



**Funder  
Safeguarding  
Collaborative**

# **Safeguarding in Philanthropy**

**Safer grant-making  
for greater impact**

January 2026

This research was conducted by Accountable Now on behalf of Funder Safeguarding Collaborative.

Funder Safeguarding Collaborative is a network of philanthropic funders driving action to strengthen safeguarding and promote organisational practices that keep people safe from harm.

Accountable Now is a global collective of civil society actors with a common goal to do good, better. Together with our members and partners, we seek to build people-led, accountable, and thriving civil society ecosystems around the world.

### **Researchers, authors, and support:**

This report was completed by Elodie Le Grand and Bao Han Tran Le, with assistance from Joci Cho and Shalom Ejima at Accountable Now.

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# Executive Summary

**Funders can play an important role in promoting safe practice and supporting efforts to prevent harm among the organisations they fund. How effective are they in achieving this?**

In 2025, Accountable Now and Funder Safeguarding Collaborative carried out research into the safeguarding practices of grant-making organisations. Altogether 87 grant-makers, 285 grantee partners and 55 sector professionals contributed to the study, which combined a literature review, surveys, key informant interviews and focus groups.

This report presents the findings of the study in seven thematic sections, covering different stages of the grant cycle. It looks at the ways in which funders are approaching safeguarding, which of the different practices they adopt are effective, and the resource implications of supporting safer practice.

## Definitions and scope of safeguarding

Clarity and consistency in how safeguarding is defined is essential if grantee partners are to understand what is expected. Funders and grantee partners largely agree that, at a minimum, safeguarding should cover physical, sexual and emotional mistreatment. Both funders and grantee partners agree that safeguarding is more effective when it is applied to anyone in contact with the organisation as this places an emphasis on building a strong organisational culture of accountability rather than focusing on specific groups.

## Due diligence and funder requirements

Although funders have diverse safeguarding requirements grantee partners generally viewed these expectations as clear and realistic. However, where organisations have multiple funders, the differences may mean that organisations have to spend a lot of time and effort to meet each funder's specific requirements. While the majority of funders check grantee partners' safeguarding policies, fewer explore how these work in practice which may mean safeguarding is treated as a tick-box exercise.



## Monitoring and check ins

Again, funders take different approaches and this is largely determined by grant type or internal capacity constraints. It should be noted, however, that a substantial number of funders do not monitor safeguarding at all. Where funders place conditions requiring grantee partners to make improvements in safeguarding, these funders are more likely to provide access to external expertise or additional funding to support grantee partners.

## Technical support

Most funders do not provide technical support unless grantee partners ask for it or due diligence assessments indicate that improvements are necessary. Interestingly, UK-based funders provide less technical support than funders based elsewhere. Where technical support is provided, it is usually in the form of guidance from funder staff or signposting to materials and tools. However, grantee partners did not necessarily find this type of support helpful and access to contextualised training or expertise as well as peer learning opportunities were considered more effective.

## When things go wrong

Even where strong safeguards are in place, harm can still occur. This research revealed that there is a lot of variation in funders' reporting requirements and a lack of clarity on what should be reported. While funders can play an important role in ensuring incidents are handled appropriately and lessons learned, the way they respond also varies.

It is positive that the majority allow the grantee partner to lead the response in line with their own policies and procedures, but additional support such as resources for investigations and survivor support were identified as highly valuable.

## Resourcing Safeguarding

Safeguarding requires time, money and skilled staff and yet it is not well-resourced in grantee partner organisations. There is a lack of consistency in how budget is allocated for safeguarding among funders, and grantee partners are not sure how to ask for the resources they need. Critically, both funders and grantee partners are unsure about the true costs of safeguarding which makes accurate resource allocation more complex.

Grantee partners in the UK receive fewer resources for safeguarding from their funders in comparison to organisations elsewhere. 78% of grantee partners in the UK said no funder provides additional grants for safeguarding; compared to only 33% based elsewhere.

## Funders safeguarding capacity

While this research was not primarily focused on funders' internal safeguarding practices, respondents highlighted the importance of funders demonstrating the same commitment to safeguarding they expect from grantee partners. While most funders have a safeguarding policy and approach, many do not have dedicated safeguarding staff to support and guide implementation.

## Three interconnected findings recurred across all aspects of the grant cycle

1

### Clarity and alignment among funders helps reduce confusion and administrative burden on grantee partners:

- » Clear, upfront communication on expectations helps prevent organisations wasting time applying if they do not meet requirements.
- » Greater alignment of expectations between funders would reduce the time grantee partners spend on tailoring the information they provide to fit each funder's needs.
- » Clarity and alignment on what safeguarding costs can be funded would help organisations access the resources they need.
- » Funder communication should emphasise why safeguarding is important and the importance of organisational ownership of safeguarding practice.
- » When incidents occur, clarity and alignment in reporting expectations helps to reduce the time needed to report and allows the grantee partner to focus on the response.

2

### Safeguarding cannot be one-size-fits-all: flexibility is required, with a strong emphasis on context:

- » Funder requirements and due diligence assessments must take into account local realities, levels of safeguarding risk and the size and capacity of the partner organisation.
- » Funding should be flexible so grantee partners can make their own decisions about how to shape their safeguarding measures and build their own capacity.

- » Monitoring should promote discussion and learning about the realities faced by grantee partners and the impact these have on safeguarding
- » Training and support that is tailored to the grantee partner's context is more effective than generic support.
- » When funders respond to incidents in grantee partners, they need to recognise the limits of their own knowledge and avoid imposing actions that could cause additional risk or harm.

3

### Trust and the relationship between funder and grantee partner play an important role in promoting positive safeguarding practices.

- » Open dialogue and trust are pivotal to ensuring funders work in ways that support effective safeguarding within grantee partners.
- » Dialogue at the application stage and during monitoring ensures a common understanding about realities on the ground, and why certain practices have been implemented.
- » It is important that the funder shows a willingness to listen and learn as this reinforces their commitment to a partnership approach.
- » A trust-based relationship encourages grantee partners to report to funders when incidents arise, and to speak up if they have unmet resourcing needs for safeguarding.
- » Trust is enhanced when funders have their own safeguarding measures in place and invest in experienced and knowledgeable staff.

## Section 1

# Introduction

Keeping people safe is essential for maintaining trust in Nonprofit Organisations. Organisations need the trust of their staff, community members, and the general public to carry out their activities effectively. Incidents of abuse by staff or volunteers, or harm caused by poorly designed programmes can seriously undermine this trust.

Safeguarding plays an important role in ensuring that organisations 'do no harm' and retain the confidence and trust necessary to achieve a positive social impact.

While prevention of harm should always be the priority, incidents may still occur, especially when organisations are working at scale or engaged in high-risk work. Proper safeguards can help organisations to redress harm in a timely manner, support survivors, and ensure those responsible are held to account. These measures help to rebuild trust and provide important learning about how to strengthen safeguarding and prevent harm in the future.

## 1.1 Why is research into funder safeguarding practices important?

**Every year, philanthropists invest billions aimed at achieving positive change in the world. The impact of this investment is undermined when organisations, through their actions or omissions, cause harm to people or communities.**

As nonprofits in their own right, funders have a responsibility to prevent harm and build trust within their own organisations and promote safe practice within their grantee partners too.

Increasingly, funders are incorporating safeguarding requirements into their assessment and due diligence procedures, requiring applicants to demonstrate that certain measures are in place in order to qualify for funding. Once funding is approved, grantee partners may be required to comply with safeguarding requirements as part of their grant agreements; this often includes notifying funders of safeguarding incidents involving their staff, volunteers or operations.

While funders are increasingly taking action on safeguarding, there is little evidence on which approaches actually promote safer practices. Although there is some evidence that funder requirements motivate action on safeguarding, a study commissioned by Funder Safeguarding Collaborative (FSC) (2021) found inconsistent, unrealistic expectations, tick-box approaches to due diligence and monitoring, and gaps in funder knowledge. Individually and collectively, funders are seeking to address these challenges but stronger evidence about what works is needed to support them in these efforts.

Building on the work already done by FSC, this research maps out funders' current practices and also provides evidence on which measures are effective in supporting safer organisations. It gives practical recommendations to strengthen funder safeguarding practices at every step throughout the grant cycle. While this report is primarily intended for funders, it includes recommendations for grantee partners to support them in their interactions with funders around safeguarding. We hope it will contribute to thinking and discussion within grant-making organisations and help inform improved practices for the benefit of all those working in and supported by the sector.

## 1.2 Terminology

### Safeguarding

This research uses the FSC’s definition, which entails three pillars:

- » **Promote:** policies, practices and organisational cultures which promote a culture of dignity, respect and safety;
- » **Prevent:** proactive prevention of harm, abuse or exploitation by staff, volunteers and operations; and
- » **Protect:** timely action to address any actual or suspected harm, abuse or exploitation.

However, definitions of safeguarding are not always consistent (see [Chapter 3: Definitions and Scope of Safeguarding](#)). Our definition may differ from those used by other organisations.

### Funders

Funders are philanthropic trusts and foundations whose core mission is grant-making. This includes private, family, corporate and community trusts and foundations, as well as intermediary funders. While the research is not focused on bilateral, multilateral donors or local councils and government departments that provide funding, the findings largely apply to these groups too.

### Grantee partners

Grantee partners are any organisation that receives funding and grants, regardless of size, scope, location, or type of work they carry out. We use the term “grantee partner” in preference to “grantee” as it emphasises partnership as a step towards addressing unequal power dynamics.

## 1.3 Structure of the Report

This report has three main sections:

- » **Methodology:** shares how the research was conducted, as well as the demographics of respondents, and discussion limitations.
- » **Findings:** provides insights from our existing literature review. It is divided into seven sections, each about a different aspect of safeguarding in philanthropy. Each section contains an overview of current funder practices and findings on their effectiveness, and practical recommendations for funders. There are also recommendations for grantee partners in some sections where clear actionable steps emerged from the research.
- » **Conclusion:** pulls together high-level findings from across the report and identifies key factors that drive effectiveness.

## Section 2

# Methodology

This research was designed to address three key questions:

- 1 How are funders approaching safeguarding throughout the grant cycle?
- 2 Which of the different practices they adopt are most effective, and why?
- 3 What are the resource implications (human, financial, time) for funders who wish to promote and support safer organisational cultures and practices?

The research employed both qualitative and quantitative data collection methods. Safeguarding measures were integrated into data collection and details of our approach are available [here](#).

## Literature Review

To ground the research, existing knowledge about what works was gathered from a range of grey literature, including research, meta-analyses, norms, standards, discussion notes and output papers (See [Bibliography](#) for a full list).

## Data Collection

### Secondary Data

Initially, evidence of current funder practice was gathered through a review of grant-making and safeguarding processes, including grant requirements, policies, guidance, reports and strategic documents. Overall, **the policies and requirements of 54 different funders were reviewed** through convenience sampling of publicly available documents or those shared with the researchers. Policies and reference documents for grant-making were analysed and codified to identify common practices or specific approaches that could be explored further during primary data collection.

