

Preventing harm (safeguarding) in research and innovation policy

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1.Executive Summary

1.1 Overview

UKRI believes that everyone has a right to be treated fairly and with dignity and respect. We are committed to promoting safe research and innovation environments, which are free from sexual exploitation, abuse and harassment, bullying, psychological abuse and physical violence, for all individuals that are employed on, participate in, or otherwise come into contact with, the research and innovation activities that we fund.

To this end, UKRI has developed a preventing harm (safeguarding) in research and innovation policy to support individuals and organisations to enhance their approach to preventing and addressing actual or potential harms in their research and innovation activities building on good practice where it exists.

This policy applies to all UKRI funded activities irrespective of whether they take place in the UK, or overseas and to all individuals and organisations receiving UKRI funding either directly, or indirectly through a partner organisation.

1.2 UKRI expectations

Tackling exploitation, abuse and harm is everyone's responsibility. All staff, students and any associated personnel directly involved in a UKRI funded research and innovation activity must play their role in preventing exploitation, abuse or harm from occurring by anticipating and mitigating the risks associated with their activities and by reporting concerns or incidents if they do occur.

Organisations should promote a fair, transparent and positive culture, where individuals feel able to report concerns and are confident that they will be acted upon. Organisations must have appropriate policies and procedures in place to prevent exploitation, abuse or harm from occurring and to be able to respond to and address any incidents that do occur appropriately. To manage the risks associated with our funding, organisations must inform UKRI of any upheld allegations of sexual exploitation, abuse and harassment, bullying, psychological abuse and physical violence against staff, students or associated personnel directly involved in a UKRI funded activity.

1.3 Monitoring

UKRI will monitor compliance with this policy through our funding assurance processes and will work with organisations to address any issues including, for example, instances where organisations are deemed to have insufficient policies or procedures in place. In all cases actions taken by UKRI will be proportionate and determined on a case by case basis.

1.4 Related policy areas

This policy sits alongside and complements the UKRI **bullying and harassment** position statement and programme of work, the UKRI stance on **equality, diversity and inclusion** and the **UKRI Policy and Guidelines on Governance of Good Research Conduct**.



2. Introduction

UK Research and Innovation (UKRI) believes that everyone has a right to be treated fairly and with dignity and respect. We are committed to promoting safe research and innovation environments which are free from sexual exploitation, abuse and harassment, bullying, psychological abuse and physical violence for all individuals that are employed on, participate in or otherwise come into contact with the research and innovation activities that we fund.

For ease, the phrase 'exploitation, abuse and harm' will be used throughout the rest of the policy to encompass the full range of offences covered by this policy, namely sexual exploitation, abuse and harassment, plus any broader forms of violence, exploitation and abuse such as bullying, psychological abuse and physical violence.

UKRI recognises that as a major public funder of research and innovation, we can play an important leadership role in addressing exploitation, abuse and harm within the sector. Therefore, we commit to working with individuals, organisations and other funders across the breadth of the research and innovation sector to promote the development of the highest standards in organisational culture, systems and practice that are required to prevent and tackle incidents of exploitation, abuse and harm, building on good practice where it exists.

This policy builds on the commitments that UKRI made in the International Development Research Funders' statement on safeguarding, which was published in October 2018, and seeks to support the research and innovation sector to develop and implement contextualised good practice approaches to prevent and address incidents of exploitation, abuse and harm. To that end, UKRI has joined with other funders through the UK Collaborative on Development Research (UKCDR) to develop an evidence base and guidance for individuals and organisations on how to anticipate, mitigate and address exploitation, abuse and harm within research and innovation activities. The guidance and evidence review are available on the UKCDR website.

