

SAFEGUARDING IN RESEARCH AND INNOVATION POLICY

1. INTRODUCTION

Keele University is committed to promoting and maintaining safe research environments, and to preventing and reducing the risk of harm in research and innovation. The University has a moral and legal obligation to do no harm, to prevent harm and to assure the welfare of staff, students, participants and any other individuals or communities involved in or affected by research and innovation activities. This policy formalises our principles around safeguarding in research. This document should be read in conjunction with the broader Institutional [Safeguarding Policy](#), which outlines the University's approach to preventing and reducing the risk of harm to children and adults at risk.

1.1 Purpose

All those involved in the University's research and innovation activities have a right to be treated fairly with dignity and respect, and to work or participate in safe research environments which are free from sexual exploitation, abuse and harassment, bullying, psychological abuse and physical violence.

Institutional commitments to safeguard children and at-risk adults, along with mechanisms to support these commitments, are contained in our [Safeguarding Policy](#).¹ Several other processes include mechanisms to ensure safety specifically in the research process (for example, in the [Research Ethics Policy](#) and [Research Code of Good Practice](#)). The purpose of this Safeguarding in Research and Innovation policy is to align these commitments and mechanisms, and to:

- Acknowledge that our duty of care extends to *all* involved (directly and indirectly) in research and innovation activities, where all people may be potentially vulnerable to harm due to a range of intersecting factors (see 2.2).
- Formalise our approach to identifying, preventing and addressing risks of harm in relation to research and innovation activities, accounting for some of the complexities that arise from, and might be specific to, collaborative research and innovation processes.
- Formalise a set of key principles to guide researchers and professional staff conducting and/or supporting research.
- Signpost relevant procedures and mechanisms to be used for reporting and addressing concerns/ incidents relating to safeguarding in research.

¹ This policy is underpinned by the same legal and regulatory frameworks contained in the institutional Safeguarding Policy. Relevant legislation includes Sexual offences Act 2003; Mental Capacity Act 2005; Safeguarding Vulnerable Groups Act 2006; Equality Act 2010; Counter Terrorism and Security Act Data Protection Act 2018; Working together to Safeguard Children 2018.

This is in response to recent developments in the research and innovation sector. In 2018, UK Research and Innovation (UKRI) and other funders of international development research commissioned the UK Collaborative on Development Research (UKCDR) to undertake a review of evidence around safeguarding in this sector, resulting in a set of good practice guidelines and principles.² In May 2020, drawing on this work, UKRI published its 'Preventing harm (safeguarding) in research and innovation policy'.³ In September 2020, the National Institute for Health Research (NIHR) published its policy on preventing harm in research, which applies to all NIHR funded activities.⁴ Our policy responds to these developments, providing a wider scope to encompass research and innovation in our safeguarding approaches. It also ensures compliance with funder requirements, since the implementation of these principles is now being monitored through assurance processes and organisational audits.

1.2 Scope

This policy outlines the University's commitment to taking all reasonable steps to anticipate, mitigate and address potential and actual harms occurring during research. We utilise UKCDR's definition of safeguarding:

"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/or physical violence."⁵

This policy applies to all Keele University staff and students (academic and professional services), including postgraduate research students, honorary contract holders and others within Keele University who are actively involved in any research or innovation activities. Key groups that should be considered in the context of this policy include:

- Those directly involved in research activity (i.e. staff, students, participants in/subjects of research, collaborating partners).
- Those indirectly involved in research activity (i.e. members of the public, family members/associates of research participants, members of communities in which research is being carried out).

