Probatio Africa

Safeguarding and Referral Policy

How we keep the people we meet safe from harm, abuse and exploitation, and what happens when someone needs help.

Version	1.0
Approved	10 October 2026
Approved by	James Lumowo, Managing Director
Next review	October 2027
Applies to	Everyone who works for or on behalf of Probatio Africa

In short

- We have zero tolerance for sexual exploitation, abuse and harassment, and for any harm to children or adults at risk, by anyone who works for or with us.
- No fieldwork starts until an ethics decision, a risk assessment and a local referral pathway are in place.
- Everyone who works with us must report a concern within 24 hours. Anyone else can report to us in confidence, anonymously if they wish.
- We respond in a way that puts the safety, wishes and dignity of the person affected first.

1. Purpose and commitment

Probatio Africa carries out social research, evaluation and related work in communities across Nigeria and Africa. Our work brings researchers into homes, markets, motor parks, health facilities and government offices, often with people who have little power in the encounter. This policy sets out how we prevent harm to those people, and how we respond when harm is suspected or reported.

We have zero tolerance for sexual exploitation, abuse and harassment, for the abuse or neglect of children and adults at risk, and for inaction when a concern is raised. Zero tolerance means every concern is taken seriously and acted on; it does not mean that concerns are hidden to protect our reputation.

2. Who and what this policy covers

This policy applies to everyone who works for or on behalf of Probatio Africa: directors, employees, consultants, field supervisors, enumerators, research assistants, interns, volunteers, drivers, recruiters, local guides, interpreters and subcontracted firms and their staff (together, “our people”). It applies at all times during an engagement, on and off duty, in person and online.

It protects everyone our work reaches, including research participants, their households and communities, and our own people. It applies to every stage of a study, from design and recruitment to fieldwork, data handling, publication and the use of photographs and recordings.

3. Standards and law we follow

This policy is built on the following international standards and Nigerian law. Where they differ, we apply whichever gives the greater protection.

- Inter-Agency Standing Committee (IASC): Six Core Principles relating to Sexual Exploitation and Abuse (2019).
- UN Secretary-General’s Bulletin on special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13).
- Core Humanitarian Standard on Quality and Accountability (2024), in particular its commitments on safety and complaints.
- Keeping Children Safe: International Child Safeguarding Standards.
- UNICEF Procedure for Ethical Standards in Research, Evaluation, Data Collection and Analysis (2021), and the Ethical Research Involving Children (ERIC) guidance.
- ICC/ESOMAR International Code on Market, Opinion and Social Research and Data Analytics.
- National Code of Health Research Ethics (National Health Research Ethics Committee of Nigeria).
- Child Rights Act 2003 and the state laws that domesticate it; Violence Against Persons (Prohibition) Act 2015 and its state equivalents; Trafficking in Persons (Prohibition) Enforcement and Administration Act 2015.
- Nigeria Data Protection Act 2023 and the General Application and Implementation Directive (2025).

4. Definitions

- Safeguarding: the actions we take to prevent our people, our work and our operations from causing harm, and to respond well when harm happens.
- Child: anyone under the age of 18, whatever the local age of majority or consent.
- Adult at risk: an adult who, because of age, disability, illness, displacement, detention, poverty or circumstance, is less able to protect themselves from harm or exploitation.
- Sexual exploitation: any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically.

- Sexual abuse: actual or threatened physical intrusion of a sexual nature, by force or under unequal or coercive conditions.
- Sexual harassment: unwelcome conduct of a sexual nature that might reasonably be expected or perceived to cause offence or humiliation.
- Harm: physical, sexual, emotional or psychological abuse, neglect, exploitation, trafficking, discrimination, and the misuse of personal data or images.

5. Principles

- Do no harm. If a study, a question or a visit could put someone at risk, we change it or do not do it.
- The best interests of the child come first in every decision that affects a child.
- Survivor-centred. The safety, wishes, dignity and confidentiality of the person affected guide our response.
- Equal protection. Everyone is protected regardless of sex, age, disability, ethnicity, religion, language or status.
- Shared responsibility. Safeguarding is everyone’s job, not only the safeguarding lead’s.
- Accountability. We record what we do, learn from incidents, and report to clients, funders and authorities where we must.

6. Rules of behaviour

These rules adopt the IASC Six Core Principles and apply to all our people. Breaking them is gross misconduct and grounds for dismissal or termination of contract, and may be reported to the police or other authorities.

1. Sexual exploitation and abuse are forbidden.
2. Sexual activity with anyone under 18 is forbidden, whatever the local age of consent. Mistaken belief about a person’s age is no defence.
3. Exchanging money, employment, goods, services, incentives or research participation for sex, sexual favours or any humiliating, degrading or exploitative behaviour is forbidden. This includes the use of sex workers while on assignment.
4. Sexual relationships between our people and research participants, or members of their households, are forbidden for the duration of a study, because of the inherently unequal power involved.
5. Anyone who has a concern or suspicion about sexual exploitation, abuse or harassment, or about harm to a child or adult at risk, by anyone connected to our work, must report it through the channels in section 10.
6. Managers and field supervisors must create and maintain an environment that prevents harm and supports reporting.

In addition, our people must never: hit, threaten or humiliate anyone; be alone with a child out of sight of other adults; contact participants privately through personal phones or social media for any purpose unrelated to the study; take or share images of participants outside the consent given; or offer anything that could pressure someone to take part.

