



Prevention of Sexual Exploitation, Abuse and Harassment Policy

1. PURPOSE

The purpose of having a **PSEAH (Preventing Sexual Exploitation, Abuse, and Harassment) Policy** for Animals Fiji is to ensure a **safe, ethical, and professional environment** for all individuals involved in our work, including staff, volunteers, community members, and beneficiaries.

As a **charity focused on animal welfare**, we engage with diverse communities across Fiji, often in vulnerable settings. A **PSEAH Policy** reinforces our commitment to maintaining **high ethical standards**, safeguarding the well-being of those we work with, and ensuring that **our services remain inclusive, respectful, and free from exploitation or harm**.

Additionally, as Animals Fiji relies on **donations and community trust**, having a robust PSEAH Policy demonstrates our **dedication to accountability, transparency, and responsible operations**, further strengthening public confidence in our mission.

Consider the following points:

- fundamental to the operation is respect for the dignity and basic human rights of all people.
- committed to safeguarding all vulnerable people.
- recognise that the nature of our workplaces our workers, contractors and volunteers in positions of authority and trust especially vulnerable adults and children.
- Workers, contractors and volunteers must not abuse their position in order to exploit or abuse another person.
- have an obligation to uphold high standards of personal and professional conduct at all times.
- sexual exploitation, abuse, and sexual harassment (SEAH) are violations of basic human rights.
- We will actively prevent and respond to SEAH and advance an organisational culture that prioritises safeguarding against SEAH.
- We will safeguard those affected by SEAH, encourage them to come forward and report incidents.
- We will ensure all reports of SEAH are handled sensitively and confidentiality.

2. SCOPE / PERSONS AFFECTED

The following must comply with this Policy in the course of their work and when Animals Fiji:

- Employees, Trustee members and personnel
- Program participants, volunteers, subcontractors, grant recipients
- Contractors and their personnel
- Consultants, advisors and contracted individuals
- Non-government and civil society organisations
- Sponsorship partners
- Grant recipients, awardees
- Partner governments and multilateral organisations
 - o Government agencies which have agreements in place with the Australian Department of Foreign Affairs or Australian Volunteers International (funded or unfunded)
 - o Multilateral partners
 - o Other partner governments.



All of the aforementioned must comply with the standards of behaviour set out in this Animals Fiji Prevention of Sexual Exploitation, Abuse, and Harassment Policy.

These individuals and groups are expected to act in accordance with the principles and reporting requirements outlined in this Policy. They must also abide by their own relevant policies, international declarations, conventions, agreements and domestic legal frameworks that relate to preventing sexual exploitation, abuse and harassment.

3. PRINCIPLES

Zero tolerance of inaction.

Behaviour by members of Animals Fiji that results in the sexual exploitation or abuse of a child or adult, helps facilitate SEAH or where allegations of SEAH are ignored, will not be tolerated and we will immediately respond and take seriously any concerns raised. The reporting of incidents and responses is an indicator that the risk of SEAH is being managed appropriately. Zero tolerance is defined as acting on every allegation in a fair and reasonable way with due regard for procedural fairness.

Strong leadership to accelerate culture change.

Strong leadership is essential to set organisational culture, and therefore leaders need to set clear expectations and model respectful behaviour in their interactions at work. This will support communities, victims/survivors and whistleblowers to feel safe, report concerns and be assured their allegations are taken seriously.

- Strong leaders address SEAH by taking measures to improve diversity and inclusion. This can include:
- strong, actionable human resource procedures that embed gender equality and PSEAH.
- inclusion of PSEAH discussions in board meetings.
- having senior champions responsible for PSEAH and encouraging staff gender balance particularly in senior roles.

Victim/survivor needs are prioritised.

A survivor-centred approach puts the safety, wishes and interest of the survivor first, above all other considerations. This means that the survivor should be empowered. They must be in control. What the survivor needs and wants must be at the centre of any assistance we give. This approach:

- Treats the survivor with dignity and respect.
- Involves the survivor in decision making.
- Provides the survivor with comprehensive information.
- Protects privacy and confidentiality.
- Does not discriminate based on gender, age, race/ethnicity, ability, sexual orientation, or other characteristics.
- Considers the need for counselling and health services to assist the victim/survivor with their recovery.

Preventing Sexual Exploitation, Abuse and Harassment is a shared responsibility.

Preventing Sexual Exploitation, Abuse and Harassment is everyone's responsibility. Real change to reduce SEAH will not occur unless every sector plays a role — government, business, non-government organisations, institutions, communities and individuals. DFAT requires the commitment, support and investment of its partners for this Policy to be effective. All organisations have a responsibility to build their capacity to deal sensitively and effectively with SEAH that occurs in the course of their work.



Gender inequality and other power imbalances are addressed.

Animals Fiji particularly recognises that gender, disability, age, sexual orientation and poverty have powerful intersection points with the likelihood of SEAH. There are also power imbalances at play. Inequalities based on the distinctions of worker/beneficiary; ability/disability; ethnic and Indigenous status; religion; gender identity and sexual orientation; age; health and poverty, can also result in SEAH. The intersection of gender with other forms of inequality can further increase the likelihood of SEAH occurring.

Animals Fiji actions promote gender equality, child protection & safeguarding, social inclusion and accountability towards a 'do no harm' approach.

Stronger reporting will enhance accountability and transparency.