### Primary Data Collection

Based on the preliminary findings from the review of literature and funder policies, three **online surveys** were developed to gather inputs from funders, grantee partners and sector professionals. To promote access, the surveys for funders and grantee partners were available in four languages (English, French, Spanish and Arabic). The survey for sector professionals was only available in English.



Survey	Funders	Grantee Partners	Sector Professionals
<b>Respondents (427 total)</b>	87; mostly trusts and foundations, funding a mix of international and domestic work	285; mostly nonprofits or networks, working at the national or community level	55; mostly consultants and advisors providing safeguarding-related training, policy or general support
<b>Location of Head Quarters</b>	<ul style="list-style-type: none"> <li>» Africa (4)</li> <li>» Asia (2)</li> <li>» Europe (64 total, 59 based in the UK)</li> <li>» North America (17)</li> </ul>	<ul style="list-style-type: none"> <li>» Africa (27)</li> <li>» Asia (26)</li> <li>» Europe (187 total, 177 in the UK)</li> <li>» Latin America (26)</li> <li>» Middle East (7)</li> <li>» North America (12)</li> </ul>	<ul style="list-style-type: none"> <li>» Africa (20)</li> <li>» Asia (17)</li> <li>» Europe (11 total, 7 in the UK)</li> <li>» North America (3)</li> <li>» Unknown (4)</li> </ul>
<b>Size of organisation</b>	<ul style="list-style-type: none"> <li>» 43% less than 10 staff</li> <li>» 28% between 11–50</li> <li>» 28% 50+ staff</li> <li>» 1% unknown</li> </ul>	<ul style="list-style-type: none"> <li>» 32% less than 10 staff</li> <li>» 51% between 11–50</li> <li>» 17% 50+ staff</li> </ul>	Not applicable

**Key informant interviews** were conducted with 7 funders, 8 grantee partners and 9 sector professionals (24 in total, in English (21), French (1) and Spanish (2)), to gather more in-depth information on their experiences, identify nuances and develop recommendations. Informants were selected based on survey responses that had provided interesting or unusual insights that warranted further exploration. Additional interviewees were identified to address gaps in survey data using a snowball sampling approach.

## Data Analysis

Before the surveys were analysed, data was cleared of duplicative and invalid responses (for example, the wrong survey was used, empty responses). Quantitative analysis of survey data was conducted on each answer, disaggregated by different factors to explore potential correlations. Qualitative responses to surveys and data from key informant interviews were coded thematically, triangulated across different sources and quantified to develop initial findings. These were then peer-reviewed to reduce potential researcher bias. An accountability lens was applied throughout the analysis.

## Sensemaking and Validation

To validate the results, internal sensemaking sessions were held with the Accountable Now and FSC teams. In addition, four validation focus groups were conducted with 14 funders, 10 grantee partners and 10 sector professionals. During these sessions, the main research findings and recommendations were shared as well as any ambiguity or contradictions that required further exploration. These discussions helped refine the results and ensure that the conclusions reflect the realities of organisations within the sector.

### A note on percentages

Throughout the report, results are presented as **percentages of valid responses**. Please note:

- » **Sometimes percentages won't add up to 100%** as some questions allowed participants to select more than one option.
- » **Participants could skip questions**, and thus the number of respondents changes for each question.

## 2.1 Limitations

### The use of the term 'safeguarding' may have influenced the sample:

- » Despite the survey being available in four languages and shared widely across networks and public platforms, **most responses came from the English-speaking world**, particularly the United Kingdom. This is likely to be due to the regulatory framework in the UK and the widespread use of the term 'safeguarding' in the nonprofit sector there.
- » Although surveys and interviews asked respondents to engage with the term safeguarding even if they didn't use it or have a formalised approach, **those who were already engaged in safeguarding were more likely to respond**, potentially influencing both who participated and the kinds of answers they gave.
- » In other languages, **it is difficult to translate the word 'safeguarding'** directly. Even within English-speaking countries, the term 'safeguarding' is not always understood or used in the same way.
- » During data collection, efforts were made to unpack the term to illustrate the type of practices being explored and by framing safeguarding as approaches to safety, wellbeing and protection. However, differences in understanding may have still affected responses.

### Conclusions in this research are based on relationships observed in the data:

- » This study used a **convenience sample** rather than a random or representative one, which means the findings may not be representative of practices or experiences of all funders or their grantee partners.
- » The **funders and grantee partners** who completed the surveys **were not necessarily connected to each other**. This means it was not possible to draw direct correlations between funders' practices and experiences of their grantee partners.

- » These limitations mean that it was not possible to produce statistically significant results. Instead, the quantitative data was analysed to identify patterns and relationships and this was triangulated with qualitative data to further test conclusions.

### Not all external influences can be accounted for:

- » Safeguarding measures and funder requirements may vary depending on the programme and level of safeguarding risk. The **risk profiles of respondents were not known**, which is likely to affect the analysis.
- » Most of the funder respondents were trusts and foundations. However, **the practices of governmental, bilateral, or multilateral donors** may have a significant impact on grantee partners' practices due to their reach and the size of the funding. Also, these donors often have more rigid rules and requirements, but the **extent to which their practices shaped the responses from grantee partners cannot be estimated**. This is an area that warrants further research.
- » **Over half of the respondents to the funder survey were members of Funder Safeguarding Collaborative**. It is likely that their practices will have been influenced by the support and guidance provided by FSC, which means their responses may reflect stronger safeguarding practices than exist in the wider philanthropic sector.
- » Although confidentiality was assured, respondents were asked to share their contact details to enable follow-up for interviews or further information. This may have introduced **obsequiousness bias**, where respondents adjust their responses to appear favourable or share what they thought researchers wanted to hear.

## Section 3

# Definitions and Scope of Safeguarding

“

We see safeguarding, safety, and wellbeing as interconnected and inseparable, and we align our advice with national legislation while tailoring our approach to the needs of our partners.”

— Funder, Europe

A clear alignment in the definition and scope of safeguarding is important as it means that everyone is speaking the same language.

When differences are too big, funders and grantee partners risk misalignment in their expectations of what measures should be implemented. This can lead to confusion and an increased burden on grantee partners as they try to adjust their approach to fit with each funder’s definition of safeguarding.

## 3.1 Insights from Literature

### Previous research highlights the absence of a clear and consistent definition of safeguarding (Walker-Simpson, 2022).

The term 'safeguarding' originates in the UK where it has been enshrined in legislation since 1989. Internationally, however, the concept is relatively new (Bond, nd) and has no legal basis in many countries. International agencies use the term safeguarding with a lack of consistency both over who safeguards are designed to protect and what types of harm they cover.

Some leading agencies, such as the Charity Commission for England and Wales (2017) and Keeping Children Safe (2024), take a **broad approach** to safeguarding, considering it to be protection from all forms of physical, sexual and emotional mistreatment. However, others such as the UN (2017), Inter-Agency Standing Committee (IASC) (2019) and Foreign, Commonwealth & Development Office (FCDO) (2022) focus only on **protection from sexual exploitation and abuse**. Even among these, there is disagreement about whether this should also include sexual harassment. Reports from the Core Humanitarian Standards Alliance (CHS) Harmonised Reporting Scheme argue that sexual harassment should be included as it is not a lesser offence but is often a warning sign of further abuse (CHS, 2024b).

There is also disagreement about who should be considered under the scope of safeguarding. In 2017, the Charity Commission for England and Wales adopted a broad scope, requiring organisations to take steps to safeguard **anyone in contact with the organisation**. UNICEF adopted this broad scope in its new safeguarding policy (2024); this previously just focused on children. However, accountability guidelines for organisations working in the humanitarian and international development sector place a stronger focus on **affected populations** (UNHCR, 2025; IASC, 2019; UN, 2017). The Core Humanitarian Standard (2024a) does consider **staff and volunteers' wellbeing**, reflecting the fact that frontline workers face significant security and safety challenges and that local staff are often the least protected and the most at risk (Protect Humanitarians, 2024).

Some standards also consider the **environment as a silent stakeholder** and the subject of safeguarding measures. This includes accountability frameworks like the ACFID Code of Conduct (2023), Pacific Island Accountability Framework (2023), the Global Standard for CSO Accountability (2017) and the FCDO Due Diligence Guidance (2022). This recognises that the activities of nonprofit organisations contribute to climate change and can disrupt the ecosystems that communities rely on for their livelihoods. For those taking a human rights-based approach to programming, the right to a clean, healthy and sustainable environment is recognised as a fundamental human right needing protection (UN Human Rights Council, 2021) and therefore integrated within the wider principle of 'do no harm'.

## 3.2 Current practices

### Q Key finding

Survey results show that funders and grantee partners largely agreed that, at a minimum, safeguarding should cover physical, sexual and emotional mistreatment. This is consistent with UK guidance<sup>1</sup> and some international standards.

#### Funders and grantee partners are aligned in the type of harms that safeguarding covers.

The review of funders' policies found that most include protection against sexual exploitation and abuse. The survey found that 83% of funders and 89% of grantee partners include protection from sexual exploitation and abuse within their definition of safeguarding.

- » 93% of funders and 95% of grantee partners include **protection from neglect, physical and emotional abuse**.
- » 81% of funders and 81% of grantee partners include **protection from bullying and harassment**.
- » Some funder policies reviewed include discrimination under the umbrella of safeguarding.
- » The surveys showed that grantee partners are slightly more likely to include other types of harm than funders; e.g. **wellbeing and mental health** (included by 67% of funders and 74% of grantee partners), **digital and physical security** (58% of funders and 68% of grantee partners) and **safe programme design** (47% of funders and 59% of grantee partners).
- » 55% of funders and 61% of grantee partners include financial systems and anti-fraud within their understanding of safeguarding.
- » In the Francophone context, grant-making documents emphasised fraud, bribery, and corruption more than those from English-speaking funders. One reason may be linguistic as the French term used for safeguarding ('sauvegarde') is most often associated with financial management.

<sup>1</sup> The Charity Commission for England and Wales (2017) considers a range of risks and harms that encompasses physical, sexual and emotional harms, as well as abuses of power, discrimination, data security, and beyond.

## Q Key finding

Although there is some alignment on who should be safeguarded, grantee partners often consider safeguarding to apply to more groups than funders do.

### Funders and grantee partners are somewhat aligned on who should be safeguarded:

- » Most funders include children in their safeguarding policies, and some expand safeguarding to cover adults at risk and young people (without a clear age threshold). Others expand this further to cover anyone in contact with the organisation.
- » From the survey results, 73% of funders and 85% of grantee partners define safeguarding as covering **anyone in contact with the organisation**.
- » For those who didn't select that answer, both groups tended to include at least two stakeholder groups, normally **children** (68% of funders and 77% of grantee partners) and **adults at risk**<sup>2</sup> (61% of funders and 74% of grantee partners).
- » Grantee partners were much more likely than funders to include **staff** and **volunteers** within the scope of safeguarding (60% of funders and 80% of grantee partners considered staff; 51% of funders and 78% of grantee partners considered volunteers).
- » The **environment** was the least frequently included subject. Only 11% of funders and 28% of grantee partners considered it as a stakeholder group within their definition.

