

Website Safeguarding Policy

Review date:	October 2026
Next review date:	October 2027. This policy will be reviewed by the Board of Trustees at least annually or when an incident occurs that highlights a need for change – whichever occurs first.

Introduction

Statement of Commitment

This Policy relates to LifeArc's compliance with the Charity Commission's definition of safeguarding in its guidance on 'Safeguarding and protecting people for charities and trustees':

- LifeArc is committed to proactively safeguarding and promoting the welfare of all individuals who come into contact with the organisation through its work. This includes beneficiaries (including patients and patient representatives), LifeArc People, research participants and other members of the public. LifeArc will take reasonable steps to ensure that no one suffers harm as a result of its activities, including any programmes that are funded or otherwise supported by LifeArc and any events hosted by LifeArc, including in collaboration with other organisations. Particular attention will be given to children or adults at risk in recognition of the statutory safeguarding responsibilities that apply to these groups;
- LifeArc takes **safeguarding** to mean the range of measures in place to protect people within LifeArc, or those it comes into contact with, from abuse and maltreatment of any kind.

Safeguarding is everyone's responsibility. LifeArc believes that everyone it comes into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin, has the right to be protected from all forms of harm, abuse, neglect and exploitation. LifeArc will not tolerate abuse and/or exploitation by LifeArc People or Partners.

Purpose

As noted above, LifeArc has an overarching duty to safeguard LifeArc People in line with Charity Commission guidance. The purpose of this Policy is to protect people who come into contact with LifeArc through its work, with particular attention given to children and adults at risk. LifeArc recognises that some LifeArc People may themselves be adults at risk and related safeguarding matters affecting LifeArc People are more broadly addressed through other LifeArc policies.

This Policy sets out the commitments made by LifeArc and informs LifeArc People and Partners of their responsibilities in relation to safeguarding.

Definitions

A **"child"** is anyone under the age of 18.

"LifeArc People" means all people working for LifeArc, or on its behalf, in any capacity and/or any person working on LifeArc's physical premises or digital estate. LifeArc People includes employees at all levels, trustees/directors (those people who are registered at Companies House as a formal director of LifeArc), officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives, researchers, and students.

"Partner(s)" means any organisation which i) receives funding or in-kind support from LifeArc; ii) collaborates with LifeArc to deliver any programme, activity or event (whether funded, or otherwise

supported by LifeArc); iii) is a service provider to LifeArc; or iv) is otherwise associated with LifeArc's name and brand. In respect of investments into companies and funds by LifeArc's ventures and investment teams, these are managed as commercial equity and fund investments and are subject to those teams' respective investment control frameworks. Safeguarding risks in relation to such investments will be managed to the extent possible through those investment controls rather than through the Partner requirements set out in this Policy. However, this Policy still applies where a safeguarding concern arises from LifeArc's direct interaction with such companies or funds – for example hosted activities, joint events, research collaborations or the provision of funding outside of a venture capital or investment – and LifeArc People must notify the Designated Safeguarding Officer under this Policy in those circumstances.

An **“adult at risk”** is any person who is aged 18 years or over who, because of their needs for care and support is unable to protect themselves from either the risk of or the experience of abuse or neglect. Whether someone is an adult at risk or not is something which can change with their circumstances and is not fixed. An adult at risk may have a mental illness, a learning disability, a physical disability, be frail or be otherwise in need of additional assistance to protect themselves from harm or exploitation, for example, due to social factors such as poverty, displacement or lack of services or support.

Scope and consequences of breach

Compliance with this Policy is mandatory for all LifeArc People. Breaches of this Policy by LifeArc People will be treated seriously.

LifeArc works in collaboration with many Partners. This Policy is intended to work alongside the equivalent policies of LifeArc's Partners, where appropriate. LifeArc expects that its Partners will fully support the values and commitments set out in this Policy. Partners, as independent organisations, retain ultimate responsibility for their own safeguarding arrangements and for internally dealing with their own safeguarding concerns. However, LifeArc expects that any safeguarding concern connected with a LifeArc-funded or otherwise supported activity or a LifeArc hosted event (including any actual or alleged incident of significant harm, significant risk of harm, or serious safeguarding failure) is escalated promptly to LifeArc's Designated Safeguarding Officer through an agreed contact route, so that LifeArc can comply with its own regulatory requirements. In all cases where LifeArc's work brings a Partner into contact with children or adults at risk, and in any other case where LifeArc considers it appropriate, LifeArc will ensure that each Partner has a nominated safeguarding contact who will be responsible for promptly reporting safeguarding concerns to LifeArc's Designated Safeguarding Officer.

