RSH Nigeria: Safeguarding (or SEAH) risk assessment and management tool

Every civil society organisation (CSO) faces a broad range of safeguarding risks. Also, as situations, dynamics, relationships, and therefore risks, may change over time, a risk assessment is a continuing process (not a one-off exercise).

A safeguarding or SEAH risk assessment is central to every CSO's safeguarding prevention and response measures. The RSH Nigeria hub has developed this risk assessment and management tool to help you identify and manage the safeguarding risks that your CSO faces.

We are grateful to the CSOs in Nigeria who tested this tool for us, and welcome further input – if you want to share feedback on your experiences of using this tool, or if you have a query with a particular safeguarding issue, please email us: askanexpertnigeria@rshub.org.uk.
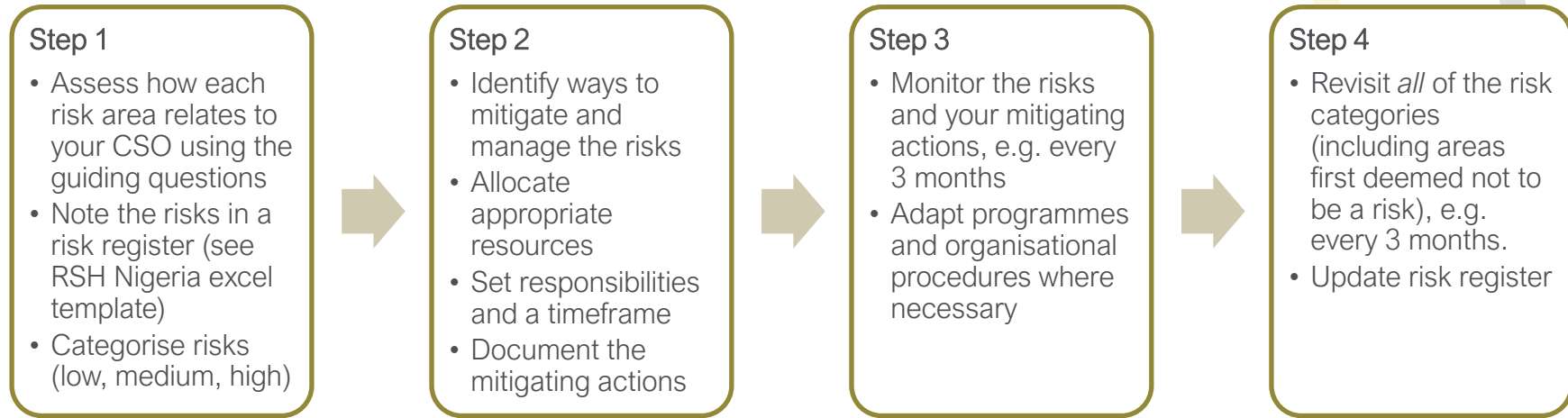
This tool was developed for CSOs in Nigeria, and it will be useful for:

- staff with safeguarding or PSEAH responsibilities
- HR staff
- security and risk staff

- programme staff working on any programme area / sector
- managers and directors with oversight of the risk management process

Before you start, remember:

➔ Safeguarding risk management may be integrated with existing organisational risk management process. It doesn't need to be separate.
➔ This is not an exhaustive list of risks. The risk environment changes, you will need to identify risks that are specific to your organisation.
➔ Completing a safeguarding risk assessment for the first time can be a lengthy process! After that you can focus on updates and additions.
➔ Some risks, e.g. within external environment and programme risk areas, will overlap with your organisation's protection assessment.

How to use this risk assessment and management tool:

Step 1
- Assess how each risk area relates to your CSO using the guiding questions
- Note the risks in a risk register (see RSH Nigeria excel template)
- Categorise risks (low, medium, high)

Step 2
- Identify ways to mitigate and manage the risks
- Allocate appropriate resources
- Set responsibilities and a timeframe
- Document the mitigating actions

Step 3
- Monitor the risks and your mitigating actions, e.g. every 3 months
- Adapt programmes and organisational procedures where necessary

Step 4
- Revisit *all* of the risk categories (including areas first deemed not to be a risk), e.g. every 3 months.
- Update risk register

Categorising risks

When you are categorising the identified risk, it is useful to consider **likelihood** (the probability of the event occurring) and **impact** (how severe the harm could be for an individual or the organisation).

