



# SAFEGUARDING IN RESEARCH POLICY

NIHR GLOBAL HEALTH RESEARCH GROUP ON PROMOTING CHILDREN'S AND ADOLESCENT'S MENTAL WELBEING IN SUB-SAHARAN AFRICA



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VERSION 1.1



## About the Project

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### Summary

The World Health Organisation (WHO) recommends preventative mental health interventions in schools. When children and adolescents focus on being mindful, they slow down, take their time, and focus on something in a way that is both relaxing and stress-free. Practising mindfulness makes children and adolescents happier. It improves their attention span, helps them manage stress, increases their sense of well-being, and improves their communication skills. It also improves their school performance. We do not know if mindfulness improves the well-being of children and adolescents in Sub-Saharan Africa. There is a need to know if it does so and if it would be a good use of government resources. We have designed a project which will help answer these questions.

We will deliver the project in Ethiopia and Rwanda between 2022 and 2026. Rwanda and Ethiopia are two of the poorest countries in the world. The wellbeing of children is poor in both countries, and school attainment is low. We will research ways of providing an affordable and acceptable mindfulness intervention that improves children's and adolescents' well-being. We will work with parents and policymakers to agree on delivering and testing it. Teacher-educators working with primary school teachers will develop an appropriate mindfulness intervention. Teachers involved in developing the intervention will train other teachers in their schools. Teachers will deliver the intervention as part of the primary school curriculum so that it reaches all children.

Further information is available at [www.abdn.ac.uk/nihr-camw](http://www.abdn.ac.uk/nihr-camw)



GHRUG Project: NIHR133712 - NIHR Global Health Research Group on Promoting Children’s and Adolescent’s Mental Wellbeing in sub-Saharan Africa.

## Safeguarding in Research Policy

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## Section 1: Introduction

The purpose of this policy is to act as guidance to ensure that the research project is compliant with the National Institute for Health and Social Care's (NIHR) [NIHR Safeguarding Guidance](#)<sup>1</sup>, and [NIHR Policy on Preventing Harm in Research](#) (2001) as required by Clause 37 of the *Research Contract Between The Secretary of State for Health And Social Care and the University Court of the University Of Aberdeen* and Section 14, points 14.3, 14.4 and 14.5 of the *Collaboration Agreement (CA)* between the Court of the University of Aberdeen (UoA), the University of Rwanda (UOR) and Addis Ababa University (AAU). If there is any conflict between this policy and the CA or the Contract, the CA and the Contract take precedence.

Under clause 37.1.2 of the Contract it is the responsibility of the Contracting Partner (the University of Aberdeen) to ensure that the project:

1. Takes all reasonable steps to prevent actual, attempted or threatened serious misconduct by any person engaged to work on the project;
2. Adopts robust safeguarding and whistleblowing policies to promote and support the reporting and investigation of suspected misconduct, illegal acts, serious misconduct, or failures to investigate any such matter; and;
3. Takes all reasonable steps to prevent bullying and harassment.

The Policy is also informed by [UKCDR: Guidance on Safeguarding in International Development Research](#).<sup>2</sup>

## Section 2: Scope

This Policy protects everyone who is employed on, participates in, or otherwise comes into contact with the project activities.

This includes (but is not limited to): co-investigators, project support staff, post-doctoral researchers (PDRs), PhD students, external intervention staff, teachers in the pilot, intervention and control schools, children and adolescents participating in the project, parents of children and adolescents participating in the project, community members, and bystanders to the project.

This Policy outlines the steps for raising a safeguarding concern including addressing the reality that some individuals may not have the access, ability, or confidence to raise a concern through formal institutional mechanisms. This Policy also outlines the steps for someone to raise a safeguarding concern on their own behalf, on behalf of someone else, or based on something they have witnessed or heard about.

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<sup>1</sup> Under Clause 14.3 of the CA any complaints shall be dealt with in accordance with the NIHR Safeguarding Guidance which is part of the agreement.

<sup>2</sup> A Webinar on the policy can be found here: [Webinar: 'Preventing Harm in Research'](#)

## Section 3: Definitions

### 3.1. Safeguarding in Research

#### 3.1.1. Background

Traditionally, safeguarding has had a very narrow definition. However, the ODA funding opportunities available since 2016, and the activities which led to the creation of the [UKCDR: Guidance on Safeguarding in International Development Research](#) have contributed to, and reflect, an increased focus on the concepts of vulnerability, risk, harm and power relations in global health research, acknowledging that this research can present specific situations where power imbalance and abuse of power may occur<sup>3</sup>.

