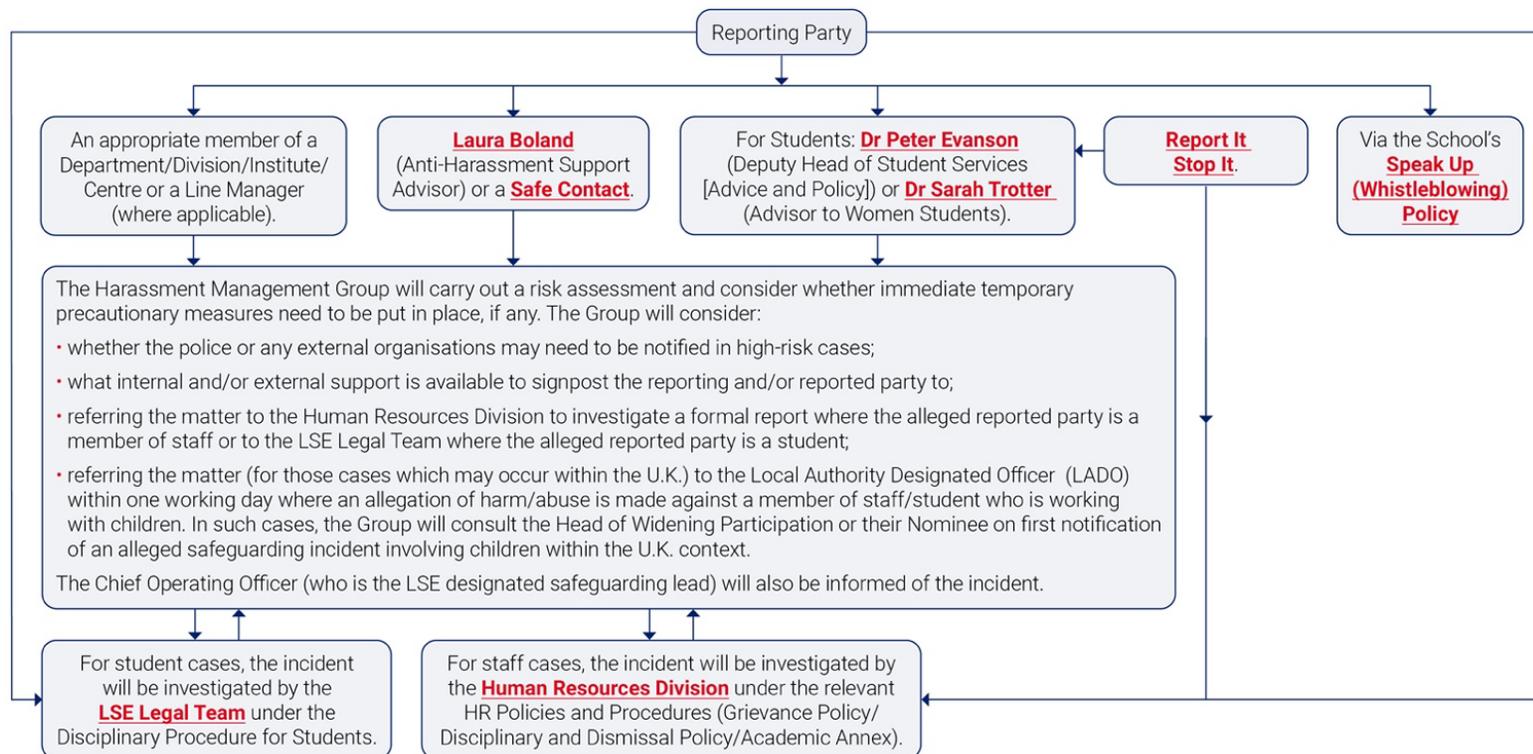
9.2 The School envisions putting in place three levels of training as follows:

- i) An on-demand online training for all staff and students involved in research and international activities.
- ii) A Supplementary Training for Safe Contacts, members of the Research Ethics Committee, and for Department Managers and Professional Service Leaders who may receive, advise on, or handle safeguarding concerns.
- iii) Training for members of the following teams who are responsible for advising on or investigating safeguarding incidents, such as the Legal Team, Human Resources Division, Health and Safety Team, and the Senior Management Committee.

