



**Funder
Safeguarding
Collaborative**

1480

Safeguarding Standard for Funders

**Draft Version for
Public Consultation**

July 2026

Background

In 2025, the Funder Safeguarding Collaborative (FSC) commissioned Accountable Now to undertake in-depth research on '[Safeguarding in Philanthropy](#)' to understanding effective approaches to safeguarding in grant-making. Building on this research, a Co-Creators group of funders and CSOs have been working with Accountable Now and FSC to develop a draft standard to strengthen safeguarding in grant making.

We are now seeking feedback to ensure the commitments and behaviours contained within the standard are clear, relevant and useful to a broad range of funders.

Within each commitment there is a set of behaviours for funders to follow. These are divided into different levels to ensure flexibility for funders of different sizes, structures and safeguarding capacity:

- » **Avoid:** behaviours that could negatively impact safeguarding practice or could cause unintended harm, and which funders should avoid, even if they are unable to implement the other behaviours.
- » **Must-haves:** behaviours that are foundational to embedding safety in grant-making and all funders should consider.
- » **Going further:** behaviours that funders should consider if they wish further strengthen safety within their grant-making practices.
- » **Collective transformation:** behaviours taken in collaboration with other funders to strengthen safety beyond individual funders or institutions.

Progress is not intended to be linear and funders should not wait to implement all behaviours at one level before considering behaviours elsewhere.

Evidence informed practice

All behaviours have been cross-referenced with relevant research to ensure they are evidence informed.

If you would like a version of the draft Standard with full citations, please contact baohan@accountablenow.org.

Overview of the Standard

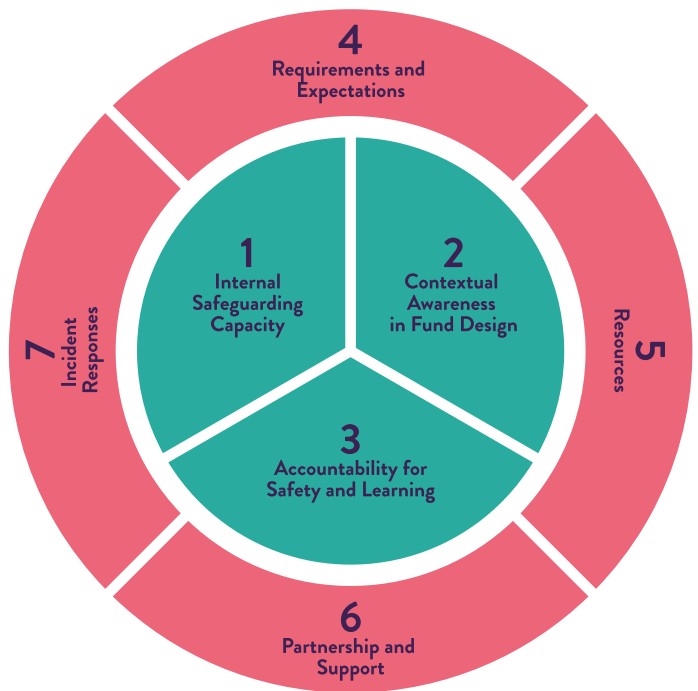
The Standard is divided into seven inter-connected commitments which work together to help funders make a positive contribution to keeping people safe:

Inner Ring:

- » Internal Practices that are necessary to support safeguarding in grant-making.

Outer Ring:

- » Grant-making practices that support safety through funder interactions with partners throughout the grant cycle.



Commitment One:

Build Internal Safeguarding Capacity



Inner Ring: Internal Practices

Commitment:

We commit to enhancing dignity, safety and wellbeing for all through sustained investment in building safer operations, people and partnerships.

Behaviours to meet this commitment

Avoid

- » Avoid developing policies, procedures and practices without considering the specific risks within your work or understanding the laws and regulations in your context.

