

# Safeguarding Policy and Standards



For NFER, safeguarding means identifying and minimising the risk of any form of harm and abuse occurring as a result of our research and assessment activities. It means having systems in place to swiftly and effectively respond to concerns and incidents when they do arise, and actively promoting the well-being of all project participants, particularly children, young people and at-risk adults. We take a zero-tolerance approach to all forms of harm and abuse.

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## Introduction

### Definition

Safeguarding is protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.

### Applicable to

This policy applies to all employees in the business. It does not apply before your employment starts. Please note, this policy does not form part of your contract of employment. This policy also applies to our associates or other workers associated with NFER and where appropriate our partners.

We reserve the right to amend or remove this policy at any time. NFER will use this policy alongside other policies that might also be relevant.

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## Overview

### The Purpose

The purpose of this policy is to **protect all our research participants** and those associated with it, particularly children, young people and at-risk adults, from any harm that may be caused by coming into contact with us, whether in the UK or Internationally.

This includes harm arising from:

- The conduct of our employees, our associates or other workers (i.e. Temps and Consultants) associated with us.
- The design and implementation of NFER's project activities.

- NFER's operations.

This policy lays out our commitments and informs our employees, associates and workers of their responsibilities in relation to safeguarding.

This policy does not cover safeguarding concerns that are not directly related to our activities.

These are the responsibility of the partner organisation/school.

## Principles

We are committed to the following principles in delivering this policy:

- Ensuring the physical, psychological and emotional safety and well-being of all research participants, including children, young people, at-risk adults and adults, all NFER employees, associates, workers and our partners.
- Safeguarding is everyone's responsibility.
- We believe that every individual has an equal right to protection from all forms of harm and abuse, regardless of gender, gender identity, sexual orientation, race, ethnicity, disability, or any other status.
- We abide by the `Do No Harm` principle and strive to minimise any harm our activities may inadvertently cause, as well as harm caused by inaction.

We will keep those we work with safe by:

- Valuing, listening to and respecting them.
- Preventing and reporting extremism and radicalisation concerns.
- Recording, storing and using information professionally and securely, in line with data protection legislation and guidance and our IT policies and procedures.
- Adhering to this policy and all other NFER policies, procedures and protocols to ensure we safeguard children, young people, at-risk adults and adults.

## NFER Values

Safeguarding is central to our culture and is guided by our **values**.

- **Collaboration** - we work together with colleagues and partners to identify and address concerns, ensuring the safety and well-being of all individuals.
- **Outcome Focused** - we prioritise effective action that protects those at risk.
- **Can Before Can't** – our approach provides proactive solutions and a commitment to overcoming challenges.
- **Acting with Integrity** - ensures transparency, honesty, and accountability in every safeguarding decision.

These values together create a safe, respectful, and supportive environment for everyone.

## Safeguarding Different Groups

NFER supports a culture that enables employees, associates, and all our research participants to raise concerns and to feel supported.

### Employees, associates and other workers

The safeguarding of NFER employees, our associates, and other workers is overseen by separate HR and Health and Safety policies and procedures.

These policies align with the Equality Act 2010, the Health and Safety at Work Act 1974 and the Employment Rights Act 1996 and include appropriate reporting mechanisms.

All policies can be accessed through NFER Connect or the Policy and Training Hub for Associates.

## Children and Young People

The needs of children and young people are paramount to NFER, and we are committed to ensuring the safety and well-being of all children and young people who engage with us as research participants or through any other interactions.

We recognise our duty of care to children and young people and ensure our safeguarding standards align with the Department for Education's Keeping Children Safe in Education Statutory guidance.

### At-risk Adults

NFER defines an at-risk adult as someone over the age of 18 who requires care and support and is unable to protect themselves from harm or exploitation.

Our approach to working with at-risk adults is person-led and outcome-focused, and we ensure a consistent, inclusive approach to meeting our duty of care to these individuals.

### Adults

Our commitment to safeguarding goes beyond at-risk or vulnerable groups; it also includes all adults who interact with our organisation, including research participants, partners, clients and visitors.

## Responsibilities

It is everyone's collective responsibility to ensure our employees, associates, and other workers do no harm to any research participants, particularly children, young people, at-risk adults or each other.

## Accountability

Our Senior Management Team (SMT) is accountable for ensuring that all safeguarding measures and procedures are followed. They take responsibility for:

- Promoting a positive safeguarding culture, ensuring awareness of safeguarding is built across the Foundation.

