LONDON SCHOOL *of* HYGIENE &TROPICAL MEDICINE

Safeguarding Framework

1. PURPOSE AND SCOPE

1.1.   Purpose

LSHTM's mission is to improve health and health equity in the UK and worldwide, working in partnership to achieve excellence in public and global health research, education and translation of knowledge into policy and practice.

This Safeguarding Framework describes LSHTM's commitment to safeguarding and identifies LSHTM policies, procedures and guidelines which are in place to safeguard staff, students and children and adults who participate in or are impacted by, our programmes and research.

1.2.   Definition and scope

LSHTM has social, moral and legal obligations to safeguard the wellbeing and safety of children and adults involved in any LSHTM activities, whether they are conducted in person or online, in the UK or overseas. LSHTM's commitments to safeguarding focus on preventing and addressing harm and abuse[1] of children and adults involved in LSHTM activities, including:
- Registered, and applying, students under the age of 18 and those who are adults at risk;
- LSHTM staff who are at risk of, or experiencing, harm and abuse within the workplace;
- Children[2] and adults[3] who participate in, or are impacted by, LSHTM's programmes and research.

LSHTM has also made an explicit commitment to Anti-Slavery and Human Trafficking. Concerns relating to bullying and harassment are covered by specific policies, principally the Dignity at Work: Anti-Bullying & Harassment Policy.

The Safeguarding Framework and the associated polices apply to all LSHTM staff, volunteers, students, consultants, contractors and Council members, plus accompanying partners and family members of staff travelling or posted overseas.

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[1] Harm and abuse is defined as emotional, physical, sexual harm and abuse and neglect. Sexual exploitation is the 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 abuse is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

[2] A child is defined as anyone under the age of 18. In this policy we also use the term 'young person', 'young worker', or 'young people' to refer to children aged 16 or 17 years old.

[3] Adults at risk are persons aged 18 years or over who receive specific support or who have particular vulnerabilities. In the UK adults at risk are defined by UK legislation. We recognise, however, that any member of the communities in which, or with whom, we work may be at risk or vulnerable due to issues of poverty, marginalisation and relative lack of power.

LSHTM's MRC Units in The Gambia and Uganda work to this Safeguarding Framework but implement their own set of policies which support the Units in meeting the LSHTM's safeguarding standards and requirements.

LSHTM in the UK is bound by UK legislation on safeguarding including the Safeguarding Vulnerable Groups Act (UKPGA 2006). The MRC Units are bound by their respective domestic legislation relating to social protection, employment, and specific offences against groups e.g. women.

LSHTM's partners and service providers are bound by the safeguarding requirements included in partnership and service provision contracts. This may involve agreeing to implement the requirements of LSHTM's policies, or an agreement that the partner or service provider's own policy(ies) meet the necessary standards.

2. ROLES AND RESPONSIBILITIES

The Safeguarding Framework places responsibilities on various groups of people and individuals involved in LSHTM's work. These are as follows:

LSHTM will:
- Ensure a culture of confidentiality and trust to enable individuals to safely raise and discuss safeguarding concerns;
- Promote accountability between staff, and staff and students, so poor or abusive behavior can be prevented and challenged when it occurs;
- Maintain a reputation of robust standards and high standards of working;
- Manage safeguarding risks.

Staff will:
- Abide by the standards set out within the policies that uphold this Framework;
- Act with due care and attention to safeguard the wellbeing of every person with whom LSHTM is in contact;
- Remain vigilant about concerns or issues, be prepared to take action, and understand what to do in the event there is a concern which needs raising or reporting.

Students will:
- Abide by the standards set out within relevant policies that uphold this Framework;
- Conduct relationships based on mutual respect, honesty and openness.

Managers and supervisors will:
- Act as rolemodels with consciousness of the power their position holds;
- Treat all colleagues with courtesy and respect;
- Maintain an open, supportive dialogue within their teams;
- Endeavour to create an atmosphere in which teams, and other individuals, feel free to express concerns about inappropriate behaviours.

LSHTM's Council and Committees will:
- Ensure that appropriate policies and procedures are in place and measures are in place for the Framework to be known by LSHTM staff;

- Take oversight of, and be accountable for, safeguarding risks that arise from all the work of LSHTM globally;
- Ensure that concerns are appropriately managed and reported in line with best practice[4].

3. STANDARDS AND APPROACH

3.1. Standards

LSHTM adheres to a set of safeguarding standards in keeping with those described in the UKCDR's Guidance on Safeguarding in International Development Research.