Sexual exploitation, abuse and harassment is a failure of responsibility. Stronger reporting allows an organisation to better monitor SEAH, understand risks, improve assurance and work with organisations to improve systems and safeguards accordingly. Reporting will also help to focus organisations on the issue by providing a regular prompt that PSEAH is a core obligation of their work.

Animals Fiji aims to prevent SEAH through implementation of this Policy, communication, training and working collaboratively with all workers and partner organisations to safeguard everyone against SEAH.

4. POLICY

The following list of expected behaviours applies to all of Animals Fiji staff and volunteers and in both their personal and professional lives. At all times workers:

- Maintain a duty to act in a manner which upholds the values and reputation of Animals Fiji
- Undertake to create and maintain a safe and trusted environment that promotes the
- implementation of this Policy and safeguards everyone from SEAH.
- Comply with all relevant laws of the country of residence, or in which he or she is travelling.
- Be aware that sexual behaviour is an area of particular sensitivity, where conduct may more easily be seen as offensive or be misinterpreted.
- Avoid actions or behaviours that could be perceived by others as sexual exploitation, abuse or harassment underpinned by a 'do no harm' approach.
- Ensure personal conduct towards co-workers and volunteers alike is not exploitative or such that it reasonably leads to a perception of exploitation.
- Ensure photographs, films, videos, including those in social media posts, present vulnerable people in a dignified and respectful manner and not in a vulnerable or submissive manner. This includes ensuring that vulnerable people are adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure that social media use and the sharing of photographs, films and videos are underpinned by informed consent principles and documentation of the informed consent.
- Read and agree to abide by the expected behaviours outlined in the relevant code of conduct.
- Immediately report to (insert appropriate reporting person/group) any concern, suspicion or allegation of SEAH or any alleged policy non-compliance. (Reporting procedures are outlined below).

In addition, Animals Fiji workers must adhere to the following expected behaviours:

- Animals Fiji workers must not engage in sexual relationships with staff, volunteers, community members, and beneficiaries as these relationships are based on inherently unequal power dynamics and there is



the potential for abuse of power. Such relationships undermine the credibility and integrity of Animals Fiji.

It is strictly prohibited for employees, volunteers, and contractors:

- Sexually exploit or abuse or sexually harass a child or adult.
- Use their position of trust and authority to request any service or sexual favour from beneficiaries of Animals Fiji, adults, children or others in the communities in which Animals Fiji works, in return for protection or assistance, or coerce a person to engage in sexual intercourse or any sexual activity.
- Exchange or withhold from beneficiaries of Animals Fiji - adults, children or others in the communities in which Animals Fiji works - money, food, employment, goods, assistance or services for sex or sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- Use Animals Fiji or partner organisation facilities, personnel or resources for the purpose of arranging or facilitating access to sex workers by any person, including visitors to Animals Fiji offices or programs.
- Engage in sexual activity with a child under any circumstance. Even in a country where the age of majority or the age of consent is lower than 18 years, Animals Fiji staff, volunteers, community members, and beneficiaries are forbidden to have sexual activity with anyone under the age of 18 years. A mistaken belief that the child is over 18 is no defence.
- Use computers, mobile phones, video cameras, cameras or other technology inappropriately, or to exploit or harass children and/or adults, or to access or disseminate child exploitative material and/or sexually exploitative material through any medium, including social media.
- Procure sex for others, and/or use a third party to do so.

5. DEFINITIONS

Worker: Employees (in-country and overseas), consultants, contractors, office volunteers, interns, Trustees, visitors, or anyone engaged to undertake work for Animals Fiji

Partner Organisations: Vets Beyond Borders, Vet Projects, and any other organizations that partner in the future.

Safeguarding: Actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm and abuse.

Sexual exploitation, abuse and harassment (SEAH) occurs against a child or an adult and can occur between people of the same or different genders. It includes situations such as:

- Sexual exploitation and abuse;
- Sexual harassment;
- Child sexual abuse and exploitation;
- Women and men sexually exploited through sex work;
- Possessing, controlling, producing, distributing, obtaining or transmitting sexually exploitative
- Images of adults and children; and

- Possessing, controlling, producing, distributing, obtaining or transmitting photographs or videos that may not be explicitly sexual in nature or sexually provocative, however they could be considered sexual in nature if for instance the image would likely cause offence, humiliation or intimidation to the subject of the image.

Sexual Exploitation - any actual or attempted abuse of a position of vulnerability, differential power,

or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual Abuse - the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Harassment - any verbal or physical conduct or any conduct of a sexual nature that is unwelcome, uninvited or not reciprocated in circumstances in which a reasonable person, having regard to all the circumstances would have reasonably anticipated the possibility that the person harassed would be offended, humiliated or intimidated. This can include unwelcome sexual advances or unwelcome requests for sexual favours or displaying or sending sexually explicit images or asking intrusive questions about someone's personal life, including their sex life. Sexual harassment can take various forms. It can be direct and/or indirect, physical and/ or verbal, repeated or one-off instances and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries of AVI's programs, program participants, community members, citizens, as well as employees and workers.

Child Sexual Abuse - the use of a child for sexual gratification by an adult or significantly older child

or adolescent. Sexually abusive behaviours can include fondling genitals; masturbation; oral sex; vaginal or anal penetration by a penis, finger or any other object; fondling breasts; voyeurism; exhibitionism; and exposing the child to, or involving the child in, pornography (see Animals Fiji Child Protection Policy).