Must Haves

- » Adopt a clear, holistic definition of safeguarding which includes the prevention and response to all forms of harm.
- » Develop an internal safeguarding policy and/or approach that addresses the specific risks in your work and reflects the legal and regulatory requirements where you are based.
- » Ensure your policies, procedures and practices address the safety of everyone connected with your organisation, including specific measures for those who might be most at risk (e.g. children, adults in vulnerable circumstances).
- » Communicate your policy internally, through inductions and training to ensure staff understand their responsibilities and expected practices.
- » Allocate proportionate resources (human, financial, time, expertise) to build and maintain internal safeguarding capacity, including the response to incidents.
- » Clearly define responsibilities for safeguarding across your organisation, including at leadership and governance level.

Why this commitment is important

Developing internal safeguarding capacities enables funders to understand the risks in their own work and ensure their own practices 'do no harm'. It also supports funder staff to be more confident to discuss and support safeguarding in grantee partners and respond to incidents that may arise. In turn, grantee partners feel more comfortable responding to requirements, raising concerns or discussing gaps when they know funders are prioritising safety in their own organisations and have appropriate systems in place.

Going Further

- » Provide tailored, context and role specific training for staff, recognizing that different staff in different roles will need different knowledge, skills and capacities.
- » Provide regular training and awareness raising on safeguarding to senior leadership, including Board members.
- » Put in place safeguarding related performance indicators for relevant staff, especially leadership.
- » Ensure your staff have access to specialist, external safeguarding expertise, particularly when responding to safeguarding incidents.

Collective Transformation

- » Invest and participate in peer learning forums, creating and supporting spaces to share learning and good practice with other funders.
- » Advocate for the adoption of effective safeguarding practices among peer funders and other stakeholders.
- » Align definitions and approaches with other funders and credible, leading agencies, to reduce inconsistency and promote alignment across the sector.

Commitment Two:

Ensure contextual awareness and sensitivity in fund design



Inner Ring: Internal Practices

Commitment:

We commit to understanding the contexts in which we and our grantee partners operate, so we can integrate proportionate and relevant safeguarding strategies into the design of our funding and grant-making practices.

Behaviours to meet this commitment

Avoid

- » Avoid imposing a one-size-fit all approach to safeguarding across different funding portfolios, without considering the needs and risks associated with different activities, groups, geographies and contexts.

Must Haves

- » When designing funds, seek to understand the specific risks for the groups, programmatic areas, and geographies you plan to fund.
- » Explicitly consider whether differential risks require adaptations in your approach to safeguarding, including in your approach to selecting and supporting partners.
- » Consider the capacity of partners you plan to fund, and whether you need to build in resources and support to ensure safety within the funded work.
- » Define your organisational risk appetite in relation to safeguarding and ensure it is understood and approved by senior leadership.
- » Ensure that safeguarding is considered within risk management procedures, with clarity on your role in managing risk within partnerships.

Why this commitment is important

Safeguarding risks, how safety is understood, and the measures that are the most appropriate will look different across contexts, programmatic areas, and languages. This means that funders need a proportionate and flexible approach to safeguarding when designing new funds, taking into account socio-political and cultural realities, legal frameworks, as well as the capacity and size of potential partners.

Going Further

- » Integrate safeguarding into any contextual analysis of the geographic/programmatic areas where you plan to invest.
- » Proactively engage with organisations, communities, and relevant partners to gather insights on potential risks, safety, and effective approaches to preventing harm.
- » Review evidence and lessons learnt from previous concerns and programmes and to inform your safeguarding approach to future funding strategies.

Collective Transformation

- » Where the design of funds identifies gaps in safeguarding infrastructure, consider investing in tools, resources, and service to support more effective safeguarding in the sectors or geographies where you work.

Commitment Three:

Ensure accountability for safety and learning



Inner Ring: Internal Practices

Commitment:

We commit to being transparent and accountable for our safeguarding work and putting in appropriate mechanisms to learn and improve our safeguarding practice.

Notes from the Co-Creators Group:

The group would welcome feedback on whether accountability and learning belong together in one commitment, or whether they should be separate or even integrated in other commitments as a cross-cutting theme. The group had differing views on this and although accountability and learning appear together in this draft document, we welcome feedback on the best approach moving forward.

