

Safeguarding Students Policy

(Incorporating prevention of harassment and sexual misconduct)

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13. If this policy has been reviewed, has this resulted in a minor or major changes?	Major
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Always view the current version of the document via the Knowledge Exchange Policy Hub.

Modifications from previous version of document

Version	Date of issue	Details of modification
2	30.06.25	<ul style="list-style-type: none"> Major edits following the release on the Office for Students (OfS) Condition (E6) on harassment and sexual misconduct Student engagement events were held with students on the new OfS guidance, the learning from these has been incorporated into this revised edition.

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1. INTRODUCTION AND CONTEXT - WHAT IS SAFEGUARDING?

- 1.1 Safeguarding means “Preventing harm to people... it means taking all reasonable steps to prevent sexual exploitation, abuse and harassment (SEAH) from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.” (Safeguarding Resource and Support Hub n.d.)
- 1.2 The UK Collaborative on Development Research define safeguarding as preventing and addressing:
“Any sexual exploitation, abuse or 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 physical violence” (UKCDR, 2020)
- 1.3 Liverpool School of Tropical Medicine (LSTM) recognises its duty of care in safeguarding and protecting beneficiaries, research participants, patients and communities with whom we have direct and indirect contact through our work, and in protecting staff, students, volunteers, collaborative partners and other representatives. Safeguarding includes the protection of students from harassment and sexual misconduct, including that which occurs in any intimate relationships with staff.
- 1.4 UK Higher Education Institutes that are registered with the UK Office for Students (OfS) are required to prevent and address Condition E6: Harassment and sexual misconduct (in force from 1 August 2025)
- 1.5 LSTM has developed its procedures and processes for safeguarding students with due consideration of the key guidance documents and requirements from the [Office for Students](#), [UUK](#) and the [IASC](#).
- 1.6 The purpose of this policy is to ensure that as an organisation we:
- Have systems and processes in place to guide and support staff in their role in safeguarding and protecting students
 - Protect students from all types of abuse, exploitation or intentional and/or unintentional actions and failings that place them at risk of injury and/or any other harm, including from harassment and sexual misconduct and abuse of power.
 - Have systems in place to deal well with any allegations, complaints and cases of all types of abuse and exploitation by our own personnel against students or by students themselves, through effective implementation of safeguarding policies and procedures.
- 1.7 **Freedom of speech**
- The principles of free speech are a fundamental consideration when a provider produces policies and processes for dealing with harassment and sexual misconduct and when it acts under those policies to comply with condition E6. Please refer to Appendix 1 for further information.
- 1.8 This policy should also be read in conjunction with the:
[Student Mental Health Policy](#)
[Tackling Sexual Harassment and Misconduct Policy](#)
[Dignity at Work and Study Policy](#)
[LSTM Relationships policy – Staff and students](#)
[LSTM Safeguarding \(Protecting children and vulnerable adults\) policy](#)

- 1.9 LSTM also has specific policies in place in relation to safeguarding students at risk of being drawn into extremism:

[Policy on the prevent escalation process at LSTM](#)

[Policy in Response to Prevent Guidelines as part of the Counter-Terrorism and Security Act 2015](#)

Concerns related to academic integrity and academic procedures are **NOT** covered by this safeguarding students' policy and you should refer to the relevant policies on Brightspace <insert link>.

2. DEFINITIONS

For a full list of definitions used in this policy please refer to Appendix 2.

3. SCOPE

- 3.1 This Policy applies to all LSTM students and staff (including employees, volunteers, consultants, contractors, honorary and emeritus staff and other representatives of LSTM and the wider LSTM group of companies and subsidiaries; whether national or international, full-time, part-time or engaged on short-term contracts) in the UK and overseas.
- 3.2 Breaches in the policy by staff and students may lead to disciplinary action. In some cases, it could lead to criminal prosecution. LSTM reserves the right to refer alleged instances of abuse to the relevant professional body and/or the police authorities.
- 3.3 For partners/contractors and volunteers, breaches may initiate the termination of relations including contractual & partnership agreements. Where relevant, the appropriate UK legal or other frameworks will be referred to. LSTM reserves the right to refer alleged instances to the relevant professional body and/or the police authorities as necessary.
- 3.4 This policy covers subject matter relating to Condition E6 of the OfS (2024), relating to incidents of harassment and/or sexual misconduct which affect one or more students, (including the conduct of staff towards students, and/or the conduct of students towards students or students towards staff).
- 3.5 This policy applies in relation to students on higher education courses provided in any manner or form by, or on behalf of LSTM (including, but not limited to, circumstances where we are responsible only for granting awards for students registered with another provider).

4. SAFEGUARDING STUDENTS STATEMENT

- 4.1 LSTM aims to create a safe learning environment (in classroom settings, during any external placements and during visits to international sites and on-line), where our students can study safely and enjoy rewarding and stimulating experiences.
- 4.2 LSTM recognises its responsibility to safeguard the wellbeing of students and, where necessary, to work closely with statutory and voluntary local agencies to ensure that they are not put at risk of harm or abuse.

- 4.3 LSTM has developed a Safeguarding Process (see section 6 onwards) which sets out how LSTM staff and students can report concerns about an individual's welfare within LSTM and that these will be addressed quickly and appropriately.
- 4.4 As far as possible, the confidentiality of all individuals involved in safeguarding concerns will be respected. However, there may be circumstances where it is necessary to share information with third parties such as the police, health care professionals or social workers external to LSTM, or to a child's/vulnerable adult's parents or guardians. Remember that **where there are concerns about the immediate welfare or safety of a person under 18 years, information will have to be shared**, and this will be carried out by a safeguarding lead or focal person.
- 4.5 Harm and abuse may take many different forms. Individuals may have different perceptions of what constitutes harm or abuse. For the purposes of this policy, LSTM consider the types of safeguarding harm/abuse that can be experienced or perpetrated by students (this can be face-to-face or online) to be:
- Sexual abuse, including sexual harassment, sexual assault, sexual misconduct
 - Physical abuse
 - Abuse of power
 - Psychological abuse
 - Financial or material abuse or vulnerability
 - Modern slavery
 - Discriminatory abuse, including hate crime
 - Organisational/institutional abuse
 - Domestic abuse/domestic violence
 - Neglect or acts of omission
- 4.6 Students may also face vulnerabilities related to their mental health and wellbeing and also experience self-neglect. For student mental health concerns please refer to the [Student Mental Health Policy](#)
- 4.7 An 'incident' of harassment and/or sexual misconduct includes a wide range of circumstances. For example, it includes, but is not limited to, allegations, complaints, suspected behaviour, and formal findings of harassment and/or sexual misconduct. This means that it also includes instances where a formal complaint is not made, or where there is insufficient evidence to progress to disciplinary proceedings.

4.8 Intimate personal relationships

- 4.8.1 A personal relationship between a staff member and a student raises questions of potential abuse of power, conflict of interest, of trust and confidence in working relationships and of equal treatment in teaching, learning, supervision, selection, assessment, research and pastoral support.
- 4.8.2 LSTM **strongly discourages** '*intimate personal relationships*' between staff members and students. This means a relationship that involves one or more of the following elements:
- i. physical intimacy including isolated or repeated sexual activity; or
 - ii. romantic or emotional intimacy.