Child Exploitation - one or more of the following:

- Committing or coercing another person to commit an act or acts of abuse against a child.
- Possessing, controlling, producing, distributing, obtaining or transmitting child exploitation
- Material.
- Committing or coercing another person to commit an act or acts of grooming or online grooming.
- Using a minor for profit, labour, sexual gratification, or some other personal or financial advantage.

Online Child Sexual Exploitation (or child pornography) - in accordance with the Optional Protocol to the Convention on the Rights of the Child, 'child pornography' means 'any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes.

Child – any person under the age of eighteen (18) years as defined by the Convention on the Rights of the Child irrespective of local country definitions of when a child reaches adulthood.

Vulnerable adults - those aged over 18 years and who identify themselves as unable to take care of themselves/ protect themselves from harm or exploitation; or who, due to their gender, mental or



physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.

Survivor - A person who has SEAH perpetrated against him/her/them or an attempt to perpetrate SEAH against him/her/them.

6. Breach of Policy

Sexual exploitation, abuse and harassment by Animals Fiji workers, contractors or volunteers constitute acts of gross misconduct and are therefore grounds for termination of employment, funding or services.

Disciplinary actions/possible outcomes for breach of the Animals Fiji PSEAH Policy can include:

- Referral to local law enforcement authorities (as per national and any mandatory reporting laws), where appropriate.
- Referral to Australian Federal Police, where appropriate.
- internal investigation which may include an externally engaged investigator.
- Perpetrator standing aside with pay pending investigation.
- Performance management and disciplinary action including formal warnings.
- Training, mentoring and support where appropriate.

7. Shared Responsibility

All Animals Fiji workers are responsible for championing good practice and maintaining an organisational culture that prioritises safeguarding against SEAH. Managers and leaders at all levels have responsibilities to support and develop systems that maintain an environment that facilitates implementation of the PSEAH Policy. This includes ensuring that Animals Fiji workers and workers, contractors or volunteers understand policy obligations. Managers and leaders must create a safe environment at Animals Fiji for anyone to come forward and raise allegations or concerns of SEAH and immediately respond to any reports. This will be done by:

- Providing survivors with a safe (and protected) space, where survivors can speak.
- Ensuring informed consent, confidentiality and data protection with any recording and sharing of information.
- Offering referral to counselling and other support services, in line with the wishes and welfare of survivors.
- Assisting survivors to document and lodge a report, in line with the wishes of the survivor
- Clearly and openly communicating with survivors, including giving feedback on what will happen next.
- Inviting survivors to have a support person with them at any time in the reporting and response process.
- Making every effort to meet survivors' needs, including accommodating requests to have a person of a particular gender present at the time of disclosure.

8. PSEAH Training

PSEAH training will be provided for Animals Fiji and workers, contractors or volunteers workers as awareness and also as part of staff induction. The same training will cover topics related to the Code of Conduct.



9. Recruitment

Animals Fiji will apply robust recruitment and screening procedures for all Animals Fiji workers and employees, contractors or volunteers to reduce the risk of engaging a person who poses an unacceptable risk to children or adults, particularly vulnerable children and adults. These procedures include:

- Criminal history checks
- Referee checks from an applicant's last place of employment/volunteer including when working in overseas locations and will include a question regarding any concerns of sexual misconduct.
- Personnel records to include performance or conduct issues regarding concerns or allegations of SEAH.
- All employment/contracts must contain provisions for potential disciplinary action including termination of employment/assignment following breach of this policy.

10. Risk Management Process

Animals Fiji will design and implement effective risk management processes that include consideration of the risk of SEAH. The process will document the controls in place or to be implemented to reduce or remove the risks of SEAH.

11. Reporting and Investigation

11.1 How to Report

Animals Fiji provides a safe, supportive and secure environment to report alleged incidences of SEAH or policy non-compliance. Animals Fiji will take all concerns seriously and respond immediately and in accordance with Animals Fiji and Australian Volunteers International reporting requirements, and subject to the wishes and welfare of the survivor. All reports of SEAH will be recorded through completing an incident form and submitting it to management (Appendix A), regardless of whether substantiated or full investigation required and Animals Fiji will de-identify complaints at the request of the survivor. The principles of natural justice will apply to all investigations. Animals Fiji workers and employees, contractors or volunteers must immediately report any concerns, suspicions or allegations of SEAH or alleged breach of the Animals Fiji PSEAH Policy. A report should be made to one of the following people as applicable:

Animals Fiji may report a concern regarding sexual exploitation, abuse and harassment or Policy breach to any of the following people:

- Animals Fiji Trustees
- Animals Fiji Management
- Animals Fiji Shelter Supervisor

Animals Fiji workers may report a concern regarding sexual exploitation abuse and harassment or Policy breach to any of the following people:

- Animals Fiji Trustees
- Animals Fiji Management
- Animals Fiji Shelter Supervisor

Visitors, beneficiaries, and Members of the Public may report a concern regarding sexual exploitation, abuse and harassment through:



- Animals Fiji Trustees
- Animals Fiji Management
- Animals Fiji Shelter Supervisor

11.2 Managing Reports

Anyone wishing to make a report anonymously needs to refer to the Animals Fiji Whistleblower Protection Policy (Appendix B) for information.

Anyone reporting a case of SEAH, in good faith, or any person who has cooperated with an investigation into a report of SEAH, will be protected by this Policy. Malicious and vexatious reporting of SEAH with the intention and/or result of harming another person's integrity or reputation amounts to serious misconduct and is subject to disciplinary action up to and including termination of employment. This is distinct from reports made in good faith based on the judgment and information available at the time of the report, which may not be substantiated by an investigation.