Policy Statement

Examples of LifeArc activities involving children and adults at risk and LifeArc's approach to safeguarding

LifeArc believes that everyone has a right to be treated fairly and with dignity and respect. We are committed to promoting safe environments for all individuals who come into contact with LifeArc's work, including the research activities we carry out and fund, our patient engagement work, our workplace activities and our outreach and hosted events. This includes patients, family members, communities, research participants and the general public. LifeArc may encounter children and adults at risks in a range of situations that include:

- research work, which involves direct physical contact as well as online contact with, or access to data on, children and/or adults at risk that also require appropriate ethical approvals in place, any clinical trials are conducted safely and in compliance of all regulatory requirements and that any adverse incidents are appropriately reported;
- Patient engagement work, that includes projects that we fund or collaborations we are involved in (including involving patient data);

- Within the workplace, protecting work experience students and any staff who may be vulnerable, including our obligations around appropriate recruitment checks;
- Outreach activities with schools and colleges to increasing participation and knowledge of LifeArc's translational activities and engagement with work experience students under 18; Consequently, LifeArc will take reasonable steps to safeguard and protect from abuse LifeArc People and those connected with the activities of LifeArc and who come into contact with it.

LifeArc commits to:

- Placing safeguarding at the heart of recruitment practices by carrying out pre-employment screening checks of qualifications and experience, including (in accordance with Charity Commission guidance) carrying out the highest level of DBS checks to which we are entitled;
- Ensuring LifeArc People are aware of safeguarding concerns, including how to recognise, respond to, refer, record and resolve them, and adhere to this Policy and LifeArc's Safeguarding Code of Conduct (please see Annex 1);
- Taking appropriate and proportionate action if this Policy is not complied with;
- Carrying out appropriate due diligence on Partners and prospective partners, ensuring they have appropriate controls and safeguarding measures in place, and integrating safeguarding and onward reporting requirements in agreements with Partners; 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;
- Maintaining its Whistleblowing 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;
- Developing and maintaining a 'safety culture' within LifeArc that creates and maintains protective environments and enables people to raise related concerns;
- Ensuring that LifeArc's Privacy and Data Protection policies remain suitably updated so that it is clear that it will report wrongdoing on the part of LifeArc People and Partners to appropriate authorities and will share such information as may be necessary to protect individuals from harm.

Embedding organisational commitment

LifeArc People will receive appropriate training/briefing on their responsibilities and obligations under this Policy and it will form part of the induction for new LifeArc People. Additional training will be available to LifeArc People if required by their role.

LifeArc People will be expected to acknowledge and accept their responsibilities under this Policy. See heading 'scope and consequences of breach' in relation to consequences of breaches of this Policy.

Adults at Risk and Children Risk Assessment process, recruitment of LifeArc People and DBS checks

Initiating the Adult at Risk and Children Risk Assessment Process

LifeArc's activities, as noted above, may involve interaction with children and adults at risk. In order to assess the risks involving our work with children and adults at risk (including any LifeArc People) and to put in plans to control any risks arising, we will initiate an Adults at Risk and Children Risk Assessment process prior to the commencement of new activities or events, or changes to such activities or events, that involve or may involve children and/or adults at risk.

Identifying required checks

Once the key duties and responsibilities of the activity are determined, one of the required actions must be to identify which level of DBS check is required prior to the individual working with children and/or adults at risks.

In addition, LifeArc must consider if the required checks should be treated as essential before employment/engagement (ie new LifeArc People recruited to the role should not be able to start work until the check is completed).

Reporting & responding to concerns

Concerns for the safety and wellbeing of children and adults at risks and any other person who comes into contact with LifeArc through its work could arise in a variety of ways and in a range of situations. For example, a child/adult at risk may report or show signs of abuse, someone may hint that a child/adult at risk is at risk or that a colleague is an abuser, or someone may witness abuse.

A non-exhaustive list of the signs and types of abuse are set out in Annex 2. It is not always easy to recognise a situation where abuse may occur or has taken place and LifeArc People are not experts at such recognition. However, each person has a responsibility to act if they have any concerns about someone's behaviour towards a child or adult at risk. It is important that the recipient of any complaint or accusation that a child or adult at risk has been or is being abused listens carefully without making or implying any judgment as to the truth of the complaint or accusation.

Process for raising and reporting a safeguarding concern

The process for raising and reporting a safeguarding concern will differ depending on the nature of the concern. These processes are as follows:

If any LifeArc People have a concern regarding the immediate safety of a child or adult at risk, believe them to be at immediate risk of harm or abuse, and/or a criminal offence is taking place, they must take immediate steps to protect the person by making a referral to social services or to the police to prevent harm. Where such a referral is made, they should inform LifeArc's Designated Safeguarding Officer as soon as possible following the referral. Where the concern happens within, or is connected with, a Partner organisation, the Designated Safeguarding Officer will work with that Partner as appropriate.

