



# ANNEX 2

## ECPAT INTERNATIONAL SAFEGUARDING RISK ASSESSMENT GUIDANCE

ECPAT International recognises that our organisation can cause harm to children and adults and that it is essential to clearly identify, assess and regularly review the type of risks children and adults could be exposed to because of our interventions. The purpose of this Safeguarding Risk Assessment Guidance is to provide 'prompts', ideas, and suggestions for the range of risks to consider when conducting a Safeguarding Risk assessment. It outlines the five (5) steps to follow in conducting a safeguarding risk assessment.

Every project requires an overall safeguarding assessment. When direct contact or impact on children is foreseen, additional safeguards are needed that are outlined here. Therefore, this guidance is particularly focusing on the risks related to children. Every project manager should adapt this when conducting the overall safeguarding risk assessment.

As situations, dynamics, relationships, and therefore risks, may change over time, a risk assessment is a **continuing process** (not a one-off exercise). **Assessing the risks is central to our safeguarding policies**, and the measures we put in place to prevent or respond to harm to children or adults are central to our safeguarding approach.

### When do we conduct Risk Assessment?

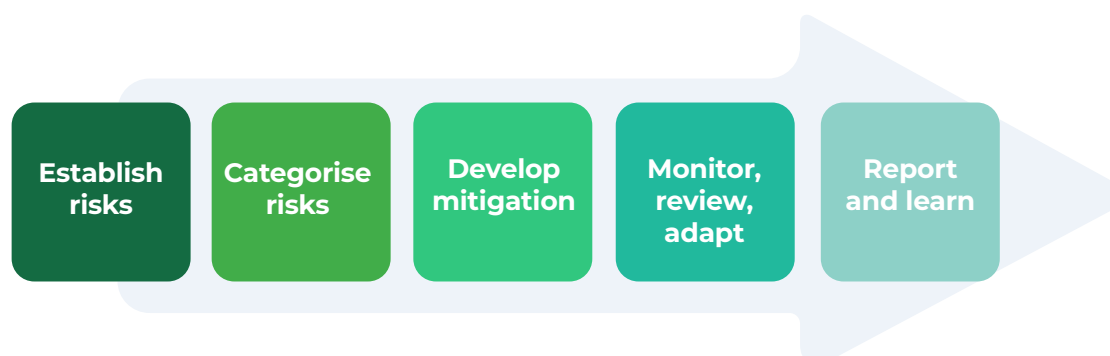
We conduct overall safeguarding risk assessment when designing or planning new projects.

### Specific Child Safeguarding Risk Assessment

If contact with children is foreseen, specific Child Safeguarding Risk Assessments are to be conducted:

- ▶ Integrated into the overall safeguarding risks assessment when designing new programmes, activities, or proposals when contact with children may be foreseeable;
- ▶ Specific Child Safeguarding Risk Assessment before an event or any activity in-person or online involving children;
- ▶ Before signing a partnership agreement with a new implementing partner;
- ▶ When choosing a supplier for services where child sexual exploitation could occur, such as a hotel venue;
- ▶ Whenever there is a sudden and dramatic change in the programme, activity, member organisation or overall socio-political context.

### What is the process of conducting a Risk Assessment?



## Step 1. Establishing the Child Safeguarding risk context

- This may be done by staff with partners and others to understand the operating context.
- You can use the list of guiding questions below to help inform your thinking on the risks.

## Step 2. Categorise the risks

Risks should be categorised based on two elements:

- How likely the risk is to occur;
- What the impact may be for the child or the organisation.

To then calculate the overall risk level: Likelihood x Impact = **Overall risk level**

1. Note how likely it is that the risk will occur	2. Note the likely impact for individuals and organisational reputation	3. Calculate the overall risk ratings (likelihood x impact)
Highly likely 3	Highly likely 3	Highly likely 7 to 9
Likely 2	Highly likely 2	Highly likely 4 to 6
Highly likely 1	Highly likely 1	Highly likely 1 to 3

## Step 3. Develop mitigation strategies

For every risk identified, there is a need to develop a mitigation strategy with related actions to be implemented. If risks are assessed as too high the mitigation strategy needs to be discussed with the manager and the Safeguarding focal point and validated by a director. In cases when the mitigation strategy does not seem robust enough and harm could be caused, the intervention will be postponed until proper measures can be put in place to intervene safely.

## Step 4. Monitor, review and adapt

Risks should be reviewed regularly to ensure changes in the contexts and others are adequately reflected.

## Step 5. Report

Report on progress to senior management at least once a year or more if deemed necessary.

## What precautions have been taken or will be taken to reduce the risk?

All levels of risk will require control measures to reduce the risk level to as low as is reasonably practicable. This could be through, for example:

- increasing the staffing to participant ratio;
- reviewing the codes of conduct and communicating these to all;
- ensuring clear safeguarding information is available;
- developing strong and diversified referral pathways and access to support.