Reporting and investigation progress will include engagement of and reporting to the Organisational Leadership Team and Animals Fiji Board members.

11.3 External Reporting

Where safe to do so, and in accordance with the wishes and welfare of survivors, alleged SEAH incidents will be reported to appropriate local authorities. If an Australian Volunteers International's staff member or participant/volunteer are either the survivor or alleged perpetrator, Animals Fiji must inform Australian Volunteers International immediately. Our timeframes are very strict; therefore, you must report immediately.

11.4 Investigations

Animals Fiji investigations of SEAH will be carried out in a manner that is timely, fair, objective and as far as is practicable, confidential. This includes the use of appropriate interviewing practice with complainants and witnesses. All information and documented evidence will be held securely and in the strictest confidence as far as is appropriate.

11.5 Survivor Support and Assistance

Animals Fiji will adopt a survivor-centred approach in preventing and responding to SEAH. Animals Fiji will ensure that all responses are developed in a manner that balances respect for due process with a survivor centred approach in which the survivor's wishes, safety and wellbeing remain a priority in all matters and procedures. Furthermore, all actions taken should be guided by respect for choices, wishes, rights and dignity of the survivor.

Animals Fiji will ensure survivors of SEAH are offered support and assistance such as referral to safe health/medical, psychosocial and legal/justice response where appropriate and where required to specialised children's or women's services.

Survivors will be provided with information on the progression of an investigation and final outcomes.

11.6 Partner Organisations

Animals Fiji will work with Partner Organisations, funding donors and grantees in the prevention of SEAH and Partner Organisations will be advised of avenues available to report concerns regarding SEAH within Animals Fiji.

12 Responsibilities

Board Animals Fiji Trustees	Approve the PSEAH Policy, hold senior leadership accountable, organization meets obligation, communicates the policy.
Animals Fiji Management	Ensure the PEAH Policy is upheld and leadership accountable.
Animals Fiji Shelter Supervisor	Lead by example
All workers	Example: Understand and follow ,organisations. PSEAH Policy. Report all allegations of PSEAH to Animals Fiji
volunteers, contractors, grant recipients, downstream partners etc	Understand and follow ,organisations. PSEAH Policy. Report all PSEAH allegations to Animals Fiji

13 Related Policies

- Employment Agreements
- Shelter SOPs
- Child Protection Policy

14 Relevant External Policies

- Australian Department of Foreign Affairs PSEAH Policy
- International Bill of Human Rights
- The UN Convention on the Elimination of all Forms of Discrimination Against Women
- UNSC Resolution 1325: Women, peace, and security (WPS)
- Australian Volunteers International PSEAH Policy.
- Fiji laws and legislation

15 Evaluation and Performance

Animals Fiji will monitor compliance through a range of approaches including review of this policy every three years.

16 Revision History

DATE	Revision Number	Change(s)
20 March 2025	1	New Policy
20 March 2028	2	Next PSEAH Policy Review
	3	
	4	



Appendix 1: General Safeguarding Behaviours

Animals Fiji Safeguarding Code of Conduct provides clear behavioural guidelines and expectations designed to protect all people who come into contact with our organisation from harm, particularly children and vulnerable adults. All Animals Fiji workers and associated personnel working on or visiting Animals Fiji office or program are required to adhere to the Safeguarding Code of Conduct. The code is as follows:

General Safeguarding Behaviours

I will:

- Conduct myself in a manner that is consistent with the values of Animals Fiji and the PSEAH
- Maintain a professional role and establish clear professional boundaries that serve to protect everyone from misunderstandings or a violation of the professional relationship.
- Model appropriate behaviours to ensure a positive culture of respect is maintained.
- Be aware of and respect the cultural differences, sensitivities, and expectations of the communities in which we work, and refrain from any form of behaviour that would be deemed inappropriate in that setting.
- Provide a welcoming, inclusive, trusted, and safe environment for all people that promote the implementation of the PSEAH and Child Protection and Safeguarding Policy(ies).
- Be aware that sexual behaviour is an area of particular sensitivity, where conduct may more easily be seen as offensive or be misinterpreted.
- Comply with the guidelines on the use of images.
- Take responsibility for ensuring I am accountable and do not place myself in positions where there is a risk of allegations being made.
- Be transparent in my actions and whereabouts.
- Speak up when I observe concerning behaviours of colleagues.
- Immediately report any concerns of behaviour that contradicts the standards of behaviour outlined in the Code of Conduct.
- Follow the reporting processes below to report and/or respond to concerns in relation to safeguarding.
- Comply with all relevant local laws and legislation, including labour laws in relation to child labour.
- Immediately disclose all charges, convictions and other outcomes of an offence that relates to child exploitation and abuse, or sexual, exploitation abuse and harassment to any person, including those under traditional law, which occurred before or occurs during association with Animals Fiji.

I will not:

- Use any communication device including computers, mobile phones, video cameras, cameras or other technology inappropriately, or to sexually exploit or
- harass adults or children, or access or disseminate exploitative material through any medium, including social media.



Prevention of Sexual Exploitation Abuse & Harassment Behaviours

I will:

- Immediately inform my line manager if I become engaged in a personal relationship which may be perceived as inappropriate or sexually exploitative; and/or where real or perceived unequal power dynamics exist e.g., if there is a reporting relationship; and/or if I am unsure if my relationship falls into this (SEAH) category.