3. Aim

UKRI provides funds to a range of different types of organisations to support a wide variety of research and innovation activities both in the UK and overseas. We recognise the importance of developing contextually relevant approaches. Therefore, it is not practical or feasible for UKRI to prescribe exactly how individuals and organisations should meet the expectations set out in this policy, as there is no 'one size fits all' approach or solution. Instead, this policy aims to provide a framework to support individuals and organisations who want to apply for, or are receiving funding from, UKRI to critically reflect on their existing approaches and provide them with the flexibility to respond to any gaps in a way that is most appropriate to their organisation, type of research and innovation activities and to the contexts in which they work. However, in the guidance and useful resources sections at the end of this document, we have provided links to a number of sources which provide guidance on approaches individuals and organisations could take.

By meeting the expectations set out in this policy, we anticipate that individuals and organisations will:

- be better equipped to anticipate the potential risks for exploitation, abuse and harm within all their research and innovation activities
- have taken all reasonable steps to mitigate these risks
- have robust policies and procedures in place to enable them to respond to and address incidents of exploitation, abuse and harm when they do occur

While this policy relates specifically to UKRIfunded research and innovation activities, we expect that the organisations we fund will take an organisation-wide approach to preventing and addressing exploitation, abuse and harm.

4. Scope of the policy

This policy focuses on taking all reasonable steps to prevent and address exploitation, abuse and harm within UKRI-funded research and innovation activities.

This policy specifically covers taking all reasonable steps to prevent and address incidents of exploitation, abuse or harm to any:

- individual directly involved in a research and innovation activity funded by UKRI, including research and innovation participants, staff, students and any associated personnel by any other individual(s) directly involved in the activity
- staff, students, associate personnel or research and innovation participant by individuals not directly involved in the activity, such as members of the general public or other groups, as a direct result of their involvement in the research and innovation activity
- child, young person or vulnerable adult who is not directly involved in a UKRI-funded research and innovation activity but may be vulnerable to exploitation, abuse or harm by staff, students or any associated personnel directly involved in UKRI-funded research and innovation activities while they are conducting the activity

This policy applies to all:

- UKRI-funded activities irrespective of whether they take place in the UK or overseas, and
- individuals and types of organisations that receive funding from UKRI irrespective of whether they are based in the UK or overseas, or whether they receive funding from UKRI directly or indirectly through a partner organisation

The ethical conduct of research and innovation has a vital role to play in preventing exploitation, abuse and harm from occurring. For guidance on the governance of good research conduct and how to respond to incidents of exploitation, abuse and harm arising from unacceptable research conduct, individuals and organisations should refer to the **Research Councils' Policy and**

Guidelines on Governance of Good Research

Conduct, which should be read in conjunction with this policy.

Workplace bullying and harassment of staff, students or any associated personnel by other staff, students or associated personnel are covered in **UKRI's Bullying and Harassment position statement**. Through our Bullying and Harassment statement, we set out our expectations that organisations we fund will have in place an organisation-wide approach with effective preventative and response strategies, together with clear communication to ensure everyone is confident that issues will be dealt with effectively. These expectations are aligned with the expectations set out in this policy.

In our position on bullying and harassment, we recognise that organisations operate within distinctive environments which may require adherence to additional frameworks, and our expectation is that organisations will reflect these in their approach, which also aligns with this policy. In this way, we intend that this policy will complement and provide additional guidance to reflect the distinctive risks and support needed to prevent and address bullying and harassment of different groups and in different contexts.

Therefore, the UKRI preventing harm (safeguarding) in research and innovation policy brings together a number of existing policies and addresses important gaps or provides additional guidance for key areas.

Individuals who are employed by UKRI should refer to the **UKRI Safeguarding policy** for staff.

Examples of things that are not within the scope of this policy include, but are not limited to, harm caused by workplace accidents, harm caused by medical negligence, harm to the environment. However, as situations are often very complex and multifactorial, it may be hard to make a clear determination about whether an incident or upheld allegation is covered by this policy. In these cases, the organisation should contact UKRI for guidance.

