

Safeguarding Policy and Procedures for Children and Vulnerable Adults

The Institute for Fiscal Studies

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1. Introduction and Purpose

The Institute for Fiscal Studies (IFS) is strongly committed to the welfare of all research participants, and to protecting them from abuse and exploitation.

We will uphold the highest possible ethical and professional standards when conducting research, and will consistently work to ensure that participating in our research is safe for the children and vulnerable adults with whom we work.

The purpose of this Policy and procedures is to:

- Outline the standards that we expect all IFS staff members and representatives to adhere to when working for, or on behalf of IFS;
- Outline the main safeguarding risks faced by IFS;
- Outline concrete procedures which will help to mitigate these risks through increased awareness and the prevention of abuse or exploitation; and
- Outline procedures for reporting and responding to potential instances of abuse or exploitation.

Any breach of this Policy will be treated as a disciplinary matter, which may result in immediate termination of employment or contract, and reporting to law enforcement authorities and other relevant regulatory authorities or bodies.

2. Policy

2.1 Scope

This Policy applies to all:

- **IFS staff members**, summer students, PhD scholars and affiliated researchers (Research Associates, Research Fellows, Visiting Scholars) who are working within the scope of an IFS project which involves human research participants.
- **IFS Representatives**, including:
 - Individuals who have a collaborator or consultancy agreement with IFS;
 - Trustees and executive committee members;
 - Funders, supporters, journalists, politicians and others who may come into contact with children through their involvement with IFS.

Staff members and representatives of partner organisations are covered under Section 2.5. This section outlines in detail how this Policy relates to partner and sub-contractor organisations. These organisations will be expected to share their internal policies and procedures in the early stages of partnership discussions, and as part of the due diligence process. Where these do not already exist, IFS will work with partner and sub-contractor organisations to ensure that IFS Policy is applied and implemented.

2.2 Definitions

Child	A person under the age of 18
Vulnerable adults	<ul style="list-style-type: none"> • A person who is, or maybe, unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation; • A person who, due to their gender, age, mental or physical health, disability, or as a result of poverty, disasters or conflicts, are deemed to be at increased risk of harm or exploitation.
Abuse	Anything which individuals, institutions, or processes do, or fail to do, which directly or indirectly harms children or vulnerable adults.
Physical abuse	Purposefully injuring or threatening to injure a child or vulnerable adult
Emotional abuse	A chronic attack on an individual's self esteem. It can take the form of name calling, threatening, ridiculing, intimidating or isolating
Neglect/negligent Treatment	Persistent failure to meet basic physical and/or psychological needs, for example by failing to provide adequate food, clothing and/or shelter; failing to prevent harm; failing to ensure adequate supervision; or failing to ensure access to appropriate medical care or treatment
Sexual abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Engaging a child sexually regardless of consent
Sexual exploitation	Any 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
Survivor	A person who has been abused or exploited
Financial or material abuse	Theft, fraud, exploitation, misuse or misappropriation of property, possessions or benefits
Discriminatory abuse	Ageism, racism, sexism based on disability or other harassment.
Human research participant	A living individual about whom an investigator conducting research obtains (1) data through intervention or interaction with the individual; or (2) identifiable private information.

2.3 Responsibilities of IFS staff and representatives

Our capacity to ensure the protection of the children and vulnerable adults that we work with depends on the ability of staff to uphold and promote the highest standards of ethical and professional conduct. Our work may put us in positions of power in relation to children and vulnerable adults. We have an obligation not to abuse this power.

All staff members and representatives of IFS are obliged to follow this Policy and maintain an environment that prevents exploitation and abuse, which encourages reporting of breaches of this Policy using the appropriate procedures, and which places the well-being of potential victims and survivors at its heart.

All staff members and representatives of IFS will:

- Read, understand and adhere to the IFS Safeguarding Policy;
- Strive to promote a zero-tolerance approach to abuse and discrimination in all working environments;
- Be aware of the power that we may have over children and vulnerable adults who participate in our research projects and incorporate this awareness into the design and implementation of our work;
- Strive to develop relationships with all stakeholders which are based on equality, trust, respect and honesty;
- Place the safety and welfare of children and vulnerable adults above all other considerations;
- Report any concerns we may have about the welfare of children or vulnerable adults;
- Report any concerns we may have about the behaviour of a staff member or representative of IFS or a partner organisation in relation to safeguarding;
- Wherever possible, ensure that another adult is present when working in the proximity of children.

All staff members and representatives working with IFS will not:

- Engage in sexual activity with anyone under the age of 18;
- Sexually harass, assault or abuse another person;
- Physically harass, assault or abuse another person;
- Emotionally abuse another person, such as engaging in behaviour intended to shame, humiliate, belittle or degrade;
- Condone, or participate in behaviour which is abusive, discriminatory, illegal, or unsafe;
- Develop, encourage or fail to take action in relationships with children or vulnerable adults which could in any way be deemed sexual, exploitative or abusive;
- Act in ways that may be violent, inappropriate or sexually provocative;
- Agree with a child or vulnerable adult to keep a secret which has implications for their safety or the safety of other young people.