I will not:

- Engage in sexual relationships with program participants or beneficiaries as such relationships are based on inherent power imbalances which have high risk of exploitation.
- Use my position of trust and/or authority to request any service or sexual favour from partners or beneficiaries of Animals Fiji programs, be they adults or others in the communities in which Animals Fiji works, in return for protection or assistance; and/or coerce a person to engage in sexual intercourse or any sexual activity.
- Exchange or withhold from beneficiaries of Animals Fiji programs funds services or support of any kind for sex or sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- Engage in transactional sex when travelling for or undertaking Animals Fiji business even if it is legal in that respective state or country.
- Use Animals Fiji or partner organisation facilities, personnel or resources for the purpose of arranging or facilitating access to sex workers by any person, including visitors Animals Fiji offices or programs.
- Procure sex for others or use a third party to do so.
- If I am a non-national staff person, fraternise with in-country staff or partners while engaged in any work or actions related to Animals Fiji

Name: _____

Address: _____

I have read and understood the Animals Fiji PSEAH Safeguarding Code of Conduct, and I will comply with it.

Signed: _____

Print Name: _____

Date: _____



Appendix 2: PSEAH Policy Declaration

I confirm that I have read and understood Animals Fiji's Prevention of Sexual Exploitation, abuse and Harassment (PSEAH). I agree to comply with this PSEAH.

I understand that a breach of the PSEAH may provide grounds for my appointment or association with the organisation to be terminated. I also understand that a breach of the PSEAH could result in criminal prosecution. I understand that it is my responsibility, as a person associated with Animals Fiji to use common sense and avoid actions or behaviours as defined in this policy as sexual exploitation, abuse or harassment of adults, children or young people, or could be construed as such.

I confirm my willingness to participate in available Animals Fiji training sessions on Prevention of Sexual Exploitation, Abuse and Harassment.

Name in block letters..... Job title

Signature Date

Appendix 3: reference number: PSEAH INVESTIGATION Report

Date	
Time	
Investigator	
Region/Country	
Responsible Area Manager	
Partner Organisation	
Subject of Allegation (SOA)	
Reported By	
Internal Report System Reference ID number	
Subject of allegation contact record updated to indicate matter of concern	

Incident Management Team.

Name	Role Title

Incident and Allegations Description.

Brief description of the incident

Brief description of immediate actions (may include a meeting with the victim/survivor to provide support and gather further information and details).

Objectives.

In accordance with Animals Fiji PSEAH or Safeguarding Policy and aligned with guidelines, the objectives of the investigation were to:

Example of some objectives below, remove any nonrelevant items and add organisations objectives aligned with organisation PSEAH Policy below. **(Delete this sentence prior to finalising the report)**

- prioritise the needs of the survivor.
- ensure a zero-tolerance approach to all allegations of SEAH and act on every allegation in a fair and reasonable way.
- to establish and document the relevant facts, in order to make a finding based on the available evidence as to the whether the evidence substantiates the allegations made; and
- to provide recommendations on possible PSEAH control improvements.

Approach.

The approach undertaken by the investigator was as follows:

Example of some approaches below, remove any nonrelevant items and add organisations actions aligned with organisation PSEAH Policy below. **(Delete this sentence prior to finalising the report)**

Date	Task	Location (in person, zoom, email etc)
	Initial allegation meeting with the victim/survivor. (if applicable)	

	Reviewed subject of allegation volunteering assignment and training records. <i>(if applicable)</i>	
	Victim/Survivor safeguarding welfare check. <i>(if applicable)</i>	
	Copy of the PSEAH notification incident report shared with Donor. <i>(if applicable)</i>	
	Contact made with the partner organisation of the subject of allegation for feedback regarding any concerns or complaints regarding SOA conduct. <i>(if applicable)</i>	
	Meeting(s) with any witnesses <i>(if applicable)</i>	
	Meeting with the subject of allegation <i>(if applicable)</i>	

Assessment and Findings.

The incident was assessed as meeting our PSEAH/Safeguarding reporting obligations under SEAH as **(select one of the following: *Exploitation/Abuse/Harassment*)**.

Based on the disclosure and the information collated during the investigation, the findings are as follows:

Brief description of the findings of the investigation and actions taken against the subject of allegation and safeguarding actions for the survivor and other people who may be at risk.

Recommendations

- *In consideration of the wishes of the victim/survivor (how were the victim/survivors wishes respected, considered and included in the recommendations?)*
- *The subject of allegation (what action is recommended)*
- *Consider if a refresh of PSEAH policy and procedures or PSEAH training could prevent additional incidents occurring in the future?*

As a result of this investigation, the following recommendation actions are completed and scheduled:

Recommendation	Person Responsible	Timeframe	Completed	Location	Resources



Appendix 4: Incident Report



INCIDENT REPORT

ALL INCIDENTS REGARDING SHELTER ANIMALS, CLIENT ANIMALS, CLIENTS, CO-WORKERS, WEATHER, OR EQUIPMENT MUST BE REPORTED TO THE MANAGEMENT IMMEDIATELY.

YOUR NAME	
CLIENT'S NAME	
ANIMAL NAME	
DATE OF INCIDENT	
TIME OF INCIDENT	
LOCATION OF INCIDENT	
TYPE OF INCIDENT	

DESCRIBE DETAILS OF INCIDENT:

SIGNED: _____ **DATE:** _____



Appendix 5: Whistleblower Protection Policy

Whistleblower Protection Policy

1. Purpose

Animals Fiji is committed to the highest standards of integrity, accountability, and ethical conduct. This policy aims to encourage and protect employees, volunteers, contractors, and other stakeholders who report misconduct, unethical behavior, or illegal activities within the organization.