- 4.8.3 LSTM acknowledges that as a post-graduate Higher Education institution, students are over the age of 18 and that there may be times where relationships develop between staff members and students, that may be romantic or sexual in nature.
- 4.8.4 LSTM has a duty of care to ensure that abuses of power do **not** occur.
- 4.8.5 In the event of physical intimacy, or romantic/emotional intimacy or relationship, staff members and students should be transparent and declare this as soon as possible via the declaration form, which you can find on the [ESS](#).
- 4.8.6 For the full guidance on intimate personal relationships, and making a declaration, please refer to the LSTM Relationship Policy – Staff and Students

4.9 Protecting students during international work and study

- 4.9.1 LSTM recognises that students may have increased vulnerability when they are working in isolated, international settings during their research and study. All supervising academics and Group Leaders have a responsibility to assess whether a student's research project could pose safety, security and/or safeguarding risks to the student and ensure that safety and security risk assessments and associated risk mitigations are in place. LSTM provides international travel safety training to students.
- 4.9.2 The UK Collaborative on Development Research (UKCDR) notes that students, and early career researchers may face additional safeguarding risks and vulnerabilities during international study and scientific research placements, this can be due to:
- Less experience and familiarity/knowledge of local politics and society
 - Being less prepared to respond to security issues, physical and mental rigours and emotional and ethical challenges
 - Additional pressures faced with degree timelines, funding constraints and failing to complete their research
 - Less support available from in-country research teams
 - Tolerating harassment to allow their research to proceed, they may want to “downplay” any difficulties they are having so they are seen as good/competent researchers
 - Being less willing to report issues or concerns for fear of jeopardising research and worries about educational and career prospects.
- (UKCDR commissioned evidence review by D Orr et al, 2019)

5. RAISING CONCERNS

- 5.1 A range of different mechanisms are provided at LSTM so that staff and students, research partners, research participants and members of the community are able to raise concerns, including in person, or online.
- 5.2 The easiest way for staff and students to raise concerns about harm or abuse is by reporting them using LSTM's and confidential reporting system, [VAULT](#). The VAULT app can be accessed via a mobile using the instructions on the intranet here: <https://content.vaultplatform.com/client-assets/videos/mobile-app/mobile-app.mp4>

Whilst it is possible to raise concerns on VAULT anonymously, (and a person can reply to you anonymously through the system, even though we don't know who you are), we encourage and support all staff and students to raise concerns personally, wherever possible, as we may not be able to fully investigate anonymous concerns.

- 5.3 You don't have to be personally affected to report. If you witnessed something, heard something, or are worried about something or someone, you can raise a concern.
- 5.4 You can also contact the Educational Safeguarding Lead Professional, an Educational Safeguarding Focal Point, or Dignity & Respect Champion about your concern. This can be by phone, email or in person. (Please see Table 1 below for contact details).
- 5.5 If you don't want to contact someone in the Faculty of Education, you can contact LSTM's Designated Safeguarding Lead in person, by phone or by email at:
safeguarding@lstmed.ac.uk

Table One: UK Safeguarding Contacts.

LSTM Designated Safeguarding Lead (DSL) Philippa Tubb, Managing Director, Well Travelled Clinics	safeguarding@lstmed.ac.uk or phil.tubb@LSTMed.ac.uk Tel: + 44 151 705 3744
Education Safeguarding Lead Martyn Stewart, Head of Student Experience and Professional Short Courses	martyn.stewart@LSTMed.ac.uk Tel: + 44 151 705 3292
HR Safeguarding Lead Carol Hughes, Head of People Services	carol.hughes@LSTMed.ac.uk Tel: + 44 151 705 3783
Educational Safeguarding Focal Points:	
Mia Lindfield Student Academic Support Officer	mia.lindfield@LSTMed.ac.uk studentlife@lstmed.ac.uk
Leon Smith Academic Registrar	leon.smith@LSTMed.ac.uk +44 151 832 1647
Richard Madden PGR Team Manager	richard.madden@LSTMed.ac.uk +44 151 705 3758
David Pevalin Associate Dean	david.pevalin@LSTMed.ac.uk +44 151 452 2604

- 5.6 Research participants, community members and external partners, who do not have access to LSTM's Sharepoint (intranet) system, can also raise concerns using the online LSTM VAULT Open Reporting system:
<https://app.vaultplatform.com/lstmed.ac.uk/open-reporting/>
- 5.7 If the concern relates to a child or vulnerable adult, then you **MUST** refer the matter to the Designated Safeguarding Lead (or the Educational or HR Safeguarding Lead) as soon as possible. If the situation is an emergency, then you should contact the police.
- 5.8 For cases in the UK, it is the role of the Designated Safeguarding Lead, or one of the professional leads to carry out a safeguarding referral regarding a child or vulnerable adult to the local child or vulnerable adult safeguarding board, via the appropriate Child or Adult Careline.

If an individual makes a disclosure to you, they may ask for the matter not to be escalated further and ask you to keep the matter confidential. In some circumstances it may be appropriate to maintain this confidentiality provided:

- a) there is no risk to a child or vulnerable adult
- b) a serious crime has not been committed

Provided these two criteria are met, then a recipient of a disclosure may signpost the individual towards an appropriate external organisation themselves (please refer to Appendix 3), in order that they may get support with their problem.

- 5.9 For safeguarding issues cases at international locations, you should refer any safeguarding matters to either the Safeguarding Lead in Liverpool: safeguarding@lstmed.ac.uk or one of the local safeguarding leads in our collaborative partners, (See Appendix 4) or the Principal Investigator/Senior Manager in your location.

6. SURVIVOR CENTERED APPROACH

- 6.1 A survivor-centred approach (SCA) means ensuring that the complainants'/survivors' rights are considered at all times. It means placing the complainant/survivor at the centre of decisions and processes that involve them. This means respecting their voices and choices.
- 6.2 Survivor-centred approach means ensuring that prevention and response are non-discriminatory and respect and prioritise the rights, needs and wishes of survivors, including groups that are particularly at risk or may be specifically targeted for SEAH.
- 6.3 LSTM will:
- Not make assumptions about the needs of the complainant/survivor
 - Ensure confidentiality, safety, respect and non-discrimination of the survivor
 - Take complainants'/survivors' wishes into account
 - Keep survivors informed about what is happening during any investigation
 - Keep in mind the potential effects of an investigation on the survivor - create a "community of care" for them
 - Identify who is best able to provide support for recovery - this will include local external agencies
 - Ensure that all staff and students who are the subject of complaints receive appropriate support and are referred to relevant services as necessary.

7. SINGLE COMPREHENSIVE SOURCE OF INFORMATION

- 7.1 LSTM provides a [single comprehensive source of information](#) on our website, where students may find clear information on:
- Harassment and sexual misconduct and other safeguarding issues,
 - How a report can be made, both online and in person by complainants, witnesses, research participants, external collaborative partners and others.
 - The mechanisms in place to support reporting, including anonymous reporting
 - How we are trying to overcome barriers to reporting
 - How information will be treated and handled sensitively and used fairly, including:
 - with appropriate confidentiality, irrespective of the reporting mechanism
 - how information is handled (as set out in data protection legislation).
 - how information may be used, e.g., during a disciplinary process for a staff member/student.

- How LSTM will ensure that investigations and subsequent decisions made in respect of incidents of harassment and/or sexual misconduct are credible, fair and free from perceptions of bias and reflect established principles of natural justice in practice, including a policy which sets out a clear, easy to understand process for investigations or decision-making against a student or a member of staff.

8. SUPPORT FOR STUDENTS

- 8.1 Students can access appropriate support when they wish to raise concerns or complaints, or if they are cited as a subject of a complaint. This support is available whether or not a formal report is made.
- 8.2 Support is available to students who have alleged and/or experienced harassment or sexual misconduct, whether or not the incident has occurred on LSTM's premises or during/in connection with a student's registration.
- 8.3 There are several people at LSTM who can provide support to students; depending on the type of issue you want to raise, or the type of support you need:
- Safeguarding Focal Points or Leads
 - Dignity and Respect Champions
 - Educational Supervisors
 - Line Managers and Pls
 - HR staff
 - Educational Staff

If you are unsure who to go to, speak with one of the UK or international safeguarding contacts given in section six.

- 8.4 LSTM staff can refer students to the internal Student Counselling Services, or to the Student Academic Support Officer.
- 8.5 Support is available to students with different needs, including those with protected characteristics. We have specific staff/student networks in place where you can seek advice and support:
- [BAME Network](#)
 - [LGBTQ+ Network](#)
 - [Disability and Carers Network](#)
 - [Women in LSTM Network](#)
- 8.6 We can also make external referrals to specialist services such as:
- Sexual Violence Referral Centre
 - Domestic Violence Services
 - Mental Health Services
 - Drug and Alcohol Services
- 8.7 Students who have experienced harassment or sexual misconduct, or have witnessed it, and any staff or student who is the subject of a complaint will be provided with relevant academic support, and we have processes in place for extenuating circumstances and extension or support with assessment. You can find out about these in our [Education Quality Manual](#).