## CHILD SAFEGUARDING RISK ASSESSMENT EXAMPLES AND GUIDING QUESTIONS

**EXAMPLES ONLY:** Below are examples of ways to complete the Risk Assessment - areas of risk, risk factors, risk significance, mitigating strategy, and actions to implement are meant to serve as prompts, to help you consider the kinds of child safeguarding risks to assess and mitigate.

What contact will you have with children through this work/project?	What potential risks to children/young people can you identify?	Likelihood to occur	Potential impact for the child/children and/or ECPAT	Overall risk (likelihood x impact)	What steps and strategy will you adopt to mitigate these risks?	Who is responsible for ensuring this action is taken?
Levels of contact with children are high in the programmes and often with one staff only	Incidents may happen in case of unsupervised individual contact with a child - Any allegation can be made	3	3	9 HIGH	Changes and adaptations need to be made to the staff, by assigning an additional member of staff	Project manager
	No way of getting feedback from the children and community	2	2	4 MEDIUM	Organisational culture (strengthen the culture of openness) Put in place the reporting and complaint mechanisms and discuss them with children and community  Include responsibility to seek feedback in project activities	Project manager
In person meetings with children in the children's groups on a weekly basis	Children travel to the meeting unaccompanied	2	2	4 MEDIUM	Ensure safety measures are in place for travel of children	Activity lead
Children are using cameras and taking pictures within the project activities	Children take pictures that are inappropriate	2	2	4 MEDIUM	Discuss our child safeguarding policy with children prior to starting activity and train through small practical exercises  Before every activity, issue a reminder about the agreed behaviours and approaches	Activity lead
	No permission sought for image or story	2	2	4 MEDIUM	Ensure that the Code of Conduct is clearly understood by all  Ensure permission mechanism is introduced for all images and stories	Activity lead

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	No permission sought for image or story	2	2	4 MEDIUM	Ensure that the Code of Conduct is clearly understood by all  Ensure permission mechanism is introduced for all images and stories	Activity lead
Children participate in an online event	One participant approaches a child through direct messaging to ask for contact details	2	3	6 MEDIUM	Use only secured online platforms, disable direct messaging functions  Ensure a code of conduct is signed by all before the event  Prepare with the children in advance  Ensure adequate support and referral is in place throughout the event and after	Project manager
Indirect contact with children through our partner	Policy and procedures not written down, or implemented, so staff do not understand responsibilities  Informal process for recruiting staff, no reference checks	3	3	9 HIGH	Support the partner in development of their policies  Develop procedures and the implementation plan  Train partners  Assign a Focal Point  Revise recruitment policy and procedures	Project manager

Please mark to confirm that this Risk Assessment has been copied to the Safeguarding Focal Point

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**Name and position of the person completing the risk assessment**

## Areas of risks and guiding questions

### 1. Context

Area of risk	Guiding questions to risk identification
<b>Patterns of harm and abuse:</b> This may include abuse due to the child's age, gender, language, race, disability, nationality, sexual orientation, or a combination of characteristics such as gender plus age.	<ul style="list-style-type: none"><li>Is child abuse or exploitation of certain groups normalised locally? E.g., child marriage, gender-based violence, corporal punishment, discrimination or abuse based on disability, race or nationality etc.</li><li>Is there any cultural tolerance or harmful social norms we should be mindful of?</li><li>Are there particular groups of children who are more exposed to/at risk of harm?</li><li>What are common attitudes towards violence against children we should keep in mind?</li><li>Is it likely that our staff and contracted individuals or suppliers may share these norms, find them acceptable and act on them?</li><li>Is it likely that our staff and contracted individuals or suppliers may fail to act when they witness abuse?</li><li>How much of the children we are engaging with are active online and in digital settings? Have we considered these risks in our interventions?</li></ul>
<b>Governance and law enforcement<sup>3</sup></b> If there is poor local governance and weak law enforcement, policing or judiciary, cases of harm and violence against children are more likely to occur due to lack of preventive measures, but less likely to be reported and responded to.	<ul style="list-style-type: none"><li>Does the judiciary have the capacity, resources and infrastructure to respond to reports and cases of child abuse?</li><li>Is it safe to report cases of child abuse in this context?</li><li>What is the status of the rule of law?</li><li>Is there an obligation to report and what are the implications for our work in this context particularly when working on research?</li></ul>
<b>Social and child protection systems</b> If there are weak social or child protection systems, it is less likely that local authorities can be relied upon to respond to child safeguarding and other harms and abuses.	<ul style="list-style-type: none"><li>What social nets, care and support services exist for children? Do they cover all community groups? (Note this may change and develop over time)</li><li>What community-based protection systems and mechanisms are in place and are these working effectively? Do they also consider ways to discuss and understand digital risks, where relevant?</li></ul>