This policy applies to all aspects of the research process, including (but not limited to) project design and development, communication and interactions with partners, stakeholders and participants, data collection and fieldwork, dissemination activities, the creation of outputs, engagement with publics and communities. This policy is concerned with safeguarding concerns, risks or incidents that are directly related to and/or a result of the research and

² See UKCDR, 'Safeguarding in International Development Research: Evidence Review' (June 2019) [Safeguarding in International Development Research: Evidence Review | UKCDR](#); UKCDR, 'Guidance on Safeguarding in International Development Research' (April 2020) [UKCDR: Guidance on Safeguarding in International Development Research | UKCDR](#)

³ UKRI, 'Preventing harm (safeguarding) in research and innovation policy' (May 2020) [UKRI-050920-PreventingHarmSafeguardingInResearchAndInnovationPolicy.pdf](#)

⁴ NIHR, 'Policy on Preventing Harm in Research' (September 2020) <https://www.nihr.ac.uk/documents/nihr-policy-on-preventing-harm-in-research/27567>; NIHR, 'Safeguarding Guidance' (September 2020) <https://www.nihr.ac.uk/documents/nihr-safeguarding-guidance/25744>

⁵ [Safeguarding – prevention from harm | UKCDR](#)

innovation process. Where concerns that are not directly related to research arise (for example, where a participant discloses an unrelated concern or incident), procedures in the [Safeguarding Policy](#) should be followed.

Because research is often collaborative and undertaken with a range of project partners, it is important to hold open discussions about policies on and approaches to safeguarding with all parties involved within the research process, and to agree approaches to safeguarding for particular projects.

All research and innovation activities, irrespective of location, fall within the remit of this policy. Sometimes these may take place in countries with distinct regulatory, statutory, or legislative frameworks which require adherence, or in particular cultural or geopolitical contexts that require consideration.

2. POLICY

2.1 Key Principles

- Keele is committed to undertaking excellent research and innovation with integrity that aims to benefit individuals and society, while minimising the risk of harm to all and respecting the rights and dignity of individuals and groups.
- The University has a duty of care, both legal and moral, to all individuals and communities involved in the research process.
- The University is committed to transparency. This and related policies are publicly available, as are the procedures for reporting concerns. We will comply with funder requirements to report concerns or instances of harm.
- The University is committed to a victim/survivor centred approach. Where concerns about safeguarding in research are raised, we will listen and take concerns seriously, and provide appropriate support for the victim/survivor.
- The University will report any criminal activity to relevant authorities, except where such reporting will likely bring further harms to the victim/survivor. This decision should be taken with relevant institutional Safeguarding Leads/Co-ordinators (see the [Safeguarding Policy](#) for details of these roles).
- The University is committed to supporting those involved in assessing and mitigating against the risk of harm. It will signpost resources, provide professional services support for research development and ensure that researchers have access to relevant training.

2.2 Equality, Diversity and Inclusion

- Keele is committed to promoting Equality, Diversity and Inclusion (EDI). This commitment is outlined in our [Equality and Diversity Strategy](#) which is overseen by Human Resources (HR).
- EDI must be considered when assessing vulnerabilities and risk of potential harms. Risks are not experienced equally. All people may potentially be vulnerable to harm due to a range of intersecting factors, including (but not limited to) gender, sexuality, age, race, ethnicity, religion, disability and socio-economic status.
- Risks are context specific and may be exacerbated in particular settings (for example, where projects are working in conflict affected regions, where research involves working with

vulnerable adults or children, etc.). Where research in such scenarios is undertaken, extra care should be taken to manage risk of harm.

- Researchers at all career stages will be supported to implement this policy through the distribution of appropriate resources and professional services support through HR, Keele Doctoral Academy and the Research and Innovation Support (RaISE) team.

2.3. Expectations of Staff and Students Conducting Research

All staff, students and associated personnel involved in conducting research are expected to:

- Familiarise themselves with this policy and other related policies and procedures (see section 4).
- Treat each other, participants, partners and publics with respect. Act with integrity, honesty and professionalism, and embed good practice in every aspect of their research work.
- Conduct safeguarding risk assessments for their projects to assess and mitigate against risks of harm.
- Contribute to the development and maintenance of a positive research culture, that values transparency and integrity, adheres to the highest level of research ethics and enables the prevention of harm.
- Report any safeguarding concerns (see section 2.5).
- Cooperate with any investigations into safeguarding concerns.
- Principal investigators are responsible for ensuring that team members are suitably trained.

