



The Department for Business, Energy and Industrial Strategy (BEIS)

Research and Innovation ODA - Safeguarding Policy

1. Summary

This policy details BEIS' expectations for how delivery partners can promote safe research and innovation environments as grant giving organisations involved in delivering research and innovation activities funded through the Newton Fund and the Global Challenges Research Fund (GCRF). It outlines the key principles that guide BEIS' approach to safeguarding in research and innovation for international development. It lays out BEIS' expectations for its delivery partners, the UK organisations who deliver the Newton Fund and the Global Challenges Research Fund activities on behalf of BEIS, and how those expectations are configured by the devolved model of both funds. It addresses BEIS' responsibility, governance and accountability, and offers guidelines for delivery partners to use in developing their safeguarding policies and processes for working with organisations to whom they give BEIS ODA R&I grants.

2. Background

In recent years, a new impetus has gathered in the UK behind developing specific guidance for safeguarding principles and practices in international development research. There are two main reasons. Firstly, new funding opportunities have expanded the range and number of actors engaging with research for development. Some are breaking new ground for themselves or their organisations, making the existence and promotion of best practice principles that address research for development's particular circumstances more pressing. Secondly, a spotlight has been shone on larger issues of unequal power relations and unequally distributed risk in the wider development sector, following widely publicised cases of sexual abuse, exploitation, and harassment in the sector coming to light.

In response, the UK Collaborative on Development Research has developed a set of guidance for safeguarding in international development research. The guidance was developed following wide-ranging consultations with multiple actors involved in international development research in low-, middle-, and high-income countries. [This guidance](#) was published in April 2020.

BEIS was one of the major UK funders that formed a working group supporting the development of the UKCDR guidance. In this policy document, BEIS is applying the principles outlined in the UKCDR guidance to inform and improve safeguarding policy for activities under the Newton Fund and the Global Challenges Research Fund, the two BEIS R&I ODA funds.

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3. Purpose and scope of the policy

The primary purpose of this policy is to take all reasonable steps to prevent and address exploitation, abuse, and harm within BEIS ODA funded research and innovation activities by clearly laying out roles, responsibilities, and expectations between BEIS and its delivery partners.

The scope of the policy at this time is all activities funded by the BEIS ODA R&I funds (i.e. the Newton Fund and the Global Challenges Research Fund), as well as all administration related to those funded activities.

This policy will be subject to regular review. Its scope and purpose represent a first step by BEIS in understanding the principles embodied in the UKCDR guidance for safeguarding in international development research and applying them to BEIS activities. The lessons learned in implementing safeguarding policy for the Newton Fund and the GCRF will be taken forward in other relevant areas of BEIS' funded activities.

4. BEIS R&I ODA delivery partners and the devolved delivery model

BEIS R&I ODA funds are managed internally within BEIS to ensure robust scrutiny and oversight. BEIS follows FCDO best practice in funding international development research and tailors our approach to what is most appropriate for the type of funds delivered and the delivery partners with whom we work. In line with practice for BEIS' non-ODA research programmes, both GCRF and Newton Fund programmes are delivered through trusted delivery partners. These delivery partners have their own safeguarding policies and procedures,¹ and engage independently as experienced funders of research for development with evolving understandings within the sector of how best to prevent and address exploitation, abuse, and harm.

The delivery partners are:

- UK Research and Innovation
- British Council
- British Academy
- The Met Office
- Royal Society
- Academy of Medical Sciences
- Royal Academy of Engineering
- UK Space Agency

GCRF and Newton Fund delivery partners are both grant giving organisations and UK employers in their own right. As this is a policy document relating to safeguarding in research

¹ E.g. UKRI: <https://www.ukri.org/files/ukri-preventing-harm-safeguarding-in-research-and-innovation-policy/>

for development activities, this policy is concerned with BEIS' expectations for delivery partners as grant giving organisations funding GCRF and Newton Fund activities.