Behaviours to meet this commitment

Avoid

- » TBC – awaiting feedback from consultation.

Why this commitment is important

Transparency and openness about safeguarding approaches helps funders build trust and credibility with their staff, grantee partners, and external stakeholders. It helps demonstrate that funders take safeguarding seriously and are willing to be accountable for their own practice, particularly where harm may have been caused. Funders should document and review lessons learned, including learning from incidents and near misses, and there should be oversight mechanisms to ensure learning contributes to the continual improvements in practice.

Must Haves

- » Share information on your safeguarding approaches publicly, including any requirements or expectations you have for (potential) grantee partners.
- » Ensure that there are accessible channels for staff, grantee partners and others to provide feedback about safeguarding within your organisation, including raising complaints or concerns.
- » Establish high-level reporting, governance, oversight and assurance mechanisms on safeguarding, including for the management of incidents (e.g. Safeguarding lead at the Board level, Safeguarding Committee).
- » Maintain a log of incidents so that you understand the frequency and types of issues that arise. Analyse and learn from this information to inform policies and practice.
- » Share updates and discuss safeguarding successes, incidents and lessons learnt at the leadership and Board level.
- » Review and improve safeguarding related policies, practices and processes regularly, taking into account learning and feedback.

Commitment Three:

Ensure accountability for safety and learning

Going Further

- » Develop mechanisms to share learning about safeguarding with staff across the organisation to show the importance and impact of safeguarding.
- » Develop mechanisms to share learning about safeguarding with grantee partners to demonstrate your commitment to continual learning and improvement.
- » When sharing learning, ensure this is done in an accessible manner and protects the confidentiality of the individuals involved.
- » Establish indicators and collect data to monitor the efficacy of your organisation's safeguarding approach and inform improvements.
- » Include safeguarding as part of internal or grant-portfolio related reflection and learning processes, without adding burden to grantee partners.

Collective Transformation

- » Encourage and influence counterparts at other funding institutions to be more open, transparent and accountable on safeguarding matters.
- » Collaborate and share learning with other funders, safeguarding practitioners and the wider sector to build knowledge about safeguarding within different geographies and programmatic focus areas.

Commitment Four:

Set proportionate requirements and expectations



Outer Ring: Grant-Making Practices

Commitment:

We commit to ensuring our safeguarding expectations throughout the grant making cycle are proportionate and recognize the context, risk, size and scope of grantee partners' organizations and proposals.

Behaviours to meet this commitment

Avoid

- » Automatically rejecting proposals with a higher level of safeguarding risk. Instead, consider how these risks are managed prior to making any decision on funding.
- » Automatically rejecting applications from organizations who have experienced serious safeguarding incidents in the past. Instead, seek to understand how the incident was managed and the learning or improvements that have been made.
- » Rigid expectations on wording or requirements on policy formats as this can lead to duplication of policies simply to meet the requirements of each individual funder.
- » Changing your safeguarding expectations or requirements without communicating these or providing adequate notice so that organisations can respond to changes.

Why this commitment is important

Funder expectations can act as a powerful incentive for organisations to develop or strengthen their policies and practices that keep people safe. However, it is important that any checks or requirements set by funders do not place an unnecessary burden on grantee partners and are proportionate and realistic to the level of risk, size of funding, and context.

Must Haves

- » Clearly articulate your safeguarding expectations and requirements and communicate these in accessible ways to existing or potential partners.
- » In your communications, be clear about which requirements are non-negotiable or will result in applications being rejected to avoid organisations spending time applying for funding when they don't have the required measures in place.
- » When reviewing safeguarding arrangements, consider the time and resources needed to respond to requests for information and ensure requests are proportional and necessary, given the level risks in the activities that may be funded.
- » When reviewing safeguarding arrangements, be flexible in how organisations meet your requirements, recognising that policies, procedures and practices should be tailored to the organisation, their specific context and ways of working.
- » If you have safeguarding requirements once funding is in place, ensure these are documented in your terms and conditions or grant agreements.