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**2** Adults at risk are generally understood to be individuals over the age of 18 who are at risk of harm and less able to protect themselves due to care and support needs arising from personal characteristics (e.g. age, disability, mental or physical ill health) or life circumstances (e.g. socioeconomic factors, environmental living conditions).



## 3.3 What Works?

### Definitions and scope that are effective in supporting safer organisations

**Safeguarding is considered more effective when its scope is holistic rather than focusing on specific groups:**

- ✓ Funders and grantee partners noted that when safeguarding measures are applied to anyone in contact with the organisation, it allows a more holistic approach, encompassing all individuals, regardless of their relationship with the organisation.
- ✓ In addition, they noted that when a broader scope is applied, the emphasis is placed on building a strong organisational culture of accountability to all stakeholders, rather than focusing on specific groups.
- ✓ However, participants noted that this could lead to certain groups being invisible. For example, individuals living with disability may require adapted safeguarding approaches to properly protect them from harm. And traditionally marginalised groups, such as Indigenous peoples or those facing intersecting forms of discrimination, may require safeguarding mechanisms that recognise their specific needs and vulnerabilities to harm.

**Safeguarding should encompass all types of harms:**

- ✓ The findings of this study suggest that to be effective, safeguarding should go beyond an exclusive focus on protection from sexual exploitation and abuse and should consider all forms of harm.
- ✓ In addition, funders and grantee partners both considered the inclusion of staff wellbeing as important, as it links safeguarding to organisational health more broadly. This was particularly raised in interviews by locally-led humanitarian, women-led and survivor-led organisations, where staff have a higher likelihood of being subjected to harm by external stakeholders.

### Definitions and scope that are ineffective or that funders should avoid

- ✗ Funders should avoid using definitions of safeguarding that differ widely from those used by peer organisations. This can add to the workload for grantee partners, who have to adapt their policies and practices to be able to apply and receive grants.
- ✗ This lack of coherence may also lead to certain grantee partners disqualifying themselves even when they have safeguards in place because they believe they do not match the funders' exact written expectations of what safeguarding should encompass.

## 3.4 Recommendations for funders

1

**Adopt a broad view of safeguarding** that recognises the different types of harm that might be experienced. However, within this, clarify expectations for safeguarding specific groups (e.g. children, people living with a disability, or particularly vulnerable or traditionally marginalised populations).

2

**Ensure there is a clear definition of safeguarding in grant-related documents.** Without this, grantee partners may be unclear or confused about what you expect.

3

**Discuss definitions and scope of safeguarding with peer organisations who make grants in similar issue areas** and align your policies as far as you can.

4

**Be flexible in terms of how grantee partners operationalise their definitions.**

Grantee partners may not choose to cover all forms of harm within their safeguarding policy but may do so in other documents. As long as grantee partners can point to clear policies and procedures that cover the safeguarding of specific groups and protection from harm, you don't need to ask them to create new policies just to align with funder-specific language or definitions.

5

**Consider staff wellbeing as part of safeguarding.** Include staff as a stakeholder group in safeguarding or related policies. Consider burnout, stress, and related risks as part of the risk register, and work with colleagues on preventative and mitigation strategies.

## Section 4

# Due Diligence and Funder Requirements

“

When funders require specific documents, to be aligned with their own, it can either lead the potential grantee to exclude themselves, or the potential grantee creates or copies a policy that is not fit for their purpose.”

— Grantee Partner, Europe

Due diligence is the process by which funders undertake checks and assess whether they are willing to provide funding to an organisation.

Increasingly, this includes checks to ensure the applicant has appropriate safeguards in place or can meet certain requirements that indicate whether they are able to implement activities safely and protect stakeholders.

## 4.1 Insights from Literature

International standards and guidance on safeguarding emphasise the need for strong preventative policies, practices and processes to ensure effective safeguarding (International Council of Voluntary Agencies (ICVA), 2007; Charity Commission, 2017; International Federation of the Red Cross and Red Crescent (IFRC), 2021; CAPSEAH, 2024; Keeping Children Safe (KCS), 2024; IASC, 2024).

In addition to policies and procedures, **safer recruitment, staff training, risk management and management accountability** mechanisms are often cited (ICVA, 2007; Charity Commission, 2017; Common Approach to Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment (CAPSEAH), 2024a; KCS, 2024; IASC, 2024). There is recognition that even with these measures, incidents can still occur and so the need for **solid reporting and response mechanisms** is emphasised (Charity Commission, 2017; CAPSEAH, 2024a; KCS, 2024; IASC, 2024; Fuchi, 2024). These reporting mechanisms should be contextualised and ensure a timely, robust and survivor-centered response mechanism (KCS, 2024; IASC, 2024).

Funders may want to check that some of these measures are in place before approving funding, in order to ensure potential partners are able to carry out their work safely. Indeed, there is some evidence that by setting these expectations funders can have a positive impact.

A study by Brunel University identified funder requirements as the most significant factor in motivating improvements in safeguarding (Rhind & Owusu-Sekyere, 2018). **In doing so, however, funders also need to consider the impact of their requirements.**

Previous research highlighted the need for requirements to be **proportionate**, taking into account the level of safeguarding risk and grantee resources (FSC, 2021; Oak Foundation, 2020), as overly burdensome assessment requirements can divert critical resources from service delivery. In addition, care is needed to ensure that requirements are **clear and well-communicated** so organisations know what is expected before they apply (FSC, 2021).

Learning reviews by leading funders suggest that **the way safeguarding assessments are conducted is important**. They should go beyond tick-box compliance and encourage ownership at grantee level (Oak Foundation, 2020; Segal Family Foundation, 2022). An over-reliance on policies as a benchmark of good practice can lead to policies being developed to ensure compliance, rather than as a tool to promote safer practice (FSC, 2021). **Realistic** assessments with well-framed questions and dialogue can instead help funders to understand how policies are lived and help avoid a one-size-fits-all approach by building a better understanding of the organisation's context and approach (FSC, 2021; Segal Family Foundation, 2022).

## 4.2 Current Practices

### Which safeguarding requirements are funders asking grantee partners to meet?

#### Q Key finding

Funders have diverse safeguarding requirements but in general, grantee partners view these as clear and realistic. However, where organisations have multiple funders, they may have to spend a lot of time and effort to meet each funder's specific requirements.

#### Funders vary in terms of the requirements they want to see in place:

- » The review of funders' policies found that the majority check whether an organisation has a safeguarding policy. The survey found that 88% of funders require their grantee partners to have such a policy.
- » The review found that policy requirements can be quite didactic, such as demanding separate policies for different stakeholder groups or for different types of harm.
- » Some funder policies require their grantee partners to align their safeguarding policies with their own.
- » In addition to looking at an applicant's safeguarding policies, the review found that some funders consider whether other measures are in place such as risk assessments, safer recruitment processes, diversity, equity and inclusion practices, and availability of a safeguarding lead.

- » This was evidenced in the funder survey which found:
  - 65% require potential partners to have procedures related to safe programming or the management of operational risks.
  - 65% look for procedures for the reporting and response to safeguarding concerns.
  - 59% require organisations to have a safeguarding lead.
  - 41% require organisations to carry out background checks or vetting on staff and volunteers.
  - A small minority of funders have 12 or more safeguarding requirements.

#### There were differences in the level of flexibility that funders will allow in terms of meeting their expectations at application stage.

Of the funders surveyed:

- » 40% tailor requirements to the type of grant and level of risk.
- » 33% accept partial compliance if there is a plan to address any gaps.
- » 28% will work with grantee partners who have no measures in place yet, as long as they show a willingness to develop and implement safeguards.
- » 27% require all criteria to be met upfront.

### Grantee partners surveyed largely view most of their funders' requirements positively:

- » 74% felt that funder requirements are transparent and clearly communicated.
- » 77% said their funders' requirements are easy to implement.
- » 77% said requirements are realistic given time and resources.
- » 66% of grantee partners said that most of their funders' requirements are flexible enough to allow them to determine their own safeguarding approach.
- » However, 37% reported differences in safeguarding requirements across various funders which is significant as 75% of grantee partners had six or more funders in the past five years.

## How are funders assessing grantee partners' safeguarding practices?

### Q Key finding

While the majority of funders check grantee partners' safeguarding policies, fewer discuss or explore how these work in practice. This may lead to safeguarding being treated as a tick-box exercise.

### Funders differ in the way they assess safeguarding requirements.

- » The review of funder policies found differences in the way funders approach potential grantee partners' safeguarding policies. On one end of the spectrum, some funders will check the existence of policies but not really interact with grantee partners to understand how these work in practice. These funders are also likely to be more rigid and expect grantee partners to meet all requirements upfront.
- » On the other end of the spectrum, funders review policies as a first step and this then serves as a foundation for further dialogue.
- » Survey results show a range of approaches that may be used in isolation or in combination with one another:
  - 70% of funders check safeguarding policies and procedures.
  - 56% ask questions about safeguarding practice in the application form.
  - 44% assess safeguarding through discussion with grantee partners.
  - 43% of grantee partners said that at least one of their funders is not willing to engage in dialogue on safeguarding policies and practices.
  - 38% ask grantee partners to demonstrate how they meet minimum safeguarding criteria.
  - 33% conduct a visit as part of their assessment.
  - 6% conduct assessments through a third party.
- » Only 6% of funders said they do not assess safeguarding. While this number is very low, this is likely to be influenced by the high proportion of survey respondents that are FSC members.



## 4.3 What Works?

### Due diligence practices that are effective in supporting safer organisations

**Having a policy is a part of a strong safeguarding system, but due diligence should also involve dialogue to understand how policies work in practice:**

- ✓ Unprompted, 17% of grantee partners reported that having a funder review their policies and ask questions about how it works in practice and how it is adapted into their context and operational risks helped them remain up to date and improve internal systems.

**Discussing risks and understanding risk mitigations are helpful:**

- ✓ Funders stated that it was helpful to discuss risks with applicants as it provides useful indications of ownership of safeguarding in the organisation.
- ✓ These discussions, conducted either at the start of funding or on a recurring basis, are a way for funders and grantee partners to identify vulnerabilities and contextual risks and consider how to mitigate them.
- ✓ Key informants added that enabling grantee partners to adopt more context-appropriate risk mechanisms rather than imposing the funders' view of risks is effective, as it enables the organisation to identify its own risks and develop mitigation strategies adapted to its needs and context.

**Safer recruitment practices are a positive indication of effective safeguarding practices:**

- ✓ Exploring safer recruitment practices was seen as relevant as it directly affects safeguarding by influencing who enters an organisation. However, this approach has its limitations. Reliable vetting mechanisms such as criminal record checks are not available in all contexts and blanket checks may breach data protection legislation in some countries. In addition, record checks do not prevent the recruitment of personnel who have been subjected to internal investigations and/or have left their previous organisations before the conclusion of the investigation (CAPSEAH, 2024; What Works to Prevent Violence, 2024).
- ✓ Including safeguarding responsibilities and accountability in job descriptions, at various levels of the organisation, was seen as particularly effective at enabling safer organisations. This reinforces the importance of embedding safeguarding as part of everyone's job, rather than the responsibility of just one person or team.
- ✓ Including safeguarding in job performance evaluations, with indicators for adoption and adherence to safeguarding, was praised as a meaningful way to engage all staff in safeguarding.