- 8.8 HR and/or Education staff will also provide support during any investigation or decision-making processes to complainants, witnesses and to any staff/student who is the subject of a complaint. Support can be provided before any formal investigation, for the duration of an investigation, and following its outcome.
- 8.9 Support is provided to ensure the continued academic engagement of any student involved in an investigation, or a disciplinary or similar process, where a student wishes to continue studying. It may be appropriate to make changes to academic and/or assessment arrangements for a student who has alleged and/or experienced harassment or sexual misconduct, or who is an alleged perpetrator or a witness, during or following such a process.
- 8.10 Information on the student counselling service can be found on the student intranet: <https://lstmed.sharepoint.com/sites/Students/SitePages/Counselling%20Service.aspx>

9. SAFEGUARDING ROLES AND RESPONSIBILITIES

9.1 Students and staff

- It is everyone's responsibility to safeguard and protect our research and programme participants, staff and students. You should raise any concerns regarding safeguarding or conduct (whether in our education and research work in the UK or international sites), through the [VAULT](#) system
- All staff and students should follow the policies listed in section 1.7 above and the LSTM code of conduct (Please refer to Appendix 5).
- LSTM recognises that staff, students and contractors are not expected to be experts in the field of safeguarding. However, we all have a duty to:
 - Read relevant policies and procedures and the LSTM code of conduct
 - Be alert and responsive to problems and the potential indicators of physical, mental or emotional abuse or neglect
 - Be alert and responsive to the risks which individual abusers or potential abusers may pose to research or programme participants or staff and students
 - Be alert and responsive to situations and activities during which participants, staff or students may place themselves at risk of harassment, abuse, neglect or other harm
 - Be alert and responsive to situations and activities which may pose a more general risk to the protection of participants, staff and students, both face to face and/or online.

9.2 Safeguarding Focal Points

- Provide support, advice and guidance to staff and students about the safeguarding
- Act as a point of contact for any individual who may wish to discuss a safeguarding concern, including those about sexual harassment or misconduct, or make an allegation or disclosure
- Be aware of how to identify signs of harassment and abuse and signpost appropriately to other services and know when to escalate concerns to the Educational Safeguarding Lead Professional or Designated Safeguarding Lead.
- Take part in training activities to maintain and develop knowledge in relation to safeguarding and protection, signs of abuse, internal processes and procedures
- Ensure detailed and accurate written records are kept of concerns/referrals and that they are secure, confidential, yet accessible to those with designated authority

- Support the Designated Safeguarding Lead and the Educational Safeguarding Lead Professional with the roll-out of training and policies re: safeguarding and protection of students across the organisation.
- There are also Dignity and Respect Champions available across LSTM who can provide support and signposting regarding Bullying and Harassment, Sexual and Racial Harassment, and other dignity at work and study issues.

9.3 Designated Safeguarding Lead

Function as the designated lead for LSTM for safeguarding to:

- Oversee, implement and monitor the ongoing assurance of safeguarding arrangements through the development and implementation of the safeguarding action plan
- Develop, implement and audit policy and strategy in relation to safeguarding
- Identify named focal points/lead professionals for safeguarding across the organisation and ensure support and mentoring of these individuals
- Support staff, through the design and delivery of safeguarding training and mentoring
- Work in partnership with groups/departments across LSTM, including partner organisations and donors, to ensure best practice in safeguarding/protection of research and programme participants, staff and students in our research programmes in the UK and overseas
- Ensure systems are in place across the organisation to assess risk in relation to safeguarding and promote protection of children and vulnerable adults
- Ensure that serious incidents relating to safeguarding are reported immediately and managed effectively and that appropriate systems are in place to learn lessons
- Oversee the referral of serious safeguarding incidents to appropriate external organisations and inform relevant donors and the Charity Commission.
- To work collaboratively with global hubs and research partners on the further development of safeguarding systems and processes.
- Ensure systems are in place to monitor progress against the implementation of our safeguarding action plan, risk register, policies and procedures through the Strategic Safeguarding Oversight Committee (SSOC), The LSTM Executive and the Board of Trustees.

9.4 Education Safeguarding Lead (Head of student experience and professional short courses).

Function as the lead for safeguarding and conduct within the Faculty of Education at LSTM:

- Have overall responsibility for the effective implementation of the safeguarding student policy across LSTM
- Ensure induction processes are in place for staff and students within education which clearly outline the organisations' policies and processes in relation to the protection of students from harassment and sexual misconduct and outline expected behaviour and conduct of staff and students
- Have specific powers to oversee suspension of students pending investigations and where a significant risk of harm to a vulnerable individual is considered to exist
- Provide advice and support to Educational Safeguarding focal points

10. INVESTIGATION PROCESS

10.1 After you report a concern:

- We will listen/read the concern carefully
- We may contact you for more information, (we can speak to you anonymously through the VAULT system, even if we don't know who you are) we encourage and support all staff and students to raise concerns personally, wherever possible, as we may not be able to fully investigate anonymous concerns.
- We will review the matter within 5 working days and let you know how we will proceed
- In accordance with our policies and/or code of conduct, if appropriate, there will be a detailed investigation. Please refer to:
[Disciplinary Policy](#) (for staff)
[Student Disciplinary Code](#) (for students)
[Sexual Harassment, Sexual Misconduct and Victimisation Policy](#)
[Dignity at Work and Study Policy](#)
- In the case of complaints relating to LSTM staff, a Commissioning Panel will be convened and if appropriate, they will appoint an Investigator(s). If it is not appropriate to deal with the matter within LSTM, the Commissioning Panel will appoint an external investigator. (i.e., such as when specialist external expertise is required for cases involving children).
- In the case of LSTM students, an Investigating Officer will be appointed by the PVC of Education or their nominee
- There will be a nominated HR or Faculty of Education representative to support the process
- The purpose of an investigation is to establish the facts relating to alleged misconduct and to identify whether there may be a disciplinary case for the staff member or student to answer
- The format of the investigation will be determined by the nature of the allegations and will vary from case to case. Investigations can involve:
 - Interviewing people
 - Taking statements
 - Reviewing relevant documents and digital evidence
 - Reviewing evidence such as staff rosters or door access data
 - Reviewing CCTV footage or photos
 - Reviewing text messages, phone records and emails
- The investigator may need to conduct site visits and sometimes take photos of the site
- The investigator may need to review information such as team structures and leave records for staff
- The investigation will be completed as quickly and thoroughly as possible
- Support will be provided for all parties throughout the process
- We will seek to learn lessons following any incidents
- We may make referrals to other agencies, e.g. counselling services, social services, local voluntary organisations, legal services, or the police.

10.2 Staff who undertake investigations into harassment and sexual misconduct, sexual abuse or exploitation will have received appropriate training for the level of investigation required.

- 10.3 There is NOT a requirement for a provider to use a criminal standard of proof in its own internal investigations. Any judgements reached as part of an investigation do not constitute a legal ruling on whether or not criminal activity has taken place.

10.4 Principles of Investigation

Investigations should:

- *Do no harm* - which should be the cross-cutting ethical principle of all investigation processes
- *Be survivor-centred* - based around the four key principles: safety, confidentiality, respect and non-discrimination
- *Be transparent and fair* - due process must be followed, must be fact-based and impartial
- *Be professional* - follow the best practice standards for investigation, carry out investigations in a timely fashion, ensure investigators are appropriately trained.
- *Be structured* - investigations must be thorough and focused and carried out diligently, they must follow a process.

10.5 Handling of information

- Information will be handled sensitively and used fairly in practice
- Information will be collected sensitively and treated with appropriate confidentiality, irrespective of the mechanism used to make a report or disclose information, for example, in person or online
- Information will be handled on the basis set out in data protection legislation
- Staff and students will understand how information they disclose may be used, for example during a disciplinary process for a student or a member of staff.

- 10.6 We will not use NDAs (non-disclosure agreements) or confidentiality clauses that prevent members of the LSTM community from speaking out about harassment or other unacceptable behaviour. We wish to ensure that all our colleagues and students are safe and supported and would consider the use of confidentiality clauses in such circumstances to be wholly unacceptable.