2.4 Working Collaboratively with partners

Where research involves collaboration with external partners, it is important that i) partnerships are developed in a transparent, inclusive and equitable manner to avoid exploitation and harms within the partnership and ii) that the partner is familiar with the principles and processes in this Safeguarding Policy, and commits to uphold them during the research process. It is important that researchers:

- Engage in equitable partnerships through research, avoiding exploitative approaches and adopting transparent practices, for example sharing full details of and responsibility for budgets fairly.
- Recognise inherent power imbalances (eg. gender imbalances, inequities between research teams in the global north and south, imbalances related to career stage etc.) and take steps to mitigate these.
- Involve all research partners in design and planning to ensure contextually appropriate activities that reduce risks.
- Agree approaches to safeguarding, where possible in writing, including appropriate methods for reporting, handling and escalating safeguarding issues that occur throughout the collaborative research process.
- Fairly and appropriately credit all contributors.

The University will:

- Undertake risk-proportionate due diligence on all global partners that we work with to help identify and mitigate risks. This includes due consideration of partners' approaches to safeguarding and ethics in research, and to relevant in-country contexts (for example around travel, political sensitivities) that may put people at risk.
- Provide professional services support for ensuring that agreed approaches to safeguarding are documented in collaboration agreements.
- Provide professional services support around the protection of Intellectual Property.

2.5 Existing mechanisms for reporting and addressing concerns

The University has several existing mechanisms for providing information about, reporting concerns, and addressing incidents in a range of areas that relate to safeguarding (including guidance on how to recognise Emergency situations, deal with disclosures, steps to be taken following disclosures, and available support for staff in the Safeguarding Procedure).⁶ The most appropriate route for reporting and addressing concerns or incidents will depend on their nature. A full list of intersecting policies and procedures is included below (section 4). Concerns about safeguarding in research and innovation are particularly likely to intersect with:

- [Research Ethics Policy](#)
- [Research Misconduct Procedure](#)
- [Whistleblowing Policy and Procedure](#)

More detail on how these mechanisms operate can be found in the relevant procedure documentation.

2.6 Establishing mechanisms within research projects

It is also important that individual projects establish appropriate routes for reporting safeguarding concerns raised by or during the research process. Where projects involve human participants, the use of personal data, the use of human tissue, and/or where they will interact with other publics, communities and stakeholders, they must build appropriate mechanisms for reporting, handling and escalating safeguarding concerns into their design. Approaches to this should:

- Include routes for reporting that are independent of the research team.
- Consider barriers to reporting (e.g. language, fear, power imbalances) and how these might be addressed, and how the team will communicate reporting mechanisms to those who might need to utilise them.
- Include an action plan for handling reported concerns or incidents in line with this policy and, depending on location, in line with local law and/or customs.
- Include plans for escalation of concerns to the University.

2.7 Addressing reported concerns or incidents

⁶ These procedures can be found on p.10-14 of the [Safeguarding Policy](#) document. Although these procedures

Concerns will be addressed in accordance with the applicable policy/procedure, depending on their nature. Where concerns or incidents reported via any route involve Research and innovation activities, the person/team receiving the report must also inform the Director of Research Strategy Delivery who will take appropriate action. If the Research team has not already reported the incident to the relevant Research Ethics Committee Chair, the Director of Research Strategy Delivery will do so. The Chair may then decide to reconsider the project's favourable ethical opinion. The Director of Research Strategy Delivery will also ensure that, where appropriate, concerns or incidents are reported to funders and any other necessary organisations (e.g. External partners on collaborative research projects). All parties and individuals involved will maintain the strictest confidentiality.