- Championing the importance of safeguarding.
- Appointing the appropriate personnel to coordinate and implement this policy.
- Ensuring that any potential safeguarding risks are assessed and mitigation measures are put in place.
- Ensuring safeguarding is included in our Corporate Risk Register, where appropriate.
- Updating the Board of Trustees as part of regular reporting processes of any breaches of this policy.
- Ensuring all our employees, our associates or other workers associated with us understand this policy and the safeguarding responsibilities it assigns them.
- Ensuring disciplinary procedures are followed for any breaches of this policy.
- Undertaking annual checks of all safeguarding processes, training and guidance.
- Reviewing the Safeguarding policy every year.

## Recruitment

Safeguarding is embedded in all HR activity within NFER, including recruitment.

- A commitment is made clear in our Job Application packs, which accompany each vacancy.
- Our Recruitment Policy includes safer recruitment practices.
- Safeguarding and our pre-engagement checks are discussed with all candidates at interview.
- Employment references, Right-to-Work and DBS checks (or equivalent outside of the UK) are undertaken as part of the NFER onboarding process as detailed in the Pre-Engagement Checks Policy.

- All offers of employment/engagement are conditional on the satisfactory outcome of the pre-engagement checks.
- NFER has an established policy and process in place for the recruitment of people with criminal records.
- Employees have access to resources, information and signposting on safeguarding through NFER Connect.
- Specific safeguarding training is provided to our associates and other workers who undertake NFER projects and assignments

## Accessing Information

- **NFER Connect** – for policies and procedures.
- **The NFER Work Hub** – for the code of conduct and policies relating to our associates.
- **NFER eLearning** – for Safeguarding training.

## Training

In order to promote a positive safeguarding culture and understanding, we provide a range of training on safeguarding to our employees, our associates or other workers affiliated with us. This includes:

- Training for all new starters and new associates or other workers affiliated with us, normally within a month of joining or prior to any engagement with any research participants or their data. This training can include our Safeguarding Policy, Code of Practice, Code of Conduct, and all safeguarding-related procedures, including whistleblowing, reporting, and response mechanisms.
- Mandatory safeguarding training is provided to all our employees on a regular basis. This includes any changes or amendments to this policy, as well as reporting and response procedures.
- Additional training is provided to the appropriate personnel to coordinate and implement this policy.

## Partners, Contractors & Suppliers

NFER works with and engages a range of partners, contractors, and suppliers. In doing so, we ensure the following.

### Partners

A due diligence process is carried out before we contract with any delivery partners. Partners agree to comply with our safeguarding policy and procedures, unless they have and use their own safeguarding policy and procedures.

### Contractors/Suppliers

All contractors and suppliers are required to disclose their safeguarding approach to us through a supplier questionnaire.

Where direct engagement with research participants is likely, or indirectly through access to their data, or where we feel some level of safeguarding risk exists, we will assess their approach and request additional measures, as appropriate.

## Measures

The physical, psychological, and emotional safety and well-being of all research participants, our employees, our associates, and other workers associated with us is the overriding priority in our work.

We have measures in place to ensure this, including:

### Child Protection Protocol

Provides guidance to all our employees, associates and other workers who come into direct contact with children and/or deal with their data. It makes them aware of what steps to take

should any safeguarding concerns arise from our work and how to report them.

The protocol also details the process our employees, associates, and other workers should follow if a child, young person, or at-risk adult makes a disclosure to them.

A step-by-step guide is also available on NFER Connect.

### **Working with Schools Policy**

Sets out how we approach working with schools. It outlines how we communicate and interact with them, how we conduct our research in schools and manage confidential information, and provides ethical guidelines and rules for data protection.

### **Research Governance Framework**

Is a set of policies, procedures and standards of good practice through which we ensure the integrity and quality of our research. It sets out who is accountable for the decisions and actions we take that affect our research integrity and quality.

### **Code of Practice**

Is a public document, setting out the principles and practices that affect the assessment, evaluation, information, research, delivery and product development work we carry out in the UK and internationally.

It is issued to all our employees, our associates and other workers affiliated with us, to ensure they operate within our guidelines.

To support the implementation of the Code of Practice, a comprehensive guide is available, providing additional information and guidance on its use. Included is advice on managing disclosures, as well as on the taking and use of visual images.

### **Code of Conduct**

Outlines the minimum standard of behaviour we expect from our associates or other workers associated with us.

### **Pre-Engagement Checks Policy**

Sets out the requirements for pre-engagement screening checks and ongoing security checks for UK and International employees and associates.