10.7 Timescales

- Once reported, we will conduct an initial assessment of the concern and any risks, and this may include a discussion with the complainant to discuss the process and what is involved. This will normally take up to 5 working days.
- After this we may take another 5-10 working days to set up the investigation, which includes: identifying an investigator (internal or external), engaging with those affected, drawing up the terms of reference and if necessary, seeking specialist advice on the matter.
- It may take longer than the above timescales if we need to appoint an external investigator, or if the matter is particularly complex, but this will happen as soon as is reasonably practical. The complainant will be advised if timescales need to be adjusted.
- Once appointed the investigator(s) will carry out the investigation as quickly as possible, and this can often be completed within 30-60 working days, but for complex cases involving many staff/students the investigation could take up to 6 months
- Investigations that require an external investigator will usually take 3-6 months or occasionally even longer depending on the matter being investigated and the number of people involved.

Please refer to the Incident Investigation Algorithm (Appendix 6).

10.8 The range of possible outcomes following a STAFF disciplinary process

- The outcome of the investigation will be communicated to the complainant in writing. Should the outcome be that there has been a breach of policy/code of conduct and there may be a disciplinary case to answer, the next step would be to call a disciplinary hearing
- Should the outcome be there is no case to answer, no further action will be taken
- The complainant will **not** be informed of the outcome of the disciplinary hearing; this is between the individual staff member and the disciplinary panel
- Outcomes can include:
 - i. No formal action
 - ii. First written warning
 - iii. Final written warning
 - iv. Dismissal
 - v. In some case alternatives to dismissal may be considered at the disciplinary officer/panel's discretion, such as transfer to another role, demotion, loss of annual salary increment.

10.9 Appeal process in line with the disciplinary policy - STAFF

If a staff member believes the disciplinary action taken against them is wrong or unjust, they may appeal against the decision made. They should submit their appeal in writing, stating the grounds for the appeal, to the Global Director of HR via HR@lstm.ac.uk no later than 7 calendar days from the date they were informed of the decision.

Grounds for appeals may include:

- i. New evidence
- ii. Undue severity of disciplinary action
- iii. Procedural issues
- iv. Insufficient consideration given to evidence
- v. Mitigating circumstances.

Please refer to LSTM's [Disciplinary Policy](#)

10.10 The range of possible outcomes following a STUDENT disciplinary process

- The outcome of the investigation will be communicated to the student in writing
- Should the outcome be that there has been a possible breach of the student disciplinary code and there may be a disciplinary case to answer, a Student Disciplinary Panel will be convened
- Should the outcome be there is no case to answer, no further action will be taken
- The complainant will **not** be informed of the outcome of the disciplinary hearing, this is between the student and the disciplinary panel
- Outcomes can include:
 - An oral or written warning
 - A requirement to pay costs respect of any damages and/or losses suffered by LSTM and/or any third parties
 - The requirement to participate in a programme identified by the disciplinary panel to educate students about misconduct and its consequences
 - Suspension from study for a specified period of time
 - Expulsion from LSTM.

10.11 Appeal Process- **STUDENTS**

If a student believes the disciplinary action taken against them is wrong or unjust, they may appeal against the decision made in writing to the Academic Registrar within 15 working days of the date on which written notification of the decision is sent to the student.

Students shall have the right of appeal against both the finding and any penalty imposed as a consequence on one or more of the following grounds:

- i. Procedural irregularity
- ii. Availability of new evidence which could not reasonably have been expected to be presented to the original hearing
- iii. The disproportionate nature of the penalty.

The outcome of the appeal and any action to be taken will be communicated to the student by the Academic Registrar. A student who is dissatisfied with the outcome may make further appeal to the Office of the Independent Adjudicator for Higher Education (OIA). Further details and advice on how to do this are available from the OIA website at the following address: www.oiahe.org.uk

Please refer to the [Student Disciplinary Code](#)

11. **TRAINING FOR STAFF AND STUDENTS**

- 11.1 LSTM must ensure that staff and students are *“appropriately informed to ensure understanding”* of our policies and also of behaviour that may constitute harassment or sexual misconduct.
- 11.2 Staff and students are provided with a copy of the LSTM code of conduct on induction, which gives details of acceptable and non-acceptable behaviour.
- 11.3 Student induction will include highlighting the content of the single comprehensive source of information when students register at the start of each year of study.
- 11.4 The induction session for new students contains training to ensure they:
 - Understand behaviour that may constitute harassment and/or sexual misconduct.
 - Know how to raise a concern about a student or staff member
 - Have information on educational safeguarding focal points
 - Have information on the Student Advice and Wellbeing (SAW) service.
- 11.5 Student completion rates are monitored via attendance at the student induction sessions where information is given on the single comprehensive source of information.
- 11.6 In addition to induction training, LSTM have mandatory online training courses on safeguarding and on sexual harassment for staff and students which must both be completed at least three-yearly.

This course includes information on how to report concerns, how to recognise and respond to concerns, and how to refer others for support. (If staff or student here for less than three years then they need only undertake the course once).
- 11.7 The course includes information on behaviour that may constitute harassment and/or sexual misconduct and information on the content of the *“single comprehensive source of information”*.

- 11.8 Staff course attendance is monitored by the Learning and Development team who highlight to staff when course is due and inform line managers when staff members are overdue.
- 11.9 Students have further training on safeguarding issues, including harassment and sexual misconduct during the Research Ethics module.
- 11.10 Staff and post-graduate PhD students who are carrying out research that involves participants or has contact with communities, are strongly encouraged to complete the safeguarding in research half-day workshop which is offered regularly throughout the year and focuses on the responsibility of researchers to develop and maintain safeguarding systems within a global research context. (Safeguarding within a research context, including the safeguarding of research participants is covered under LSTM's Safeguarding Policy: Protection of children and vulnerable adults).
- 11.11 LSTM has provided additional training for staff who act as Safeguarding Focal Points or Dignity and Respect Champions, including a team of staff who have received additional training in carrying out investigations on Race and Sexual Harassment. These staff have additional knowledge and skills to provide extra support to both staff and students who:
- Wish to make allegations or complaints about harassment and/or sexual misconduct
 - Have alleged and/or experienced incidents of harassment and/or sexual misconduct
 - Are the actual or alleged perpetrators of incidents of harassment and/or sexual misconduct
- 11.12 LSTM's Designated Safeguarding Lead and some of the Global Partner Safeguarding Lead Officers are trained to Tier Two of the Investigator Qualification Training Scheme ([IQTS](#)) standard for SEAH investigation based on the Core Humanitarian Standard (CHS) [SEAH Investigation Guide](#).
- 11.13 Additional training and support is provided to the Safeguarding Focal Points and Dignity and Respect Champions, via training and through the quarterly focal point meetings.
- 11.14 Training (including that delivered by third parties) is consistent with LSTM's freedom of speech obligations. Refer to LSTM's [Freedom of Speech Policy](#)

12. EQUALITY AND DIVERSITY

- 12.1 LSTM is committed to promoting equality of opportunity, combatting unlawful discrimination and promoting good community relations. We will not tolerate any form of unlawful discrimination or behaviour that undermines this commitment and is contrary to our equality policy.
- 12.2 This policy required an Equality Impact Assessment. The assessment is at the end of this policy document.

13. REFERENCES AND BIBLIOGRAPHY

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Interagency Standing Committee (2016). Protection against Sexual Exploitation and Abuse (PSEA). Global Standard Operating Procedures. May 2016

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UKCDR (2020) Guidance on Safeguarding in International Development Research. 17 April 2020. UKCDR. London.

<https://ukcdr.org.uk/publication/ukcdr-guidance-on-safeguarding-in-international-development-research/>

UUK (2016) Changing the Culture: Report of the Universities UK Taskforce examining violence against women, harassment and hate crime affecting university students.

<https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/changing-the-culture-final-report.aspx>

Appendix 1: Freedom of Speech Principles (Office for Students 2024, page 2 and 21)

The 'freedom of speech principles' in Annex A: Condition E6 include a 'rebuttable presumption' that requires a provider to assume that the exposure of students to course materials, and statements made and views expressed by a person as part of teaching, research or discussions about any subject matter that is connected with the content of a higher education course, are unlikely to constitute 'harassment', unless otherwise demonstrated that these matters do in fact amount to harassment.