If BEIS sponsors or funds other delivery partner activities that are not GCRF or Newton activities, then these other activities lie beyond the scope of this policy document. If delivery partners have any questions regarding BEIS policy and expectations regarding safeguarding relating to non-GCRF and non-Newton activities, then they should contact the relevant team within BEIS (e.g. the BEIS Sponsor Section). Except where otherwise stated, this policy document applies only to BEIS R&I ODA funded activities.

BEIS expects delivery partners to promote safeguarding best practice and key principles among grantees and in their own policies and procedures for working with grantees. BEIS takes responsibility for reviewing, monitoring, and aiding delivery partners' application of safeguarding best practice and key principles as grant giving organisations.

BEIS recognises that delivery partners, BEIS itself, other government departments, and other research funders are working to develop and implement new safeguarding policies and procedures in a wide variety of organisational settings and with recent and developing understandings of best practice in this area. BEIS recognises that improving safeguarding policies and procedures is an ongoing and resource and time intensive process which may lead to divergent understanding and practices depending on the context. BEIS commits to working with delivery partners to resolve any disputes or points of disagreement in productive dialogue.

BEIS' expectations with regard to safeguarding for delivery partners as UK employers are the same as BEIS' expectations for other UK organisations to which it allocates funding: to abide by all relevant UK employment legislation for creating safe working environments. Delivery partner staff engaged in ODA activities are expected to follow the code of conduct and responsibilities outlined in the UK's interpretation of the international standards on tackling sexual exploitation and abuse and sexual harassment (SEAH) set out in the UN Secretary General's Bulletin 'Special Measures for Protection from Sexual Exploitation and Sexual Abuse' (15 October 2003): these UK ODA staff responsibilities are found in Appendix 1.

5. Key principles for BEIS' R&I ODA safeguarding policy

In relation to safeguarding policies and reporting, there is the expectation that all in BEIS and all delivery partners will act with integrity and be transparent and accountable in relation to their safeguarding policies and reporting.

BEIS endorses the key principles laid out in the [UKCDR Guidance for Safeguarding in International Development Research](#). These are:

- **Rights of victims/survivors and whistle-blowers:** the rights of actual and potential victims/survivors of safeguarding incidents should be central, and there should always be meaningful and effective pathways for support and redress

- **Equity and fairness:** involvement of all research partners at the research design and planning stage is necessary to ensure that research questions and methodologies are contextually appropriate and do not pose an unacceptable risk of harm to researchers, participants or communities. Responsibilities and rewards in the research process should also be clearly identified and shared fairly.
- **Transparency:** transparent practice, policy and procedures for safeguarding form a touchstone characteristic of good practice. Transparency requires clear and public safeguarding commitments and policies, as well as openness about incidents or breaches and the measures taken to address them, while upholding confidentiality to avoid secondary trauma or harm.
- **Accountability and good governance:** accountability is a significant feature of approaches to address and prevent harm and underpins good governance in the research process. In order for accountability to be proportionate and realistic, the expectations of all actors/partners in the research process must also reflect the distribution of legal responsibility, power and resources, as well as recognition of realities on the ground in often challenging contexts.

The cross-HMG SEAH Strategy lays out the key principles which UK government departments will apply within their own organisations and across their programming. They are:

- A **respect for human rights** in which survivors and victims will be responded to with respect confidentiality, safety, and without discrimination.
- Placing **the rights, needs, and wishes** of victims and survivors at the centre of reporting, investigative, complaints and response systems
- Developing appropriate and sensitive **reporting, complaints, and whistle-blowing mechanisms** across all our work and strengthen **accountability and support services** for survivors.
- That the UK will **listen** to victims, survivors, and whistle-blowers, or their representatives, and **learn** from their experiences, adapting our approaches where required.
- To do all we can to prevent incidents of sexual exploitation, abuse and sexual harassment from happening, but where they do occur, take a **zero tolerance approach** to ignoring, covering up, or mishandling cases.

As part of UK HMG and as a key contributor to the development of the UKCDR best practice guidelines, BEIS commits to working with delivery partners to apply these principles across Newton Fund and GCRF funded activities.

BEIS expects delivery partners to be guided by these same principles in developing and reviewing their own internal safeguarding policies and procedures.