This is to ensure the safety and security of children when our employees and associates undertake activities within schools to maintain our own integrity, safety and security.

### **Complaints Policy and Procedure**

Provides a route for bringing complaints to us, be they UK or International, where someone may not be happy with the way we have conducted our business or where they feel we have fallen short of the level of service that they would expect.

### **Whistleblowing Policy**

All our employees, associates, and other workers associated with us are able to report any concerns related to NFER activities or our supply chain. Our whistleblowing procedure is designed to make it easy to make disclosures without fear of retaliation.

### **Data Security Policy**

Sets out how the Foundation will maintain the security of our data, including that of our research participants, children, young people and at-risk adults to appropriate levels in all aspects of its business.

## **Reporting and Response**

We take a low-risk approach to safeguarding risks, which means that even minor concerns or suspicions of harm must be reported.

Failure to report safeguarding concerns is considered a serious breach of our safeguarding procedures and may result in disciplinary action.

Our employees and associates can raise concerns through a range of channels. They can:

- Follow the reporting procedures within NFER's Child Protection Protocol
- Report to NFER's Designated Safeguarding Leads (DLS).

- Speak to their line manager or any member of SMT.
- Speak to their HR Business Partner or Associates Manager.
- Report through the grievance and complaints policies.
- Using the Anonymous Reporting form available to employees on NFER Connect.

All reports are logged, records are held confidentially, and access is limited to those with safeguarding responsibilities.

We take proactive steps to ensure that our employees, associates, and research participants are aware of our reporting channels and know how to access them.

We will follow up on any safeguarding reports and concerns in accordance with this policy and any other relevant policies, including the Child Protection Protocol and in line with our legal and statutory obligations.

We will follow a person-centred approach and be guided by the person’s wishes, combined with a risk assessment of potential risks to the individual and/or other participants, and NFER.

Where deemed necessary, we may undertake an internal investigation, led by the most appropriate personnel and overseen by a senior manager.

If in-house expertise does not exist to investigate a particular case, we will seek external expertise, support and advice where appropriate.

We will provide support to survivors during any investigation as a priority.

### Responding to online concerns

We recognise that safeguarding concerns may be raised through online platforms or social media and will be treated with the same seriousness as those raised outside of these platforms.

Our online and social media platforms, including LinkedIn and X, are monitored for comments that

indicate harm, abuse, or risk. Any concerns raised are reported immediately.

We are committed to responding promptly and appropriately. We will do so in line with this policy and any other relevant policies, including the Child Protection Protocol, our Social Media Policy, and our legal and statutory obligations.

## Designated Safeguarding Leads

Fiona Walker [f.walker@nfer.ac.uk](mailto:f.walker@nfer.ac.uk)

Matthew Walker [m.walker@nfer.ac.uk](mailto:m.walker@nfer.ac.uk)

Charlotte Hussein [c.hussein@nfer.ac.uk](mailto:c.hussein@nfer.ac.uk)

## Other Considerations

### Bullying & Harassment

We do not tolerate any form of bullying or harassment. NFER has an established Anti-Harassment and Bullying Policy, which defines bullying and harassment as behaviour from a person or group that is unwanted, unacceptable and has a negative impact on your emotional wellbeing.

The policy also covers sexual harassment and victimisation, and includes instances of bullying and harassment behaviour against a colleague or other person connected with NFER, including research participants.

The Anti-Harassment and Bullying Policy and the Prevention of Sexual Harassment Risk Assessment can be accessed through NFER Connect or the Associates Hub.

## Visual Images and Audio Recordings

guidance is available on NFER Connect and the Associate Hub.

We will, on occasions, for the purposes of our research, marketing and branding, take and use both visual images and recordings of children.

In doing so, employees, associates and other workers will follow the requirements step in our Code of Practice Implementation Guidelines.

These guidelines include:

- Gaining written consent from parents or guardians through school support and engagement.
- Having clear and agreed parameters in place for the use and storage of images and recordings.
- Ensuring compliance with our data security standards/policy and GDPR.
- Not using images or recording where permission has not been given or has been revoked.

NFER employees, associates or other workers are not to use their personal equipment or devices to take photos and recordings of children, unless otherwise agreed with us and subject to our data security standards/policy and compliance with GDPR.

Doing so may result in disciplinary action.

## Safeguarding Guidance

Accompanying this policy are guidance and frequently asked questions (FAQs), which should be considered an extension of this policy. This

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If you have any questions regarding this policy, please email [hr@nfer.ac.uk](mailto:hr@nfer.ac.uk)