#### 3.1.2. Definition

In the context of research, the NIHR use the UKCDR definition of **safeguarding in research** which is '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 .... such as bullying, psychological abuse and physical violence' (UKCDR 2020). No sexual activity should be engaged in with any child under 18 years or vulnerable adults<sup>4</sup> including community members who are not participating in the research (bystanders) regardless of whether they give consent or not.

Safeguarding in the context of research refers to the measures taken to ensure that **all** individuals that are either employed on, participate in, or otherwise come into contact with the project activities, do not come to harm as a result of their involvement, or as a result of the impact on their lives or their communities.

This includes anticipating, as far as possible, the **potential** for harm, taking steps to mitigate the identified harms, and taking appropriate actions to address any concerns when they arise. This also includes instances where researchers become aware of abuse that may not be directly associated with their research activities. The Project Risk Register will include an assessment of the risks related to safeguarding and the mitigation in place to reduce the risks.

**Anyone** can be a victim/survivor of harm in research if it is not prevented or addressed, and particular groups of people can be disproportionately affected, including, but not limited to, children, minoritized groups, women, older people, people in subjugated socioeconomic groups or castes, Black, indigenous and people of colour, people with disabilities, people living with HIV, refugees and internally displaced people).<sup>5</sup>

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<sup>3</sup> [NIHR Safeguarding Guidance](#)

<sup>4</sup> [NIHR Policy on Preventing Harm in Research](#)

<sup>5</sup> [UKCDR Guidance for Safeguarding in International Development Research](#)

### 3.2. Other Key Terms

This Policy refers to two similarly named but distinct safeguarding roles, which are defined below.

A **Designated Safeguarding Contact** (DSC) refers to the identified individual(s) who are nominated initial contacts on the Participant Information Sheet, and can be contacted by research participants and research bystanders in the countries where on-the-ground research is being engaged in.

A **Designated Safeguarding Officer** (DSO) refers to the identified individual(s) who are trained to, and responsible for, coordinating and ensuring that safeguarding principles and standards are embedded throughout the project design and implementation at their institution<sup>6</sup>. See section 4.5. of this Policy for further information.

For the other relevant terms, below, this policy uses the NIHR's definitions.<sup>7</sup>

**Bullying** is the misuse of power through ongoing and persistent attacks, verbal, written, electronic, psychological, or physical on an individual. It is a misuse of power over another person through negative acts and behaviours that undermine that person.

**Harassment** is any unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating hostile, degrading or offensive environment for them.

**Victimisation** is when a person is treated less favourably because they have made or are planning to make an allegation of harassment or have participated in an investigation.

### 3.3. Language of Safeguarding

Safeguarding issues may be raised explicitly or implicitly. It is important to be aware of the difference and recognise both as safeguarding issues that must be raised through the same mechanisms and treated with the same seriousness. An individual may also not recognise that what they are experiencing is a safeguarding concern.

Examples of explicit language may be using words like 'abuse', 'harm', 'harassment' or 'bullying'. An example of implicit language may be someone saying they are afraid of someone else. Body language can also indicate a safeguarding issue, such as bruises or markings, or a sudden or extreme change in an individual's usual behaviour, either generally or around someone(s) specifically.

These examples are not exclusive and there may be other situations where it would be appropriate to submit a report.

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<sup>6</sup> [NIHR Safeguarding Guidance](#)

<sup>7</sup> [NIHR Policy on Preventing Harm in Research](#)

## Section 4: Responsibilities

### 4.1. Responsibilities of the Contracting Partner (University of Aberdeen)

The Contracting Partner is responsible for:

1. Ensuring that all complaints are recorded, investigated and the findings of investigations recorded;
2. Reporting all incidents relating to safeguarding or bullying and harassment to the NIHR using an [Incident Reporting Form](#) and using the procedures outlined in the [NIHR Safeguarding Guidance](#), and ensuring all incidents are reported to the relevant employer;
3. By January 2023 and annually thereafter certifying to the NIHR that the project is compliant with Clause 37 of the Contract;
4. Ensuring all those working on the project, including but, not limited to J-Ls and co-Is, post-doctoral research fellows, PhD students, administrators and other support staff and external intervention staff are trained in safeguarding in research, and;
5. Ensuring that the project is conducted in accordance with the [Concordat to Support Research Integrity](#) including having a whistleblowing policy.