2.4 Risk assessment

IFS is a research institution whose staff members and representatives spend limited amounts of time in direct contact with children and vulnerable adults. This Policy identifies four key areas of risk that IFS staff members, representatives and managers should be particularly conscious of in the conduct of our work:

- i. Our research design is unethical and places an undue or unacceptable burden on children or vulnerable adults, or directly or indirectly increases their risk of abuse or exploitation;
- ii. Conducting in-depth research on sensitive topics with vulnerable children and adults may mean that incidents of abuse or exploitation become known to IFS staff or representatives;
- iii. IFS staff members or representatives are directly involved in the abuse or exploitation of children or vulnerable adults;
- iv. Staff members from partner organisations are directly involved in the abuse or exploitation of children or vulnerable adults;

The specific identification of the institution's major risks is designed to ensure that IFS' awareness, prevention, reporting and response procedures are targeted and appropriate, therefore minimising the risks to children and vulnerable adults. These risks will be reviewed every two years at a minimum, or updated in response to specific cases or concerns

2.5 Working with partner and sub-contractor organisations

In this Policy, "partner organisation(s)" or "partner(s)" is taken to refer to all organisations with whom we collaborate on a specific research project or intervention, irrespective of the nature of contractual arrangement which governs the collaboration.

Where IFS is working in partnership with another organisation and this work involves contact with children and vulnerable adults, we will request that the organisation shares its Safeguarding Policy and procedures with us, and we will review these in order to ensure that they meet best practice, and are appropriate to the type of work that they are undertaking. We will also ensure that each organisation is made aware of the IFS' Safeguarding Policy.

Where an organisation does not have Safeguarding Policy and procedures in place, IFS will require the organisation to sign up to this Policy through the agreement or contractual arrangement between the two parties, and take concrete measures to ensure that it is implemented, complied with, and enforced. We will seek to do this initially through our due diligence and contracting processes, and subsequently through continued dialogue and engagement with our partners.

All projects which work directly with human research participants and are funded by IFS must:

- Be governed by a Safeguarding Policy setting out standards and written procedures for the management of protection complaints.
- Have appropriate recruitment and screening processes, including, where relevant and possible, criminal record checks prior to engagement, targeted interview questions and referee checks for all those who will be working directly with children and vulnerable adults.
- Provide safeguarding and child protection training for staff members who work directly with children and vulnerable adults.
- Have ethical approval from an approved Institutional Review Board/Research Ethics Committee, as well as local ethical approval if relevant institutions exist.

- Ensure that there is provision in all employment contracts that the organisation has the right to dismiss a staff member or representative if he/she breaches this Policy.
- Have a reporting mechanism where the IFS Principal Investigator and Head of Operations is informed promptly in writing if anyone implementing IFS-funded activities is alleged to have committed, been arrested for, or convicted of criminal offences relating to abuse or child pornography.

3. Procedures

3.1 Awareness procedures

Policy awareness

- The Policy will be available on the IFS intranet, and all staff members will be informed about the Policy during the annual IFS induction process.
- Staff members and representatives who are expected to work with human research participants must receive this Policy during the induction process and must sign a declaration of acceptance indicating that they agree to abide by it. Scans of signed declarations will be stored in the Safeguarding folder on the secure network.

Awareness of research ethics

- All staff members and representatives must abide by the IFS' Policy on *Good Practice and Misconduct in Academic Research*, which encourages the highest possible standards of intellectual honesty and integrity. Any breach of this code may result in disciplinary action being taken against staff members and result in summary dismissal.
- During the induction process, all staff members must read the Social Research Associations' *Ethical Guidelines*.
- During the induction process, all staff members who work with human research participants must complete an approved course on research ethics and protecting human research participants.

Working with partner organisations

- IFS will carry out a due diligence process of all potential partners during the preliminary stages of the partnership, and before any collaboration agreement or contract is signed. As part of this process, we will share this Policy and request that partner organisations share details of their existing policies and procedures. The due diligence process will allow IFS and partners to discuss and be aware of any potential gaps, and design appropriate procedures to fill them.

3.2 Prevention procedures

Seeking ethical approval from Institutional Review Boards (IRBs)

- All research projects which involve human research participants must receive ethical approval from the relevant Institutional Review Board(s) (IRB(s))/Research Ethics Committees (REC(s)) before any data collection project activity commences. Applications to IRBs/RECs should contain a detailed and thorough assessment of the potential risks to research participants, and outline concrete steps to mitigate

such risks. Specific attention will be given to the potential risks to children and vulnerable adults.