A provider is not required to take a step that interferes with lawful speech in order to meet the requirements of the condition:

- a) The OfS recognises that the Equality Act 2010 does not currently give rise to legal obligations for a higher education provider to address conduct by a student that amounts to harassment.
- b) One of the aims of this condition is to create obligations for higher education providers in respect of dealing with harassment that goes further than the existing law, but only in so far as that does not involve doing things that could reasonably be considered to have the object or effect of restricting freedom of speech within the law or academic freedom.
- c) A provider will need to carefully consider its freedom of speech obligations and ensure that it has particular regard to, and places significant weight on, those obligations when creating and applying policies and procedures that are designed to help protect students from harassment by other students.
- d) Freedom of speech obligations should not be considered to be a barrier to creating or applying policies and procedures in respect of types of conduct that may amount to harassment unless such policies and procedures could reasonably be considered to have the object or effect of restricting freedom of speech within the law and/or academic freedom

LSTM will **NOT** include any restricting provisions in any contract formed or varied on or after the date that condition E6 takes effect.

(Please refer to 10.6 on page 13 of this Safeguarding Students Policy)

<https://www.officeforstudents.org.uk/media/bpffhauth/hsm-condition-and-guidance.pdf>

Appendix 2: OfS Condition E6: Harassment and Sexual Misconduct Definitions

‘Abuse of power’ means a situation where a relevant staff member exploits a position of power in relation to a student so as to apply pressure in a way which:

- may result in the student doing something, or refraining from doing something, that they may not have otherwise done; and
- that action or inaction could reasonably result in something that falls within the scope of an intimate personal relationship.

‘Appropriate support’ means the effective deployment of assistance, including but not limited to:

- support targeted at the needs of students involved in any way in an incident of harassment and/or sexual misconduct, including but not limited to during an investigatory and decision-making process
- personal support, including in the form of counselling where appropriate
- academic support, including in relation to decisions about attendance, continuation, suspension or cessation of study.

‘Appropriately informed to ensure understanding’ includes, but is not limited to ensuring that:

- students understand the content of the single comprehensive source of information required by paragraph E6.2 when they register at the start of each year of study; and induction sessions for new students contain training to ensure they understand behaviour that may constitute harassment and/or sexual misconduct.

‘Appropriately trained’ means staff have and maintain:

- up-to-date understanding of the content of the single comprehensive source of information required by paragraph E6.2 and all the requirements of this condition
- up-to-date understanding of behaviour that may constitute harassment and/or sexual misconduct
- the required knowledge and skills to support students who:
 - wish to make allegations or complaints about harassment and/or sexual misconduct
 - have alleged and/or experienced incidents of harassment and/or sexual misconduct
 - are the actual or alleged perpetrators of incidents of harassment and/or sexual misconduct
- the required knowledge and skills to undertake investigations or make decisions in relation to incidents of harassment and/or sexual misconduct.

‘Capacity and resources’ includes, but is not limited to:

- the financial resources of the provider
- the number, expertise, and experience of the staff employed or contracted by the provider
- the resources deployed by the provider to undertake investigations or make decisions in relation to incidents of harassment and/or sexual misconduct.

‘Comprehensive source of information’ means:

- a single document or webpage that comprehensively sets out all the information required in order to comply with E6.2 and E6.3; or
- a single document or webpage that gives a clear summary of the information required by E6.2, complies with E6.3, and links to additional documents that comprehensively set out the remaining relevant detail as required by E6.2 and E6.3. If the provider adopts this approach, the single document or webpage must include a summary of the content to be found by following these links.

‘Content principles’ means the following requirements:

the provider may include other additional information and provisions in the single comprehensive source of information in addition to the minimum content requirements, but such other information and provisions must:

- not contradict, undermine or conflict with the minimum content requirements
- be subject to a provision which makes it expressly clear that the minimum content requirements take precedence over any other information and provisions
- the provider must not include information and provisions on subject matter relating to harassment and/or sexual misconduct (and/or any subject matter of a similar nature to matters covered by those defined terms) in any other documents, which could reasonably be considered to contradict, undermine or conflict with the minimum content requirements.

‘Excluded relationships’ means any ongoing intimate personal relationship that:

- existed before the date this condition comes into force and that remains in existence
- existed before the date that the staff member became a relevant staff member in relation to that student.

‘Freedom of speech principles’ means the following requirements:

irrespective of the scope and extent of any other legal requirements that may apply to the provider, the need for the provider to have particular regard to, and place significant weight on, the importance of freedom of speech within the law, academic freedom and tolerance for controversial views in an educational context or environment, including in premises and situations where educational services, events and debates take place; the need for the provider to apply a rebuttable presumption to the effect that students being exposed to any of the following is unlikely to amount to harassment:

- the content of higher education course materials, including but not limited to books, videos, sound recordings, and pictures
- statements made and views expressed by a person as part of teaching, research or discussions about any subject matter which is connected with the content of a higher education course.

‘Harassment’ has the meaning given in section 26 of the Equality Act 2010 and section 1 of the Protection from Harassment Act 1997 (in its entirety, and as interpreted by section 7 of the Act).

‘Incidents’ includes, but is not limited to, circumstances where:

- allegations or complaints are made to the provider about harassment and/or sexual misconduct
- the provider could reasonably be considered to have grounds for suspecting that harassment and/or sexual misconduct has taken place or is taking place.

‘Intimate personal relationship’ means a relationship that involves one or more of the following elements:

- physical intimacy including isolated or repeated sexual activity; or
- romantic or emotional intimacy.

‘Minimum content requirements’ means comprehensive and easy to understand provisions in respect of:

- in addition to any other steps required, multiple steps which could (individually or in combination) make a significant and credible difference in protecting students from behaviour that may amount to harassment and/or sexual misconduct, including, but not

limited to, steps that may reduce the likelihood of harassment and/or sexual misconduct taking place

- the ways in which students, staff and other persons are able to report behaviour that may amount to harassment and/or sexual misconduct to the provider
- how information received or obtained in connection with incidents of harassment and/or sexual misconduct will be handled sensitively and used fairly
- how the provider ensures that students are appropriately informed to ensure understanding
- the appropriate support that will be provided to students in response to incidents of harassment and/or sexual misconduct. This includes, but is not limited to, students who have alleged and/or experienced incidents of harassment and/or sexual misconduct and actual or alleged perpetrators
- how the provider ensures that staff and other persons responsible for receiving information about, investigating, or taking decisions on, matters relating to incidents of harassment and/or sexual misconduct are appropriately trained
- how the provider ensures that investigations undertaken, and decisions made in respect of incidents of harassment and/or sexual misconduct are credible, fair and otherwise reflect established principles of natural justice
- how the provider ensures that persons directly affected by any decisions made in respect of incidents of harassment and/or sexual misconduct are directly informed about the decisions and the reasons for them. This includes, but is not limited to, persons who have alleged and/or experienced incidents of harassment and/or sexual misconduct and actual or alleged perpetrators.

‘Prominence principles’ means the following requirements in respect of the single comprehensive source of information required by paragraph E6.2:

the single comprehensive source of information is published in a prominent position in an area of the provider’s website which is easily accessible by students and those considering applying to be students without the need for any form of password or security check.

a clear and easy to understand statement about the existence of the single comprehensive source of information, the nature of its content, and how to access it is:

- communicated directly to all students and staff in writing at least once each calendar year
- set out in the main documents designed to promote the higher education services available from the provider
- set out in any documents that are designed to provide a collection of useful information about rules, policies and procedures for students and staff (for example, any documents that are commonly known as student handbooks and staff handbooks).

‘Relevant staff member’ means a member of staff who has direct academic responsibilities, or other direct professional responsibilities, in relation to that student.

‘Restricting provisions’ means any provisions that have the object or effect of preventing or restricting any student from disclosing information about an allegation of harassment and/or sexual misconduct, which in any way involves or affects one or more students, to any other person.

‘Staff’ includes but is not limited to employees and contractors.

‘Sexual misconduct’ means any unwanted or attempted unwanted conduct of a sexual nature and includes, but is not limited to:

- sexual harassment, sexual assault and rape.

‘Students’ includes, but is not limited to, persons who are registered on a higher education course and, at any point in time within the overall duration of that higher education course, are employed by, or otherwise providing services to, a higher education provider.

