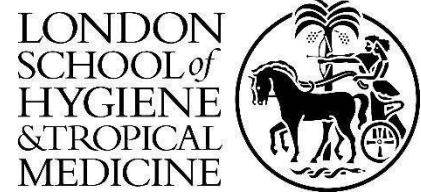


HUMAN RESOURCES

Safeguarding Policy and Procedure



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Approved by	HR Policy Committee and Joint Negotiating and Consultative Committee (JNCC)
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Related Policies & Procedures	Safeguarding Framework Dignity and Respect: Anti-Bullying and Harassment Policy Values & Behaviour Framework Data Protection Policy Disciplinary Policy & Procedure Records Management Policy LSHTM Prevent Duty

If you require this or any other document in an alternative format, for example, in larger print, please contact the Human Resources department (HR@lshtm.ac.uk).

Policy aims and scope

1. LSHTM is committed to achieving the highest possible standards in all aspects of its work, and this includes taking every reasonable step to safeguard staff, students, volunteers, visitors, research participants, and members of the public with whom we work or interact (be they based in the UK or overseas). This policy specifically describes how LSHTM safeguards children, young people and vulnerable adults, and provides a safe environment for these groups who are impacted by our work. The policy also sets out the effective and supportive mechanisms for responding to safeguarding concerns, disclosures and allegations in relation to these specific groups. For reference, these groups are defined in Appendix B.
2. Safeguarding in a UK legal context applies to children and young people under 18, as well as vulnerable adults. This Policy sets out LSHTM's responsibilities in ensuring the protection of these groups in accordance with the *Safeguarding and Vulnerable Groups Act 2006*.

3. The LSHTM [Safeguarding Framework](#) is an umbrella document under which this specific policy falls, and describes the institution's wider commitment to safeguarding, and identifies the relevant LSHTM policies, procedures and guidelines which are in place to safeguard staff, students, children, young people and adults who participate in or are impacted by our programmes and research. This specific Safeguarding Policy describes how LSHTM provides a safe environment for the children, young people, and vulnerable adults and impacted by our work, as well as the effective and supportive mechanisms for responding to safeguarding concerns, disclosures and allegations for these specific groups.
4. It is expected that all staff are aware of how to recognise and respond appropriately to safeguarding concerns through the effective communication of this Policy and associated training. Those with specific responsibilities as set out in this Policy are required 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.
5. This Policy applies to LSHTM staff both in the UK and overseas, including the MRC Units. Allowances or exceptions to the policy provisions will be accommodated to satisfy any local/domestic laws or cultures, where necessary. The policy also applies to all wholly, or substantively, owned subsidiaries of LSHTM.
6. Contractors, consultants, suppliers and collaborators working on behalf of (or for) LSHTM are also required to understand and accept the requirement of this Policy, and are responsible for ensuring that their behaviour – and that of any of their employees also engaged in work on behalf of (or for) LSHTM – is in line with the requirements set out in LSHTM's [Values & Behaviour Framework](#).
7. In line with the Higher Education (Freedom of Speech) Act 2023, this policy does not restrict or penalise any form of lawful free speech. The Safeguarding responsibilities and measures outlined in this policy are not intended to inhibit the lawful expression of academic or personal views, even where such views may be controversial or unpopular, provided they do not constitute unlawful activity or pose a safeguarding or security risk.

Safeguarding definition and situations

8. Safeguarding is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect. LSHTM has social, moral and legal obligations to protect the wellbeing and safety of children, young people and vulnerable adults involved in any of our activities, whether those are conducted in-person or online, in the UK or overseas.

9. 'Harm and abuse' is defined as emotional, physical, sexual harm and abuse and neglect. There are a wide range of situations from which children, young people and vulnerable adults should be safeguarded, including – but not limited to – the following:
- Sexual exploitation, abuse, harassment.
 - Physical, emotional or psychological abuse.
 - Bullying or harassment.
 - Financial exploitation.
 - Enticement to illegal activities.
 - Recruitment to radical extremist organisations¹.
 - Cyber abuse.
 - Modern day slavery.
 - Female genital mutilation.
 - Forced marriage.
 - Domestic violence.
10. It is not always easy to identify where abuse, neglect or exploitation has or may be about to take place, but there are a number of ways in which they might become evident and/or manifest themselves. There might be:
- Disclosure of the abuse, either by the individual or by a third party. This might be full disclosure, or a form of disclosure which raises suspicions of abuse.
 - Signs of abuse, such as physical injury for which there appears to be no satisfactory or benign explanation.
 - Certain specific behaviour which leads to a suspicion that someone has or may be being abused.
11. It is not a staff member's responsibility to determine whether or not abuse, harm or neglect has taken place, only to report the concerns or disclosure as per the process set out in this Policy (see sections 22-26).
12. Further relevant Safeguarding definitions are located in **Appendix B**.
13. A concern about the wellbeing and/or treatment of an LSHTM member of staff or student who is not vulnerable, and therefore is not a Safeguarding matter as defined within the specific scope of this Policy, can be reported in the ways set out in LSHTM's [Dignity and Respect: Anti-Bullying and Harassment Policy](#). Anyone who wishes to report any type of concern should be reassured that all