1. Note how likely it is that the risk will occur	
Highly likely	3
Likely	2
Not likely	1

2. Note the likely **impact** for individuals and organisational reputation	
High impact	3
Moderate impact	2
Minor impact	1

3. Calculate the overall risk rating: **likelihood x impact**	
High	7 to 9
Medium	4 to 6
Low	1 to 3

We have grouped the risks into six main categories. You can identify categories that are relevant to you, however it is advised that the broad areas are all covered in your risk assessment. Click to get to each section.

There is a lot here! Choose one category to start with. Once you have completed that category move onto the next one. You can come back to the next category another day / when you have more time.

| 1. External environment, p3 | 2. Programmes, p5 | 3. Partnerships, p8 | 4. Communications & information management, p8 | 5. Human resources, p10 | 6. Governance, culture & leadership, p12 |
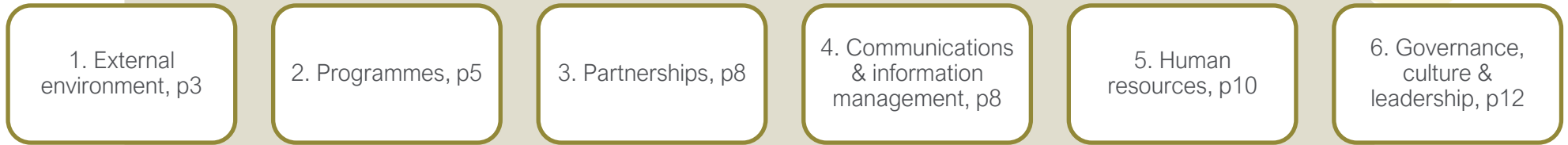
1. External environment

#	Area of risk	Cause of the risk	How does this relate to the work you do?
1.1	Age	Countries or regions with a lower age of sexual consent make sex with children legal, which can place them at risk of sexual abuse or exploitation. Indicators of potential abuse may be less likely to be noticed by staff, as they are considered "normal"	* Is the age of consent in Nigeria / XXX state lower than 18? *Note: consent applies equally to all married and unmarried children (under 18)*
1.2	Patterns of harm and abuse	Abuse or exploitation of certain groups of children or adults may be seen as a norm locally, such as child marriage, gender-based violence or corporal punishment. Staff may also believe these norms are acceptable and act on them. They may have prejudices against certain	* What patterns of harm and abuse (GBV, child protection) exist in the areas in which you are working? * Are there particular groups of either children or adults who are more at risk of harm?

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			children (for example, children with disabilities) or may have a mistaken belief that children can consent to taking part in sex work.	
1.3	Humanitarian context	During emergencies, the basic needs of families and communities may not be met and usually protection or safeguarding concerns are exacerbated. They may be vulnerable to sexual exploitation and exchanging sexual acts for food, shelter or security. Families and communities may not be able to help each other, and support services may be absent or not functioning well. During rapid onset emergencies which require a quick response, organisations may take short cuts, e.g. not conducting background checks of staff, or not doing adequate risk assessments. Taking these short cuts may undermine the safety of the programme		* Is your situation an emergency or disaster? * Are there people where you are working who have been displaced or have lost their possessions and cannot fulfil their basic needs, like food or shelter?
1.4	High levels of poverty	Being in poverty can make people vulnerable to sexual exploitation and exchanging sexual acts for basic needs from the community and staff. Children may have to work, and organisations or their suppliers may use child labour		* Are the levels of poverty so high that people may be at risk of sexual exploitation or abuse for other goods?
1.5	High number of children / adults in need of special protection	For children (and adults) living with disabilities, those living with HIV/AIDS, orphans, internally displaced people (IDPs), refugees or those living on the streets, etc. the risk of abuse is heightened due in part to stigma, isolation, discrimination and a lack of support. Staff may share these prejudices and fail to act when they witness abuse		* Are there high numbers of children or adults in need of special protection or support?
1.6	Governance and law enforcement	Where there is poor local governance and weak law enforcement, policing or judiciary, abuses are less likely to be reported and responded to		* Do local authorities or systems respond to all reports of sexual abuse, exploitation or harassment? * Do local authorities respond to some reports but not other reports?