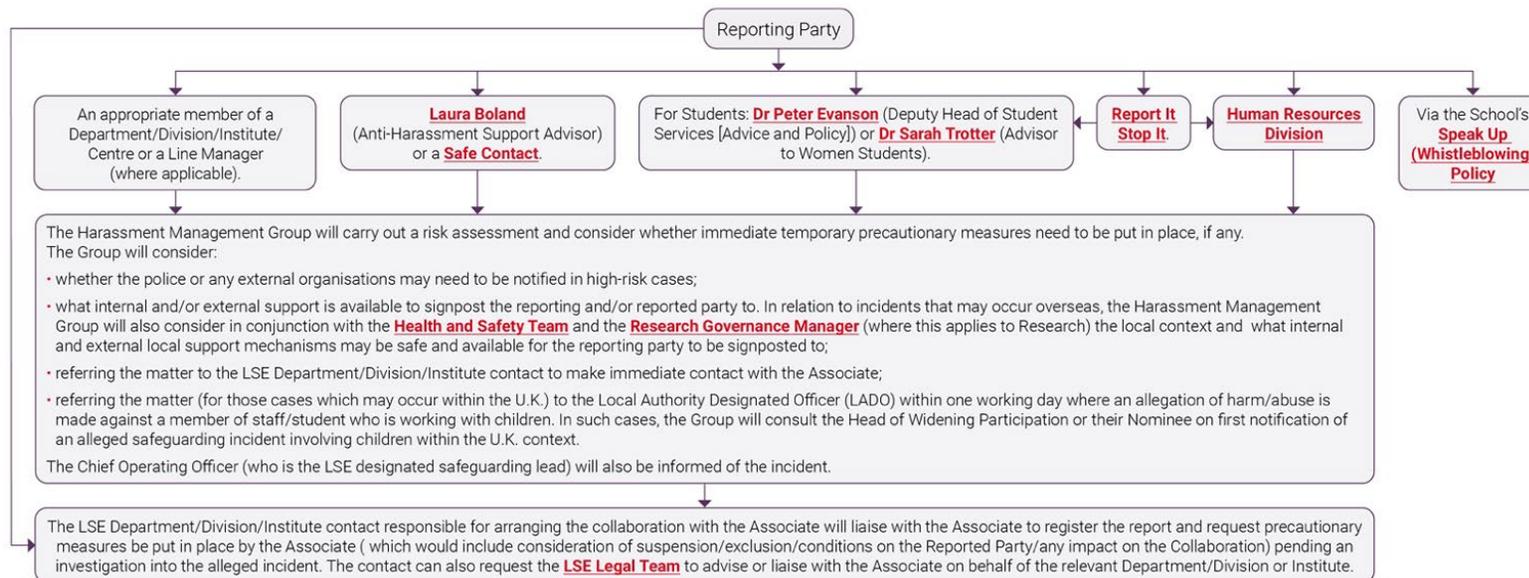
9.3 Until the proposed training outlined above is put in place, staff and students who may work with children or vulnerable groups may be required to undertake relevant external training which would be discussed/agreed on a case-by-case basis.