6. BEIS ODA R&I Governance and Accountability

Responsibility for BEIS R&I ODA safeguarding policy will reside with the BEIS R&I ODA policy team. This policy will be kept under regular review to ensure it meets evolving understanding of best practice for safeguarding in research for development.

BEIS must ensure that delivery partners responsible for delivering Newton Fund and GCRF activities have sufficient safeguarding processes and procedures in place. Responsibility for reviewing delivery partner's safeguarding policies and procedures will reside with the BEIS R&I ODA policy team. Details of these policies and procedures will be gathered through a process led by BEIS/UKRI Project Management Office. Delivery partners' safeguarding policies and procedures will be reviewed annually.

There will be committed Board-level engagement in the process of working with delivery partners to improve safeguarding policies and approaches in relation to Newton Fund and GCRF funded activities. This will include updating the Portfolio and Operations Management Board (POMB) and the Ministerial ODA board on matters relating to safeguarding, including regular updates on reporting and approval of any policy revisions.

7. Expectations for delivery partners as grant giving organisations

BEIS R&I ODA funded activities take place in a wide variety of geographical and cultural settings, within a wide variety of regulatory, statutory, and legislative frameworks. Safeguarding policies and approaches here need to be particularly responsive to context and to historical power imbalances between and within countries, and between and within groups and organisations engaged in research and innovation activities. The expectations for delivery partners laid out here are intended to provide clarity regarding what BEIS would consider an 'ideal' approach to implementing safeguarding best practice within funded activities. BEIS acknowledges that not all elements of these expectations will always be appropriate for all delivery partners and the organisations with which they work at all times. BEIS commits to working with delivery partners to improve policies and approaches and to apply the principles and expectations outlined in this policy with sensitivity to organisational, historical, and cultural context.

BEIS acknowledges that delivery partners already accord substantial importance to the improvement of their safeguarding policies and processes, both within their organisations and as part of the programmes of research they fund, design, and undertake. For some delivery partners this has already included the publication of sector-leading safeguarding policies and the development of innovative processes to apply key safeguarding principles. BEIS expects that delivery partners will continue to devote resources to improving safeguarding policies and work with BEIS to realise the commitments laid out in the UK SEAH Strategy and to apply the principles embodied in that strategy, in the UCKDR guidance, and laid out here in this policy. This includes continuing to highlight this issue internally within delivery partners' own organisations and engaging with other organisations with whom delivery partners work to raise awareness, share lessons, and apply key principles to funded programmes.

BEIS expects delivery partners to have or be working clear safeguarding policies that will apply to working with any organisations they fund, whether the funded activities take place in the UK or overseas, or whether they are funded directly by the delivery partner or indirectly through an intermediate organisation. This could take the form of a separate safeguarding

policy and guidance for such organisations, or it could form part of a wider organisational policy or policies.

Whatever the format, delivery partners' safeguarding policies for grantees should be easy to find on delivery partners' websites. They should lay out the delivery partner's key principles for its approach to safeguarding issues, and these principles should derive from the key principles embodied in the UKCDR guidance and outlined here in this policy. They should clearly lay out the expectations the delivery partner has for grantee organisations with regards to addressing safeguarding issues, complaints, allegations, or whistleblowing. These expectations should include:

- An acknowledgement that it is the responsibility of everyone involved in funded activities to prevent SEAH, to mitigate risks in their activities, and to report breaches and abuses, as appropriate to their role.
- Transparent and appropriate organisational policies and procedures to prevent and address exploitation, abuse, and harm within ODA funded activities, including clear and transparent processes for reporting incidents and clear lines of governance and accountability.
- The capacity to respond appropriately to any incidents or complaints that occur, and to address them appropriately, including alternative reporting routes (for instance if direct line managers/senior managers are involved) and clear indication of when external agencies or local law enforcement should be involved.
- That organisations promote a culture where all staff know their responsibilities on safeguarding and feel safe to come forward and report concerns in the knowledge that their concerns will be taken seriously, responded to robustly but sensitively, with a victim and survivor-centred approach. If deemed appropriate, this could include anonymous reporting and support for individuals who may require counselling and professional help resulting from any abuse and harm.
- That safeguarding issues are addressed in organisational risk management.
- That organisations include training on organisational standards, codes of conduct, whistleblowing, and reporting incidents in their induction of new employees, with regular refresher training, the promotion of a safe and mutually respectful work environment at all levels, and appropriate professional training for designated safeguarding officers and board members.
- That organisations report upheld allegations of exploitation, abuse, and harassment against any individuals directly involved in delivery partner ODA funded activities to the delivery partner in a safeguarding disclosure.
- That organisations should have a process for periodically reviewing safeguarding policies and procedures, and applying lessons learned to modify or amend processes.