5. Expectations of individuals involved in UKRI-funded activities

Tackling exploitation, abuse and harm is everyone's responsibility. All staff, students and any associated personnel directly involved in a UKRI-funded research and innovation activity have a role to play in preventing exploitation, abuse or harm from occurring by anticipating and mitigating the risks associated with the activity, and by reporting concerns or incidents if they do occur.

We expect staff, students and any associated personnel directly involved in a UKRI-funded research and innovation activity to:

- treat each other, research and innovation participants and members of the general public with dignity and respect, to act with the highest standards of integrity, honesty and professionalism and to embed good practice in every aspect of their work
- adhere to the highest level of research ethics, in line with requirements set out by national and international regulatory bodies, profession and regulatory research guidance and research ethics frameworks issued in appropriate areas, see Research Councils' Policy and Guidelines on Governance of Good Research Conduct
- recognise the inherent power imbalances that exist in research and innovation activities and take all reasonable steps to mitigate them within the activities that they are involved in
- engage in equitable partnerships throughout the development, delivery and dissemination of a research and innovation activity to avoid extractive and exploitative approaches
- be aware of relevant policies and procedures within their organisation and know how to respond to and report concerns about exploitation, abuse and harm
- raise concerns that they have, or those that are reported to them, through the appropriate channels in their organisation and/or the appropriate authorities

We expect UKRI grant holders to take a leadership role in developing and role-modelling a positive

culture within their research and innovation teams where exploitation, abuse and harm is not tolerated, and to anticipate, mitigate and address the risks of exploitation, abuse and harm within their funded activities in line with their organisation's policies and procedures.

6. Expectations of the organisations that we fund

UKRI recognises that organisations we fund, especially those based overseas, may be subject to different regulatory, statutory and legislative frameworks. If any of the expectations set out in this policy are incompatible with the regulatory, statutory or legislative frameworks by which an organisation is bound then those frameworks will take precedence. However, under these circumstances, UKRI will expect the organisation to be able to evidence why it is unable to meet the expectations set out in this policy and provide evidence of alternative approaches in place to cover the area of policy and practice.

We expect organisations to take all reasonable steps to anticipate and mitigate the risk that exploitation, abuse and harm might happen to an individual as a direct result of a UKRI-funded research and innovation activity. Organisations should promote a fair, transparent and positive culture, where individuals feel able to report concerns and are confident that they will be acted upon. Organisations should have appropriate policies and procedures in place to prevent exploitation, abuse or harm from occurring and should be able to appropriately respond to and address any incidents that do occur.

We expect all organisations receiving UKRI funding either directly or indirectly to:

- i. Have policies and procedures in place that clearly set out:
 - the standards of behaviour it expects from its staff, students and any associated personnel engaged in research and innovation activities
 - routes for reporting and escalating allegations of exploitation, abuse or harm

- how individuals reporting concerns will be protected and kept informed of procedural stages and outcomes
- how it will respond to and investigate reports of exploitation, abuse or harm
- disciplinary procedures the organisation will follow if an allegation of exploitation, abuse or harm is upheld

Accountability for, and management of, the policies should be clearly articulated.

The policy or policies should be readily available to all staff, students and any associated personnel.

As part of the design and implementation of a UKRI-funded research and innovation activity it must be made clear to any research and innovation participants and, if relevant, members of the general public, what standards of behaviour they should expect from the staff, students and any associated personnel involved in the activity, including how to report incidents and concerns and what response they can expect. The methods used should be contextually and culturally appropriate.

Wherever possible, organisations should use participatory processes to co-develop their policies. Organisations should review their policies and procedures on a regular basis and have a process for monitoring and evaluating their effectiveness, drawing on feedback from interested parties.

Where an organisation follows national regulatory or legislative frameworks, rather than having organisational-specific policies, they should be able to evidence how these are implemented in their organisation.