**It can be helpful to encourage organisations to assign safeguarding responsibilities. But to be effective, safeguarding leads need the time, capacity, resources and space to engage with all functions across the organisation:**

- ✓ Respondents in this study highlighted the value of safeguarding leads being able to participate in high-level strategic meetings and contribute to strategic decisions on

programming and allocation of resources – this was applicable for safeguarding leads in both grantee and funder organisations. This can help to integrate safeguarding within other functions of the organisations (such as administration, finances and logistics) and move towards a more sustainable organisational safeguarding culture. This echoes findings from a study by the National Youth Agency in the UK (2024).

- ✓ It is more effective when the safeguarding lead's whole job is dedicated purely to safeguarding. Including responsibilities within another role may mean that safeguarding-related work gets deprioritised due to other programmatic priorities or operational workload.

#### Requirements that encourage the involvement of leadership in safeguarding have a positive impact:

- ✓ Unprompted, 32% of grantee partners said that Board or Trustee involvement was helpful as leaders are able to make decisions regarding budgets, policies and strategy.
- ✓ Grantee partners also noted that funders encouraging Board or Trustee involvement in safeguarding, even just for training, has been helpful as it points to the importance of safeguarding as an organisational priority.

#### Clarity, simplicity and greater alignment in requirements are helpful:

- ✓ Informants expressed that clarity around safeguarding requirements at the application stage shortens the application time, especially for grantee partners who are at an early stage of organisational development or have few resources.
- ✓ Greater alignment and cohesion of due diligence processes and requirements between funders would allow grantee partners to better develop and share their own practices rather than multiplying policies to fit each funder's wishes.

### Safeguarding requirements that are ineffective or that funders should avoid

- ✗ **Inflexible, didactic policy requirements create unnecessary burdens.** Unprompted, 31% of grantee partners reported that complex, unrealistic policy demands place heavy burdens on organisations, especially when no additional funding or flexibility is offered.
- ✗ **Requesting policies on specific groups can create the risk of harm** by attracting attention and creating the risk of retaliation (e.g. a policy on LGBTQI+ communities can drive unwanted attention to grantee partners, especially in geographies where these communities are persecuted).
- ✗ **Requiring specific policies** for a specific group or type of harm requires more resources to draft, review, approve and train for, while also risking missing out other aspects of intersectionality.
- ✗ **Requiring diversity data is illegal** in some countries (e.g. France, Spain).

### Approaches to assessment that are ineffective or that funders should avoid

- ✗ **Automatically rejecting higher-risk proposals means rejecting opportunities to reach stakeholders who are at greater risk of harm.** Key informants noted that assessments should be based on how risks are managed, particularly when working in high-risk contexts.
- ✗ Safeguarding risks can never be reduced to zero, and when an incident does occur, **transparent incident management** can demonstrate that effective monitoring, reporting, and mitigation systems are in place.

## 4.4 Recommendations

### Recommendations for Funders

1

**Simplify requirements and templates and align with other funders where possible.**

This helps to reduce the administrative burden on grantee partners, particularly when they may have multiple funders.

2

**Ensure expectations are realistic for those you wish to support.** Organisations vary in their capacity, proposed activities, and risk profiles. Funders should consider whether their requirements are proportionate to the activities to be undertaken, level of risk and capacity of the organisation.

3

**Go beyond checking the existence of policies and seek to understand how they work in practice.** The most effective way to understand grantee partners' safeguarding practice is to talk to them to understand how policies are implemented and mainstreamed across all functions of the organisation, including at the governance level.

4

**Support staff to know how to start discussions on safeguarding.** As the term "safeguarding" is not easily translated and/or can be understood in different ways, it is important to frame discussions or questions on application forms using relatable examples. Demonstrate why safeguarding is important to prevent the perception that measures are simply a compliance mechanism. Careful framing is also more likely to lead to meaningful reflection and ownership of improvements.

5

**Assess and discuss the risks related to the project** for all parties (grantee partners, service users, funders). This not only helps ensure your expectations are proportional to the risks, it also helps with the identification and mitigation of those risks and their implications for the project.

6

**Encourage grantee partners to discuss risks and risk management with stakeholders and communities.**

This helps ensure safeguarding measures are contextualised, enabling organisations to identify the best channels for reporting and response.

7

**Be open to alternatives to background checks.** Differing legal frameworks make it difficult to have a blanket approach to vetting and organisations need to have flexibility to tailor it to their context.

8

**Don't automatically reject higher-risk proposals,** but consider how risks can be managed.

9

**Don't rule out grantee partners who have experienced safeguarding incidents,** but look at how these were reported and managed, and for evidence of learning and improvements.

## Recommendations for Grantee Partners

**Feedback from respondents identified some specific actions that grantees can take to ensure more effective assessment of safeguarding practice:**

1

**Don't be afraid to question requirements that could pose further harm.** This research found that funders are genuinely committed to supporting safe practice in their grantee partners. If you are concerned about the impact of funder requirements, it is important to raise this so that funders can continue to improve their approach and support your work.

2

**Clarify and document your approach to safeguarding, and build on other accountability mechanisms.** If your organisation has practices in place that promote transparency, staff wellbeing, feedback and complaints, or learning, you already have some of the core infrastructure for safeguarding. Rather than re-writing these to fit specific funder requirements, ensure that you can explain your approach and signpost to relevant policies and procedures.

## Section 5

# Monitoring and Check-Ins

“

To stay responsive, quarterly check-ins with grantees help track evolving safety and wellbeing priorities, which can change with the environment or even as a result of the grantees’ own work.”

— Funder, North America

**Organisations, programmes and operating contexts change.**

For grantee partners, this means safeguarding risks and the measures to address these risks require continuous monitoring. For funders, it means being alert to changes and their potential implications for safeguarding, resourcing, or outcomes. If due diligence identifies gaps in safeguarding capacity, monitoring is important as funders may want to see improvement over time.



## 5.1 Insights from Literature

**Safeguarding is a journey, and an organisation's safeguarding system needs to be continually reviewed and adapted to maintain its relevance and effectiveness (Rhind & Owusu-Sekyere, 2018; Charity Commission, 2017; IASC, 2024; CHS Alliance, 2024a).**

This is particularly important when there are rapid shifts in context (for example, emerging conflicts, natural disasters), as new risks can emerge that require additional mitigation strategies that may not have been previously accounted for (Girls' Education Challenge (GEC), 2021; OECD Development Assistance Committee (DAC), 2024). However, an evaluation of Porticus's safeguarding interventions found that grantee partners do not regularly update their safeguarding policies or consider them "living documents" (Porticus, 2021).

Funders who want to support their partners on safeguarding may, therefore, find it helpful to **integrate safeguarding into their grant monitoring practices** (European Community Foundation Initiative (ECFI) and FSC, 2024; Association of Charitable Foundations (ACF), 2021). Requesting updates can help funders better understand the grantee partners' context and gain assurance that appropriate measures are in place to deliver projects safely (GEC, 2021). It also provides the opportunity to celebrate milestones and achievements, which helps maintain momentum and encourage grantee partners to continue with improvements (Oak Foundation, 2020).

While monitoring progress may be helpful, **excessive monitoring can place a heavy burden** on grantee partners (Center for Effective Philanthropy (CEP), 2025b). A study by FSC stressed the importance of funders enabling grantee partners to 'own' their safeguarding approach and determine what types of improvements may be required (FSC, 2021). Intensive monitoring and check-ins that are framed as clear-cut requirements can lead to a more compliance mindset (FSC, 2021). Instead, co-created plans with clear milestones are useful (Oak Foundation, 2020; Rhind & Owusu-Sekyere, 2018; Porticus, 2021).

Literature reviewed highlights that **engaging in ongoing discussions with partners is helpful** and can encourage honesty as it demonstrates the funder's willingness to listen and learn about what works best (FSC, 2021; Bond, 2019; Oak Foundation, 2020; Walker-Simpson, 2021). In addition, well-conducted field visits, although sometimes costly, can provide valuable insight into the grantee's context, constraints and real-world safeguarding practices (FSC, 2021). Understanding how organisational culture supports the prevention of harm is more suitable to qualitative approaches (such as visits and discussions) than quantitative indicators (such as training numbers, exit interviews, employee metrics, etc) (OECD DAC, 2024).



## 5.2 Current Practices

### How are funders monitoring safeguarding?

#### Q Key finding

Funders have diverse approaches to monitoring safeguarding. This depends on grant type and may be constrained by internal capacities. However, a substantial number of funders do not monitor safeguarding at all.

#### Funders monitor safeguarding in a range of ways.

- » The review of funders' policies and documents showed that there is no consistent approach to monitoring safeguarding. Funders may carry out site visits, hold conversations, or ask for reports (at different intervals) to monitor practice.
- » Responses to the survey of funders indicate that:
  - 46% of funders check in on safeguarding during monitoring calls and meetings.
  - 44% ask about safeguarding in progress reports.
  - 34% include safeguarding discussions as part of field visits.
  - 7% organise external audits for safeguarding.
  - 6% conduct interviews with grantee partners' stakeholders.
  - 26% of funders **do not** monitor safeguarding. Of the funders who reported that they do not monitor safeguarding, half had fewer than 10 staff.
  - 43% of funders monitor safeguarding through more than two methods.
  - Many funders shared that their monitoring efforts are tailored to the type of grant (in size, time, and level of risk) or the capacity of their grantee partners.

#### Q Key finding

Funders who require improvements as part of grant agreements use monitoring to enhance and support grantee partners' safeguarding capacity.

- » The review of funders' documents found that some stipulate that grantee partners are required to make improvements in safeguarding over time and this can be included in grant agreements.
- » Qualitative responses from the survey and interviews show that funders who do this are also more likely to build relationships with grantee partners over time and create spaces for grantee partners to come to them with questions.
- » Survey results show that funders which require improvements are more likely to provide additional resources, such as access to external expertise or additional funding to grantee partners.

## 5.3 What Works?

### Monitoring practices that are effective in supporting safer organisations

#### Open and trustful dialogues contribute to strengthening safeguarding:

- ✓ 45% of funders said an open, trust-based relationship is important in supporting a safeguarding culture in their grantee partners.
- ✓ 38% said that open dialogue with grantee partners helps ensure a shared understanding about lived realities, enabling funders to understand why their partners have chosen a specific approach or need an additional budget for safeguarding.
- ✓ It is particularly effective when the conversation on safeguarding is informal and not simply an issue raised after a safeguarding incident or concern.
- ✓ Similarly, some funders recommended shifting from a reactive to a proactive approach by systematically discussing safeguarding matters with grantee partners as part of standard monitoring practices.