The person making the report should otherwise keep the matter strictly confidential and not seek to investigate the incident or suspicion.

Children and adults at risks, and any other person whom LifeArc comes into contact with, can also raise a concern directly with the Designated Safeguarding Officer. Individuals who are visitors to, or guests of LifeArc, including but not limited to those who are attending events held by LifeArc, should raise any complaints to their host, who should be a LifeArc employee.

Where a safeguarding concern relates to one of LifeArc's Partners, including concerns arising from LifeArc-funded or otherwise supported activities or hosted events (including in collaboration with Partners) or in the Partner's workplace, we will take those concerns seriously and take appropriate action, such as raising those concerns with the relevant Partner depending on the context.

Reporting serious incidents to the Charity Commission and other external bodies

LifeArc is committed to reporting all relevant incidents to the Charity Commission for England and Wales via a serious incident report.¹ LifeArc will also report incidents to other regulatory bodies and government departments or funding bodies, where appropriate.

Reporting will not be avoided on the basis that it may harm LifeArc's reputation or give rise to litigation and any concerns in relation to data protection will not act as a barrier to reporting, although they will be carefully considered to ensure that the disclosure is made within the legal framework for so doing.

Data protection

LifeArc complies with the principles of the UK GDPR and the Data Protection Act 2018 in the way it collects, holds and disposes of personal information in compliance with its Data Protection Policy.

Roles and Responsibilities and who to contact

The **Trustees** of LifeArc have ultimate responsibility for ensuring that LifeArc protects from harm all those who come into contact with it through its work. The Trustees have oversight of LifeArc's safeguarding and linked policies and oversee LifeArc's handling of safeguarding reports. The Trustees retain ultimate responsibility for deciding whether any serious incident reports need to be made to the Charity Commission in relation to safeguarding incidents, after taking advice from the Designated Safeguarding Officer. In accordance with Charity Commission guidance, this responsibility remains with the Trustees even where day-to-day activity is delegated within the organisation.

LifeArc's **Safeguarding Trustee** is Pankaj Davé who is the safeguarding point of contact on the Board of Trustees.

LifeArc's **Designated Safeguarding Officer** is the General Counsel & Company Secretary. The Designated Safeguarding Officer takes responsibility for: advising and supporting the senior leadership team and the Trustees in developing and establishing LifeArc's approach to safeguarding; playing a lead role in maintaining and reviewing LifeArc's plan for safeguarding; coordinating the distribution of policies, procedures and safeguarding resources throughout LifeArc; advising on training needs and development, providing training where appropriate; providing safeguarding advice and support to LifeArc People; managing safeguarding concerns, allegations or incidents reported to LifeArc; and managing referrals to key safeguarding agencies (eg social services or police) of any incidents or allegations of abuse and harm.

Given LifeArc's size, the Designated Safeguarding Officer will work with individuals within the organisation on the day-to-day operation and implementation of this Policy.

LifeArc's **Deputy Designated Safeguarding Officer** is LifeArc's Chief People Officer.

All **LifeArc People** working with children and adults at risks within or connected with LifeArc's activities/events should be familiar with this Policy. In addition, they should conduct themselves in

¹ The Charity Commission has published guidance as to what constitutes a serious incident and how to make a report, which is updated from time to time and available at <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>.

accordance with the LifeArc's Safeguarding Code of Conduct (see Annex 1). This provides guidance on acceptable and desirable conduct to protect both children and adults at risks who come onto contact with LifeArc People.

Every **individual** who becomes aware of any suspicions or allegations regarding harm to children or adults at risks is required to report this immediately to the Designated Safeguarding Officer.

Annex 1 – Safeguarding Code of Conduct

When working with children and/or adults at risks, LifeArc People must comply with this Safeguarding Code of Practice. Non-compliance by LifeArc People will be treated seriously and will be treated as a potential cause for disciplinary action or termination of the relationship by other means. Breaches by trustees may result in the termination of their trusteeship.