### 4.2. Responsibilities of signatories to the Collaboration Agreement

All signatories to the CA (UoA, UOR, AAU) are responsible for:

1. Taking all reasonable steps to ensure that anyone who is unsuitable to work with children, young people and vulnerable adults is prevented from doing so;
2. Ensuring that all researchers working on the project take any legal checks required in their country for people working with children and vulnerable adults.
  - a. Those employed by the University of Aberdeen must have a PVG check in accordance with the University's [Protection of Vulnerable Groups Policy](#);
  - b. The co-leads at Addis Ababa University must inform the Ethical Review Committee that the project is working with children and adhere to any requirements they issue.
  - c. The University of Rwanda does not require any legal checks but has informed the Ethics Committee that the project is working with children.
3. Ensuring that all those working on the project are aware of their institutional requirements for reporting concerns relating to this policy;
4. Ensuring that all complaints are recorded and investigated as necessary, and;
5. Reporting all incidents relating to safeguarding or bullying and harassment and the outcomes of any investigations to the Research Project Manager at the University of Aberdeen.

### 4.3. Responsibilities of the Management Group

1. The Management Group is responsible for ensuring that all those working on the project are trained in safeguarding and complete the online test, and;
2. The lead researcher in each country is responsible for ensuring that their team are made aware of this policy. They are also responsible for ensuring that any relevant concerns raised with them are dealt with in line with this policy.
  - a. The lead researchers are:
    - i. UK: Professor Pamela Abbott ([p.abbott@abdn.ac.uk](mailto:p.abbott@abdn.ac.uk))

- ii. Rwanda: Professor Wenceslas Nzabairwa ([wzabairwa@gmail.com](mailto:wzabairwa@gmail.com))
- iii. Ethiopia: Dr Tsion Hailu ([bitahailu@gmail.com](mailto:bitahailu@gmail.com))

#### 4.4. Responsibilities of the Joint-Leads and Co-Investigators

1. The J-Ls and all co-Is are responsible for the project design and implementation (the Executive Committee), to ensure it meets the requirements of the policy by ensuring that any potential harms arising from the research have been carefully considered and mitigated.
2. They are responsible for establishing a culture within the project in which exploitation, abuse and harm are not tolerated, and which allows safeguarding concerns within the project to be reported. All members of the research team will be made aware of this code of practice and their individual responsibilities to uphold the code of practice requirements.
3. The J-Ls and co-Is are responsible for clarifying the routes for reporting safeguarding concerns or incidents and explaining how these will be dealt with under the terms of this Safeguarding in Research Policy at their institution.
4. The J-Ls and co-Is are responsible for ensuring that the contact details of the Designated Safeguarding Contacts (DSCs) in Rwanda and Ethiopia are included on the Participant Information Sheet.

#### 4.5. Responsibilities of the Designated Safeguarding Officers

The Designated Safeguarding Officers (DSOs) are the Research Project Manager at the University of Aberdeen and the Project Administrators at the University of Rwanda and Addis Ababa University.

They are responsible for:

1. Acting as the identified internal contact for responding to safeguarding concerns or allegations raised in the course of the projects' activity;
2. Ensuring any safeguarding concerns and incidents are appropriately recorded and reported to the Research Project Manager at the University of Aberdeen, and;
3. Ensuring any safeguarding concerns and incidents are reported through the appropriate procedures in their organisation for further action.
4. Managing safeguarding reports in accordance with local law and with sensitivity to the local context, customs, and practises.