2. Scope

This policy applies to all employees, volunteers, board members, contractors, and any other individuals associated with Animals Fiji. It covers reports related to, but not limited to:

- Fraud, corruption, or financial misconduct
- Animal cruelty or neglect
- Violations of laws or regulations
- Discrimination, harassment, or workplace misconduct
- Conflicts of interest
- Any other unethical behavior that may harm Animals Fiji, its employees, or the animals in its care

3. Reporting Misconduct

Individuals who become aware of any misconduct or unethical behavior should report their concerns through the following channels:

- **Email:** info@animalsfiji.org
- **In-Person:** By dropping an anonymous letter on the Co-Founders & Managing Trustees' desk

4. Confidentiality & Protection

Animals Fiji is committed to protecting the identity of whistleblowers to the fullest extent possible. Retaliation, harassment, or victimization against individuals who report concerns in good faith is strictly prohibited. Any such retaliation will result in disciplinary action, including possible termination.

5. Investigation Process

- Upon receiving a report, the designated Whistleblower Officer or an independent committee will conduct a preliminary assessment.
- If warranted, a full investigation will be initiated, ensuring fairness, impartiality, and confidentiality.
- Findings will be reviewed by senior management or the Board of Trustees, and appropriate action will be taken.
- If necessary, legal authorities or external auditors may be engaged.

6. Good Faith & False Reports

Whistleblowers must act in good faith and provide truthful information. False, malicious, or misleading reports may result in disciplinary action.

7. Communication & Training

Animals Fiji will ensure that all employees, volunteers, and stakeholders are aware of this policy through training sessions, induction programs, and internal communications.

8. Policy Review & Updates

This policy will be reviewed periodically by the Board of Trustees to ensure effectiveness and compliance with legal and ethical standards.

Appendix 6: PSEAH Safeguarding Risk Register (Year)