### 2. Activities and Programmes

Area of risk	Guiding questions to risk identification
<b>Programme/ intervention design</b> If there are no participatory risk assessments, the programme is less likely to deliver on aims and objectives safely.	<ul style="list-style-type: none"><li>Are risk assessments only informed by staff? If so, which category of staff (e.g., those in the office, those working with the children and community etc.)? Are they informed by different people including ECPAT members, partners, children, local stakeholders?</li><li>Have all potential costs for Child Safeguarding prevention and response activities been budgeted?</li><li>Did you note in the proposal that the Child Safeguarding measures may need to be adapted over time to make sure they are working?</li></ul>

## Area of risk

## Guiding questions to risk identification

### Programme implementation

If programmes are being delivered by staff and associated staff, who may not understand that different groups of children experience harm and abuse differently and may need different forms of programme intervention, there is a risk of child safeguarding

- Have all the staff and associated staff been trained on basics of Child Safeguarding in a language that they understand well?
- Are the staff and associated staff aware of the Child Safeguarding risks in their contexts?
- Do staff and associated staff come from diverse groups? Are males and females available to conduct activities?
- Do programmes consider how different groups of children can better participate or engage in activities? (e.g., consider if and how you include children with disabilities, girls, boys and children of different sexual orientation and gender identity, socially isolated children, child-headed households, ethnic or linguistic minorities and other stigmatised groups of children)
- Have awareness raising activities or materials on child safeguarding been developed and distributed (in the right language and accessible format) to the children engaged?
- Does the awareness raising to children clarify the conduct to expect from staff?

### Programme monitoring

If the organisation does not monitor if programmes are being delivered safely, there is a risk of sexual exploitation, abuse and harassment.

- Are there clear indicators for monitoring harm and abuse that might be caused by the response?
- Do staff conducting the monitoring exercises know how to safely identify concerns and to respond appropriately?

### Community based complaints mechanisms (CBCM)

If children are not involved in the design of the CBCM, they are less likely to make use of it. The mechanism may not be safe or meet the specific needs of vulnerable children. If organisations do not have a clear process on how to respond to a child safeguarding report and what the steps are, it is less likely that staff will respond appropriately and objectively.

- Are all staff and associated staff aware of what to do if they receive a disclosure or a report?
- Do we have systems to receive and manage feedback in multiple languages?
- Do we have a system to ensure that any translation of reports is kept confidential?
- If we receive a report about a staff member from another organisation, do we know how to share information on child safeguarding reports with other organisations in a safe and confidential way?
- Is there a mapping of essential, existing and trusted services, legislation and formal authorities that can be used to support or refer a child survivor to where necessary? Does this consider what languages services are offered in?

### 3. Partnerships

Area of risk	Guiding questions to risk identification
<p><b>Partnership</b></p> <p>There can be risks of harm to children in many situations, including where:</p> <p>(1) you are working with implementing partners in situations where oversight and due diligence is reduced;</p> <p>(2) partners are (relatively) new to child safeguarding;</p> <p>(3) child safeguarding policy, procedures and training are not tailored to the partner and the context or the intervention;</p> <p>(4) partners must adapt quickly due to a change in context; (5) partners do not feel comfortable asking about child safeguarding because they think their funding or other resources will be cut or in case of members, their membership to ECPAT may be questioned.</p>	<ul style="list-style-type: none"><li>■ Does the partnership agreement process ensure child safeguarding due diligence?</li><li>■ Has our partner adjusted their procedures to respond to contexts such as remote implementation for instance, digital environments, etc?</li><li>■ Have we put in place a system to complete comprehensive due diligence in due course?</li><li>■ Do partners have their own child safeguarding policies/code of conduct? Are they relevant to the context and meet our standards?</li><li>■ Have partners been assessed for their staff's capacity to implement child safeguarding?</li><li>■ Have we clearly planned how we will support the partners to strengthen their capacity on child safeguarding?</li><li>■ Are there clear plans and funding to train partners on child safeguarding before the activities start?</li><li>■ Are our child safeguarding contractual requirements resourced?</li><li>■ Does our partner feel comfortable reaching out to us to ask for advice on child safeguarding or do they feel anxious that their funding will be cut if they report child safeguarding cases to us?</li></ul>