Annex 1: Flowcharts

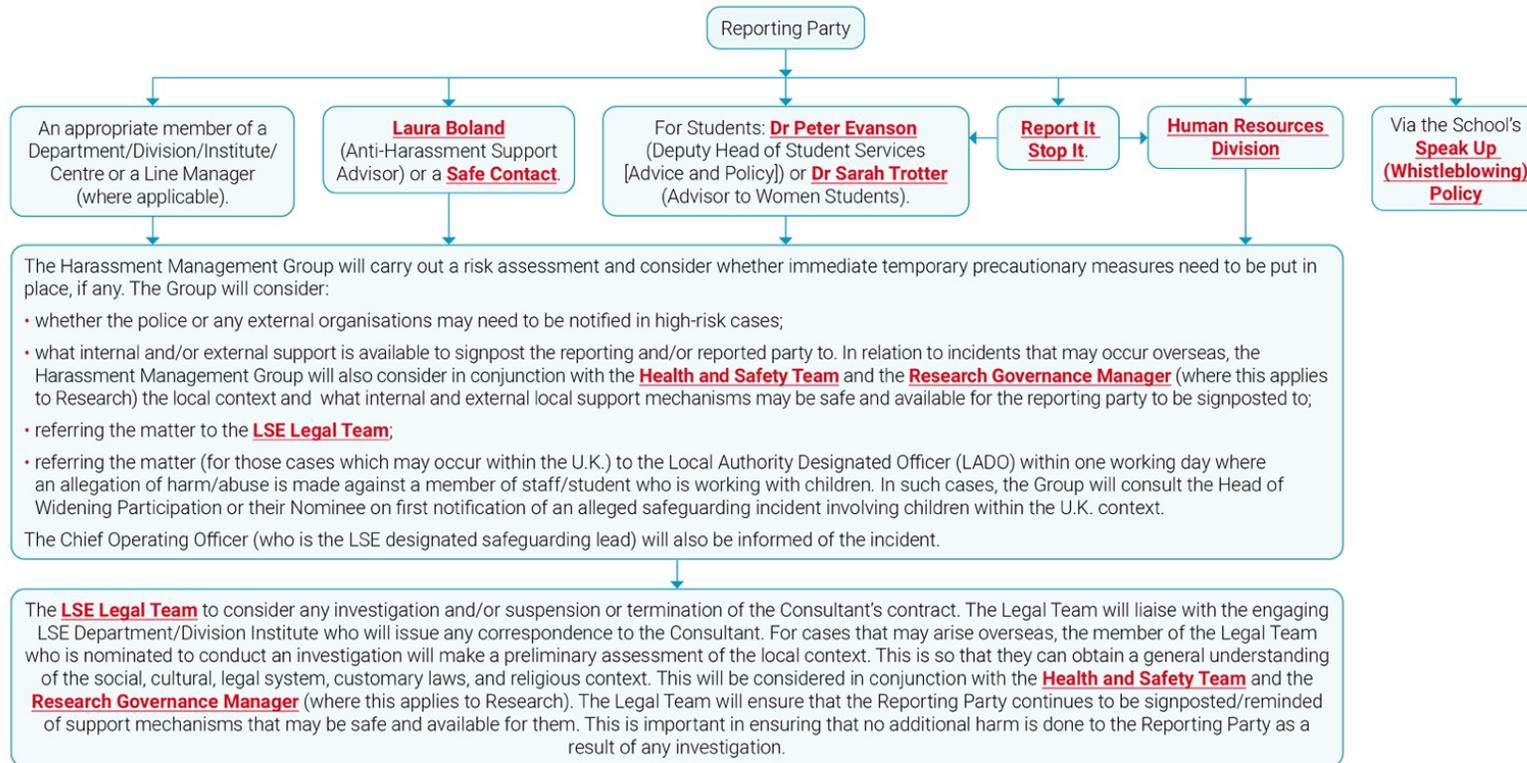
1 Where a safeguarding incident is reported against a member of staff or student