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#	Area of risk	Cause of the risk	How does this relate to the work you do?
			* Do local authorities or systems take all cases seriously?
1.7	Weak social and child protection systems	Where there are weak social or child protection systems, it is less likely that local authorities can be relied upon to respond to abuses	* What social nets, care and support exist for adults and children at risk? * What national, local and community protection systems and mechanisms are in place and are these working effectively for all people?
1.8	Attitudes towards violence against children and women	Where domestic and sexual violence against children and women is tolerated, staff may not know that abuse towards women, children and other vulnerable people is not right, or they may not recognise the signs of abuse	* What are common attitudes towards violence against women or children in the areas in which you work? * Is sexual violence, exploitation or harassment normal where you work? * Are people who speak up and report about sexual abuse, exploitation or harassment listened to and taken seriously?

2. Programmes

#	Area of risk	Cause of the risk	How does this relate to the work you do?
2.1	Programme design	Where there are no needs or risk assessments bringing in the voices of the most vulnerable including women, children and people with disabilities, the programme is less likely to deliver on aims and objectives safely and more likely to increase risk of harm	* Are programmes designed without risk assessments being conducted? * Are risk assessments only informed by staff and not by the communities involved or impacted by the programmes? * Are risk mitigation strategies designed in partnership with communities?
2.2		Where programmes are not designed in line with relevant and appropriate standards and principles (e.g. Core Humanitarian Standards (CHS) or Do No Harm principle), the programme may inadvertently put people at risk of abuse	* Will the risk mitigation strategies allow the programme to go ahead as safely as possible but still achieving objectives? * Are particularly risky programmes subject to "no go"

			decisions or additional monitoring to continually assess and manage risk?
2.3		Where programme proposals and budgets do not include costs for safeguarding measures or funding does not extend to these measures.	* Have all activities and costs for safeguarding been included in the programme design and budget? * Are there costs which have not been funded which will compromise the safety of the programme?
2.4	Programme implementation	Where programmes are being implemented by staff and volunteers who do not understand that different groups of children and communities experience harm and abuse differently and may need different forms of programme intervention	* Have all the staff and volunteers working on the programme been trained on safeguarding and how different groups experience risk? * Will the risk mitigation strategies work for all the different groups involved in the programme?
2.5		Where organisations lack diversity and do not consider how different groups of children and adults can better participate or engage in activities e.g. through single gender groups, groups of persons with disability etc.	* Are the staff working on the programme from the same gender, ethnicity etc.? * Are they largely male staff or volunteers?
2.6		Where awareness raising about safeguarding to programme participants and target communities on what they can expect from the organisation and behaviour of staff and partners is not communicated in the right languages or with communications materials that the programme participants can understand	* Have awareness raising activities on safeguarding been done in the right language with all groups in the community? * Does the awareness raising highlight the behaviours to expect from staff? * Do communities know how staff should and should not behave?
2.7	Programme monitoring	Where community and programme participants are not involved in programme monitoring, they are unable to identify if programmes are being delivered in ways that are harmful	* Are the monitoring activities conducted by staff only? * Are questions asked about the safety of the programme or the monitoring is limited to only achieving objectives?
2.8		Where programme monitoring is done infrequently and harm and abuse is not identified early enough	* Is monitoring done less than once every 3 months?