 Assess whether a job role will involve contact with children, young people or vulnerable adults and ensure that appropriate and effective recruitment, vetting and disciplinary processes are in place to manage the risk(s). The level of risk associated with a job role should be reviewed on a regular basis and more frequently if there is a significant change in responsibilities or activities.

- iii. Have a risk management framework which includes the assessment of the risks of exploitation, abuse and harm associated with current and planned UKRI-funded research and innovation activities, and the development and implementation of effective risk mitigation strategies.
- iv. Provide appropriate guidance, awarenessraising activities and training for staff, students and, where necessary, any associated personnel so that they understand the different types of exploitation, abuse and harm that might occur, their responsibilities, how to anticipate, mitigate and address the risks to themselves and others, and how to report and respond to concerns.
- v. Have policies, procedures and training in place, in line with the expectations set out in the **Research Councils' Policy and Guidelines on Governance of Good Research Conduct** and the requirements set out by national and international regulatory bodies, profession and regulatory research guidance and research ethics frameworks issued in appropriate areas, to support the conduct of research to the highest ethical standards.
- vi. Have policies, procedures and training in place to anticipate, mitigate and address issues relating to the safety of staff, students and any associated personnel involved in a research and innovation activity, including, but not limited to:
 - policies and training which cover international travel and safety while working overseas, risk assessments, pre-departure briefings and procedures to follow in case of an emergency
 - Ione-working policies and procedures
- vii. If they are receiving funds from UKRI on behalf of a partnership, make all reasonable endeavours to ensure that effective policies and procedures are in place to prevent and address incidents of exploitation, abuse and harm across the partnership. They should have processes in place to anticipate, monitor and manage the risks across the partnership over the lifetime of the UKRI-funded research and innovation activity. There should be an

agreed process in place for sharing information about upheld allegations against individuals directly involved in the research and innovation activity, and/or risks to the activity by the partner organisations.

- viii. Respond effectively and in a timely manner to reports that:
 - a member of staff, student, associated personnel or research and innovation participant has been, or is at risk of being, exploited, abused or harmed, for example by members of the general public or other groups during a research and innovation activity

Organisations must inform UKRI of the concern or incident in a timely manner so that UKRI can work with the organisation to determine an appropriate course of action to mitigate the risk that harm, or further harm, could occur.

The report should provide a brief factual statement about the nature of the concern or incident, any action taken and any further planned action. No personal information should be included in the report.

In order to support learning, organisations should investigate the incident and identify whether any changes to policy and practice should be implemented in response to this case.

6.1 How organisations should respond to unacceptable research conduct

If there is reason to believe that staff, students, associated personnel or research and innovation participants directly involved in a UKRI-funded research and innovation activity have been exploited, abused or harmed as a result of unacceptable research conduct, for example a 'Breach of Duty of Care' due to failure to maintain confidentiality, we expect all organisations receiving UKRI funding to follow the procedures set out in the **Research Councils' Policy and Guidelines on Governance of Good Research Conduct**

6.2 How organisations should respond to unacceptable personal conduct

We expect all organisations receiving UKRI funding to:

- i. In an impartial, fair and timely manner, investigate allegations that a member of staff or student has exploited, abused or harmed another member of staff, student, associated personnel, research and innovation participant or member of the general public. It must:
 - protect the rights of all individuals involved
 - take a victim/survivor-centred approach, listen and take concerns seriously, and provide appropriate support for the victim/survivor
 - take appropriate action

Guidance on conducting investigations is available from the **CHS Alliance**

Where an allegation is made to an organisation about any associated personnel involved in a UKRI-funded research and innovation activity, the allegation should be referred to their employing or enrolling organisation, which will be responsible for following their own investigation and disciplinary procedures. However, the organisation may also choose to conduct their own investigation if appropriate.