Appendix 3 - UK organisations offering help and support

1. Samaritans

Offer a service 24-hours a day to provide emotional support for people who are struggling to cope, including those who have had thoughts of suicide

Helpline: 116 123 (24 hours a day, 365 days a year)

Email: jo@samaritans.org

Web: www.samaritans.org/

2. MIND

Mental health charity. Provide advice and support to empower anyone experiencing a mental health problem.

Helpline: 0300 123 3393 Lines are open 9am to 6pm, Monday to Friday (except for bank holidays).

Email: info@mind.org.uk

Web: www.mind.org.uk/

Text: 86463

3. Papyrus

Charity dedicated to suicide prevention in young people (under 35 years)

Hopeline 247: 0800 068 4141 (Freephone)

Text: 88247

HOPELINE247 | Papyrus

Email: pat@papyrus-uk.org

Web: www.papyrus-uk.org

4. Campaign Against Living Miserably (CALM) – Charity which exists to prevent male suicide in the UK.

Email: info@calmzone.net

Web: www.thecalmzone.net

5. Liverpool Light – (Mental Health Crisis support)

Phone: 07970 738 229

Address: Liverpool Light, 181 - 185 London Road, Liverpool. L3 8JG (Mon - Sun - 6pm - 1am)

6. Merseycare Urgent Mental Health Support <https://www.merseycare.nhs.uk/urgent-help>

NHS Urgent Mental Health help. Provide phone support for people experiencing a mental health crisis. Call NHS 111 and select the mental health option.

7. Wellbeing Liverpool

Online directory for mental health and wellbeing services, activities, and groups in Liverpool.

Web: <http://wellbeingliverpool.org.uk/>

8. Rape Crisis England and Wales

The national umbrella body for the network of Rape Crisis Centres across England and Wales and was set up to support their specialist work. They currently have 44-member Rape Crisis Centres, providing services in 55 locations across England and Wales.

Helpline: 0808 802 9999 between 12 noon - 2.30pm and 7:00- 9.30pm every day of the year **for confidential support and/or information about your nearest services.**

Web: <https://rapecrisis.org.uk/>

9. Refuge – The National Domestic Violence Helpline

National service for women experiencing domestic violence, their family, friends, colleagues, and others calling on their behalf.

Helpline: 0808 2000 247

Web: <http://www.nationaldomesticviolencehelpline.org.uk/>

10. Rape and Sexual Abuse Support (RASA) Merseyside

RASA Merseyside is a professional counselling and support service that exists solely to improve the mental and physical well-being of individuals impacted by sexual violence at some point in their lives.

Web: [RASA Merseyside - Here for anyone who has been sexually abused or raped](#)

11. Liverpool Domestic Abuse Service

Liverpool Domestic Abuse Service (LDAS) is a grassroots community-based service that specialises in the support of women and girls who have experienced domestic abuse.

Web: <http://liverpooldomesticabuseservice.org.uk/>

Phone: 0151 263 7474 (Monday – Thursday 9am – 5pm, Friday 9am- 3pm)

Freephone: 0800 084 2744 (Monday – Thursday 9am – 5pm, Friday 9am- 3pm)

Mobile/Text for hard of hearing: 0792 323 2327

12. YMCA Liverpool - Domestic Abuse Rapid Accommodation Project

Provides 28 self-contained properties in the North and South of Liverpool for women and children experiencing domestic abuse.

www.ymcattogether.org.uk/domestic-abuse/

13. ManKind Initiative

Helpline providing advice and support for male victims of domestic abuse.

www.mankind.org.uk

14. Victim Support

Independent Charity to help support people after crime

Support line: 0808 168 9111

Victims' Information Service: 0808 168 9293

Web: <https://www.victimsupport.org.uk/>

Lots of information available online and Victim Support have sections on lots of different types of crime.

15. With you

With you every step of the way. Free, confidential support to adults and young people facing challenges with drugs, alcohol and mental health.

Web: www.wearewithyou.org.uk

Online chat: www.wearewithyou.org.uk/find-support/talk-to-a-trained-recovery-worker

16. Alcoholics Anonymous (AA)

AA supports the personal recovery and continued sobriety of alcoholics who turn to them for help.

Web: www.alcoholics-anonymous.org.uk/

National phone helpline: 0800 917 7650

Email: Help@aamail.org

Appendix 4: Collaborative Partner Organisation Contacts:

MLW Malawi Safeguarding Officer Ms. Elizabeth Mkutumula	emkutumula@mlw.mw
CeSHHAR, Zimbabwe Safeguarding Officer Mr. James Ghandi	james.gandi@ceshhar.org
LSTM Kisumu Safeguarding Officer Ms. Benta Kamire	benta.kamire@lstmed.ac.uk
KEMRI (Kenya) Safeguarding Focal Point Ms. Diana Okello	DMOkello@kemri.go.ke
CRID, Cameroon Safeguarding Officer Ms. Nadege Ngala	nadege.ngala@crid-cam.net

Appendix 5 – LSTM Code of Conduct

1. Introduction

As staff, students, volunteers, and representatives of the LSTM Group, it is our responsibility to ensure our personal conduct is consistent with the organisation's values and behaviours (see below). We must demonstrate them in our respect for individuals and communities with whom we work. If any of us fails to act in a way that is consistent with these, then we fail as an organisation.

Inclusivity

- Our community is a place where everyone is trusted, respected, appreciated and empowered.
- We embrace diversity and welcome different views - we encourage honest, courageous conversations and always treat each other with kindness and dignity.

Integrity

- We act with integrity, fairness, and transparency and hold ourselves, and our partners, to the highest ethical standards.
- We deliver on our commitments and foster a culture of continuous improvement and learning.

Partnership

- We work with those who share our values and ambitions and take pride in our collective achievements.
- We support each other and will use our influence to develop and sustain equitable partnerships – together we will deliver better outcomes.

Impact

- We are ambitious and strive to make a positive difference in everything that we do, working with staff and partners who are at the cutting edge of their fields of expertise.
- We will approach our work with curiosity and learning and focus our efforts and resources where they will have the greatest impact.

2. Freedom of Speech and Academic Freedom

LSTM are committed to securing and ensuring lawful freedom of speech and academic freedom for this community to foster new ideas, support productive debate and raise challenge to conventional wisdom. We are committed to ensuring that freedom of speech and academic freedom is protected for all our members within the bounds of the law, including views that may be controversial, contested or unpopular.

LSTM will take reasonably practicable steps to secure free speech within the law for students, colleagues, and visitors to create a critical and open academic environment. LSTM will not tolerate unlawful speech or actions.

Whilst individuals are free to express views within the law, LSTM expects all members of its community to treat each other with respect when engaging in discourse. LSTM will take steps to ensure that exchanges are made in a peaceful and respectful manner and will promote awareness and understanding of the importance of free speech and academic freedom across its community, including through events, training, and resources.

3. LSTM expects all staff, students, volunteers, and other representatives individually to:

- Exercise care and respect for all participants in research, implementation and education programmes, the wider community, and for all other subjects and beneficiaries of our programmes, including humans, animals, and the environment
- Extend those same values of dignity and respect for LSTM staff and students and those who we work in partnership with. Challenge any form of harassment, discrimination, intimidation, exploitation, or abuse (refer to LSTM's Dignity at Work and Study Policy)
- Create and maintain an environment which prevents sexual exploitation, abuse and harassment and other forms of abuse relating to the Dignity at Work and Study Policy and promotes the implementation of the code of conduct

- Adhere and abide by the standards of competence, honesty, integrity, and other professional behaviours as defined by our respective professional or regulatory bodies, and retain the freedom and duty to follow their professional codes
- Maintain a research environment that is underpinned by a culture of integrity, adhering to all LSTM requirements and expectations in the governance of research, and query any concerns over research/trials misconduct in a transparent, timely and fair manner
- Conduct ourselves openly and transparently, with integrity, impartiality, and honesty – we shall never deceive or knowingly mislead others
- Respect human rights, protect the environment and oppose criminal or unethical activities
- Protect the health, safety, security, and well-being of ourselves and others
- Work actively to protect all participants, community members, staff, students and partners, by complying with LSTM's Safeguarding Policy: Protecting Children and Vulnerable Adults
- Be responsible for the use of information, equipment, money and resources to which we have access, through our employment and/or contact with LSTM and its subsidiaries
- Know how to raise concerns relating to safeguarding, harassment (including racial and sexual harassment) and sexual misconduct and report any matters that breach the principles contained in this code of conduct. If you develop any concerns or suspicions regarding staff, students or partners, you must report such concerns via LSTM's Vault Platform for misconduct reporting. LSTM contracted staff can download the mobile app on [iOS](#) or [Android](#) or external staff can raise reports through the web browser: <https://app.vaultplatform.com/lstmed.ac.uk/open-reporting/>
- Undertake mandatory training related to safeguarding and sexual harassment awareness.