2.9		Where the organisation does not have indicators for monitoring whether programmes are being delivered safely	* Are there clear indicators for monitoring harm and abuse caused by the programme? * Do those monitoring know how to recognise concerns? * Do those monitoring know how to ask questions to understand whether the programme is being delivered safely?
2.10	Community feedback mechanisms (CFM)	Where programme participants and community are not involved in the design CFM, they are less likely to make use of it and the mechanism may not be safe or meet the specific needs of vulnerable groups in the community such as children, women, people with disability etc	* Have mechanisms been designed and communities informed OR has the design been done with communities? * Does feedback from communities lead to changes in the CFM or programme? * Does the organisation feedback / respond to the community about how they will respond to a report?
2.11		Where CFM lacks different channels e.g. dedicated phone line, complaints boxes, verbal communication to meet the different needs of especially vulnerable people in the community.	* Are there multiple channels for communities to complain? * Are the different reporting channels based on existing communications methods that the community already uses?
2.12		Where organisations lack documented policy/process that contains guidelines on what to do if a suspicion or allegation is brought to the attention of staff or management, it is less likely that it will respond appropriately and objectively to reports	* Are there guidelines for handling complaints and responding appropriately to reports of harm and abuse? * Are all staff aware of what to do if they receive a report?
2.13		Where a mapping of all of the potential services required to respond to reports of abuse, exploitation or harassment is not completed or not updated for every location / area that a CSO operates in	* Is there a mapping of all services, legislation and formal authorities that can be used to support or refer a survivor to where necessary?

3. Partnerships

#	Area of risk	Cause of the risk	How does this relate to the work you do?
3.1	Partnership	Where working with implementing partners is significant and oversight is reduced, e.g. due to remote management needs	* Is the programme being wholly or in the majority implemented by partners? * Are partners being monitored regularly?
3.2		Where partners are not aware of an organisation's safeguarding policy and procedures	* Have partners been assessed for their capacity to implement safeguarding? * Do partners have their own policies and code of conduct which meet standards? * Do the agreements with partners include safeguarding?
3.3		Where there is no tailored training to the partner, the implementing partners may go contrary to values	* Are there plans and funding to train partners on safeguarding during the programme? * Is safeguarding advice and support provided to partners where necessary?

4. Communications and safe information management

#	Area of risk	Cause of the risk	How does this relate to the work you do?
4.1	Communication	Where communication materials do not maintain dignity and privacy of programme participants and community, people are exposed to risk of sexual exploitation and abuse	* Are there guidelines on obtaining and publishing images and stories in ways that do not reinforce negative stereotypes and maintain authenticity?
4.2		Where informed consent is not received from programme participants before use of their pictures in communication materials is disempowering	* Has the organisation obtained informed consent e.g. the people being featured understand fully how their information will be used?

4.3		Where communication materials are not developed to keep the people reflected in them safe, it can expose community to risk of sexual abuse and exploitation	* Are there guidelines on obtaining and publishing images and stories which detail not using the full name and other identifying information?
4.4		Where communications are not conflict sensitive	* Do communications consider all of the potential readers and how they may interpret or understand the content?
4.5		Where communications make use of languages that are not inclusive	* Is the language used locally appropriate and relevant? * Will the use of a particular language cause tension by some readers?
4.6		Where communications "trigger" retraumatising memories of harm or abuse by readers	* Are images explicit or do they show abuse in a way that could bring back memories or abuse or a harmful situation?
4.7	Safe management of information and data protection	Where systems are not in place to safeguard information from communities/staff, this might expose them to risk of sexual exploitation and abuse, sexual harassment, bullying and promote lack of confidence in the system	* Is information on staff and communities held on password, or otherwise, protected databases? * Is there restricted access to these databases? * Is the sharing of information on staff and communities subject to data protection rules? * Do all staff know what confidentiality means and understand the importance of privacy around these matters?
4.8		Where systems are not in place to safeguard community members who report, people are exposed and would be less likely to report	*Is there an individual database for reports and complaints which is password, or otherwise, protected? * Is access to this database restricted to named individuals who hold particular responsibility for safeguarding and complaints/reports?