1. Explicit commitment to diversity and inclusion which is demonstrated through organisational structures and culture.
2. Explicit commitment to the Prevention of sexual exploitation and abuse (PSEA).
3. Robust, proactive response to unacceptable behaviours.
4. Governance structures have clearly defined accountabilities for safeguarding, including focal points for safeguarding.
5. Recruitment and engagement processes integrate the necessary safeguards to mitigate risks.
6. Capacity building opportunities on safeguarding are available for staff and students, and others as relevant.
7. Programmes and research are guided by ethical standards and research safeguards;
8. Partners and service providers apply safeguards in the work they deliver to, or on behalf of, LSHTM and are held accountable by LSHTM.
9. LSHTM communications are guided by data protection requirements and prioritise the best interests of those featured in, or using, communications.
10. LSHTM's reporting and whistleblowing mechanisms are survivor-centered and maintain confidentiality.
11. LSHTM's response to all safeguarding concerns and reports are investigated thoroughly and resolved promptly, without prejudice.

These standards are reflected in relevant policies which form part of this Safeguarding Framework and guide how they are implemented.

3.2. Approach

Safeguarding will be integrated into all aspects of LSHTM's work, systems and processes, in order to meet its safeguarding standards.

LSHTM has made an explicit **commitment to diversity and inclusion** through its [Equity, Diversity and Inclusion Strategy](). By creating an environment that is diverse and inclusive, LSHTM will foster a culture in which staff, students and those who work with LSHTM feel safe and confident to speak up if problems arise. Other policies are also in place to support staff and students of diverse groups to be safe from discrimination and harassment, to make complaints, and to report concerns.

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[4] This will involve reporting to any relevant regulatory body in the UK or other relevant location as well as donor organisations and, where relevant, the police and local authority in the event that a case is potentially criminal or requires a statutory response.

LSHTM commits to a rigorous process to address unacceptable behaviours, as described in this Framework and other relevant policies, including the Safeguarding & Security Screening Policy. The LSHTM Behaviour Framework describes how members of the LSHTM community are expected to conduct themselves to uphold the values of the institution. The Dignity at Work: Anti-Bullying and Harassment Policy describes acceptable behaviours for members of the LSHTM community. Students are supported to learn, and work, in a safe environment through the provisions of the Student Cause for Concern Policy and Student Charter.

Senior management and the Council and Committees **oversee and manage LSHTM risks, including risks related to safeguarding**. The Risk Management Policy describes this in more detail.

LSHTM has **appointed 'focal points' and 'leads' for safeguarding** whose role is to support staff, students and management with implementing safeguarding requirements. The Designated Safeguarding Lead (DSL) for the LSHTM is Jocelyn Prudence, Interim Secretary to Council.

The Recruitment and Selection Procedure describes how LSHTM ensures that appropriate safeguards are integrated into **recruitment, selection and screening** practices. This includes advertising LSHTM's commitment to safeguarding, exploring with potential candidates their understanding of and commitment to safeguarding, and ensuring that reference and background checks for relevant roles are robust and thorough. These practices, as relevant, are also incorporated into the engagement of consultants.

LSHTM provides a range of **capacity building opportunities** for staff and students to understand their role and responsibilities for safeguarding. LSHTM has appropriate training provisions for different staff groups as required by their role.

LSHTM's **research and programmes** are guided by the Good Research Practice Policy which describes how to design and deliver research which meets Ethical Standards and delivers on safeguarding commitments and the principles for safeguarding (defined by UKCDR). The Ethics Committees are tasked with ensuring safeguarding is integrated into the design and delivery of research.

Partners and service providers are required to meet safeguarding standards. LSHTM will determine with the partner and service provider whether their organisational policies include appropriate safeguarding standards and, where these do not, support the partner or service provider to apply LSHTM standards during the period of engagement. This forms part of the partner due diligence processes and is reflected in the Procurement Policy.

All **communication activities** that feature individuals working in, or with, LSHTM are bound by the Data Protection Policy. Guidance is provided on obtaining, storing and publishing images, and information which is appropriate, fit for purpose and is accompanied by the relevant consents. LSHTM's activities using social media or online platforms are guided by the Social Media Policy and relevant codes of practice.