1. Consider the wellbeing and safety of event participants in advance through proper planning and development of safe methods of working/activities.
2. Wherever possible, work in an open environment with children where they can be seen by others.
3. Avoid unnecessary physical contact.
4. Avoid taking a child or an adult at risk alone in a car on journeys, however short.
5. Avoid taking a child or an adult at risk to the toilet, unless another adult is present, or another adult is aware (this may include a parent, group leader or other responsible person).
6. In a situation where you are alone with a child or adult at risk, make sure that others can clearly observe you.
7. Set expectations of the standards of behaviour required from participants in an activity/event and encourage them to accept responsibility for their own performance and behaviour.
8. Ask participants in an activity/event to take reasonable steps to ensure their own safety and that of others, and to report any inappropriate behaviour they experience/witness or any concerns that they may have.
9. Avoid showing favouritism towards particular participants.
10. Report incidents of alleged abuse to the LifeArc's Designated Safeguarding Officer and ensure that any allegations are recorded.
11. Report any concerns about poor practice to senior management or the Designated Safeguarding Officer.
12. Report any safeguarding incidents to the Designated Safeguarding Officer.
13. Avoid personal relationships with a child or an adult at risk.
14. Avoid entering a physically or emotionally intimate relationship with a young person under the age of 18.
15. Staff should remember that inappropriate behaviour can also occur over the telephone, email, social media or internet.
16. Only official LifeArc social media should be used for engaging with the wider community. Inappropriate or abusive comments should be removed swiftly, and abusive individuals blocked/reported to the social media concerned. Facebook instant chat and other similar functions should not be used to interact with children or adults at risks. Wherever possible, communication should be only public pages and avoid colloquial language/abbreviations which may be misinterpreted (e.g. LOL).
17. Do not make suggestive or inappropriate remarks to or about a child or adult at risk, even in fun, as this could be misinterpreted.
18. Participate in training available to you to support you in your work with children and adults at risks.

- 19.** First aid treatment should be given with more than one adult present unless a delay would be life-threatening.
- 20.** Do not take children or adults at risks to your home.
- 21.** Maintain confidentiality about sensitive information.
- 22.** Where it is necessary for LifeArc People to take photographs or video images of children or adults at risks, written consent must be obtained (from parents/guardians in the case of children) before these images are taken in order to comply with the Data Protection Act. Personal details and photos which clearly identify an individual must only be published where he/she (or his/her parent/guardian) has given specific agreement. Subjects should be suitably dressed in photographs.

Annex 2 – Recognising signs of abuse

It can often be difficult to recognise abuse. It is nevertheless important to know what could indicate that abuse is taking place and to be alert to the need to consult further. Someone can abuse a child/adult at risk by actively inflicting harm or by failing to act to prevent harm. Abuse can take place within a family, in an institutional or community setting, by telephone or on the internet. Abuse can be carried out by someone known to the person or by a complete stranger. If you are worried about a child/adult at risk it is important that you keep a written record of any physical or behavioural signs and symptoms. In this way you can monitor whether or not a pattern emerges and provide evidence to any investigation if required.

The following is a non-exhaustive list of signs of abuse of children and adults.

A. Children

Physical Abuse	Physical abuse is the deliberate infliction of pain, physical harm or injury and includes withholding or misuse of medication.
Emotional Abuse	Emotional abuse is the emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless, unloved or inadequate or causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. It may feature age or developmentally inappropriate expectations. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone.
Sexual Abuse	Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not they are aware what is happening. This may involve physical contact, including penetrative or non-penetrative acts or non contact activities, such as involving children in looking at, or the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
Neglect	Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter or clothing, failure to protect a child from physical harm or danger, or failure to ensure access to appropriate medical care or treatment.

B. Adults

Physical Abuse	Physical abuse is the deliberate infliction of pain, physical harm or injury and includes withholding or misuse of medication.
Psychological abuse	Psychological abuse is any pattern of behaviour by another that results in harm and may include insults, humiliation, ridicule, bullying, threats, enforced isolation, interference in relationships and contact between consenting adults, coercion, lack of privacy or choice, denial of dignity.
Sexual Abuse	Sexual Abuse is any sexual activity involving but carried out without the informed consent of an adult at risk. Sexual abuse may include sexual intercourse, inappropriate touching, offensive or suggestive language, 'voyeuristic' behaviour and exposure to the suggestive or sexually explicit activities of others, including films, photographs, images etc.
Financial or material abuse	Financial abuse is the misappropriation of funds (savings or income) or property of an adult at risk. This may include exploitation, theft or fraudulent use of money, misuse of property or possessions and incurring financial liabilities on behalf of an adult at risk without their informed consent.
Neglect and acts of omission	Neglect may be deliberate or by default where the abuser is not able to provide the care and support needed or may not recognise the need for the care and support to be given. The abuser may also be neglecting themselves.
Discriminatory abuse	When the adult at risk is harassed or discriminated against because of their age, race, gender, sexuality, religion, disability, culture etc.
Self-neglect	Where the adult at risk is neglecting to care for their own personal hygiene, health or surroundings.
Modern Slavery	Includes forced labour, debt bondage, sexual exploitation, criminal exploitation and domestic servitude.
Domestic abuse	Includes controlling, coercive or threatening behaviour and / or violence between people who are or have been intimate partners or family members. Abuse can take a variety of forms, not only physical but also psychological, sexual, emotional, social, financial, intimidation and neglect.