Recruitment and selection

- Safe recruitment and vetting processes will be followed for all staff members and representatives. These include checking two references and requests to disclose criminal records where this might be relevant to the role.

Checks

- It is not usually necessary to carry out Disclosure and Barring Service (DBS) checks on IFS staff or representatives as they do not have unsupervised access to children or vulnerable adults. Completing a DBS check may be required for those involved in particular research projects, however, and we will use guidance from the IRBs/RECs and assess this on a case-by-case basis according to the project.

Staff practices

- Where possible IFS staff members and representatives should follow the “two-adult” rule, wherein two or more adults supervise all activities where children are involved and are present at all times. In some instances, for example when a project involves working with teenagers and young adults under the age of 18 and involves the discussion of sensitive topics, a two-adult rule may not be appropriate, and staff members should exercise judgement in such cases.
- Staff and representatives must not stay alone overnight with one or more children participating in IFS projects whether in their house, or elsewhere.
- Staff members and representatives should not place themselves in compromising or vulnerable positions and should take care not to discriminate against, show differential treatment towards, or favour particular children or vulnerable adults to the exclusion of others.

Use of child photos

- Any communications materials that include images of, or information about, children are subject to the IFS’ *Copyright and Permissions Policy*.
- Information, pictures, images, or other likenesses of children and/or information related to children and vulnerable adults will not be made available through any form of communication media without proper protection and understanding of their use.
- Images with text which may identify a child or vulnerable adult should never be used.

3.3 Reporting procedures

Failure to report concerns in accordance with this Policy will be treated as a serious issue and may result in disciplinary action.

Reporting ethical concerns about research design or project implementation

- All staff members and representatives who directly witness incidents of poor ethical practice in piloting, data collection or implementation activities should discuss this with colleagues and partners, and where appropriate request that activities cease until the concern has been resolved.

- All IFS staff members and representatives must report to an Associate Director, or Principal Investigator if they have any concerns that the design or implementation of an IFS research project is unethical and/or places an undue or unacceptable burden on children or vulnerable adults, or directly or indirectly increases their risk of abuse or exploitation.

Reporting concerns about possible abuse or exploitation which are disclosed as part of the research process

This section relates to concerns which may arise based on information which is disclosed to IFS staff or representatives through the process of collecting qualitative or quantitative data, or concerns which arise from observations, informal discussions, or visits to research participants' homes.

Protecting the privacy and confidentiality of research participants is a fundamental principle when conducting ethical research. It may be necessary to override this principle to prevent harm to research participants, however, or if required to by law. IFS staff members should work with Associate Directors and Principal Investigators, carefully considering the circumstances in order to decide whether it is necessary to breach the privacy or confidentiality of a research participant.

- All IRB/REC applications must provide procedures and mechanisms for reporting potential concerns about abuse or exploitation which arise as part of the process of conducting research. These procedures will be country-specific and will vary depending on the availability and capacity of child protection and law enforcement authorities to receive, process and manage incidents. IFS will work with partner organisations to design these procedures on a case-by-case basis and in line with the relevant regulatory and institutional context. Applications to the IRB/REC must carefully consider the appropriate procedures where weak institutional structures and reporting mechanisms exist.
- All incidents which become known to staff or representatives of IFS through the process of conducting research must be reported to an Associate Director and the Principal Investigator in the first instance. They must then inform the Head of Operations and IFS Director.
- All incidents must also be reported to the relevant IRB(s)/REC(s).

Reporting concerns about suspected abuse or exploitation perpetrated by a staff member or representatives of IFS or a partner organisation

- It is mandatory that any concern, suspicion, belief or allegation of actual or potential sexual or physical abuse or exploitation (past or present) by a staff member or representative of IFS or a partner organisation is reported immediately to an Associate Director. The Associate Director must inform the IFS Director and Head of Operations, who will work with IFS partners, and other senior IFS staff members as appropriate.
- If a research participant reports an incident, they must be taken seriously and listened to carefully. Once an allegation is made there should be an immediate response that protects them from further potential abuse or victimisation. Where appropriate, the family/carers of the person affected should be informed of the allegation and action proposed and they should be consulted where possible as to the process to be followed. This process will be led by the Associate Director and the Head of Operations, liaising closely with partner organisations.

Documenting the incident

- Reported incidents must be documented immediately and comprehensively by the Associate Director or Head of Operations. The report must include the concern, suspicion, belief or allegation and the time, place, witnesses and any action already taken.

Establishing a safeguarding log

- IFS will maintain a Safeguarding Log to ensure that all incidents are recorded accurately and comprehensively.