Where an organisation has reason to believe that a crime has been committed or that there is imminent risk of harm occurring, a report should be made to the appropriate authority, except in circumstances where there is a reasonable expectation that to do so would cause further harm to the victim/survivor, for example in situations where reporting a crime could result in the victim/survivor also being treated as a criminal.

ii. Have processes and procedures in place to review and manage the risks associated with the continued involvement of an individual in a UKRI grant application or UKRI-funded activity while an allegation of exploitation, abuse or harm is investigated.

- iii. If, following the investigation, the allegation of exploitation, abuse or harm against an individual directly involved in a UKRI-funded activity is upheld, the organisation must notify UKRI of the investigation and the decision in a timely manner. Notification should include:
 - a brief factual statement about the nature of the allegation
 - the findings of the investigation
 - what, if any, disciplinary action is being taken and/or remedies are being given to the victim/survivor
 - what, if any, changes to policy and practice have been implemented in response to this case and what assurances will be put in place as to their effectiveness

If UKRI receives a notification that an allegation of exploitation, abuse and harm has been upheld against an individual directly involved in a UKRIfunded activity or application for funding, we reserve the right to review the outcome of the investigation and ask for additional information, for example about the investigation process to ensure that the organisation has followed its policies and procedures.

UKRI will work with the organisation to minimise the impact on any UKRI grant applications or UKRI-funded activities that are affected.

Wherever possible, organisations must see an investigation through to its conclusion. This includes:

- documenting the findings.
- applying any disciplinary procedures

While we recognise that the requested disclosures under this policy may include personal data, we consider that we have a legitimate interest in handling this data under the General Data Protection Regulation.

Any information you send us will be:

 stored in accordance with data protection law requirements

- communicated only on a need-to-know basis (with access restricted)
- updated and/or deleted in line with our retention policy

UKRI understands the importance of protecting personal data and is committed to complying with data protection legislation. All personal data provided to UKRI in connection with preventing and addressing harm to individuals that are employed on, participate in or otherwise come into contact with the research and innovation activities that we fund, will be processed in accordance with current UK data protection legislation and the General Data Protection Regulation 2016/679 (GDPR) where appropriate. Processing personal data in connection with preventing and addressing exploitation, abuse and harm forms part of our public tasks. Processing special category data requires an additional condition, which is that the processing is by a non-profit body and additional safeguards are met. The same additional condition is used to process personal data relating to criminal convictions.

It is the organisation's responsibility to ensure that they have the appropriate terms in place to allow them to share the required information with UKRI.

7. How UKRI handles allegations

Allegations of exploitation, abuse and harm must be reported to the employing or enrolling organisation of the person against whom the allegation is being made and/or the appropriate authorities. It is the employing or enrolling organisation's responsibility to investigate, not UKRI's, except where UKRI is the employer.

If an allegation is made directly to a member of UKRI staff, we will encourage the individual making the allegation to report it to the employing or enrolling organisation of the individual against whom the allegation is being made, or to the relevant authority.

For information about how UKRI investigates complaints relating to our staff and our disciplinary procedures, please refer to the **UKRI Safeguarding policy** for staff.

8. UKRI's approach to managing the risk of exploitation, abuse and harm

If UKRI identifies a risk of exploitation, abuse or harm relating to an application for funding or a UKRI-funded activity through independent means, for example media reports, we will raise our concerns with the employing or enrolling organisation. Where the risk of exploitation, abuse or harm relates to an activity rather than a specific individual, UKRI will communicate its concerns to the organisation which is receiving funds on behalf of the partnership. UKRI will work with the organisation(s) to identify an appropriate course of action to mitigate the risk(s).