¹ As a Relevant Higher Education Body (RHEB), LSHTM has specific legislative duties "to have due regard to prevent people from being drawn into terrorism". Further information about the PREVENT duty and LSHTM's approach is available here: [Prevent duty | Governance | LSHTM](#).

concerns will be treated seriously and responded to appropriately, whether or not the reporting mechanism described in the relevant formal process or policy is followed.

Roles and responsibilities

14. LSHTM has a diverse staff, student and visitor population, and whilst educational and teaching activities are restricted to postgraduate students, there are many circumstances in which our research activities and other outreach programmes will involve interactions with children, young people and vulnerable adults. Many of our research activities involve human participants, and can take place in settings and circumstances such as: schools; healthcare/clinical locations; direct responses to infectious disease outbreaks; field work; humanitarian disasters. This Safeguarding Policy and the reporting processes set out within (see sections 22-26) are intended to ensure that all those settings are safe for all, and that concerns can be reported centrally in a quick and effective way.

15. In order to ensure that, as an institution and employer, we meet our obligations to provide a safe and welcoming environment for all who are involved in, or affected by, our activities, **LSHTM will**:
 - Provide all staff with information, training and guidance about how to recognise potential harm where it has occurred or may occur, and how to respond appropriately and report it;
 - Make sure that anyone can raise a safeguarding concern about any child, young person, or adult at risk, involved in or affected by the activities of the institution;
 - Ensure that all staff are suitable to act in their respective roles, through the provision of safe and robust recruitment practices (including additional safeguarding checks where relevant), and appropriate training;
 - Ensure there are identified staff with designated safeguarding responsibilities, who are trained in responding to safeguarding concerns and disclosures;
 - Have an appropriate reporting system in place for dealing appropriately and effectively to reported concerns, disclosures or incidents, including reporting to relevant external organisations where appropriate;
 - Ensure that lessons learned from safeguarding incidents are incorporated into relevant policies and procedures.
 - Ensure that appropriate Safeguarding risk assessments are undertaken when required, with particular focus on the scope of our research activities which in many cases will involve direct work with children, young people and vulnerable adults.

16. As the governing body of LSHTM and with overall responsibility for its operational and strategic management, **Council will**:
 - Approve the Safeguarding Policy;
 - Receive assurance that staff are trained to the appropriate training;
 - Receive the outcome of periodic reviews of safeguarding activity, and recommend action where potential gaps in provision or assurance are identified.

17. The LSHTM **Designated Safeguarding Lead (DSL)** is responsible for:
- Ensuring that this Policy is kept up-to-date, and is accompanied by appropriate formal procedural arrangements.
 - Ensuring that all staff are familiar with this Policy, understand their responsibilities, and are appropriately trained to deal with safeguarding incidents.
 - Oversight of investigations of allegations and other disclosures.
 - The appointment of Designated Safeguarding Officers.
 - Ensuring appropriate mechanisms are in place for secure reporting and recording of safeguarding incidents and disclosures, and holding the central records of safeguarding incidents and disclosures, in compliance with LSHTM's [Data Protection Policy](#).
 - Ensuring that Safeguarding incidents and disclosures are responded to in a timely manner.
 - Attending high-level training commensurate with the responsibilities of the DSL.
 - Providing reports to Council and its subcommittees as necessary.
18. In order to embed greater safeguarding expertise and knowledge across LSHTM, and also to prevent a single point of failure, there are a number of **Designated Safeguarding Officers (DSOs)** in different roles across the institution. The **DSOs** are responsible for:
- Acting as an identified contact for receiving and responding to safeguarding concerns, disclosures or allegations raised in the course of LSHTM's activities;
 - Ensuring that any such safeguarding-related incidents are appropriately recorded and reported to the Designated Safeguarding Lead;
 - Providing advice to others on safeguarding concerns and handling of incidents;
 - Assisting in the promotion of this Policy and any associated training;
 - Attending required training appropriate to their responsibilities;
 - Attending meetings and supporting the work of the LSHTM Safeguarding Group (see section 18 below).
19. The LSHTM **Safeguarding Group**, comprising the DSL and DSOs, will:
- Meet on a termly basis to review all safeguarding-related concerns, disclosures and incidents, ensuring that any learning is taken forward accordingly;
 - Provide an annual report to Council on the effectiveness of current safeguarding arrangements, a summary of safeguarding incidents, and mandatory training compliance;
 - Identify and keep under review the operation of policies, procedures and training which impact on LSHTM's ability to fulfil its safeguarding responsibilities.