#### Field visits can be helpful, but only with careful planning:

- ✓ Field visits can be a very helpful way for funders to learn more about grantee partners' operations and in-situ constraints, and bring to light safeguarding challenges or areas for improvements
- ✓ However, power dynamics within field visits have to be carefully mitigated, otherwise grantee partners may feel overly scrutinised. Funders need to be aware of the risk of being viewed as controllers or inspectors, rather than supportive partners who are there to learn and help.

- ✓ Funders need to be careful that monitoring of safeguarding on visits is not reduced to a tick-box exercise.
- ✓ Funders must understand that without careful planning, field visits may leave grantee partners feeling overwhelmed and can divert resources away from operations.

#### Funders are cautioned to know 'how' to discuss safeguarding:

- ✓ Both funders and grantee partners said it is helpful when funders are able to demonstrate why safeguarding is important, including clarity on why it should be an area for capacity development, monitoring and implementation.
- ✓ Occasional prompts or supportive discussions from **knowledgeable** funders can strengthen grantee partners' practice. More directive comments should be avoided as they may be interpreted as requirements that the grantee partner has to follow, which can risk creating more harm if the suggestions are not appropriate to the specific context.

### Monitoring practices that are ineffective or that funders should avoid

#### Excessive monitoring is not the answer:

- ✗ Grantee partners and funders agree that intensive monitoring means that grantee partners feel scrutinised and have to spend a lot of resources on preparation to meet monitoring demands. Both groups felt that this does not help their practices overall.

## 5.4 Recommendations

### Recommendations for Funders

1

**Make space for continued discussions.**

It doesn't have to be frequent but having check-ins as part of standard monitoring practices can help you to monitor progress, gain a better understanding of partners' contexts and provide space for partners to discuss budgets, challenges or questions.

2

**Ensure that grantees feel safe enough to reach out regarding their safeguarding progress or challenges.** Giving grantee partners upfront permission to contact you, or encouraging them to do so when issues arise, can foster trust and collaboration, and helps ensure that challenges get addressed.

3

**Check on safeguarding if activities have been adjusted or the context has radically changed.** Changes may affect the grantee partner's operational risks or risk management, and may have implications for safeguarding.

### Recommendations for Grantee Partners

1

**If your funder is open to it, tell them when new and significant risks arise and/or when there are rapid changes in your context.** Let them know if and how the safety of projects or activities may be affected, and any mitigation strategies you are taking, and consider together their budgetary implications.

## Section 6

# Technical Support

“

Our approach to safeguarding combines prevention with capacity building. Recognising that we operate in a challenging environment, we support grantee partners in developing their own risk mitigation strategies.”

— Funder, Asia

Grantee partners do not all have the same safeguarding capacity. Different organisations are at different points in their safeguarding journey.

Recognising this, funders can make a positive impact beyond the grants they offer by providing resources for grantee partners to develop and strengthen their safeguarding practices over time.

## 6.1 Insights from Literature

**The provision of technical support can be critically important in developing policies and practices to prevent harm and ensure an effective response to incidents (CHS, 2024; FSC, 2021).**

This is particularly important as safeguarding is still relatively new in many countries (Segal Family Foundation, 2022) and in times where resources are constrained, hiring and retaining highly skilled staff who can provide in-house support can be exponentially more difficult (CEP, 2025a & 2025b).

Recent studies have demonstrated that funders can have a positive impact in this area. An evaluation of Porticus's safeguarding interventions showed that their partners need technical support on safeguarding, and they recommend **signposting to existing resources and tools, and creating more opportunities for peer-to-peer learning** (Porticus, 2021). The Girls' Education Challenge Fund found that once partners received **guidance and support from a third party**, their safeguarding policies, practices and procedures were significantly strengthened (GEC, 2021). There is also evidence that funders who provide support beyond the grant are directly investing in grantee partners' organisational health, capacity and institutional sustainability (Carrington, Whales & Wharton, 2017; Colnar, 2021).

The way funders approach safeguarding support matters. Research suggests that support is likely to have a much greater impact when it is **tailored to the organisation and its context** (FSC, 2021; Rhind & Owusu-Sekyere, 2018). However, support is often determined by the funder, which undermines local ownership and perpetuates the perception of safeguarding as a funder-driven, compliance issue (FSC, 2021; Bond, 2019). Instead, grantee partners need **flexibility** to define an approach that reflects their organisational values and is relevant and sustainable (FSC, 2021). While external training and capacity-building support is valuable, again, it is likely to have a much greater impact when it is tailored, contextualised and when learning is continuous, participatory, and led by national experts (Walker-Simpson, 2022; Segal Family Foundation, 2022).

Studies also show that **requiring changes too quickly can be counterproductive** (FSC, 2021). Too often, timescales are unrealistic and fail to take into account other demands on organisations' time and resources (FSC, 2021; Bond, 2019). The pressure to achieve change quickly can be overwhelming and may lead to superficial changes which fail to shift organisational culture or practice (FSC, 2021). If safeguarding is to be internalised within an organisation's culture and day-to-day practice, action plans and timescales need to be flexible, acknowledging the other demands on the grantee and adjusting project milestones as needed (Walker-Simpson, 2022; Oak Foundation, 2020; Bond, 2019).

## 6.2 Current Practices

How are funders approaching **technical support** with grantee partners?

### Q Key finding

The majority of funders do not provide technical support unless grantee partners have asked for it or assessments indicate that support is necessary.

When and why funders provide safeguarding technical support varies.

Our survey of funders indicates that:

- » 35% only provide technical support when grantee partners ask for it. This is echoed by grantee partner responses, where 27% state that most of their funders only provide support when they ask for it.
- » 31% provide technical support if assessments show that the grantee partners need it.
- » 5% say that they require all grantee partners to receive mandatory safeguarding technical support. However, 68% of grantee partners indicate they have **at least one** funder that requires them to undergo mandatory technical support.
- » 26% say they do not provide technical support as they believe the responsibility for this rests with the grantee partner.

It should be noted that many funders caveated their responses by saying that available support also depends on the type of grant being disbursed (for example, multi-year grants, partnership type).



## Q Key finding

Where technical support is provided, it is usually in the form of guidance from funder staff or signposting to materials and tools.

## Q Key finding

UK-based funders provide less support for safeguarding in comparison to their counterparts elsewhere.

### When funders do make support available, the type of support offered varies:

- » The review of funder policies found that only a few funders explicitly specify what kind of support will be provided. When provided, it tends to focus on supporting grantee partners to meet policy-related requirements.
- » However, funder responses to the survey indicate that:
  - 72% make staff available to answer questions.
  - 70% signpost grantee partners to guidance materials and tools.
  - 50% provide funding to enable grantee partners to contract their own safeguarding specialist.
  - 48% directly contract safeguarding specialists to support grantee partners.
  - Only 23% organise peer exchanges on safeguarding between grantee partners.
  - Only 20% provide adapted or context-specific training, with 13% providing standardised training.

### UK-based funders provide less technical support:

- » 45% of UK funders only signpost to resources or materials, compared to 29% of funders based elsewhere.
- » 24% of UK-based funders provide support if an assessment indicates that it is necessary to; compared to 46% elsewhere.
- » 22% of UK funders would give support if grantee partners asked for it, compared to 61% elsewhere.
- » UK-based grantee partners also find the support provided to be less helpful. This may be due to the fact that they mostly get signposted to other tools or resources.

The reasons for this are unclear but the findings are noteworthy given the legal and regulatory priority placed on safeguarding in the UK.

## 6.3 What Works?

### Technical support that is **effective** in supporting safe organisations

#### Support from funders to develop policies and practices is much appreciated:

- ✓ Unprompted, 27% of grantee partner respondents indicated that the support provided by funders to develop policy and processes was useful, as it ensures proper scope, quality, and compliance with updated legislation (where relevant).
- ✓ It was even more praised when the support was adapted to their specific context.

#### Access to contextualised training and expertise is more effective:

- ✓ Unprompted, 30% of grantee partners mentioned appreciating training, either online or in person.
- ✓ 21% of funders identified training and awareness-raising as highly impactful in strengthening grantee partners' practices.
- ✓ Across both groups, respondents stated that in-person training is more effective as it allows more opportunity to discuss safeguarding in practice and explore actual situations to help staff apply safeguarding principles to their unique operational reality.

#### Providing opportunities for peer learning on safeguarding is considered effective:

- ✓ Unprompted, 12% of funders highlighted peer learning as a particularly effective tool to support safeguarding. Grantee partners echoed this view.
- ✓ Key informants noted that peer learning can enable the sharing of contextualised safeguarding measures as it allows good practices to be cascaded between staff at different organisations.

- ✓ However, this research found that funders currently provide this option less frequently than other forms of support. According to participants in focus group discussions, this may be because it is resource-intensive and requires ongoing maintenance.

### Technical support that is **ineffective** or that funders should **avoid**

#### Imposing generic training and materials is not viewed as helpful:

- ✗ The grantee partners who described technical support as not useful mainly received guidance and tools. These tools sometimes cover aspects of safeguarding that the organisation already has in place.
- ✗ Respondents stressed that if funders do signpost to guidance and tools, there should not be a requirement to comply with these but rather the tools should be shared as reference materials.
- ✗ Generic training that is not contextualised to organisations' operations and culture was not seen as helpful, especially if delivered online. This is because it limits the opportunity for interaction and space to discuss context-specific situations. In addition, generic training was described as not useful as grantees often already know the basics.

#### Unsolicited or unqualified advice is also not helpful:

- ✗ Many grantee partners said that advice from funders' staff is not always helpful, given that not all funders have staff with specialist safeguarding knowledge.
- ✗ Even when funders have technical expertise, there is a need for flexibility and an understanding of grantee partners' context to be truly effective when providing support.

## 6.4 Recommendations

### Recommendations for Funders

1

**If possible, offer capacity building or technical support to grantee partners.**

Where resources for technical support are limited, prioritise by need or by the level of safeguarding risk. To avoid providing unnecessary or unhelpful interventions, always start by asking grantee partners what they need and what works best for them.

2

**Facilitate access to adapted training.**

Training should be appropriate for grantee partners' size, capacity, risks and expertise. Otherwise, it could be seen as an unnecessary requirement.

3

**Provide grantee partners with access to localised expertise.** This can be achieved through providing funding for grantee partners to contract their own safeguarding specialist, or identifying experts you can deploy when needed who have relevant, contextual, and localised knowledge.

4

**Facilitate peer learning and exchange if possible.** This could be done through setting up cohort learning opportunities for your grantee partners or integrating safeguarding into other convenings that are already scheduled. However, be aware that maintenance and facilitation of these spaces is required.

5

**Only give technical advice if you have relevant and contextualised expertise.** If you do not have appropriate expertise, refer to a specialist. If you do have expertise in safeguarding, recognise the limitations to your knowledge regarding the specific context in which the grantee partner is operating. Facilitate discussion to gain a clear understanding of their needs rather than offering solutions.

### Recommendations for Grantee Partners

1

**Ask for technical and capacity support if you need it.** As most funders only provide technical support when they've been asked, outline your needs. Be clear about what type of support would be most helpful and appropriate for your organisation.