Where reports of concerns or incidents require further investigation, investigations will be conducted following principles set out in the relevant procedure, along with the Disciplinary and Appeals Procedure and any other relevant University statutes. Following investigations, individuals may also be excluded from conducting research on University premises or on behalf of the University and honorary/visiting contracts/titles may be withdrawn, following liaison with the relevant substantive employer.

Irrespective of the individual procedure a complaint or incident falls under, the following principles apply. The University will:

- Address any immediate safety concerns and/or offer support to affected individuals.
- Deal with concerns and complaints in a timely manner.
- Take a victim/survivor centred approach, listen and take concerns seriously.
- Maintain the highest level of confidentiality.
- Take appropriate action, including reporting to appropriate authorities (except where this would cause further harm to the victim/survivor).
- Take appropriate action at individual, departmental or organisational level to ensure, as far as possible, that similar concerns do not arise in the future.
- Notify funding bodies and other authorities as required/appropriate.

3. ROLES AND RESPONSIBILITIES

The University (via the Research Committee and Pro Vice Chancellor for Research and Innovation) is responsible for ensuring that appropriate policies, procedures and support are in place to enable safeguarding in research and innovation. The University is responsible for taking reports of concerns seriously and acting in a fair and timely manner to address any concerns or incidents. Keele's RaISE team and the Director of Research Strategy Delivery are responsible for supporting this policy and its implementation, and for ensuring that concerns are reported to funders where this is required.

All individual research staff and students must be familiar with and comply with this policy. This includes taking personal responsibility for treating each other, research participants, partners and members of the public with dignity and respect, and taking steps to anticipate, mitigate and address safeguarding risks, as appropriate for their own role. All research staff and students must adhere to the [institutional Research Ethics Policy](#), and should undertake a safeguarding risk assessment when planning research and innovation activities. Principle

Investigators and (in relation to postgraduate students) Supervisors have overall responsibility for ensuring that projects are delivered in line with this policy and related ones.

4. RELATED POLICIES AND PROCEDURES

This policy sits alongside and complements:

- (1) Existing Keele University policies on research, including
 - [Research Integrity Policy – Keele University](#)
 - [Research Misconduct Procedure – Keele University](#)
 - [Research Code of Good Practice – Keele University](#)
 - [Research Ethics Policy – Keele University](#)

- (2) Existing Keele University policies that relate to our moral and legal obligations around safeguarding, and through which safeguarding issues may be reported and/or addressed, that are not specific to research, including:
 - [Safeguarding Policy and Procedures- Keele University](#)
 - [Bullying and Harassment Policy & Procedure - Keele University](#)
 - [Dignity and Respect Policy & Procedure – Keele University](#)
 - [Sexual Violence and Misconduct Policy – Keele University](#)
 - [Religion and Belief Policy – Keele University](#)
 - [Gender Segregation Joint Code of Practice – Keele University](#)
 - [Equality and Diversity Strategy – Keele University](#)
 - [Lone Working Policy – Keele University](#)
 - [Whistleblowing Policy – Keele University](#)
 - [Anti-Bribery Policy – Keele University](#)
 - [Freedom of Expression Code of Practice – Keele University](#)
 - [Data Protection Policy – Keele University](#)
 - [Personal Relationships at work Policy – Keele University](#)
 - [Management of Conflicts of Interest Policy – Keele University](#)

5. REVIEW, APPROVAL & PUBLICATION

- This Policy and associated procedures will be reviewed after the first 12 months and then every two years after that, by the Director of Research Strategy Delivery, but will also be updated as and when required due to external regulation and guidance changes.
- This Policy will be submitted to Senate, via University Research Committee, for approval together with any subsequent reviews.
- The Policy will be stored in the Policy Zone: [Policy Zone - Keele University](#)

6. ANNEXES

Other documents supporting this policy include:

- Safeguarding in Research and innovation Guidance
- Safeguarding in Research Risk Assessment Tool
- Institutional Research Due Diligence Forms (the latest version of these can be obtained by emailing research.global@keele.ac.uk)

7. DOCUMENT CONTROL INFORMATION

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