4. LSTM strongly discourages 'intimate personal relationships' between colleagues and students. This means a relationship that involves one or more of the following elements: Physical intimacy including isolated or repeated sexual activity; or romantic or emotional intimacy.

Please refer to the: [Safeguarding Students Policy](#)

In the event of a romantic or sexual encounter or relationship, colleagues and students must disclose this as soon as possible as outlined in the: [LSTM Relationships Policy](#)

5. Principles of our code of conduct

- 5.1 As an employee, student, visitor, consultant, or holder of honorary contract of the LSTM and its subsidiaries, (including but not limited to: IVCC, WTC, global hub site), we are expected to promote its values and protect its reputation by adhering to the principles set out in this code of conduct. The code provides clear guidance on what we and the donors who fund us, expect of our staff, students, and other representatives, as well as providing examples of conduct that will always be unacceptable.
- 5.2 The code incorporates core elements of our expectations related to our Dignity at Work and Study Policy, as well as the [six core principles](#) developed by the IASC on preventing sexual exploitation, abuse and harassment (PSEAH) and LSTM's expectations that our research and trials are underpinned by the highest standards of rigour and integrity as per [LSTM's Research Integrity Statement](#)
- 5.3 This code of conduct applies across the "extended place of work and study" which includes:
 - When we are at our place of work/study
 - When we are representing LSTM and its subsidiaries at any location, at any time
 - At all times when we are visiting another location to our usual place of work/study (including outside working hours and social occasions on these visits)
 - Travelling to and from national and international destinations for work/study purposes
 - When we are participating in work/university social events; "time out" days and/or "away" days.
- 5.4 Whilst recognising that laws differ from one country to another; LSTM works internationally and therefore our Code of Conduct is developed with consideration of international and UN standards.
- 5.5 LSTM is an inclusive organisation, committed to creating a great place to work and study, in which the principles of equality, respect, dignity, and inclusion are part of our everyday goals and behaviours.
- 5.6 LSTM expects all members of our community to treat each other with respect, courtesy, and consideration at all times and to recognise the rights of others to express their views lawfully and respectfully. Everyone is

encouraged and supported to challenge or raise concerns relating to behaviours which are contrary to this principle.

6. LSTM, therefore, does not tolerate the following:

- 6.1 Sexual exploitation, abuse, harassment or other misconduct by LSTM staff and students, constitute an act of gross misconduct and are therefore grounds for termination of employment or expulsion from the Institute.
- 6.2 Engaging in sexual relations with anyone under the age of 18, or abuse or exploitation of a child or a vulnerable adult in any way, regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
- 6.3 Engaging or supporting directly or indirectly by any means, any activities that advocate the legislation, legitimisation or practice of commercial sexual exploitation or sex trafficking.
- 6.4 Unwelcome sexual advances, requests for sexual favours, and other verbal or non-verbal harassment of a sexual nature, including stalking and through online means.
- 6.5 Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to participants/beneficiaries.
- 6.6 Any sexual relationship between those carrying out research, implementation or education activities on behalf of the LSTM group and a person participating or benefitting in that work that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of our work.
- 6.7 Any kind of negative distinction, discrimination, psychological or physical harassment, bullying, threat, attack, or exclusion; due to age, disability, gender identity or reassignment, race (including nationality or ethnic identity), sex, sexual orientation, religion, or belief.
- 6.8 Abuse of power, whereby a member of staff or student exploits a position of power in relation to a participant, community member of another member of staff or student or collaborative partner.
- 6.9 Drinking alcohol, (except in moderation as part of a work-related social occasion), during working hours.
- 6.10 Taking illegal drugs/substances or using any “legal highs” (not yet controlled under the misuse of drugs act, but which could nevertheless alter behaviour or impair judgement), at any time within the workplace or extended workplace.
- 6.11 Being in possession of, or profiting from the sale of, illegal goods or substances.
- 6.12 Behaving in a way which threatens the welfare or security of ourselves or others.
- 6.13 Using LSTM resources/equipment or accessing the internet via LSTM’s networks for potentially unsafe or unlawful practices, in line with our [IT acceptable use policy](#)
- 6.14 Using social media to bully, harass or make otherwise derogatory, defamatory or offensive comments about an individual, including via posts, images, or to bring LSTM into disrepute.
- 6.15 Accepting or offering bribes/significant gifts to government employees, beneficiaries, donors, suppliers or others, which have been offered or received through your work with LSTM or in a personal capacity, which may impact on the work/reputation of LSTM (refer to: [UK Bribery Act 2010](#))
- 6.16 Using LSTM funds or resources, or those received from donors, to support directly or indirectly any of the above activities.
- 6.17 Unlawful speech or breaches of the LSTM Freedom of Speech Code of Practice

7. Agreement to the LSTM code of conduct

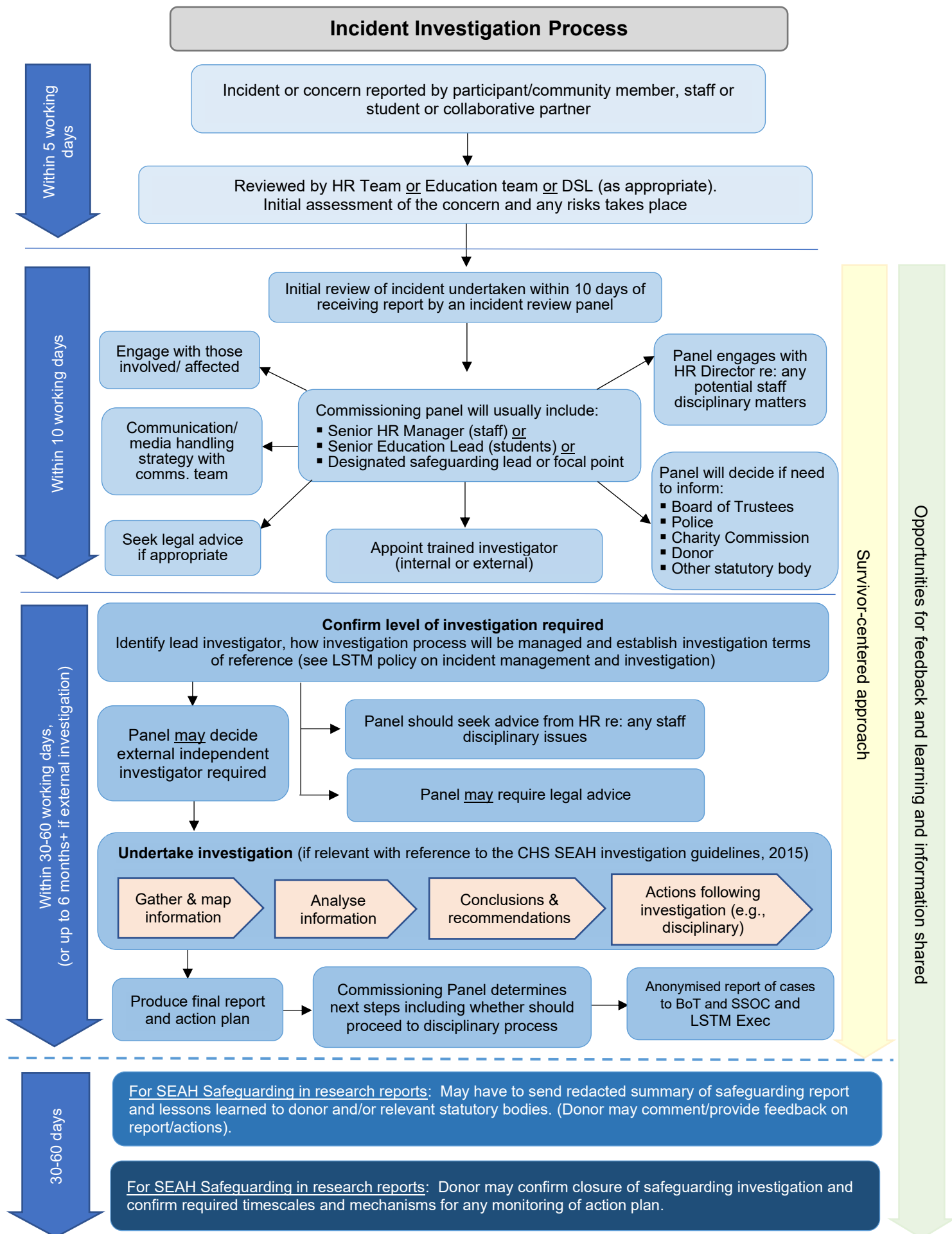
- 7.1 I understand that I am expected to observe the LSTM code of conduct. I have read this code of conduct and understand that it applies to me.
- 7.2 This code of conduct, together with LSTM’s policies, procedures, codes of practice and your contractual terms & conditions of employment (or your volunteer agreement or student charter), provide a framework within which all LSTM employees, students, or associates, undertake their duties.
- 7.3 Any breach may result in action in accordance with LSTM’s [Disciplinary Policy and Procedure](#) or disciplinary action under the [LSTM Student Disciplinary Code](#) (and could lead to criminal prosecution).