20. **All LSHTM staff**, which for the purposes of this Policy also includes Distance Learning tutors, casual workers, student demonstrators, honorary appointees, Emeritus Professors, Visitors and external examiners, regardless of their position or grade, FTE, or any other factor, will:
- Help ensure that LSHTM is a safe environment, and always behave in line with LSHTM's [Values & Behavioural Framework](#), acting 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 that there is a safeguarding concern which needs raising or reporting (see sections 22-26 of this Policy).
 - Undertake the mandatory safeguarding training in line with organisational requirements, including refresher training.
 - Co-operate fully with any internal or external investigations carried out following the reporting of safeguarding concerns.
 - Maintain the confidentiality of any suspected or actual incidents.
 - Ensure that they are aware of local safeguarding policies and procedures for the premises they are visiting when representing LSHTM, for example when visiting schools, healthcare facilities, or partner organisations.

Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH)

21. LSHTM is committed to the Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH), understanding that SEAH stems from an imbalance and abuse of power, which can create an environment where those in positions of power feel entitled to exploit, abuse, or harass those with less power. Our commitment to PSEAH aligns with those of some of our key research funders and collaborators, often working in the areas of humanitarian development and emergency/disaster responses.
22. In addition to the LSHTM [Values & Behaviour Framework](#), we are also developing a specific Safeguarding Code of Conduct (*to be finalised soon*) which all LSHTM staff are required to follow. The Code of Conduct sets out the specific requirements for LSHTM staff in regard to their conduct, specific behaviours or actions which are prohibited, and that breaking the Code of Conduct has serious consequences, up to and including their dismissal from LSHTM's employment.

Responding to a safeguarding concern or disclosure

23. This safeguarding procedure is to be followed whenever a concern is raised, or a disclosure made, that a child, young person or vulnerable adult may be at risk of abuse or exploitation. It should not be used (at least not initially) if someone is in immediate danger, in which case the emergency services should be called. Once the emergency services have been called and the initial danger or risk has been addressed, then the process outlined below can be undertaken.

24. Whenever any staff member becomes aware of a possible safeguarding concern or receives a disclosure or an allegation, they must:
- Immediately complete a *Safeguarding Incident Report Form* (see **Appendix A**) with as much information and detail as they can; and then,
 - Without delay, submit the completed form to the Designated Safeguarding Lead (Louise Nadal, Louise.Nadal@lshtm.ac.uk, marking the e-mail with 'High Importance'), **and** the dedicated Safeguarding e-mail address (Safeguarding@lshtm.ac.uk).
25. Upon receipt of the completed *Safeguarding Incident Report Form*, the Designated Safeguarding Lead and/or one of the Designated Safeguarding Officers will review the information and be responsible for deciding on the next steps, seeking relevant advice and liaising with relevant colleagues as required. Further information about what happens when a report is received is available on the dedicated [Safeguarding site](#).
26. Given that LSHTM works with a number of domestic and international partners, and that our staff work in a number of settings around the globe, there may be occasions where the Safeguarding Policy and/or Procedure of another organisation may also need to be followed, in addition to the LSHTM Policy & Procedure. In these circumstances, the LSHTM Designated Safeguarding Lead or an approved delegate will likely need to liaise with their counterpart in the partner organisation.
27. Depending on the nature of a Safeguarding concern being reported which relates to the alleged behaviour of an LSHTM member of staff, it may be necessary to commence an investigation. Any such investigation will ordinarily be undertaken in line with the provisions set out in LSHTM's [Disciplinary Policy & Procedure](#).
28. There will be occasions where research projects or teaching/educational outreach activities are undertaken wherein the process for reporting safeguarding concerns in those settings are agreed to take place through an appropriate alternative mechanism. An example of this would be a research study taking place in a secondary school, where safeguarding concerns about the research participants would be reported through the school's own safeguarding process. This example of an appropriate alternative reporting process would constitute part of the study design and LSHTM Ethics Committee sign-off. Advice as to whether the reporting process set out in this policy needs to be followed can be sought from any of the members of the LSHTM Safeguarding Oversight Group.