The Research Project Manager at the University of Aberdeen is also responsible for:

5. Ensuring that all potential risks relating to safeguarding and bullying, and harassment are included in the Risk Register and that the Risk Register is updated and reviewed a minimum of every three-months, in line with NIHR guidelines

#### **4.6. Expectations of project employees**

All those employed to work on the project are expected to:

1. Follow the requirements of this policy and any other terms and conditions required by the NIHR relating to safeguarding and bullying and harassment;
2. Treat each other, research participants and members of the general public with dignity and respect, to act with the highest standards of integrity, honesty and professionalism and to embed good practice in every aspect of their work;
3. Adhere to the highest level of research ethics, in line with requirements set out by national and international regulatory bodies, profession and regulatory research guidance and research ethics frameworks issued in appropriate areas;
4. Recognise the inherent power imbalances that exist in research activities and take all reasonable steps to mitigate them within the activities that they are involved in;
5. Engage in equitable partnerships throughout the development, delivery and dissemination of a research activities to avoid exploitative approaches;
6. Be aware of how to respond to and report concerns about exploitation, abuse and harm, and;
7. Raise any concerns that they, or those that reported to them have, through the appropriate channels in their organization and/or with the appropriate authorities.

#### **4.7. Expectations of individuals associated with the project**

1. All those associated with the project are expected to comply with this policy, and, if required, report a safeguarding concern.

#### **4.8. Safeguarding support that staff and students employed on the project can expect**

As well as having responsibilities and expectations to meet in regard to safeguarding and creating a safe research environment, staff and students employed on the project should have their own expectations of what to expect from the project, and its management, in order to support them in meeting their responsibilities.

Staff and students employed on the project should expect:

1. To work in a safe, equitable environment and to be treated with dignity and respect, and for their rights as an individual, and staff member, researcher and/or student to be upheld;
2. To receive formal safeguarding training as part of Work Package Four, in order to support the carrying out of individual safeguarding responsibilities (as outlined in section 4);
3. To have clearly identified and up-to-date Designated Safeguarding Officers at their institution (or sub-contracting organisation) which they can contact with safeguarding questions or concerns;
4. To not be afraid of reprisals if they report a safeguarding concern (see section 5.5);
5. To receive the appropriate institutional, legal, and emotional support, in line with their institution's guidance, if they are a victim/survivor of a safeguarding incident or make or receive a disclosure.

#### **4.9. Safeguarding support that research participants, teachers in the pilot, intervention and control schools, and community members can expect**

Research participants, parents of children and adolescents, teachers in the pilot, intervention and control schools, community members and other stakeholders participating in the project, and bystanders to the project should expect a safe environment underpinned by the concept of 'do no harm', and for everyone working on the project to adhere to their responsibilities to provide a safe research environment.

They should expect:

1. To have all their rights as a research participant, or parent of a child or adolescent participating in the project, to be clearly explained in a way that allows them to fully understand and act upon their rights;
2. To have the expected conduct of researchers and external intervention staff working on the project clearly explained to them before they begin their involvement in the project, and how they can recognise and report unacceptable conduct;
3. To have a clearly explained and accessible pathway to report a safeguarding concern, which recognises the challenges they may face in using formal institutional mechanisms, and having alternative pathways made available and clearly explained to them;
4. To have two Designated Safeguarding Contacts identified, and to be provided with multiple, up-to-date ways of contacting them that are suitable for research participants or community members who may not have access to resources such as internet or a telephone;
5. To have a clearly explained and accessible pathway to make a complaint if they believe that the concern(s) they raised have not been adequately dealt with;
6. To not be afraid of reprisals if they report a safeguarding concern (see section 5.5);
7. To receive the appropriate legal and emotional support, in line with their country's legal guidance and available resources, if they are a victim/survivor of a safeguarding incident.

## **Section 5: Reporting and Investigating Concerns**

### **5.1. Examples of a safeguarding concern**

The following list provides some examples of when a safeguarding report should be made. These are not exhaustive and there may be other situations where it would be appropriate to submit a report. Further advice can be obtained from the Research Project Manager (Isabel Stanley, [isabel.stanley@abdn.ac.uk](mailto:isabel.stanley@abdn.ac.uk)).

- A research participant discloses ongoing or risk of exploitation, abuse or harm (irrespective of whether this is directly related to the project or otherwise);
- A research participant makes an allegation about a member of the project team;
- There are suspicions or indicators that a research participant is being abused or put at risk;
- There is concern that the behaviour of any person might cause harm to research participant or put them at risk of harm;

- A member of the team discloses that they are being bullied or harassed or otherwise exploited by another member of the team, or;
- There is concern that the behaviour of any member of the team may cause harm to another member of the team or put them at risk of harm.

Whilst this policy focuses on guidance related to the project, historical cases unrelated to the research project can be reported through the same mechanisms outlined below. However, there may be limitations on the advice and support that can be offered in these cases.