2

**Don't be afraid to push back on technical support or advice from funders that is not helpful for your context or organisation.** Funders do not always know best. At times their advice or recommendations may not suit your organisation's needs or they may not have specific technical expertise. Do not be afraid to ask for more details or push back when this happens.

## Section 7

# When Things Go Wrong

“

Our role is to help organisations respond to concerns in ways that are practical, culturally relevant, and supportive of both staff and young people.”

— Funder, Europe

**Even where strong safeguards are in place, harm can still occur.**

Funders can play an important role in ensuring safeguarding incidents are responded to appropriately. However, care is needed as the funder’s response may also add an additional burden for grantee partners or inadvertently create the risk of further harm if not handled well.

## 7.1 Insights from Literature

**Ensuring clear procedures are in place for reporting and responding to safeguarding incidents is a core component of effective safeguarding (Charity Commission for England and Wales, 2017; IASC, 2024; CHS, 2024a; Keeping Children Safe, 2024).**

However, in addition to reporting within their own organisation and managing the response, organisations are increasingly required to notify funders when serious incidents occur. While reporting to funders may be designed to ensure accountability and promote a robust response, the way reporting requirements are framed and funders respond requires careful consideration (Walker-Simpson, 2022).

Funders are advised to be clear about **what type of allegations or incidents** grantee partners should report to them (National Council for Voluntary Organisations (NCVO), nd; FSC, 2021). Porticus' (2021) review of their safeguarding support found that grantee partners were unsure on the definition of 'serious incidents' and interpreted it differently. This lack of clarity can lead to both under-reporting and over-reporting as well as the unnecessary sharing of highly sensitive information (Porticus, 2021; FSC, 2021).

FSC (2021) further notes the importance of **flexibility in terms of the timeframe** within which grantees have to report concerns to funders. Strict, short timescales can divert time and resources away from following up the case and may lead to the funder's needs being prioritised over the needs of survivors (FSC, 2021; Walker-Simpson, 2022). The FSC report stresses that timescales for reporting should be reasonable and allow grantee partners time to assess the situation and focus on the response.

**When safeguarding incidents are reported**, funders are encouraged to recognise that this can be a positive indicator of effective safeguarding – as potential harm is being identified and the organisation is taking steps to respond (NCVO, nd; OECD DAC, 2024; ACF, 2021).

The FSC (2021) study stresses that reporting depends on trust; it recommends that funders make proactive efforts to “de-fear the relationship” and address the perception that funding will automatically be removed if cases are reported. Indeed, punitive approaches can lead to grantee partners becoming less willing to surface problems, increasing the likelihood of harm being hidden (CHS, 2021; Oak Foundation, 2020).

The literature stresses that the funders' role in response should be limited to **encouraging and supporting grantee partners to follow their own response procedures** (DEC, 2018; FSC, 2021). While making space for dialogue can be helpful, this must follow the principles of proportionality and appropriateness, with the funder acknowledging that they are several steps removed and consequently not in the best position to dictate a specific response (FSC, 2021; Walker-Simpson, 2021). If the funder decides they must intervene, for example if the grantee is unable or unwilling to take action, their role should be clarified upfront and care taken to ensure staff with appropriate expertise are available to guide this (DEC, 2018; FSC, 2021).

In some instances, weaknesses in the grantee partner's response may be due to resource constraints. Many organisations lack capacity to conduct investigations or lack the budget to enable support for survivors (FSC, 2021). Funders can help address this by providing **clarity on whether there are resources available to support the response** (NCVO, nd; DEC, 2018; FSC, 2021). Without additional resources, organisations face the dilemma of either stretching already limited resources or compromising on survivor-centred responses (Walker-Simpson, 2021).

Lastly, **funders and their grantee partners can learn lessons from what has been reported to them.**

When systematically analysed, incident reports help organisations to identify and address harmful practices, strengthen resource allocation, raise awareness about reporting mechanisms, and hold leaders accountable (CHS, 2021).

## 7.2 Current Practices

### How are funders approaching **incident reporting requirements** with grantee partners?

#### Q Key finding

There is a lot of variation in funders' reporting requirements and there is a lack of clarity on what type of incidents should be reported and how.

#### Reporting requirements are not consistent among funders.

Responses to the funder survey indicate:

- » 53% of funders require grantee partners to report safeguarding allegations or incidents; 75% of grantee partners said that **at least one of their funders** has a requirement to report incidents.
- » 20% of funders do not require reporting but encourage grantee partners to do so.
- » 22% indicated having no incident reporting requirements.
- » 5% are unsure if such a requirement is in place.

#### Timeframes for reporting varies.

- » The review of funder policies found no consensus on the timeframe required for reporting. Some funders require a strict timeframe, others take a more flexible approach.
- » Responses to the funder survey also showed a lack of consistency. Of those who require or encourage grantee partners to report:
  - Funders' reporting timescales varied significantly. Some had a fixed timescale which varied between 24, 48 or 72 hours to within 10 days.
  - Others require reporting "immediately".
  - Some funders offer more flexible, but no less confusing timeframes, such as "in a timely manner" or "as soon as possible".
  - Others didn't require reporting until "the end of the grant period".
  - Some also noted that reporting timeframes depend on the grant and the type of incident.



### There is variation in the types of allegations or incidents that should be reported.

- » The review of funder policies illustrated that there is no common approach to what should be reported. Funders are requiring grantee partners to report on a full spectrum of situations – from only allegations of sexual exploitation and abuse to any allegation that poses a reputational risk.
- » The review also found differences in the scope of what needs to be reported. Some funders only want to hear about allegations in funded projects while others want to be informed of any allegations arising within the grantee partner organisation.
- » This was consistent with the feedback to the funder survey; of those who require or encourage grantee partners to report:
  - 69% want to be informed about incidents of abuse that involve any beneficiaries of funded activities.
  - 56% want to be informed about cases of abuse or misconduct against grantee partners' staff or representatives.
  - 45% want reporting in cases where abuse or misconduct by grantee staff could lead to negative media or public attention.
  - 14% also mentioned that "serious" allegations need to be reported, but without defining the term.
- » Some funders provide templates for reporting an incident, each requesting different information, in a different order, to a different level of detail. Some templates request sensitive information about the people involved.

## How are funders responding to reported safeguarding incidents?

### Q Key finding

**Funders respond very differently when an incident is reported to them, although the majority let the grantee partner lead the response.**

### Funders respond very differently when things go wrong.

- » The review of funder policies found limited information on how funders will respond to incidents that are reported to them.
- » Some grant agreement templates stipulated that funders may intervene if grantee partners do not respond to incidents in an appropriate manner.

- » The survey revealed more detail on how funders might respond to reports of safeguarding incidents:
  - 64% of funders said they ask the grantee partner to provide further information and keep them updated on outcomes.
  - 40% ask to speak to the grantee partner to seek assurance about their response.
  - 30% will follow up if they are concerned about the response.
  - 29% do not provide any additional support or follow up but only want to be informed.
  - Only one funder indicated ceasing funding immediately. The rarity of this was mirrored in grantee partners' responses.
  - Not all funders are prepared for this situation. Some noted that they do not (yet) have an approach or that this situation has not occurred in their organisation.

**Many funders provide additional resources to support grantee partners to respond to incidents:**

- » 38% provide resources for learning and improvements following an incident (e.g. policy strengthening, capacity building support).
- » Only 27% provide resources to support the actual response (e.g. for investigations, follow-up, survivor support). This is mirrored by grantee partners' responses, where only 28% stated that the **majority** of their funders provide resources in these circumstances.

- » Some funders do not provide specific funding for investigations or other aspects of the response, viewing these as costs that the grantee partner should cover from their core budgets.

**UK-based funders provide fewer resources in response to a safeguarding incident:**

- » Only 18% of UK-based grantee partners reported receiving resources in these circumstances from most of their funders compared with 39% of grantee partners elsewhere.

**Most grantee partner responses have been respected by their funders:**

- » 56% of grantee partners reported that their proposed response and internal processes were respected by most of their funders.
- » 59% reported that most funders allow an appropriate time for resolution.

**Reporting to a funder is not necessarily helpful**

- » Only 41% of grantee partners find that reporting to a funder helped their response.

## 7.3 What Works?

### Reporting and response practices that are **effective** in supporting safer organisations

**Clarity and alignment of reporting requirements reduce the administrative burden on grantee partners and allow them to focus on the response:**

- ✓ 55% of grantee partners state that the majority of their funders have clear expectations around the reporting of incidents.
- ✓ Some grantee partners also stated that alignment in terms of reporting expectations among funders would save them time and resources.
- ✓ Anecdotally, in cases that involved multiple funders, both grantee partners and funders said that it has been particularly effective when funders appoint a lead among themselves to handle the response with the grantee partner.

**Flexibility allows the grantee partner to focus on the quality of the response:**

- ✓ Grantee partners stated that flexibility in reporting timeframes is helpful, as this allows them to assess the situation, get more information, and focus resources on responding to the needs of survivors.
- ✓ Some funders mirrored this, stating that rigidity and inflexibility are unhelpful and impose undue stress on partners.
- ✓ Flexibility and allowing grantee partners to resolve cases in ways that are contextually appropriate was also highlighted as important. It avoids harmful one-size-fits-all approaches and allows grantee partners to tailor responses that prioritise survivor safety and agency.

**Grantee partners appreciate it when funders make space to discuss incidents:**

- ✓ Unprompted, 32% of grantee partners reported that the support and advice offered by their **knowledgeable** funders was helpful after reporting an incident.
- ✓ Grantee partners said it was positive when funders engage in meaningful dialogue after an incident, helping them to reflect on the incident and learn from it.

**Easy access to additional resources contributes to the effectiveness of the response:**

- ✓ 25% of grantee partners spontaneously reported that receiving additional resources from funders was critical to responding effectively to safeguarding incidents.
- ✓ Resources from funders enabled grantee partners to access independent investigation experts, legal expertise, provide psychosocial support to survivors and staff, and strengthen organisational policies.
- ✓ Key informants noted that in emergencies, complicated administrative requirements within funders and the grantee organisations themselves can create the risk of further harm. For example, there are situations where it is vital to remove the affected individual from immediate danger, and grantee partners often need to mobilise resources for this. If funds are not rapidly available, or involve lengthy reimbursement processes, action may be delayed or staff may end up paying for protective measures like transport or accommodation out of their own pockets.

### Funders can improve effectiveness by prompting organisations to develop strong reporting and response mechanisms and encouraging learning:

- ✓ Grantee partners said that it is helpful when funders ask them about their reporting mechanisms and whether these had been adapted to the local context.
- ✓ Encouraging grantee partners to train staff on what constitutes harm, how to safely handle disclosures, and how to respect survivor-centred responses is important.
- ✓ Grantee partners appreciate it when funders share insights on reported incidents with them. If funders are collecting data on reported incidents, this can help grantee partners to identify trends or recurring issues.