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Non-compliance with PSEAH policy: Staff	Example: XXX Staff, contractors, volunteers etc may fail to comply with PSEAH policy and Code of Conduct.	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	Example: Staff, contractors, volunteers participate in online PSEAH training. Incident reports can be made discretely to multiple points of contact, to reduce the risk of a non-report due to conflicts of interest. Staff non-compliance is logged and responded to in the same manner as any other reports.	Example: All Staff regardless of employer receive training. Audit checks of training compliance are conducted. Procedures to manage non-compliance and non-reporting of incidents is in place.	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		
Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Non-compliance with local PSEAH legislation:	Example: XXX Staff, contractors, volunteers etc fail to comply with local PSEAH legislation in their country of residency/employment or when travelling to another office location.	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	Example: Staff, contractors, volunteers participate in online PSEAH training. All Staff, contractors, volunteers have access to any finalised PSEAH risk management tools and information about local laws and legislation. PSEAH risk training is conducted before travel to another location occurs.	Example: Staff, contractors, volunteers receive training in induction, annual refresher and pre-travel briefing	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Recruitment: Appointment of a staff, board member, volunteer or contractor that poses unacceptable SEAH risk	Example: XXX may appoint a staff, board member, volunteer or contractor who poses an unacceptable risk to people, may perpetuate a harmful culture, and who may threaten the reputation XXX	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	Example: All staff, board member, volunteer or contractor are comprehensively vetted via criminal record checks, reference checks and behavioural interviews questions Position descriptions note XXX commitment to safeguarding All staff, board member, volunteer or contractor are required to report misconduct, breach of PSEAH policy and any incidents of SEAH. All staff, board member, volunteer or contractors complete PSEAH training	Example: staff, board member, volunteer or contractor complete online PSEAH training. Audits of training completion are completed and confirm compliance. Audits and spot checks are conducted of compliance with PSEAH policy and procedures PSEAH procedures outline procedures, guidelines and includes templates. Staff information session occur regularly through training, sharing of newsletters sharing of materials, guidance documents are developed and socialised to support staff, board member, volunteer or contractor to identify, support and report SEAH allegations/incidents. SEAH obligations outlined in staff, board member, volunteer or contractor contracts, grant agreements and Code of Conduct which clearly indicates expected behaviours	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Non-compliance with XXX PSEAH Policy: Volunteers	Example: Volunteers may have contact with vulnerable adults as part of their role, while placed in-communities, or as part of their online engagement. In these instances, non-compliance with XXX PSEAH policy may lead to an incident of SEAH of vulnerable adults, whether intentional or not.	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	Example: All volunteers participate in PSEAH training. Incident reports can be made discretely to multiple points of contact, to reduce the risk of a non-report due to conflicts of interest. Volunteers' non-compliance is logged and responded to in the same manner as any other safeguarding incidents and health, safety and security reports.	Example: All volunteers receive online training. All volunteers attend training during which PSEAH is addressed and safeguarding elements. Expected safeguarding behaviours including PSEAH obligations are outlined in the volunteer code of conduct which is signed. All volunteers are expected to be compliant with the PSEAH obligations outlined in policy All volunteers have access to XXX PSEAH policy	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		
Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Non-compliance with local PSEAH legislation: volunteers	Example: volunteers may fail to comply with local PSEAH legislation	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	Example: All volunteers participate in PSEAH training. Training include Risk and Security briefing and includes PSEAH and safeguarding risks with a local context.	Example: All volunteers receive training which includes PSEAH and safeguarding elements with a local context. PSEAH obligations are outlined in the volunteer code of conduct which they sign. All volunteers are expected to be compliant with the policy, code of conduct and reporting obligations. All volunteers have access to XXX PSEAH policy.	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Deployment of a volunteer or contractor that poses unacceptable SEAH risk	<i>Example: A volunteer or who targets XXX as an opportunity to access and abuse vulnerable adults poses considerable risk to the reputation of XXX, and to the children in the communities that the XXX seeks supports or provides services.</i>	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	<i>Example: All prospective volunteers are comprehensively vetted via criminal record checks, reference checks, behavioural interview questions All volunteers participate in PSEAH training XXX retains the right to remove a volunteer from XXX if gross misconduct is identified or concerning behaviour are exhibited</i>	<i>Example: All volunteers receive training including PSEAH and safeguarding elements with a local context. Expected safeguarding behaviours including PSEAH obligations are outlined in the volunteer Code of conduct which they sign. All volunteers are expected to be compliant with the XXX PSEAH obligations outlined. All volunteers have access to XXX PSEAH policy.</i>	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Recruitment of a volunteer that poses an unacceptable SEAH risk	<i>Example: False personal information provided resulting in inappropriate volunteer deployed into XXX.</i>	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	<i>Example: Verification process includes manual check of documents by staff reference checking is completed.</i>	<i>Example: volunteers perform activities to quality standard. Strong and respectful relationships are developed with stakeholders</i>	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
SEAH impacts a staff member or volunteer as the survivor, whether by XXX Partner, community member or other staff or volunteer	Example: Survivor not sufficiently/appropriately supported	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	Example: All staff and volunteers participate in PSEAH training. Incident reports can be made discretely to multiple points of contact, to reduce the risk of a non-report due to conflicts of interest. PSEAH information sessions and resources created and socialised. PSEAH posters are displayed in office locations.	Example: training sessions include local context risks and reporting. PSEAH risk documents outline local SEAH risks. Survivor supports such as access to health and law enforcement services are communicated. Resources are developed and socialised to support staff to identify, support and report community SEAH allegations/incidents	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
SEAH within the community that impacts a staff member or volunteer as the survivor is not reported	Example: Staff or volunteer may fail to report an incident of SEAH in the community.	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	Example: All staff and volunteers participate in PSEAH training. Incident reports can be made discretely to multiple points of contact, to reduce the risk of a non-report due to conflicts of interest. PSEAH information sessions and resources created and socialised. PSEAH posters are displayed in office locations.	Example: training include local context risks and reporting. information sessions and guidance developed and socialised to support staff to identify, support and report community SEAH allegations/incidents.	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Engagement with a partner that poses unacceptable risks to vulnerable adults	Example: Partnering with an organisation that is perpetuating abusive/unsafe practices, and indirectly supports these practices through volunteer placements	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	Example: partner due diligence checks are completed with all partners before partnership commences. Current requirements for partners to comply with PSEAH policy are included code of conduct, incident management and recruitment checks. compliance checks with prospective partners include specific PSEAH risk control questions.	Example: PSEAH elements discussed with partners during pre-partnership discussions. Contracts with partners include all partners must comply with XXX PSEAH policy. Partners sign XXX Code of Conduct or sign and agree with XXX PSEAH policy.	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Non-compliance with local PSEAH legislation: Partner organisations	Example: XXX partners may not comply with local SEAH legislation requirements	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	Example: XXX holds training with all new partners prior to commencing partnership and ensures refresher training is offered at least annually.	Example: All XXX partners are supported to develop their own PSEAH policy. XXX partners also sign XXX PSEAH policy and Code of Conduct. PSEAH elements discussed with XXX partners during pre-partnership compliance conversations.	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Non-compliance with XXX PSEAH Policy or legislation: Partner organisation	Example: XXX Partner staff may fail to comply with XXX PSEAH policy which poses a risk to XXX reputation and may lead to the XXX indirectly supporting abusive/unsafe/harmful practices	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	Example: PSEAH incident management investigation processes. XXX work with partners and support partners to develop their own PSEAH policy	Example: XXX partner compliance assessed during initial discussions and pre-partnership compliance reviews. XXX partner compliance risks are identified. Investigation processes include root cause analysis to identify increased and emerging risks within our partners. XXX reserves the right to pause or cease relation with partners if there is an unacceptable risk identified.	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		
Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Non-compliance with XXX PSEAH Policy or legislation: Grant Recipients	Example: Grant recipient staff may fail to comply with the XXX PSEAH policy and/or Code of Conduct, which poses a risk to XXX reputation and may lead to the XXX indirectly supporting abusive/unsafe/harmful practices	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	Example: PSEAH clauses and requirements are included in grant agreements. Reporting and acquittal processes are in place that review progress and expenditure. Grant agreements contain appropriate sanctions if XXX PSEAH policy is breached. Compliance processes in place for all grant recipients PSEAH incident management investigation processes.	Example: Completed grant recipient compliance check forms are on file. Appropriate agreement templates. Audits of grant recipient supporting documentation is completed. Grant recipient compliance checks update re-completed if risk is identified. Investigation processes include root cause analysis to identify increased and emerging risks within our partners. XXX reserves the right to pause or cease relation with grant recipient if there is an unacceptable risk identified.	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
XXX partner that provides residential care to vulnerable adults doesn't comply with XXX PSEAH Policy or local laws and legislation	<i>Example: XXX partner may provide residential care to vulnerable people (thus raising SEAH risk profile) and fail to comply with the XXX PSEAH policy and/or Code of Conduct, which poses a risk to the XXX reputation and may lead to XXX indirectly supporting abusive/unsafe/harmful practices</i>	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	<i>Example: XXX partner compliance reviews are conducted and PSEAH issues are discussed All XXX partners are supported to develop their own PSEAH policy, attend training, sign XXX PSEAH policy and Code of Conduct.</i>	<i>Example: XXX partner compliance assessed during initial compliance review. compliance reviews update re-completed if risk is identified. Investigation processes include root cause analysis to identify increased and emerging risks within our partners. XXX reserves the right to pause or cease relation with partners if there is an unacceptable risk identified.</i>	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		
Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Emergence of activities/programs within XXX partner that pose unacceptable risks to vulnerable adults	<i>Example: when XXX start a partnership with a partner that is initially deemed compliant/safe, but the partner develops activities during the partnership that pose a risk to vulnerable adults.</i>	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	<i>Example: PSEAH incident management investigation processes. XXX partner compliance reviews are conducted and PSEAH issues are discussed. All XXX partners are reassessed against SEAH if a change in their business activities occurs.</i>	<i>Example: XXX partner compliance assessed during initial compliance review and reassessed regularly. Compliance updates re-completed if risk is identified. Investigation processes include root cause analysis to identify increased and emerging risks within our partners. XXX reserves the right to pause or cease relation with partners if there is an unacceptable risk identified.</i>	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Reporting: staff	Example: Alleged SEAH incidents not reported within required timeframes resulting in breach of their employment contract.	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	Example: PSEAH training at orientation and annual refresher is completed for all staff Documented procedures for management of SEAH cases Clear procedures in place which include suspension and termination clauses for PSEAH policy reporting non-compliance.	Example: Staff receive training.	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		
Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Reporting: volunteers	Example: Alleged SEAH incidents not reported within required timeframes resulting in breach of contract	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	Example: PSEAH training at orientation and annual refresher is completed for volunteers Documented procedures for management of SEAH cases Clear procedures in place which include suspension and termination clauses for PSEAH policy reporting non-compliance	Example: volunteers receive training.	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		

Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Reporting: partner organisations, contractors and grant recipients	Example: Alleged SEAH incidents not reported or are not reported within required timeframes resulting in a breach of contract	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	Example: PSEAH clauses and requirements are included in grant agreements and contractor contracts. All XXX partners are supported to develop their own PSEAH policy. XXX partners are required to sign XXX PSEAH Policy and Code of Conduct. Reporting and acquittal processes are in place that review progress and expenditure for grant recipients. Grant agreements, contractor contracts and partnership agreements contain appropriate sanctions if XXX PSEAH policy is breached. PSEAH incident management investigation processes.	Example: Engagement with partners (partners, contractors and grant recipients) include compliance review where PSEAH risk management and reporting requirements are discussed.	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		
Risk Category	Risk Analysis (Impact and consequence)	Inherent Risk	Key Controls (In addition to generic controls)	Control Effectiveness Indicators	Control Effectiveness	Residual Risk	Risk Owner	Risk Review Date
Cyber-security	Example: Online harassment towards or perpetrated by a staff member, volunteer, partner organisation, contractor or grant recipient	Select either: Likelihood x Consequence = Very Low/ Low/ Medium/ High/ Very High	Example: Reviews of IT systems are completed. Online content is monitored by XXX team.	Example: Staff, volunteers, contractors, grant recipients and partners receive training which includes issues regarding online harassment, images and videos, consent and are encouraged to report if issues are observed. PSEAH policy, online training, handbook and Code of Conduct all contain safe online messaging.	Select either: Unsatisfactory/ Satisfactory/ Adequate	Select either: Very Low/ Low/ Moderate/ High/ Very High		

Table 1 Risk level

Based on the ratings of likelihood and consequence assigned to a risk, an inherent risk level is assigned to a risk according to Table 3 below. Mitigating control factors are then identified and recorded in the risk register to determine the residual risk level for each risk.

		Consequences				
		Insignificant	Minor	Moderate	Major	Severe
Likelihood	Almost Certain	Medium	Medium	High	Very High	Very High
	Likely	Low	Medium	Medium	High	Very High
	Possible	Low	Low	Medium	High	High
	Unlikely	Very Low	Low	Low	Medium	High
	Rare	Very Low	Very Low	Low	Medium	High

Table 4 Residual risk levels and treatment approaches

Risk Level	Treatment Approaches
Very High – Extreme Risk (Avoid)	Implement immediate and extreme measures. Immediate action by Senior Management via implementation of a detailed treatment plan and close monitoring on a regular basis (e.g., daily / weekly). Escalate to Board.
High Risk (Control / Avoid)	Manage via implementation of a detailed treatment plan and close monitoring on a regular basis (e.g., monthly). Escalate to the next level of senior management.
Moderate Risk (Control and Transfer)	Enhance current measures and consider alternatives. Management to agree and apply possible treatment strategies and to monitor the risk at least on a quarterly basis.
Low Risk (Control)	Manage through normal monitoring and control procedures. Management to monitor the risk at least bi-annually.
Very Low (Managed by Routine Procedures)	Manage through routine monitoring and control procedures; unlikely to need specific application of resources.

Table 5 Control measures

Control Measure	Definition
Unsatisfactory	Action required – Further controls needed / refinement to current controls required
Satisfactory	Acceptable – but current controls could be enhanced
Adequate	Acceptable – monitor and review