The policies should include how the delivery partner will monitor compliance among grantees. BEIS acknowledges that the form these monitoring processes should take will vary across delivery partners and across forms of programme. The policies should clearly lay out

lines of responsibility and communication within the delivery partner for addressing safeguarding issues or queries with grantees.

Following the publication of such safeguarding policies by a delivery partner, BEIS expects that delivery partners will adjust their grant terms and conditions to require compliance with these policies as a condition of being granted funding by the delivery partner. If local regulatory, statutory, or legislative frameworks prevent organisations from complying with all aspects of a delivery partner's policy, BEIS expects that delivery partners will respect these local frameworks, but expect organisations to provide evidence of why compliance is not possible and that locally appropriate alternative approaches are being pursued which seek to apply the key principles outlined in the delivery partner's policy. This could be a relatively common occurrence given the nature of ODA funded activities, and BEIS expects that delivery partners will engage with overseas partner organisations in a spirit of transparent communication and equitable partnership in seeking to resolve such issues. BEIS nonetheless expects delivery partners to be clear on the circumstances and timeframes under which an organisation's non-compliance with safeguarding policies would result in a grant being cancelled or not awarded. BEIS acknowledges that a period of adjustment before requiring compliance with any new safeguarding policies would be appropriate, to give organisations a chance to review their own policies and procedures and adjust them if necessary.

BEIS acknowledges that designing such processes and implementing them with organisations, groups, and individuals within whom delivery partners work on funded programmes and/or to whom they award grants will not happen immediately, but take time and substantial resources and expertise. BEIS commits to working with delivery partners in advising on such processes, while acknowledging that delivery partners themselves are the experts in their respective fields and therefore best placed to design and implement appropriate processes.

8. BEIS reporting requirements for delivery partners in the delivery of BEIS R&I ODA activities

BEIS requires delivery partners to report to BEIS if the delivery partner receives any complaints of actual, attempted, or threatened sexual exploitation, abuse, or harassment (a 'Safeguarding Disclosure') about, by, or from its employees or those representing the delivery partner in delivering activities funded as part of Newton Fund or GCRF activities.

BEIS requires delivery partners to report to BEIS if the delivery partner becomes aware of a safeguarding disclosure in relation to a beneficiary or partner organisation where the complaint is relevant to activities funded as part of Newton Fund or GCRF activities.

In both cases, the delivery partner shall provide an outline of the complaint and details of the action (if any) being taken by the delivery partner. The delivery partner shall not be required to provide any personal data.

The reports will be made to BEIS/UKRI ODA PMO.

Appendix 1: UK ODA Staff responsibilities

UK ODA Staff responsibilities are founded on international standards on tackling SEAH as set out in the UN Secretary General's Bulletin 'Special Measures for Protection from Sexual Exploitation and Sexual Abuse' (15 October 2003). The UK spells this out for staff as follows:

- Sexual exploitation and abuse constitute acts of gross misconduct, and are therefore grounds for termination of employment
- Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority, or age of consent, locally. Mistaken belief in the age of a child is not a defence
- 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 aid/humanitarian assistance that is due to beneficiaries or resources or benefits that employees have power to give
- Sexual relationships with beneficiaries are strongly discouraged, as well as other relationships which are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of our work
- Employees who have concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, must report such concerns via established agency reporting mechanisms
- Employees are obliged to create and maintain an environment that prevents sexual exploitation and abuse, and promote the implementation of the code of conduct. Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.