## Reporting and response practices that are ineffective or that funders should avoid

### Reporting requirements that create unnecessary burden for grantees:

- ✗ Respondents shared that strict reporting timelines (such as 24 or 48 hours) do not account for delays or contextual challenges and can create an unnecessary administrative burden.
- ✗ The fact that there are multiple reporting formats among funders, requiring different levels of information, places a lot of pressure on grantee partners' resources, and diverts time away from the response.

### Ignoring reported incidents:

- ✗ Many grantee partners wonder what funders do with reported incidents, as **they have not heard back or received any follow-up**. It takes a lot of time and effort for grantee partners to fill out templates and inform funders so it is important to at least acknowledge receipt to encourage grantee partners to use the mechanism again.

### Taking a punitive approach to responding to reported concerns:

- ✗ Respondents noted that the threat of ceasing funding when incidents occur risks discouraging reporting, rather than encouraging transparency.

### Violating survivor-centred approaches to handling incidents:

- ✗ Many grantee partners apply survivor-centred approaches when managing incidents. This can be compromised, however, when funders impose strict response requirements, such as systematically reporting to authorities. Survivors may not wish to involve local authorities, or doing so may pose additional risks to their safety.
- ✗ Many grantee partners shared that funders are still requesting sensitive information, including the identity of those involved, location or other related information. This is not in line with survivor-centred approaches as it breaches survivors' confidentiality and may result in additional risks to the survivor, the team and other people involved. In addition, this practice does not contribute to creating a trusting funder-grantee relationship and may prevent the reporting of further incidents.

## 7.4 Recommendations

### Recommendations for Funders

1

**Encourage (and fund) grantee partners to implement an incident reporting system and ensure they have systems in place to respond.**

These should be suitable for the context and, where possible, service users should be involved in their development. It's also best if multiple reporting channels are available.

2

**Funders should develop their own procedures** for how to respond to reported incidents from grantee partners. Procedures should be clear about which circumstances grantee partners should report to the funder. In terms of timeframes, it is advisable to give upfront permission to grantee partners to focus on the immediate response prior to reporting and always place the survivor at the centre of any approach.

3

**Where possible, align reporting requirements and response mechanisms with other funders.** Start by discussing reporting timeframes with other funders who are funding similar efforts and consider whether alignment is possible. Furthermore, reach out and collaborate with other funders in response to a reported incident from a grantee, if possible.

4

**Make sure to follow up.** As a minimum, acknowledge receipt when incidents are reported. *If* you have staff with appropriate expertise, it can also be helpful to offer the grantee partner space to discuss the response and reflect on learning.

5

**Trust in the grantee partners' response, but make sure to verify.** Let grantee partners explain and lead their process. However, funders can provide an important layer of accountability so check in if you have concerns that their response is not proportionate to the harm being reported.

6

**Allocate resources for response.** When incidents arise, there are likely to be resource implications so, if possible, provide additional resources to support the response. Be clear about the type and scale of resources that are available, and how grantee partners can access them. This doesn't just have to be reactive, however. You can also ask relevant questions in application forms or discuss the resources needed for effective reporting and response as part of the application and budgeting process.

7

**Encourage grantee partners to learn from incidents.** Encourage grantee partners to debrief and reflect on what might have contributed to the incident and how similar harms could be prevented in the future.

8

**Learn internally from the incidents reported.** Funders may receive reports from a broad range of organisations and there is real value in reflecting on the type of incidents being reported to identify any trends or patterns. Based on these insights, consider how you can support grantee partners in preventing, investigating and responding to such issues in the future. Wherever possible, consider ways to share learning with grantee partners as this helps to reinforce that reporting is more than just compliance but aims to support learning and improved practice.

## Recommendations for grantee partners

1

**Develop a solid reporting and response system,** adapted to your context and to the different vulnerabilities of users. Include different channels for reporting, and clarity on how you will follow up and investigate concerns.

2

**Make sure your staff are trained** on how to identify, report and respond to incidents. Different members of staff may require different levels of training.



## Section 8

# Resourcing Safeguarding

“

While many grants are unrestricted, the approach varies by grantee: INGOs in the Global North typically account for true costs with well-structured budgets, whereas Global South organisations often request far less than they need, reflecting a power dynamic where they feel compelled to understate their needs, sometimes to the detriment of their work and people.”

— Funder, North America

**Safeguarding requires time, resources and skilled personnel.**

The level of resources required will vary depending on the size of the organisation, its operating context and the level of safeguarding risk. Understanding and responding to the need for resources is essential to ensure proper implementation of preventative and responsive measures.

## 8.1 Insights from Literature

**An evaluation of safeguarding measures by Brunel University identified ‘resources’ as one of the eight pillars of effective safeguarding (Rhind & Owusu-Sekyere, 2018).**

However, for many organisations, **safeguarding ranks among the most significantly underfunded areas** (Humentum, 2022). According to a recent study, protection from sexual exploitation and abuse accounted for less than 1% of reviewed organisations’ budgets, with most allocating under 0.5%. Furthermore, 25% of organisations did not know the size of their allocation (CAPSEAH, 2024b).

In the absence of sufficient resourcing, organisations are often forced to split safeguarding costs across programme, core and overhead budgets (CAPSEAH, 2024b). However, there is **no consistent approach to how overheads are defined** and what costs funders will cover, making it difficult for organisations to budget and recover safeguarding-related expenses (Development Initiatives, 2023). In addition, despite evidence that overheads are critical for institutional capacity, funders often view them as a cost to be reduced rather than an investment in safe, effective programming (Development Initiatives, 2023). Using a strict threshold ratio of overheads to direct costs as a way to evaluate ‘efficiency’ can push organisations to cut safeguarding expenditure, thereby undermining effectiveness, programme quality and safety (Segal Family Foundation, 2022). This disproportionately affects smaller, often local, organisations as they tend to have fewer grants where they can absorb costs within overheads (Development Initiatives, 2023; Walker-Simpson, 2022; Humentum, 2022).

If funders acknowledge that safeguarding is critical, then there is a responsibility to ensure that necessary resources are available (Segal Family Foundation, 2022; Walker-Simpson, 2022). However, **safeguarding is still often treated as an optional ‘add on’** (International Development Committee, 2018). Even when funders do provide resources, previous research shows that it is often aimed at basic measures, such as policy development, but rarely covers the ongoing costs of implementation or responding to incidents, such as investigation and survivor support (FSC, 2021).

Unpredictable and inconsistent funding means that organisations can struggle to find funds for specialist safeguarding staff. This means they may be forced to redistribute work among current staff (Porticus, 2024) or cut salaries and essential functions (Humentum, 2022). Again, **small local organisations face particular challenges in retaining skilled staff** as experienced staff are likely to be hired by bigger international organisations, where funding is more significant and more stable (Le Grand and Nzedom, 2021).

**More knowledge is needed about the true costs of safeguarding** (CAPSEAH, 2024b). Positively, Porticus (2024) conducted a study analysing the costs (expenditures, staff time) of implementing and maintaining safeguarding measures in small, medium and large organisations. While this study provides a costing scheme that can inform other organisations wishing to identify the true cost of safeguarding, it only covers organisations supported by Porticus on the Iberian Peninsula. More research is required in this crucial area.

## 8.2 Current Practices

### Q Key finding

Safeguarding is not well-resourced in grantee partner organisations. Budgeting practices vary among funders, and grantee partners are not sure how to ask for these resources.

- » The review of funder policies showed that even where funders expect grantee partners to have a policy on safeguarding in place, they did not specify whether or how the associated costs could be budgeted within their grants.
- » Only 6% of grantee partners received additional grants for safeguarding and only 8% got their external safeguarding support costs covered.
- » In the survey, 80% of grantee partners gave the unprompted recommendation that funders should provide more safeguarding-specific funding.
- » While 45% of funders are open to grantee partners including a safeguarding budget line if needed, focus groups with grantee partners demonstrated that they are often unaware they can request these resources
- » 91% of grantee partners said they have a safeguarding lead. However, many safeguarding leads from smaller organisations noted that their safeguarding duties get deprioritised due to competing demands.

#### The way budget is allocated for safeguarding varies among funders:

- » Only 8% of funders expect safeguarding costs to be in overheads.
- » Only 5% of funders allow grantee partners to have a specific safeguarding budget line.
- » 26% of funders said they give **unrestricted** funding. However, grantee partners report that only a few of their funders provide unrestricted funding.

## Q Key finding

Both funders and grantee partners lack knowledge about the true costs of safeguarding.

## Q Key finding

Grantee partners in the UK receive less resources for safeguarding from their funders in comparison to organisations elsewhere.

### Insights from the research show:

- » 47% of funders said they **do not** know or ask about grantee partners' safeguarding costs. This figure might be partially explained by the fact that 26% of funder respondents give unrestricted funding and thus do not require detail about where funding is spent.
- » 75% said they **do not** know or ask questions about grantee partners' unmet safeguarding needs. This lack of awareness of grantee partners needs is likely to contribute to ongoing financial constraints that undermine safeguarding practice.
- » Focus groups and interviews also indicated that the true costs of safeguarding are poorly understood by both funders and grantee partners, with smaller organisations in particular struggling to estimate and budget appropriately.
- » 68% of UK grantee partners said **no funder** covers cost of external safeguarding support; compared to only 37% based elsewhere.
- » 49% of UK grantee partners said **no funder** allows a specific budget line for safeguarding; compared to only 20% based elsewhere.
- » 30% of UK grantee partners said **no funder** allows safeguarding costs within overheads; compared to only 18% based elsewhere.

## 8.3 What Works?

### Resourcing practices that are effective in supporting safer organisations

#### Flexible and dedicated funding enhances ownership of safeguarding:

- ✓ Grantee partners clearly indicated that they need resources for safeguarding, from policy development to employing skilled staff, as well as for investigation and post-incident learning.
- ✓ Grantee partners are required to meet funders' diverse and at times costly expectations (safeguarding leads, background checks); better resourcing would allow them to better meet these expectations.
- ✓ Key informants noted that a specific budget line is particularly important for grantee partners at the beginning of their safeguarding journey, as time and resources are needed to build a strong safeguarding infrastructure. However, they also said that organisations which are more advanced still need resources to sustain safeguarding practices and retain expertise.
- ✓ Informants pointed out that while larger organisations may need more safeguarding resources in absolute terms, due to the size of their programmes and teams, they are also likely to have more funding sources and greater options for including costs in overheads. Funders shouldn't assume that the need for resources will be less in smaller organisations as they may not be able to absorb costs in overheads as easily and so may rely on funder support to cover these costs.

#### Eligibility to include safeguarding costs within budgets needs to be clear:

- ✓ While many surveyed funders said they could provide additional grants for safeguarding, grantee partners were often unaware of this. If a funder can provide specific funding or additional grants dedicated to safeguarding, it is helpful if they clearly communicate when and how grantee partners can access this.
- ✓ Grantee partners are unsure of where safeguarding costs should be integrated in budgets, or what would be eligible. As every funder has its own budget specificities, it is helpful if they are clear about what kind of costs are eligible and how these should be factored into budgets and proposals.