## **5.2. Reporting a safeguarding concern – staff and students at a partner institution**

Safeguarding concerns may be raised by those by those impacted including members of the project team, participants in the project or other community members. They may also be raised by project team members, participants in the research and community members that want to raise safeguarding concerns on behalf of others, including where participants or community members have disclosed a concern to them. Children and adolescents may disclose concerns to their school, teachers and parents and other community members to local leaders.

Safeguarding concerns should be raised and investigated in accordance with the relevant complaints procedures of the institution(s) concerned.

Safeguarding concerns should be raised even if the individual disclosing a safeguarding concern has requested the disclosure be kept private or secret.

### 5.2.1. University of Aberdeen

For the University of Aberdeen, this is outlined in section 4.2.2 of the [Research Governance Handbook](#).

As outlined in section 4.1, the University of Aberdeen is also required to report all incidents relating to safeguarding or bullying and harassment to the NIHR using an [Incident Reporting Form](#).

### 5.2.2. University of Rwanda

For the University of Rwanda, this is outlined in the [Anti-Corruption Policy](#).

The Anti-Corruption Committee contact details are available online [here](#) and are listed below:

**Email:** [anti-corruption@ur.ac.rw](mailto:anti-corruption@ur.ac.rw)

**Phone:** +250 788786376

### 5.2.3 Addis Ababa University

For Addis Ababa University, safeguarding concerns must be reported to the Ethics and Anti-Corruption Directorate of Addis Ababa University, whose function includes 'Receive and



*verify reports on ethical violations in accordance with the rules and directives of the University and submit to the President recommendations on further investigation and measures to be taken, and follow up on the implementation of the measures’.*

The Ethics and Anti-Corruption Directorate contact details are available online [here](#) and are listed below:

**Email:** [ethics.anticorruption@aau.edu.et](mailto:ethics.anticorruption@aau.edu.et)

**Phone:** +251-111- 23 97 03 or 0911457544

**Address:** AAU, Sidist Kilo Main Campus, Administration Building, Ground floor Room No. 002/008

**P.O. Box:** 1176

### **5.3. Reporting a safeguarding concern- research participants and community members**

Research participants and community members (including bystanders to the research) can report a safeguarding concern to the lead institution in their country through the pathway outlined in section 5.2. However, research participants or community members may not have the access (e.g., IT access), ability (e.g., literacy), or confidence to use these formal mechanisms.

To address this risk, the participant information sheet given to each research participant will identify two Designated Safeguarding Contacts (DSCs) and give their contact details (email, telephone, and post, to allow maximum ways of contacting them). These will be a lead co-investigator in that country and an independent member of that institution’s ethics committee (or equivalent). The DSC who receives this report is then responsible for responding in line the relevant institutional guidance related to complaints.

Alternatively, research participants will be encouraged to raise any concerns with a local leader or teacher, who can then raise a concern with a DSC.

#### **5.3.1. Sensitivity to local laws, context, customs, and practices**

The person reporting a concern or dealing with a disclosure from a research participant or community member should act in accordance with this policy and other relevant policies, as outlined in section 1, and with local laws. They should act with sensitivity to the local context, customs, and practices. The priority should always be to do no harm, or where harm has occurred, to act in a way that does not increase the extent of that harm.<sup>8</sup>

### **5.4. How the Project will respond to, and investigate, reports of exploitation, abuse, or harm**

The overriding concern should be to protect the individual who is experiencing exploitation, abuse, or harm, thereby supporting their rights, dignity, autonomy, and self-determination. It

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<sup>8</sup> [UKCDR Guidance for Safeguarding in International Development Research](#)

is the right of the individual to be fully informed about their options to minimise any risk of further harm occurring as a result of the action taken.

If a safeguarding concern is disclosed directly to a member of the research team/member of staff, the individual should be prepared to:

- Listen carefully;
- Empathise with the person disclosing a concern;
- Ask **who** is involved, **when** it happened, **where** it happened, and **what** happened (but not why);
- Repeat/check their understanding of the situation with the person disclosing a concern;
- Explain what will happen now (i.e., who else will be informed), and;
- Report the concern to the relevant institution's Designated Safeguarding Officer.

Researchers must ensure that research participants are made aware from the outset that there may be limits to confidentiality where there is a disclosure relating to exploitation, abuse, or harm. This may involve informing the Police or the Social Services department (or equivalent), a health professional, or the District Director of Education. If there is a significant risk of harm or a concern that a crime may have been committed.