Name (print):

Date:

Signature:

Dept:



Equality Impact Assessment (EIA) template

(Please refer to the [EIA guidance document](#))

Equality Impact Assessment: Section 1 (to be completed for all Policies)

Title of policy/process:	Safeguarding Students Policy
Policy owner job title:	Philippa Tubb, Designated Safeguarding Lead and Martyn Stewart, Educational Safeguarding Lead Professional
Date of EIA:	30/06/2025
Policy relevant to: Staff / students / visitors etc:	Staff and students
Summary of any consultation with stakeholders (e.g. date and type of consultation):	SSOC Committee, LSTM Executive
This policy has been checked for accessibility on: (date)	30/06/2025
I confirm that this policy does/does not impact people, and therefore does not require an EIA (delete as appropriate)	Does impact people (<i>continue to Section 2</i>)

Section 2: To be Completed if your policy has an impact on people, or if you are unsure of the impact of a Policy or Procedure and need to engage with stakeholders (note: you do not need to use this template – only use it if it’s helpful)

Ref.	Protected Characteristic (Equality Act 2010)	Yes (positive/negative)/no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
1.1	Is it likely that the policy or framework could have a positive or negative impact on a group depending on their <i>ethnicity</i> ?	Yes positive	It is recognised that BAME staff and students may be less likely to report incidents and more at risk of abuses of power.	LSTM recognises that BAME staff and students may find it difficult to report concerns and identifies that the BAME network can help to support staff and students. The code of conduct includes specific statements that negative distinctions, or discrimination, psychological or physical harassment, bullying, threat, attack, or exclusion; due to race (including nationality or ethnic identity) will not be tolerated.
1.2	Is it likely that the policy or framework could have a positive or negative impact on a group depending on their <i>gender</i> ?	Yes positive	It is recognised that young, female students may be less likely to report incidents and more at risk of abuses of power	LSTM recognises that female staff and students are more likely to experience SEAH and may find it difficult to report concerns and identifies that the women’s network can help to support staff and students. The code of conduct includes specific statements that negative distinctions, or discrimination, psychological or physical harassment, bullying, threat, attack, or exclusion; due to gender will not be tolerated and gives specific details on the nature of unacceptable behaviour.
1.3	Is it likely that the policy or framework could have a positive or negative impact on people during <i>pregnancy or maternity</i> ?	Yes positive	It is recognised that the risk of intimate partner violence increases during pregnancy	LSTM recognises that risk of intimate partner violence can increase during pregnancy and provides staff and students with contact information of relevant agencies to seek help from.
1.4	Is it likely that the policy or framework could have a positive or negative impact on <i>people with disabilities</i> ?	Yes positive	It is recognised that students with disabilities and those who are neuro-diverse may have different needs to other students and support accessing services and require adaptations	LSTM recognises that those with disabilities may have increased vulnerabilities and identifies that the disability and carers’ network can help to support staff. The code of conduct includes specific statements that negative distinctions, or discrimination, psychological or physical harassment, bullying, threat, attack, or exclusion; due to disability will not be tolerated.

1.5	Is it likely that the policy or framework could have a positive or negative impact on people due to their <i>sexual orientation</i> ?	Yes positive	It is recognised that LGBTQ+ students may be less likely to report incidents and more at risk of abuses of power.	LSTM recognises that those staff/students who identify as LGBTQ+ may have increased vulnerabilities (particularly when overseas) and identifies that the LGBTQ+ network can help to support staff and students. The code of conduct includes specific statements that negative distinctions, or discrimination, psychological or physical harassment, bullying, threat, attack, or exclusion; due to sexual orientation, gender identity or gender reassignment will not be tolerated.
1.6	Is it likely that the policy or framework could have a positive or negative impact on people due to their <i>religion, belief, or lack thereof</i> ?	Yes positive	It is recognised in Code of conduct that staff/students may be discriminated against based on religion.	The code of conduct includes specific statements that negative distinctions, or discrimination, psychological or physical harassment, bullying, threat, attack, or exclusion; due to religion or beliefs will not be tolerated.
1.7	Is it likely that the policy or framework could have a positive or negative impact on people who are <i>trans</i> ?	Yes positive	It is recognised that LGBTQ+ students may be less likely to report incidents and more at risk of abuses of power	LSTM recognises that those staff/students who identify as Transgender may have increased vulnerabilities (particularly when overseas) and identifies that the LGBTQ+ network can help to support staff and students. The code of conduct includes specific statements that negative distinctions, or discrimination, psychological or physical harassment, bullying, threat, attack, or exclusion; due to gender identity or gender reassignment will not be tolerated.
1.8	Is it likely that the policy or framework could have a positive or negative impact on people due to their <i>age</i> ?	No		
1.9	Is it likely that the policy or framework could have a positive or negative impact on people due to <i>marriage or civil partnership</i> ?	No		
2.0	We are committed to endeavouring to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.	YES		

Ref.	Other groups who could be impacted (acquired characteristics)	Yes (positive/negative)/no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
2.1	Is it likely that the policy or framework could have a positive or negative impact on people due to their <i>contract type (part-time or full-time)</i> ?	No		
2.2	Is it likely that the policy or framework could have a positive or negative impact on people due to their <i>contract status (fixed-term or indefinite)</i> ?	No		
2.3	Is it likely that the policy or framework could have a positive or negative impact on people due to <i>their grade</i> ?	No		
2.4	Is it likely that the policy or framework could have a positive or negative impact on <i>people with dependents or caring responsibilities</i> ?	No		
Ref	PREVENT Duty	Yes /no	Potential issues to consider, any data obtained	Potential actions that can be taken to mitigate against impact
2.5	PREVENT: Does this policy/proposal impact on any of the following areas of PREVENT duty: (a) staff and student welfare (b) events and external speakers (c) training in relation to PREVENT	Yes No No		
2.6	Is a separate risk assessment required?	No		

Conclusion

a. What issues are highlighted by the EIA process? Summarise the action you will take to mitigate against them, or how you've changed your policy to remove the issues.	
b. If you consider intersectionality of protected characteristics, are the issues compounded? Summarise the action you will take to mitigate against the issues.	
c. Are there are groups of people who aren't recorded so far, who may be adversely impacted by this policy/framework?	
d. Are there any opportunities within the policy/framework to particularly promote equity?	
e. Does the policy/framework need amendment after the outcome of the EIA process?	
f. Timeline for amendment, review and further consultation with key stakeholders.	
g. Any additional comments	

Once Section 1 & 2 are completed, copy and paste into your policy template, with any confidential or restricted data (or identifying numbers of individuals [<5]) redacted, to allow for sharing of good practice across LSTM via the internal Policy Hub. Please ensure you refer to job roles and group names, and not individual's names.

Please share the final document with inclusion@lstmed.ac.uk prior to internal publication.