Commitment Four:

Set proportionate requirements and expectations

Going Further

- » Wherever possible, enter into dialogue with (potential) partners to understand how their safeguarding may work in practice - both during application assessments and once funding is in place.
- » If you identify gaps in safeguarding, support partners to put in place a plan with clear milestones to address any gaps and improve practices (see also commitment 6).
- » If organisations are not approved for funding due to gaps in safeguarding, provide feedback to help organisations learn and improve practice in the future.
- » Once funding has been agreed, include information on your safeguarding expectations in onboarding or initial meetings with new grantee partners to ensure requirements are understood.

Collective Transformation

- » Align requirements with other funders to avoid duplication or confusion around what is expected.

Commitment Five:

Allocate resources for safeguarding



Outer Ring: Grant-Making Practices

Commitment:

We consider safeguarding-related costs as necessary and legitimate. We commit to understanding the costs involved and supporting proportionate resourcing of safeguarding within our partners.

Behaviours to meet this commitment

Avoid

- » Placing unnecessary on partner capacity by imposing generic training or requiring compliance with generic guidance that hasn't been adapted to context since this is often of little value and may be ill-fitted to organisational needs.

Must Haves

- » When designing new funds, clearly define what resources (financial, non-financial, technical) are available to support safeguarding in grantee partners (see also Commitment 2).
- » When publicising or sharing information on grant funding, communicate clearly what resources are available and whether organisations can include safeguarding in budgets.
- » Allow partners to include safeguarding within budget proposals if they identify this as necessary to deliver their work safely.

Why this commitment is important

Safeguarding requires time, financial resources and skilled personnel. Yet, too often, the true cost of safeguarding is poorly understood by funders and grantees, resulting in the persistent under-resourcing. Explicit consideration of grantee partners' resourcing needs helps ensure the appropriate allocation of staff time and resources needed to implement safeguards effectively.

Going Further

- » Encourage partners to raise or discuss safeguarding costs in order that funders learn about and can support partners to address resource needs in a timely manner.
- » Take a flexible approach that allows you respond to emerging needs or changing risks within partners (e.g. flexibility on milestones or project activities, enabling partners to reallocate budgets, etc)
- » Put in place contingency funds that can be allocated if grantee partners encounter emergencies or unexpected needs; for instance, to cover the cost of investigations or survivor support following an incident, or if their context has rapidly changed.
- » Fund or facilitate access to relevant training and technical support to build partners' safeguarding capacity, collaborating with partners to ensure the training and support is tailored to their needs and context.

Collective Transformation

- » Fund or co-fund services to support, build and strengthen the safeguarding capacity across the wider ecosystem (e.g. increasing availability of high-quality training, investigations, peer-learning initiatives).

Commitment Six:

Build partnerships that support safe practice



Outer Ring:
Grant-Making Practices

Commitment:

We commit to fostering communication and relationships that allow grantee partners to be honest about safeguarding needs, gaps, risks and incidents throughout the grant cycle.

Behaviours to meet this commitment

Avoid

- » Overburdening partners with excessive monitoring or requests for information as this can place additional burden on grantee partners and undermine trust; although funders should still seek assurance about practice when necessary.

Must Haves

- » Recognize the inherent power dynamic between funders and grantee partners and ensure that communications take this into account and seek to minimise the impact it may have.
- » When discussing safeguarding, acknowledge grantee partners' expertise and allow them to determine their safeguarding practices without imposing a pre-determined approach.
- » Encourage partners to communicate any changes in safeguarding needs and gaps, especially if their context or operating environment has drastically changed.
- » Check in with partners when there are significant changes in activities, context or organisational structure to re-evaluate risks, and understand any changes in their safeguarding needs or approaches.
- » Revisit safeguarding when renewing funding to ensure that expectations and arrangements remain relevant and up to date.