### 4. Communications and safe information management

Area of risk	Guiding questions to risk identification
<p><b>Communication</b></p> <p>If communication materials do not maintain safety, dignity and privacy of the child participants, there are risks of harm</p>	<ul style="list-style-type: none"><li>■ Are there contextually relevant guidelines on obtaining informed consent from children and caregivers and safely publishing images and stories, (e.g., in ways that do not reinforce negative stereotypes, which detail not using the full name and other identifying information)?</li><li>■ Has ECPAT or its partners obtained informed consent in a language understood by the child being featured, fully understanding how their information will be used?</li><li>■ Are images explicit or do they show abuse in a way that could bring back memories of abuse or a harmful situation?</li><li>■ Is the language and terminology used locally appropriate and relevant?</li></ul>

Area of risk	Guiding questions to risk identification
<p><b>Safe management of information and data protection</b></p> <p>If systems are not in place to protect information shared by staff and associated staff, this might expose children to risks of harms and abuses.</p>	<ul style="list-style-type: none"> <li>■ Is information on children and caregivers in a locked folder or in a protected database? Is there restricted access to these databases?</li> <li>■ Is the sharing of information on children subject to data protection regulations?</li> <li>■ Do all staff understand confidentiality and its importance for child safeguarding?</li> <li>■ Is there an individual database for reports and complaints which is password protected?</li> <li>■ Is access to this database restricted to named individuals who hold particular responsibility for child safeguarding and complaints/reports?</li> </ul>

## 5. Human resources

Area of risk	Guiding questions to risk identification
<p><b>Recruitment</b></p> <p>There may be risks of child safeguarding and other harms and abuses:</p> <p>(1) where there are no reference checks for new candidates and questions during interviews to assess knowledge and commitment to child safeguarding, and</p> <p>(2) where staff do not understand organisation's code of conduct and child safeguarding</p>	<ul style="list-style-type: none"> <li>■ Are two or more references which also consider personal behaviour and approach to child safeguarding taken for successful candidates? (a reference does not have to be written; it can be verbal)</li> <li>■ Is a police record check, or locally relevant alternative, completed?</li> <li>■ Are questions asked during interview on understanding what child safeguarding is/means as a staff member and on suitability to work with children?</li> <li>■ Do all staff receive an orientation / induction on child safeguarding?</li> <li>■ Do all staff sign a code of conduct and sign / commit to the relevant organisational policies on child Safeguarding?</li> <li>■ Do we have a code of conduct or summary version in language(s) understood by all staff?</li> <li>■ Does staff training include child safeguarding?</li> </ul>

### Reporting

If safe and confidential systems for staff to report against sexual exploitation, abuse and harassment are not in place or not well known by all staff, this might expose them and the community to risk of retaliation against child abuse

- Is there a system in place for all staff to report suspicious or confirmed misconduct /wrongdoing?
- Do all staff know that there is a reporting system in place, and how to access/use it to report misconduct?
- Do they feel safe using it and trust passing on rumours of child safeguarding and other harms and abuses to their line manager or someone within their organisation?
- Do all staff know how to safely receive a disclosure/report and respond appropriately?
- Do all staff know what confidentiality is and why it's important?
- Do all staff know the disciplinary measures in case of proven misconduct?



## 6. Governance, culture and leadership

Area of risk	Guiding questions to risk identification
<p><b>Culture and Leadership</b> There may be risks of child abuse and other harms and abuses:</p> <ol style="list-style-type: none"><li>(1) where there is no dedicated child safeguarding focal person with a job description outlining expectations;</li><li>(2) where there is no risk register reviewed regularly by management or the risk register does not include child safeguarding;</li><li>(3) where managers are not responsible for integrating safeguarding into their area of responsibility; and</li><li>(4) where leadership do not act swiftly or in a transparent or accountable way following reports or suspicions of abuse,</li></ol>	<ul style="list-style-type: none"><li>■ Is there a trained child safeguarding focal point in the organisation?</li><li>■ Do all staff know who the child safeguarding focal points are and how to contact them?</li><li>■ Is child safeguarding included in the organisational risk register?</li><li>■ Do managers understand their own and their team's role on safeguarding?</li><li>■ Is there any monitoring tool, checklist etc. they use to ensure that teams are implementing safeguarding?</li><li>■ Does leadership act swiftly and in a transparent way following reports or suspicions of abuse?</li><li>■ Is staff wellbeing considered by leadership?</li><li>■ Do all staff feel safe to contribute and challenge without fear of humiliation, repercussions or other?</li></ul>
<p><b>Reporting / Investigation</b> There may be risks of sexual exploitation, abuse, harassment and other harms and abuses:</p> <ol style="list-style-type: none"><li>(1) where documented policy / process does not contain guidelines on what to do if a report falls outside the scope of the organisation;</li><li>(2) 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</li></ol>	<ul style="list-style-type: none"><li>■ Is there a process/routine in place to govern the reporting and investigation processes?</li><li>■ Is there a clear case handling response process with responsibilities? Does the organisation know if and when it may be more appropriate to call for external investigators?</li></ul>