5. Human resources

#	Area of risk	Cause of the risk	How does this relate to the work you do?
5.1	Recruitment	Where organisations lack reference or background checks for new candidates or where reference checks do not ask about behaviour and attitude towards SEAH and safeguarding	*Are two or more references taken on successful candidates? * Do the references consider personal behaviour and approach to SEAH? * Is a police record check done?
5.2		Where questions during interview to ascertain knowledge and commitment to safeguarding are not included in recruitment process	*Are questions asked during interview on suitability to work with children and communities and understanding of safeguarding?
5.3		Where job adverts do not clearly show an organisation's commitment to zero tolerance of SEAH and other safeguarding concerns	*Are all jobs advertised widely and does the advert include a commitment to safeguarding?
5.4		Where staff are not asked to sign the code of conduct and Safeguarding policy	*Are all staff and volunteers asked to sign a code of conduct and receive a briefing in the right language so they understand what they are signing?
5.5		Where volunteers, short-term staff or consultants irrespective of length of engagement are not required to sign onto the organisation's code of conduct and safeguarding policy and don't understand the organisation's zero tolerance to SEAH	* Do all staff, including volunteers, short-term hires and consultants, have a briefing on safeguarding and sign the code of conduct?
5.6	Performance management	Where safeguarding is not incorporated in staff job description and not adequately reviewed during performance management process	* Do all job descriptions contain a responsibility for safeguarding? * Is performance management carried out and does this include discussions on safeguarding and concerns staff might have with their understanding or ability to perform their safeguarding responsibilities?
5.7	Awareness raising	Where staff training is not institutionalised and routine sensitisation on safeguarding of staff is not done	* Is staff training conducted regularly and does it include safeguarding?

			* Are refreshers conducted each year?
5.8		Where opportunities for regular discussions of safeguarding are not provided	* Is safeguarding an agenda item on team meetings?
5.9		Where volunteers or short-term staff are not trained on safeguarding	* Are volunteers or short-term staff trained on safeguarding?
5.10		Where consultants, contractors, media representatives and other representatives of the organisation do not get sensitised on the organisation's safeguarding policy and zero tolerance to SEAH	* Do consultants, contractors, media representatives and other representatives of the organisation receive a briefing on safeguarding?
5.11	Reporting	Where safe and confidential systems for staff to report against SEAH are not in place	* Is there a system in place for all staff to report suspicions or abuse?
5.12		Where staff reporting system is not well known by all staff, volunteers and other representatives of the organisation	* Do all staff know that there is a reporting system in place? * Do all staff feel comfortable using the reporting system in place?

6. Governance, culture and leadership

#	Area of risk	Cause of the risk	How does this relate to the work you do?
6.1	Culture and Leadership	Where there is no dedicated/identified safeguarding focal person with a job description outlining expectations at either Board or staffing level	* Is there a focal point on the staffing and a focal point on the Board? * Do they understand their roles? * Have they had training?
6.2		Where there is no risk register reviewed regularly by management and Board or the risk register does not include safeguarding	* Is safeguarding included in the organisational risk register?
6.3		Where departmental heads are not responsible for integrating safeguards in their area of responsibility	* Do departmental heads understand their team's role on safeguarding?

			* Do they ensure that their team is implementing safeguarding? * Are the departmental heads held responsible for their teams' implementation of safeguarding?
6.4		Where the organisation's policy is not reviewed or communicated regularly by senior management and Board	* Is the policy reviewed every 3 years? * Is it signed off by the Board?
6.5		Where safeguarding measures are not integrated into existing strategic planning processes	* Does the organisation's strategy include safeguarding?
6.6		Where leadership do not act swiftly or in a transparent or accountable way following reports or suspicions of abuse	* Does leadership act swiftly or in a transparent or accountable way following reports or suspicions of abuse?
6.7		Where inequality and discrimination against diverse profiles is prevalent and is not challenged	* Is inequality and discrimination against diverse profiles prevalent? * Is inequality and discrimination challenged?
6.8		Where sexual exploitation, abuse and sexual harassment are restrained or held back	* Do people speak up about sexual abuse, exploitation and sexual harassment? * Do people hold back from talking about and reporting sexual abuse, exploitation and sexual harassment?
6.9	Reporting / Investigation	Where documented policy / process does not contain guidelines on what to do if a report falls outside the scope of the organisation	* Is there a process in place on what to do if a report cannot be handled by the organisation alone? *Is there a risk assessment for every case received and the response process?
6.10		Where the organisation is unable to manage complaints safely e.g the organisation does not have the skills to undertake investigations or know where to access support externally	* Is there a clear case handling response process with responsibilities? * Does the organisation know if and when it may be more appropriate use external investigators?

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