3.4 Response procedures

Responding to ethical concerns about research design or project implementation

- Where concerns about the design or implementation of a specific research project have been raised, Associate Directors and Principal Investigators must discuss these with IFS Research Directors. In most instances it will be appropriate to refer the concern to the relevant IRB/REC for further, independent guidance. It may be necessary to modify research design or implementation based on the recommendations of the Research Directors and the IRB/REC.

Responding to concerns about possible abuse or exploitation which are disclosed as part of the research process

- Associate Directors and Principal Investigators will work closely with partner organisations to implement the procedures already outlined in the project's IRB/REC application. It may be necessary to seek confidential advice from local safeguarding experts to ensure that the procedures remain relevant and provide appropriate protection and support to the survivor.
- The Principal Investigator must inform the relevant IRB/REC of the actions taken.

Responding to concerns about suspected abuse or exploitation perpetrated by a staff member or representative of IFS or a partner organisation

IFS will take all necessary steps to support and protect children and vulnerable adults where concerns have arisen regarding instances of possible exploitation or abuse. We will work closely with project partners to ensure that responses, both in the UK and elsewhere, are appropriate and follow local and international best practice. In some instances, it may also be necessary to seek confidential external guidance and support to ensure that IFS is responding appropriately.

The following procedures will apply:

1) Investigation of complaints

Physical and sexual abuse and exploitation are crimes. All staff and representatives of IFS and partners must be aware that any allegation made against them will be investigated under this Policy:

- IFS is required to notify law enforcement authorities when there are reasonable grounds for reporting an incident. For allegations about incidents made outside of the UK, IFS will consider local legislation and work with partners to follow the

appropriate procedures. This may result in criminal investigation and prosecution under the law of the country in which the staff member or representative is based, or are working at the time of the allegation or alleged incident.

- IFS may conduct disciplinary procedures in accordance with this Policy and the disciplinary procedures in the Scheme of Conditions of Service.

2) Distance the alleged perpetrator

- It may be necessary to suspend a staff member before a formal investigation is complete. This will be done in accordance with IFS' disciplinary procedures. IFS will aim to make a fair and formal decision in a timely manner.

3) Ensure appropriate support for staff members involved in reporting the concern or incident

- Any staff member who reports concerns about any form of abuse or exploitation, or provides information or assistance in relation to a suspected incident may require additional support from IFS management.
- Professional counselling support will also be made available.

4) Report the outcomes to the relevant authorities

- All outcomes of safeguarding investigations must be fully documented and reported to the IRB/REC and the IFS Executive Committee.

4. Confidentiality

IFS has a duty to manage sensitive information in a manner that is respectful, professional and that complies with applicable laws. It is essential that IFS staff members and representatives maintain confidentiality at all stages of the process when responding to safeguarding concerns. Information relating to safeguarding concerns and subsequent management of the response should be shared on a *need to know* basis only, and should be kept secure at all times.

5. Responsibilities of IFS Management and Executive Committee

The Head of Operations will act as a Safeguarding Lead at IFS.

IFS Senior Management is responsible for, and committed to:

- Ensuring that staff members and representatives of IFS and partner organisations are aware of this Policy and are supported to implement and work in accordance with it.
- Fostering a management culture that encourages a focus on safeguarding. Management must be responsive, acting immediately if they become aware of any safeguarding concerns, and supportive towards staff members who raise concerns about breaches in this Policy.

- Taking all appropriate corrective actions, including disciplinary, legal or other actions in response to any violation of this Policy, other applicable policies, procedures, and protocols.
- Reporting all incidents and outcomes to the IFS Executive Committee.
- Reviewing this Policy every two years, or more frequently if required.

The Executive Committee is responsible for:

- Providing support to IFS Management to implement and enforce this Policy.
- Reporting all serious incidents to the UK's Charity Commission.
- Reviewing this Policy every two years, or more frequently if required.

6. Associated Policies

- Conditions of Service
- Copyright and Permissions Policy
- Disciplinary Procedures
- Due Diligence Guidelines and Template
- Health and Safety Policy
- Good Practice and Misconduct in Academic Research
- Social Research Association's *Ethical Guidelines*
- Whistle Blowing Policy

7. Declaration of Acceptance

All IFS staff and representatives who are expected to come into direct contact human research participants through their work at IFS must sign a **Declaration of Acceptance**, prior to or at the time of issuing of any employment contract, to demonstrate awareness of and willingness to act in accordance with this Policy.

8. Acknowledgements

This Policy draws on policy documents, statements and materials in use at other organisations. The following sources have been used in its preparation:

Bond (2018), *Safeguarding Policy*. London: Bond

Care International UK, *Protection Policy for Vulnerable Adults & Children*. London: Care International

Save the Children (2017), *Child Safeguarding Policy*. London: Save the Children

Voluntary Service Overseas (VSO) (2018), *Safeguarding and Child Protection Policy*. London: VSO