7. Safe recruitment and training

- Every person is identity-checked and gives two references, at least one from their most recent employer. We ask referees directly about safeguarding and misconduct concerns, and we answer the same question honestly when asked about people who have worked for us.
- Where lawful and available, we ask for a police character certificate for roles with direct contact with children or adults at risk.
- Everyone signs our Code of Conduct and this policy before starting work.
- Everyone completes safeguarding and PSEA training before their first day of fieldwork, with a study-specific briefing covering the referral pathway, and a refresher at least once a year.
- Field staff carry a photo identity card with an interviewer number, so participants can verify them through our Verify a survey page.

8. Safeguarding in research design and fieldwork

Safeguarding is built into each study before it reaches the field. For every study we:

- Complete a safeguarding and security risk assessment as part of the written protocol, and update it if the situation changes.
- Obtain a written decision from an independent, registered research ethics committee before first contact, and permission for access from the relevant authorities and community leaders.
- Seek free and informed consent in a language the participant chooses, in writing or recorded orally where literacy requires it. Participants are told they may skip any question or stop at any time without consequence.
- For children: obtain consent from a parent or guardian and the child’s own assent; interview in a place that is private enough to protect confidentiality but visible to other adults; and never interview a child where the topic is not necessary to the study’s purpose.
- Match the interviewer’s sex to the participant’s where the topic or setting calls for it, and use trained interviewers for sensitive topics such as violence.
- Pause an interview if a participant becomes distressed, and offer the referral information whether or not the interview continues.
- Keep any reimbursement for time or travel modest and proportionate, so that it does not pressure anyone to take part.
- Use photographs and recordings only with specific consent; never photograph people in distress; never publish an identifiable image of a child without a guardian’s consent and a clear purpose.
- Protect personal data in line with the Nigeria Data Protection Act 2023, as set out in our privacy notice.

9. The referral pathway

Before fieldwork begins in any area, the field lead maps the health, protection, psychosocial and legal support services available there — such as health facilities, Sexual Assault Referral Centres, the state ministry responsible for women's and children's affairs, social welfare offices and NAPTIP for trafficking — and agrees a referral route with them. Fieldwork does not start until that route is in place. The contacts are printed on the consent information each participant receives.

If a participant discloses harm, or our people see that someone is at risk, they:

1. Make sure the person is safe right now. If there is immediate danger to life, call the national emergency number, 112, and the field supervisor.
2. Listen calmly, without judging or asking probing questions. Do not investigate or confront anyone.
3. Explain the support available and, with the person's informed consent, make a referral. For a child at risk of serious harm, a referral is made even without consent, and the child is told what will happen.
4. Record only the facts needed, in the person's own words where possible, without opinion.
5. Report to the field supervisor and the Designated Safeguarding Lead within 24 hours, and tell no one else.

10. How to report a concern

Our people must report any concern within 24 hours. Anyone else — a participant, a community member, a partner — can report to us at any time, and can do so anonymously.

- Email: safeguarding@probatioafrica.com
- Call or WhatsApp: +234 905 178 1117 (Monday to Friday, 8:00am to 5:00pm WAT); in an emergency, call 112 first.
- In person: to any field supervisor, who must pass it on to the Designated Safeguarding Lead the same day.
- If the concern is about the Designated Safeguarding Lead or the Managing Director, write to safeguarding@probatioafrica.com marked "For the independent reviewer", and it will be handled by a person outside the management line.

You may also report directly to the police, to NAPTIP, or to the ethics committee that approved the study, named on your consent form. Reporting to us does not prevent you from doing so.

11. How we respond

1. We acknowledge every report within two working days, and immediately where someone may be in danger.
2. Within five working days, the Designated Safeguarding Lead assesses the risk, agrees support for the person affected, and decides on next steps. Where a staff member is the subject of a concern, they may be suspended, without assumption of guilt, while it is looked into.

3. Investigations are carried out by a trained person who is independent of those involved, and by an external specialist where needed. The person affected is kept informed and their wishes are respected as far as the law and the safety of others allow.
4. Where the law requires it, or where a crime may have been committed against a child, we report to the relevant authorities.
5. We inform clients and funders of incidents connected to their work within the timeframe their agreements require, sharing only what they need and protecting the identity of those involved.
6. Proven misconduct leads to disciplinary action up to and including dismissal or termination of contract.

12. Protection from retaliation

No one who raises a concern in good faith will suffer any detriment for doing so, even if the concern is not upheld. Retaliation against a person who reports, or against a witness, is itself gross misconduct. A report made knowing it to be false is also misconduct.

13. Confidentiality and records

Safeguarding information is shared only with those who need it to keep people safe or to deal with the concern. Records are kept securely and separately from research data, with access limited to the Designated Safeguarding Lead and the people they authorise. Records are retained only as long as needed for the case and any legal requirement, and reviewed at least every two years.

14. Partners and subcontractors

Before we work with a partner or subcontractor whose people will have contact with participants, we check their safeguarding arrangements. Our agreements require them to meet this policy or an equivalent standard, to report concerns to us within 24 hours, and to cooperate with any investigation. We may end an agreement that is breached.

15. Roles and responsibilities

- Managing Director: accountable for this policy, its resources and its review. Until a dedicated lead is appointed, the Managing Director is the Designated Safeguarding Lead.
- Designated Safeguarding Lead: receives and manages reports, maintains the referral pathways, keeps records, and leads training.
- Project and field leads: complete the risk assessment and referral mapping for each study, brief teams, and make sure no fieldwork starts until both are in place.
- Field supervisors: model the expected behaviour, receive concerns in the field and pass them on the same day.
- All our people: follow this policy and the Code of Conduct, and report concerns.

16. Monitoring and review

We review this policy every year, after any serious incident, and when law or standards change. We publish the date of each review and a summary of what changed. Feedback on this policy is welcome at safeguarding@probatioafrica.com.