Data protection and confidentiality

29. LSHTM is responsible for ensuring that it maintains accurate records of safeguarding concerns, allegations and disclosures in accordance with the [Data Protection Policy](#) and the [Records Management Policy](#). The Designated Safeguarding Lead is responsible for ensuring mechanisms that for appropriate recording are in place, and that the LSHTM Safeguarding Group reports to Council and any relevant subcommittees as required.

30. Safeguarding concerns, allegations and disclosures are treated in strict confidence.
31. 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 when required (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 this must be weighed against the duty of care both to the individual and others who may also be at risk; information may be shared without consent where there is good reason to do so. The child, young person or adult at risk will be advised that the information will be shared with those who will address the concern. At all stages, only those people who need to be made aware of an incident or concern will have information shared with them, and LSHTM's safeguarding records will include information as to who has been given the information and why.
32. As standard practice, this Safeguarding Policy & Procedure is shared with research partners and collaborating organisations, who are required to confirm that they agree to the principles and standards set out in this document before any research contracts are signed-off.

Safeguarding Checks

33. LSHTM is committed to undertaking robust checks for all new recruits. Details of these checks are set out in the LSHTM [Recruitment & Selection Policy & Procedure](#).
34. For certain new or existing jobs which will involve certain kinds of contact or interaction with children, young people or vulnerable adults, additional Safeguarding checks – usually a DBS check or equivalent – are required before the appointment can commence, or in the case of existing staff, before they can work on the new project. Further detail about these checks and the circumstances in which they are required can be found in the LSHTM [Recruitment & Selection Policy & Procedure](#).

Appendix A

Safeguarding Incident Report Form

This form is to be used to record basic information in the light of an allegation, suspicion or disclosure of a potential safeguarding concern. Completing this record should not stand in the way of contacting police or other services or agencies in the event of an emergency or urgent safeguarding incident.

Name of the person completing this form (i.e. YOU):	
Date and time completing this form:	
Your position and/or relationship to the person/s your Safeguarding concern is about:	
Your telephone number:	
Your e-mail address:	
Your line-manager:	
Name/s of the person/s your Safeguarding concern is about:	
Any contact details you have for the name of the person/s your Safeguarding concern in about:	
Age and Date of Birth of alleged victims/s (if known):	
Any contact details for the parent, carer, guardian (or similar) of the alleged victim/s:	
What have you directly witnessed a concern or been told about it?	
Has the alleged victim/s said anything to you? (<i>Note: do not lead or investigate – just record actual details.</i>)	
Are there any partner/collaborator organisations that are aware, or should be aware, of this concern?	
Have you contacted either the police or social services? If so, please provide any detail and also record what advice you have received.	
If relevant, any contact details or clerical information (e.g. reference numbers) for any agencies you have contacted:	

Name:

Signature (e-signature will suffice):

Date:

Please submit this completed form to the Designated Safeguarding Lead (Louise.Nadal@lshtm.ac.uk) **and** the dedicated Safeguarding e-mail address (Safeguarding@lshtm.ac.uk) as soon as possible, but only after any urgent/emergency calls or action that you feel needs to be made.

Appendix B

Further Safeguarding-related definitions

Child / children

A person or people under the age of 18. The term 'young person' refers to a child who is aged 16 or 17 years old.

Vulnerable adult / adult at risk

An adult is any person aged 18 or over. Vulnerable adults, or adults at risk, are people 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. Vulnerable adults (or adults at risk) may also be a person who:

- Is elderly and frail due to ill-health, physical disability or cognitive impairment;
- Has a learning disability;
- Has a physical disability and/or a sensory impairment;
- Has mental health needs such that their capacity is reduced;
- Has a long-term illness/condition;
- Misuses substances or alcohol;
- Is a carer, such as, a family member/friend who provides personal assistance and care to adults and is subject to abuse;
- Is unable to demonstrate the capacity to make a decision and is in need of care and support.

Sexual exploitation, abuse, harassment

- 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.
- Sexual harassment is any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation. This may involve any conduct of a verbal, nonverbal or physical nature, including written and electronic communications.