If a child or adolescent makes a disclosure, parents or carers should normally be informed (unless this would put the child or adolescent at greater risk of harm).

Country-specific guidance around this should also be followed.

The Designated Safeguarding Officer should, where possible, address any immediate safety concerns and offer support to the individual raising the concern, in accordance with the action plan for handling such concerns within the research project.

The Designated Safeguarding Officer should try to obtain further information regarding the reported concern, whilst acting sensitively and providing reassurance regarding the process that will be followed for handling the report.

### **5.5. How individuals reporting concerns will be protected and kept informed of procedural stages and outcomes**

Individuals raising safeguarding concerns should be advised of the investigation process that will follow, and how they will be kept informed of actions being taken. The Project Whistleblowing Policy provides further advice on how confidentiality and anonymity will be preserved during an investigation, insofar as this remains compatible with ensuring an effective and fair investigation.

Individuals who make a safeguarding report which they reasonably believe to be true will be protected from reprisals arising from their report. This includes no adverse actions being taken against them or detriment to the individual.

### **5.6. Investigation of allegations and disciplinary procedures**

The investigation of allegations and disciplinary procedures should follow the relevant institutional regulatory guidelines.



### 5.6.1. University of Aberdeen

At the University of Aberdeen, the School of Education's designated Safeguarding Officer will carry out an investigation. If the Safeguarding Officer's investigation upholds an allegation of exploitation, abuse or harm is upheld the [Disciplinary Procedure \(Staff\)](#) will be followed.

If, as a result of the safeguarding investigation, there is suspected criminal activity then this will be referred to the Police for further investigation and any criminal investigation will take precedence over university procedures, until the investigation is concluded.

### 5.6.2. University of Rwanda

As outlined in the [Anti-Corruption Policy](#), the University of Rwanda Anti-Corruption Committee will lead any investigation and response, taking into consideration the University's policies and Rwandan law.

### 5.6.3. Addis Ababa University

At Addis Ababa University, safeguarding concerns will be reported to the Ethics and Anti-Corruption Directorate, who will carry out an investigation. The Designated Safeguarding Officer (Project Administrator) will be responsible for following up on what measures have been taken by the Directorate.

## **5.7. How to make a complaint about the handling of a safeguarding report**

If the person making a safeguarding report (or the person they are making it on behalf of) feels that their report was not adequately dealt with, they have the right to make a complaint.

A complaint about the management of a safeguarding report should be made in line with the relevant institution's guidance (see section 5.6).

## **5.8. Supporting a victim/survivor of a safeguarding incident**

Individuals who have experienced a safeguarding incident, and individuals who have heard a disclosure of exploitation, abuse, or harm, may require further support.

The resources available will be dependent on the location and individual(s) involved (for example, minor or adult, community member or university employee).

The Project's Designated Safeguarding Officers should liaise with the relevant staff at their institution to ensure that individuals are referred to the appropriate, available support in their country.

## **Section 6: Risk of Harm Protocol**

### **6.1. Definitions**

#### 6.1.1. What is chronic and acute risk of harm?

**Risk of harm** refers to a significant potential for an individual to experience serious harm other than by accidental means.

**Chronic risk of harm** refers to a risk of harm that is ongoing or continual over a significant period of time.

**Acute risk of harm** refers to a risk of harm that is sudden or immediate. It may be short-term or move to a chronic risk of harm if it extends over a longer period of time.

#### 6.1.2. What is informed consent?

**Informed consent** is giving agreement or permission, or making a decision, by a legal adult who has the full information about the possible effects or results, and the mental capacity to understand this information, in full.

Children and vulnerable adults cannot give informed consent. A ‘vulnerable adult’ is a legal adult with a temporary or permanent mental or functional impairment that impacts their ability to protect themselves from abuse, harm or exploitation

Whilst children and vulnerable adults cannot give informed consent, they should still be included in decisions made about them and their care as much as possible, explained in an appropriate way that they can understand.

This definition is informed by the UK Mental Capacity Act 2005.<sup>9</sup>

#### 6.1.3. Confidentiality and informed consent

Everyone has the right for their personal information not to be shared. However, there is also a responsibility to uphold safeguarding responsibilities if someone is at risk of harm (either from themselves or someone else). In these cases, confidentiality should be broken in order to escalate the concern, even if the individual has asked for the disclosure to be kept private or secret.