#### A meaningful dialogue on the cost of safeguarding helps trigger better practices:

- ✓ Not all grantee partners are forthcoming about their needs or fully understand their safeguarding costs. The power differential between funders and grantee partners may also prevent grantee partners from stating their needs or requesting support.
- ✓ Well-framed questions about safeguarding costs at application and monitoring stages can lead to reflection about current infrastructure and needs, and may strengthen grantee partners' ability to properly budget for safeguarding over time.

## Resourcing practices that are **ineffective** or which funders should **avoid**

Some funding practices can hinder effective safeguarding:



**Lack of flexibility or strict overhead costs should be avoided where possible**, as this discourages grantee partners from requesting real costs and may lead them to cut vital resources for safeguarding (skilled staff, training, external support, equipment for digital protection, etc) to reduce costs.



**Short funding** cycles can lead to a lack of financial sustainability and prevent grantee partners from investing in and keeping skilled staff. In addition, having to request funding every year requires time and resources that could be used for other functions.



## 8.4 Recommendations

### Recommendations for Funders

1

**Consider offering unrestricted grants.** This allows organisations to allocate funding where they determine the need is greatest, rather than having priorities set by funders. However, it is important that funders still emphasise the importance of resourcing safeguarding so this is not deprioritised in the allocation of funds.

2

**Consider harmonising cost classification with others.** This helps reduce the confusion that is created when there are differences between funders' requirements and will help organisations budget and plan more effectively.

3

**When developing programme strategy and planning new funding rounds, explicitly consider what resources should be allocated for safeguarding.** This should be considered across all programmes funded. The amount allocated will depend on the risks within each particular project and context. Consider allocating resources for grantee partner capacity strengthening, organisational health and resilience.

4

**Ask and discuss safeguarding costs and budgets.** Ask grantee partners about what resources they need for safeguarding and ensure that budgets cover the true costs of safeguarding, including staff time, training, investigations, and survivor support.

5

**If you offer additional grants for safeguarding,** communicate this clearly and make sure grantee partners know how to access these.

### Recommendations for Grantee Partners

1

**Monitor and track safeguarding costs within your organisation.** This will enable you to give funders a clear rationale for funding requested and will help plan for effective safeguarding. Start by listing all the costs (expenditures and staff time) of designing and maintaining safeguarding measures in your specific context.

2

**Include safeguarding costs in your grant budget if possible.** Some organisations charge a standard safeguarding percentage, while others include a set amount in each proposal. However, not all funders may allow this. Find out what your funder offers and if possible, advocate for its inclusion.

3

**Advocate for adequate funding for safeguarding.** Check with other similar organisations about how they budget for safeguarding and advocate for their funding needs. See which practices make sense for your organisation and advocate – either individually or with others – about shared needs to funders.

## Section 9

# Funder Safeguarding Capacity

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You cannot make other organisations do something without doing it yourself. [Safeguarding] was a journey that we did ourselves first before applying it to our partners.”

— Funder, Europe

Safeguarding within funding organisations requires time, resources and skilled personnel, just as it does within their grantee partners.

While this research was not designed primarily to document funders’ internal safeguarding practices, it is important to consider internal capacity as this is critically linked to their ability to embed effective safeguarding within the grant cycle.

## 9.1 Insights from Literature

Although funders generally have less direct contact with people and communities than their grantee partners, their imposition of requirements on those partners without implementing safeguarding in their own organisations can lead to resentment and mistrust (Walker-Simpson, 2022).

Indeed, the ACF Safeguarding Framework for Foundations (2021) emphasises **the need for funders to ‘walk the talk’** and show commitment to safeguarding as part of developing a positive approach to safeguarding in grant-making.

Previous research shows that **very few funders have dedicated safeguarding personnel**, so monitoring and supporting safeguarding among grantee partners often falls to grant managers (FSC, 2021). However, adding safeguarding to existing responsibilities can leave grant managers feeling stretched and they may not feel they have the knowledge and skills to undertake this well (Oak Foundation, 2020). A report from Oak Foundation (2020) emphasised that grant managers should not be made to feel they need to be ‘experts’ but rather, they should be viewed as ‘champions’ who raise the profile of safeguarding in their interactions with grantee partners.

It is positive that many funders now implement basic safeguarding training within their organisations (FSC, 2021). Building awareness of safeguarding can be achieved in a variety of ways including involving staff in the development or review of safeguarding policies, discussing safeguarding in meetings and providing updates on progress to build pride in what has been achieved (FSC, 2021). In particular, **funders may benefit from peer-learning and cross-sectoral exchanges**. A study by the Hewlett Foundation (2017) confirms that funders prefer to learn from their peers rather than from other sources.

While general awareness may be adequate for most staff, those who are responsible for responding to safeguarding incidents need greater knowledge. The FSC study found that **funders were worried that their staff did not always have enough knowledge to assess risk or respond to incidents** (FSC, 2021). In order for funders to support effective, survivor-centred responses, it is helpful for them to have a designated safeguarding lead who has access to additional training on the management of concerns, as well as to additional support and advice where necessary (FSC, 2021).

## 9.2 Current Practices

### Q Key finding

While most funders have a formalised approach to safeguarding, not all funders have dedicated and highly skilled safeguarding staff.

#### Most funders have a policy, but these have been developed for multiple reasons:

- » The funder survey found that 80% of funder respondents have a safeguarding policy or a formalised approach within their own organisation. However, these results may be unrepresentative as 53% of respondents are FSC members and have therefore made a concrete commitment to strengthening safeguarding.
- » 87% developed their policy because it aligned with their mission and values.
- » 71% developed it for risk reduction and mitigation.
- » 47% developed it because it is required by the legislation.
- » 11% developed it in response to a safeguarding incident within their own organisation or at a grantee partner.

#### The internal resources to support safeguarding varies among funders:

- » 77% are members of a network to support safeguarding. Again, this may be unrepresentative as 53% of respondents are members of the FSC network.
- » 51% have dedicated safeguarding staff.
- » 51% have their own case management system.

#### Training frequency is not consistent among funders:

- » The review of funder policies and other documentation showed that some funders set out how their staff will be trained and upskilled in safeguarding. However, it is not possible to confirm whether the policy commitments reflect actual practice.
- » The funder survey found that:
  - 59% of funders provide role-specific training.
  - 38% of funders do not have fixed frequency for training their own staff in safeguarding.
  - 29% do so annually.
  - 20% do so every two to three years.
  - 14% do not train their staff on safeguarding.

## 9.3 What Works

### Internal safeguarding and resourcing practices that are **effective** in supporting safer organisations

#### Clarifying internal practices before asking others to comply with safeguarding requirements increases credibility and trust:

- ✓ Funders noted the importance of mirroring internal practices with requirements for external partners.
- ✓ In general, our findings indicate that many funders apply this principle in practice.
  - Only four of the funders surveyed did not have a safeguarding policy but still required this from grantee partners
  - Only 5% of funders require grantee partners to get training on safeguarding, but do not do it for their own staff.

#### Providing training to boards and grant teams is important:

- ✓ Informants and qualitative responses highlighted that involving the funders' governance bodies in safeguarding and providing them with training enhances skills and improves buy-in at the Board level. In turn, this facilitates strategic decisions on policy adoption, appropriate budgeting (for training, staffing, mechanisms, responses), and human resource allocation.

- ✓ Informants noted that training for grant managers is particularly important to enable colleagues to better discuss and support grantee partners on safeguarding.
- ✓ As grant managers are responsible for looking at whether grantee partners meet safeguarding requirements, it is important that they are trained and supported to consider diverse safeguarding approaches, rather than simply ticking a box.
- ✓ Peer learning was noted as an effective learning tool by surveyed funders.

#### However, safeguarding does not need to be expensive for all funders:

- ✓ Proportionality applies to funders too. Respondents stressed that the levels of internal safeguarding capacity and expertise will vary depending on the risk profile of the funder.
- ✓ If funders hold the duty of care (i.e. they are delivering direct services or engaging directly with individuals and communities), they will need to invest more to ensure their safeguarding is robust.

## 9.4 Recommendations for Funders

1

**Ensure your staff have the knowledge they need to fulfil their role in safeguarding.** Assess the risks within your activities and consider what type of training different staff may require, particularly grantee-facing staff.

2

**Ensure access to additional expertise where necessary.** Not all funders will have dedicated safeguarding staff. However, staff should have access to external expertise where necessary, particularly to support them when responding to safeguarding incidents.

3

**Ensure your staff has knowledge on the contexts they are working in** and ensure that your approach considers the realities for funded partners. This can partly be achieved through desk-based research and calls but, when possible, grant staff should visit partners as this gives invaluable insights into the realities of the work.

4

**Invest in peer learning opportunities for your staff.** Connect with other funders who are similar in size, scale and risk profile to learn about their safeguarding approach and/or join networks that create spaces to share learning on safeguarding.



## Section 10

# Conclusion

This research highlights the many ways that funders can positively influence the creation and promotion of safeguarding within the organisations they fund. It also illustrates how poorly designed approaches may create an additional burden for grantee partners, without having a positive impact on their practice.

Three interconnected findings recurred across all aspects of the grant cycle. These are critical in enabling funders to support strong safeguarding practices.

## 1

**Clarity and alignment among funders helps reduce confusion and administrative burden on grantee partners:**

- » Clear, upfront communication on expectations helps prevent organisations wasting time applying if they do not meet requirements.
- » Greater alignment of expectations between funders would reduce the time grantee partners spend on tailoring the information they provide to fit each funder's needs.
- » Clarity and alignment on what safeguarding costs can be funded would help organisations access the resources they need.
- » Funder communication should emphasise why safeguarding is important and the importance of organisational ownership of safeguarding practice.
- » When incidents occur, clarity and alignment in reporting expectations helps to reduce the time needed to report and allows the grantee partner to focus on the response.

## 2

**Safeguarding cannot be one-size-fits-all: flexibility is required, with a strong emphasis on context:**

- » Funder requirements and due diligence assessments must take into account local realities, levels of safeguarding risk and the size and capacity of the partner organisation.
- » Funding should be flexible so grantee partners can make their own decisions about how to shape their safeguarding measures and build their own capacity.

- » Monitoring should promote discussion and learning about the realities faced by grantee partners and the impact these have on safeguarding
- » Training and support that is tailored to the grantee partner's context is more effective than generic support.
- » When funders respond to incidents in grantee partners, they need to recognise the limits of their own knowledge and avoid imposing actions that could cause additional risk or harm.

## 3

**Trust and the relationship between funder and grantee partner play an important role in promoting positive safeguarding practices.**

- » Open dialogue and trust are pivotal to ensuring funders work in ways that support effective safeguarding within grantee partners.
- » Dialogue at the application stage and during monitoring ensures a common understanding about realities on the ground, and why certain practices have been implemented.
- » It is important that the funder shows a willingness to listen and learn as this reinforces their commitment to a partnership approach.
- » A trust-based relationship encourages grantee partners to report to funders when incidents arise, and to speak up if they have unmet resourcing needs for safeguarding.
- » Trust is enhanced when funders have their own safeguarding measures in place and invest in experienced and knowledgeable staff.

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