9. How UKRI will monitor compliance with this policy

UKRI will, through our funding assurance processes, organisational audits and other review processes:

- check that an organisation has appropriate policies and procedures in place and is following them, including asking for evidence of how they have applied their policies and procedures when responding to an allegation of exploitation, abuse or harm
- ask for information about an organisation's risk management framework and evidence of how it has been applied to mitigate and address the risks of exploitation, abuse and harm in UKRI-funded research and innovation activities
- review how organisations receiving and managing funds from UKRI on behalf of a partnership ensure appropriate policies and procedures are in place across all partners as well as throughout the lifecycle of the partnership, including asking for evidence of how risk will be monitored and managed
- ask for summary information about the number of allegations of exploitation, abuse and harm relating to UKRI-funded activities, the nature of the allegation, whether the allegation was investigated, and the outcome of the investigation

Where we identify that an organisation does not have sufficient policies and procedures in place to meet the expectations set out in this policy, or are not following their policies and procedures, UKRI will work with the organisation to identify an improvement plan. The organisation must undertake the remedial action plan in a timely manner in order to meet the required standard.

Where an organisation fails to comply with the improvement plan, UKRI reserves the right to apply an escalating series of actions in order to mitigate the risk of exploitation, abuse or harm occurring, until the remedial action plan has been completed. See 'actions against organisations'.

10. Actions against individuals

Exploitation, abuse and harm as defined in this policy covers a broad range of possible offences of varying severity, therefore any action taken will be on a case-by-case basis. If an organisation upholds an allegation of exploitation, abuse or harm against a member of staff, or student, UKRI expects the organisation to apply appropriate disciplinary measures in accordance with their policies and procedures.

If, following the completion of the disciplinary procedures, the individual remains employed or enrolled at the organisation, UKRI expects the organisation to review the risks and impacts associated with the individual's continued involvement in any UKRI-funded activities or applications for funding, and to put in place appropriate measures to manage these risks, including, where appropriate, removing the individual from a UKRI grant or application. UKRI will also expect the organisation to review and manage the risks associated with any future involvement in a UKRI-funded activity or application for funding.

Where an organisation removes an individual from a UKRI-funded activity or application for funding, we will work with the organisation to minimise the impact on any other staff, student or any associated personnel involved in the affected grant(s). This may include transferring the grant to another grant holder.

11. Actions against organisations

If UKRI receives a notification report from an organisation that it has upheld an allegation of exploitation, abuse or harm against an individual directly involved in a UKRI-funded activity, UKRI will work with the organisation to identify any actions that should be taken to improve its systems and processes.

UKRI reserves the right to take action against any organisation receiving funding from us in order to mitigate the risk of exploitation, abuse or harm occurring as a result of our funded activities while they improve their systems and processes.

UKRI also reserves the right to take action if we find that an organisation has failed to:

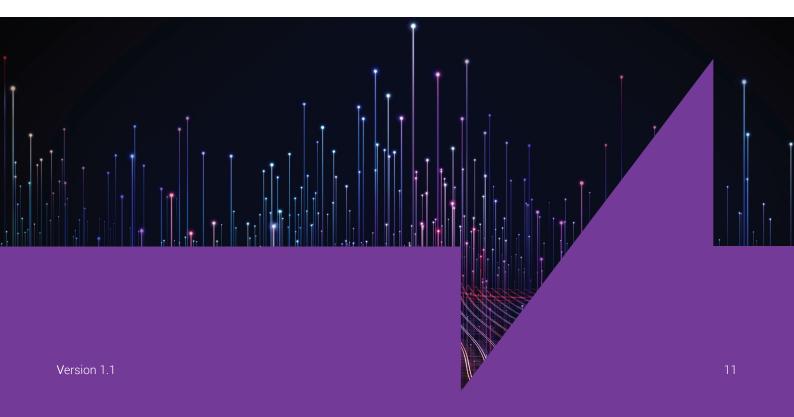
- comply with a remedial action plan
- respond to allegations of exploitation, abuse and harm by a member of staff or student promptly and objectively in line with their policies and procedures
- keep UKRI informed as outlined in 'Expectations of organisations we fund'

Action will be taken by UKRI on a case-by-case basis. Therefore, actions may vary in length and type. Except in the most serious cases, actions will generally be applied in order of escalation. Actions we may apply against an organisation include:

- sending a formal letter setting out our concerns and areas for improvement which we would expect to be addressed in a timely manner
- suspending a grant(s) for a limited period of time until a remedial action plan is agreed and implemented
- restricting applications for specific grant types, for example, doctoral training programmes and overseas based research, until a remedial action plan is agreed and implemented
- not accepting any new grant applications for a limited period of time until a remedial action plan is agreed and implemented
- terminating a grant(s) if it is not possible to identify a remedial action plan to mitigate the risks

12. Evaluation of this policy

UKRI will review this policy periodically to evaluate its impact and effectiveness.



13. Guidance

When considering the risks and vulnerabilities to exploitation, abuse and harm it is important to recognise that:

- risks are not experienced equally by people of different gender, age, sexuality, religion, ethnicity, (dis)ability, socio-economic status etc
- risks and vulnerabilities are present everywhere, but these can be exacerbated in resource-poor settings, informal settlements, refugee camps and in fragile, conflict-affected and shock-prone states/areas
- vulnerability is context-specific, therefore adults could be vulnerable as a result of a change in circumstance or situation, including, but not limited to, if they were to become internally displaced or a refugee

Therefore, approaches to prevent and address exploitation, abuse and harm should be sensitive to these different and changing dimensions of risk and vulnerability and to the different and changing contexts in which research and innovation activities take place.

While no research and innovation activity is without risk, it is important to anticipate the risks and take reasonable steps to mitigate them.

Exploitation, abuse and harm can happen in all research and innovation activities and as a result, everyone in the research and innovation sector has a role to play in preventing it from occurring. Therefore, there is a need to understand the risks and vulnerabilities to exploitation, abuse and harm and to have clear response pathways, training, guidance and named sources of advice to support decision-making across all different disciplines and across the research and innovation sector.

However, by its nature, the risks of exploitation, abuse and harm are much greater in some areas of research and innovation than in others, for example, research on gender-based violence or research that involves the participation of child refugees. Therefore, organisations should provide additional guidance and support for individuals involved in this type of research and innovation activity. Guidance on anticipating, mitigating and addressing exploitation, abuse and harm in research is available:

- the evidence review, draft principles and good practice guidance produced by David Orr et al., University of Sussex in 2019 for UKCDR
- the consultation report and finalised guidance produced by the team from Liverpool University and Liverpool School of Tropical Medicine in 2020 for UKCDR.

Guidance on developing equitable partnership is available from the **Rethinking Research Collaborative**

Useful resources

There are a large number of resources available to support the development of effective strategies to prevent and address exploitation, abuse and harm. More are available via the links below:

- Bond safeguarding resources
- CHS Alliance resources 'Protection from Sexual Exploitation, Abuse and Harassment

Other sources of information

In developing this policy, UKRI drew directly from the following standards:

DFID's standards, guidance for partners and how to report concerns

UN Interagency Standing Committee, Minimum Operating Standards for Protection from Sexual Exploitation and Abuse by own Personnel

Safeguarding and protecting people for charities and trustees

OECD DAC recommendation on Ending Sexual Exploitation, Abuse and Harassment in Development Co-operation and Humanitarian Assistance: Key Pillars of Prevention and Response

14. Definitions

'Abuse' is any action that violates a person's human or civil rights. This can take the form of physical harm, sexual, emotional or psychological abuse. This can also include financial or material abuse and neglect.

'Associated personnel' means any person directly involved in a UKRI-funded research and innovation activity who is not the organisation's staff or student, including, but not limited to:

- staff or students from partner organisations, contractors, consultants, collaborators, fieldworks, volunteers etc who are named on the grant
- those whose posts are partly or wholly funded through the grant
- those whose services are procured through the grant
- those whose salaried time is partially or wholly contributed to the grant, as an in-kind contribution from an organisation
- those whose time is volunteered to complete specific activities identified in the grant.