In the UK, this is a legal requirement of anyone with a duty of care (including educational/research institutes and the people employed by them).

Rwanda law protects confidentiality ‘except in circumstances and in accordance with procedures determined by law’<sup>10</sup>.

In Ethiopia, law encourages maintaining confidentiality except in cases of interest to the public.

## **6.2. Outline of the Risk of Harm Protocol**

The Risk of Harm Protocol sets out how to respond in a situation where it becomes evident that a research participant or research bystander is at risk of harm (acute or chronic) and the steps to be taken if a researcher or staff member or student employed on the project feels that they need immediate or longer-term assistance.

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<sup>9</sup> [Mental Capacity Act 2005](#)

<sup>10</sup> [Rwanda 2003 \(rev. 2015\) Constitution - Constitute \(constituteproject.org\)](#)



For example, they may be at risk of harm from mental, physical, or sexual abuse, or need urgent medical treatment or mental health support. This includes when psychometric tests used in the project suggest a research participant may have clinical depression or other mental health condition.

### **6.3. Decision-tree to identify risk of harm**

Questions to consider:

**Can the individual give informed consent for the situation to be escalated?** Adults should be involved in the decision to escalate the situation, and they have the right to refuse for confidentiality to be broken. However, if it is believed they are at significant risk of harm, or of harming themselves or another person, then the situation should be escalated even if they withhold consent to do so. In this situation, they should be told that confidentiality is being broken and why, unless doing so would put them at risk of harm, or someone else at risk of harm.

Children cannot give informed consent. As with adults, they should be told that confidentiality is being broken and why, unless doing so would put them at risk of harm, or someone else at risk of harm.

Initial Question		Follow-up questions		Action(s)
Is the individual at risk of mental, physical, or sexual abuse or neglect within their household, school, or other location?	→	1) Is this abuse or neglect happening, or at risk of happening?  2) Who is at risk of abuse or neglect, including adult(s) or child(ren)?	→	Report to country-lead(s). Urgency should reflect whether abuse or neglect is actual or potential, and whether any children or vulnerable adults are at risk.
Is the individual in need of urgent medical attention for a physical or mental ailment?	→	1) How did the injury or ailment occur? If it occurred from abuse or neglect, also consider question branch one.  2) Can someone get them medical attention (e.g., will a parent take them?)  3) Has medical care been withheld, and if so, why?	→	Can and will a parent or guardian get them urgent medical attention? If yes, report to parent or guardian. Also submit a report of this action. If no, then report to country-lead to make an urgent referral to the appropriate service(s).
Does the individual have a diagnosed, untreated, or poorly treated mental health condition, or an undiagnosed mental health condition? This may be observed from psychometric testing, disclosure, or observation.	→	1) Are they in urgent need of care to prevent harm to themselves or others?  2) Do they need care but are not at immediate risk of harming themselves or others?	→	Report to country-lead but if answer 'yes' to sub-question 1 then the situation should be treated with extreme urgency. If possible, support should be put in place to ensure that the individual is supervised by an adult until medical support can be given.



#### **6.4. Responding to risk of harm**

If a researcher, staff member or student employed on the project identifies a risk of harm situation in need of urgent response, they should contact their country-lead. This is Professor Wenceslas Nzabairwa in Rwanda, and Dr Tsion Hailu (co-lead) in Ethiopia.

The country-lead(s) will then decide on the level of risk and the appropriate actions to be taken. If they escalate the situation by reporting the concerns to the appropriate services, they should also follow up to ensure their report has been actioned.

At the University of Rwanda, the case must be reported to the Isange One Stop Center, Rwanda Investigation Bureau (RIB) and Local Authorities as soon as possible.

At Addis Ababa University, any risk of harm will be reported to the Ethics and Anti-Corruption Directorate within forty-eight hours.

### **Section 7: Reporting and Evaluation**

The Research Project Manager will keep a record of any safeguarding incidents.

The Project Management Group will ensure that anonymised reports on the findings of all safeguarding investigations involving project activities are reported to the Project Steering Committee annually, and to the NIHR as required by the Contract between the Secretary of State for Health and social Care and the Court of the University of Aberdeen.

End of document.