LSHTM provides safe and timely opportunities and methods for staff and students, and others, to **report concerns**. Staff are encouraged to report safeguarding concerns to LSHTM's Designated Safeguarding Lead, but can also report concerns through the Report and Support tool https://reportandsupport.lshtm.ac.uk. The Grievance Policy and Procedure for Professional

[Services Staff](#) also provides opportunities for staff to raise safeguarding-related concerns as grievances, where appropriate. The [Whistleblowing Policy](#) enables all members of LSHTM to make reports that are considered as "whistleblowing" and commits to protection and non-retaliation for the complainant. The [Student Complaints Procedure](#) provides guidance for students on reporting concerns. Reports of safeguarding concerns arising from the work of LSHTM can be made by the public through https://reportandsupport.lshtm.ac.uk/.

LSHTM **responds to all safeguarding concerns** with a survivor-centred approach. This means responding promptly with particular attention paid to concerns raised by victims or survivors on confidentiality and safety considerations. LSHTM supports survivors, and others impacted by harm and abuse, with referrals to assistance from relevant and safe service providers. Appropriate redress avenues are made available and accessible to victims/survivors.

4. POLICIES

The following policies are in place to ensure that appropriate standards are understood and maintained. Other policies which contribute to particular aspects of safeguarding e.g. disability, are not shown here but are referred to in these main policy documents.

Policy name	Policy Purpose	Date of Policy (last update)
Behaviour Framework	Is a living expression of the LSHTM values and sets out the behavioural expectations of everyone in the LSHTM community.	2023
Data Protection Policy	This policy details LSHTM responsibilities as a Data Controller and Data Processor and aims to ensure procedures are compliant with GDPR /GDPR UK requirements and ensure consent is obtained and privacy maintained.	2020
Dignity at Work: Anti-Bullying & Harassment Policy	This policy applies to bullying, harassment, sexual misconduct, micro-aggressions, and victimisation that takes place at LSHTM or any place that a member of LSHTM is in attendance in connection with their studies, research, teaching or employment, including those working overseas. This policy applies to students, staff at all levels including academic, professional services, management and governors and anyone else engaged to work at LSHTM whether they are in a direct contractual relationship with LSHTM or otherwise.	2021
Good Research Practice Policy	This policy provides the overarching element that combines all elements of the research governance framework including investigating allegations of research misconduct, ethical review, health and safety, grant management, confidentiality, intellection property. It commits to conducting research according to the highest standards.	2021

Grievance Policy and Procedure for Professional Services Staff	This policy commits LSHTM to promoting effective working relationships and an environment in which employees feel able to raise work-related issues with their managers. The procedure provides a fair and transparent framework to deal with concerns or complaints which affect their work, their working conditions or their working relationships.	2022
Procurement Policy	This policy aims to ensure that procurement activities, amongst other things, are compliant with relevant legal, regulatory and policy requirements, that the process identifies, minimises and manages procurement related risks, including those related to safeguarding.	2023
Recruitment and Selection Procedure	This procedure sets out how LSHTM ensures that all recruitment is fair and transparent, with open recruitment and the aim of identifying and appointing the best candidate for any role based on the grounds of merit. It specifies the advertising, objective job evaluation, shortlisting, and interview requirements for each recruitment.	2021
Risk Management Policy	This policy supports the development of a consistent approach to determining, analysing and managing risk to ensure that all reasonable steps are taken to mitigate risk.	2021
Safeguarding & Security Screening Policy	This policy details how LSHTM undertakes safeguarding checks for those staff who have direct contact with children and/or vulnerable adults in the course of their work or research. The policy also details how security screening checks are undertaken.	2018
Social Media Policy	This policy supports staff to minimise exposure to reputational risks to them or LSHTM as an institution by providing guidance to ensure social media engagement is safe and responsible.	2023
Student Cause for Concern	This policy applies to student welfare in UK and when overseas for students who follow School-based award-bearing programmes. It provides for a supportive and protective procedure which can be used when a student's health, wellbeing or behaviour pose a detrimental impact on their ability to study or participate in School life or when their behaviour may pose a risk to themselves or others.	2016
Whistleblowing Policy	This policy aims to support LSHTM in maintaining the highest standards of openness, integrity and accountability in its work, through encouraging staff to be vigilant for signs of illegal or dishonest practices and serious misconduct and to report any concerns they have. LSHTM is committed to ensuring that genuinely held concerns will be thoroughly investigated and those who raise these concerns will be protected against victimisation and discrimination.	2022

5. Monitoring and Review

The Executive Team will monitor the implementation of this Safeguarding Framework and the policies and procedures referred to.

The Council will receive information on significant safeguarding risks for LSHTM as well as information on trends and implications from case information.

This Safeguarding Framework will be reviewed at least every 3 years.

Document type	Framework
Document owner	Jocelyn Prudence, Interim Secretary to Council
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Related Policies and Procedures	See section 4 of this document