

## Safeguarding Policy

### Policy Statement

LifeArc does not work directly with children or vulnerable adults, however it is committed to proactively safeguarding and promoting the welfare of its employees and ultimate beneficiaries. LifeArc is taking reasonable steps to ensure that such vulnerable individuals who come into contact with LifeArc or LifeArc supported initiatives do not, as a result, come to any harm.

Where any suspected wrongdoing is in relation to employees, the procedure set out in LifeArc's Whistleblowing or Grievance Policy should be followed.

### Scope of policy

This policy applies to all LifeArc employees and trustees (whether permanent, fixed-term or temporary, trainees, interns, seconded employees) consultants, contractors, agents or any other person working for the beneficial interest of LifeArc, or any of its subsidiaries or their employees, wherever located (collectively referred to as 'individuals' in this policy).

### Understanding risks

It is clear that vulnerable persons can be harmed, or put at risk of harm, by organisations and institutions, and that abuse of vulnerable groups (including children) can happen in all types of organisations. Such harm may result from unintentional acts or deliberate actions.

Unintentional acts may lead to harm due to a lack of 'due diligence' or competence or through organisational negligence, such as inadequate care and supervision, lack of policies, procedures and guidance to inform programming and practice, or lack of employee compliance with legal requirements. Also, deliberate actions may be taken by people with intent to abuse vulnerable people.

### Statement of commitments

LifeArc will take all reasonable measures to ensure vulnerable groups (including children) impacted by projects and programmes delivered and/or supported by LifeArc are protected as far as possible from harm, including exploitation, neglect and abuse of all kinds. LifeArc commits to:

- Place safeguarding at the heart of recruitment practices by carrying out pre-employment screening checks of qualifications and experience;
- Ensuring individuals are aware of protection issues;
- Taking appropriate and proportionate action if this policy is not complied with;
- Carrying out appropriate due diligence on partners, ensuring they have appropriate controls and safeguarding measures in place, and integrating safeguarding and onward reporting requirements in LifeArc's partnership and funding-related agreements;
- Ensuring that safeguarding concerns are addressed promptly and through appropriate channels;

- Reporting safeguarding incidents, allegations or concerns to external authorities and regulators, as appropriate, and in accordance with best practice;
- LifeArc will maintain its Whistle-blowing and Grievance policies which are aimed at encouraging a culture of openness and accountability wherein individuals are confident that they can raise any matter of genuine concern without fear of reprisal in the knowledge that they will be taken seriously and that matters will be investigated appropriately and managed on a need-to-know basis, with appropriate remedial action taken.

## Compliance with the Policy

Individuals are required to:

- Read, understand and comply with this policy;
- Avoid any activity that might lead to, or suggest, a breach of this policy;
- Immediately report any concerns or suspicions of possible/actual harm to a beneficiary, including abuse, exploitation and neglect and policy non-compliance, or risk of such, resulting from action or inaction by anyone covered by this policy. This includes any suspected historical abuse. In the first instance these should be reported to the General Counsel & Company Secretary. **The person making the report should otherwise keep the matter strictly confidential and not seek to investigate the incident or suspicion.**

Management at all levels are responsible for ensuring those reporting to them are aware of this policy.

Any individual who may have breached this policy may face a disciplinary investigation, which could result in dismissal for gross misconduct.

LifeArc may terminate its relationship with other individuals and organisations working on its behalf if it is established that it has inadequate safeguarding procedures or that abuse of vulnerable people is taking place in their business.

## Governance of this policy

The Board of Trustees has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all LifeArc individuals comply with it.

The General Counsel & Company Secretary has primary and day-to-day responsibility for implementing this policy, monitoring its effectiveness and auditing internal control procedures to ensure they are effective.

This policy does not form part of any employee's contract of employment and may be amended at any time.

## Policy Review

We are committed to reviewing our policies and good practice procedures regularly. This policy will be reviewed by the Board of Trustees at least every two years, when there is a change in applicable UK law and/or best practice or when an incident occurs that highlights a need for change – whichever occurs first.

## Publishing this policy

LifeArc will ensure that this policy is at all times publically accessible on its website.