'Child' in line with the United Nations Convention on the Rights of the Child and for the purposes of this policy, is defined as any person – girl, boy, young woman, young man and children of other gender identities—under the age of 18 years. This definition supersedes any national legislation on age of majority/consent.

'Bullying and harassment' means any unwanted behaviour that makes someone feel intimidated, degraded or offended. It can include a continuum of repeated behaviours that convey hostility, force unwanted attention, objectification, exclusion or second-class status, and has negative effects on the targeted person where they may find it difficult to defend themselves, for example, because of a hierarchical relationship with the perpetrator.

'Exploitation' is any actual or attempted abuse of a position of vulnerability, differential power or trust for the purposes of gaining benefit, including, but not limited to, monetary, social or political gain. **'Exploitation, abuse and harm'** is a term used to encompass the range of offences covered by this policy, including sexual exploitation, abuse and harassment, bullying, psychological abuse and physical violence

'Grant holder' sometimes also referred to as 'grant recipient' means the person to whom the research and innovation grant (or where equivalent research and innovation activities are funded internally by an institution via a block grant provided to an organisation) is assigned, or who is accountable for the funding received, and who has responsibility for the intellectual leadership and for the overall management of the research and innovation activity funded by the grant or equivalent internally funded activity.

'Harm' is any detrimental effect on psychological, physical or emotional wellbeing and any other infringement of an individual's rights. Harm may be caused by abuse or exploitation, whether intended or unintended.

'Organisation' means any entity receiving funding directly or indirectly from UKRI, including, but not limited, to higher education institutions, research organisations, research institutes, companies, businesses, charities, non-governmental organisations etc

'Psychological harm' means emotional or psychological abuse, including, but not limited to, humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

'Research and innovation activity' means any activity funded through a grant from UKRI, including, but not limited to, research and innovation projects, networking grants, seminar series/workshop/conference grants, fellowships, doctoral training programmes, institutional block awards allocated to research organisations, other institutional strategic awards.

'Research and innovation participant' means any individual that participates in human subject research by being the target of observation by researchers.

'Safeguarding' means taking all reasonable steps to prevent harm, particularly sexual exploitation,

abuse and harassment from occurring: to protect people, especially children and vulnerable adults from that harm, and to respond appropriately when harm does occur.

'Safeguarding focal point' means an individual that has responsibility for implementation of safeguarding policies and procedures and provision of guidance and advice for staff and students.

'Sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

'Sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, and includes, but is not limited to, profiting monetarily, socially or politically from sexual exploitation of another.

'Sexual harassment' means any unwelcome sexual advances (including, but not limited to, sexual advances made without touching) and includes, but is not limited to, requests for sexual favours or other verbal or physical behaviour of a sexual nature which may create a hostile or offensive environment.

'Staff' means an individual employed by the organisation who is directly involved in a UKRI-funded activity or application for funding.

'Student' means an individual studying at the organisation who is directly involved in a UKRI-funded activity or application for funding.

'Survivor-centred approach' means putting the rights, needs and wishes of the victim or survivor of the exploitation, abuse or harm at the centre of an organisation's thinking, based on principles of safety, confidentiality, respect and non-discrimination.

'Victim/survivor' means an individual who has been exploited, abused or harmed as defined in this policy.

'Violence' means all forms of physical violence, injury or abuse.

'Vulnerable adult' means a person who is or may be in need of care by reason of mental or other disability, age or illness, and who is or may be unable to take care of themselves, or is unable to protect themselves against significant harm or exploitation.

'Young person' means any person – young woman, young man, and person of other gender– who identities between the age of 18 and 21 years.

Version Number	Status	Revision Date	Summary of Changes
Version 1.0	Complete	May 2020	New Policy Created
Version 1.1	Complete	March 2024	Updated hyperlinks

Accessibility

To request copies of this report in large print or in a different format, please contact the preventing harm (safeguarding) team:

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