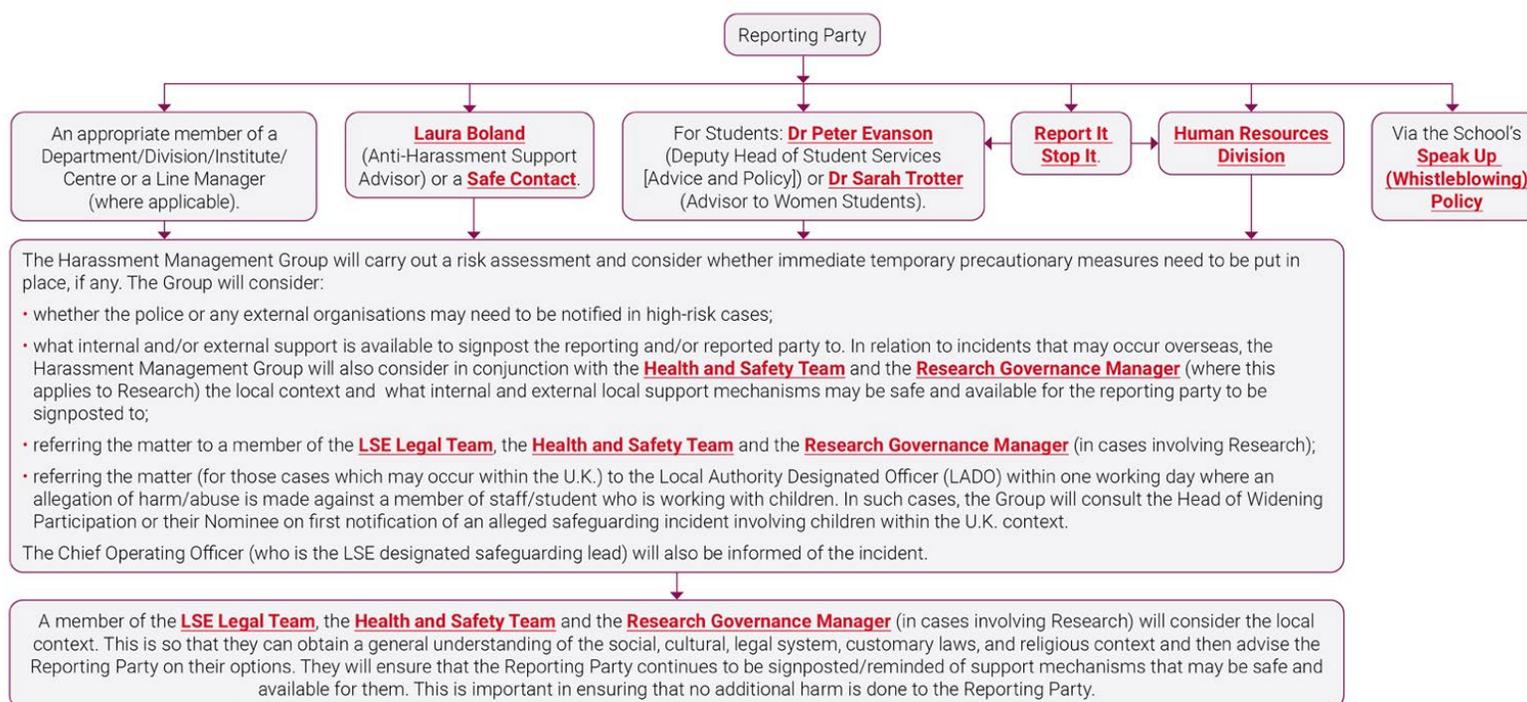
2 Where a safeguarding incident is reported by an LSE member of staff or student against an individual engaged by an Associate



3 Where a safeguarding incident is reported against a Consultant engaged by LSE



4 Where an LSE member of staff or student reports a safeguarding incident which has been perpetrated by an individual (s) who are not engaged by LSE or an Associate



Annex 2: Reporting and Supporting booklet

<https://info.lse.ac.uk/Making-a-choice/Assets/Documents/LSE-guide-to-reporting-and-accessing-support-2023-v3.pdf>

Review schedule

Review interval	Next review due by	Next review start
3 years	July 2026	September 2025

Version history

Version	Date	Approved by	Notes
v1	July 2023	SMC	(Minor formatting corrections made October 2023)

Links to related policies and procedures

Related Policies/ Procedures	Link
The Discrimination, Harassment and Bullying Policy	https://info.lse.ac.uk/staff/Services/Policies-and-procedures/Assets/Documents/harPol.pdf
Sexual Harassment and Sexual Violence Policy	https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/harVioPol.pdf
LSE Ethics Code	Ethics Code (lse.ac.uk)
LSE Policy Against Bribery and Fraud	LSE Policy against Bribery and Fraud
Code of Research Conduct	codResCon.pdf (lse.ac.uk)
Informed Consent	infCon.pdf (lse.ac.uk)
LSE Safeguarding Policy	safPol.pdf (lse.ac.uk)
LSE Core Widening Participation Safeguarding Guidance and Procedures	LSE-Core-WP-Team-Safeguarding-Guidance-and-Procedures-Oct22-FINAL.pdf
Research Ethics Policy and Procedure	resEthPolPro.pdf (lse.ac.uk)
Overseas Travel Policy	Overseas Travel Policy (lse.ac.uk)
LSE Guide for staff on handling disclosures of sexual violence, harassment and abuse	A LSE guide for staff on handling disclosures of sexual violence, harassment and abuse.

Student LSE guide to reporting sexual harassment or sexual violence	the student LSE guide to reporting sexual harassment or sexual violence
Speak Up (Whistleblowing) Policy	lsePubIntDisPro.pdf
Health and Safety Policy	Health and Safety Policy (lse.ac.uk)

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Communications and Training

Will this document be publicised through Internal Communications?	Yes
Will training needs arise from this policy	Yes
If Yes, please give details See §9 above.	