Why this commitment is important

Safeguarding risks are not static - organisational realities and operating context can change, and this can affect the level of safeguarding risk and the ability of partners to manage those risks. For grantee partners, this means continuously monitoring and reviewing safeguarding to ensure their measures remain relevant and effective. For funders, it means being alert to changes that may impact safeguarding and ensuring that safety of funded work is considered throughout the grant cycle, not just at due diligence stage.

Going Further

- » Develop trust-based relationships with grantee partners, creating space for ongoing, meaningful dialogue about safeguarding throughout the grant cycle.
- » If you have identified gaps in safeguarding at application stage, work collaboratively with partners on a plan with clear milestones to monitor progress (see also Commitment 4).
- » Recognise that safeguarding practices may shift as laws and regulations evolve; check in with partners to see whether they require any support to meet new legal requirements.
- » Include safeguarding considerations within partner visits to build a better understanding of the context and how safeguarding works in practice; ensure that any partner visits are well planned and power dynamics are mitigated.

Collective Transformation

- » Advocate to peer funders to view safeguarding through the lens of their grantee partners' needs, gaps and risks.

Commitment Seven:

Support incident response



Outer Ring:
Grant-Making Practices

Commitment:

We commit to responding to safeguarding incidents involving grantee partners with sensitivity - by respecting capacity, confidentiality, context, our role as a funder and prioritising safety over our reporting needs. We will treat incidents as opportunities for mutual improvement and learning.

Behaviours to meet this commitment

Avoid

- » Automatically withdrawing funding when a partner reports an incident as this can limit the partner's ability to respond to the incident and may create risk of further harm.
- » Giving unqualified advice or directing the response, recognising that funders may have limited knowledge of the context and only partial information about the incident.
- » Requesting identifying details of the individuals involved (survivors, witnesses, subject of complaint) or other information that could breach confidentiality.
- » Imposing a strict incident reporting timeline (e.g. 24-72 hours) as this places additional burden on partners and may take away time from focusing on their responses to the incident and to survivors.

Must Haves

- » Develop and communicate your incident reporting requirements, including why you require reporting, what types of incidents should be reported, how to report the incidents and within what timescales. Give clear examples wherever possible.
- » In addition to explaining reporting requirements, define and communicate how you will respond, including whether you may require further information to verify actions taken by your partners.

Why this commitment is important

Even where strong safeguards are in place, harm can still occur. Reporting safeguarding incidents to funders can help ensure that these incidents are taken seriously, action taken and used as opportunities to learn and strengthen practices. However, it is essential that funders recognise the legal, social and cultural realities that shape the response and respect the boundaries of their role.

- » Proactively address fears that funding may be automatically withdrawn, by acknowledging that incidents can occur in any organisation and establishing clear, proportionate criteria for suspending funding.
- » Always acknowledge incident reports shared by partners, even if you do not require any further follow up or information.
- » Respect the confidentiality of reported incidents by limiting the amount of information you request and ensuring that information is held securely, in line with data protection protocols.
- » Recognize that reporting to funders can divert time and resources away from managing the response. Ensure that your requests for information are proportionate and do not compromise partners' ability to respond to the issue.
- » Allow partners to lead the response in line with their policies, procedures, local laws and knowledge of the case. Verify if necessary.
- » Ensure your responses and communication reflect an awareness of how serious incidents and trauma can affect those involved, including the organisation handling the incident.

Commitment Seven:

Support incident response

Going Further

- » Where needed, provide additional funding to cover additional costs associated with the response - for example, to cover the costs of investigations, survivor-support or additional technical expertise (see also commitment 6).
- » Offer partners space to debrief after the response or investigation of an incident to identify lessons learned, risks, gaps and impact on ongoing projects.
- » Regularly review the patterns and themes emerging from incidents in grantee partners and use learning to inform improvements in your own approach to safeguarding.
- » Where requested by or agreed with the grantee partner, coordinate with other funders to reduce the burden on the partner who might be reporting an incident to multiple funding agencies.

Collective Transformation

- » Align reporting requirements and reporting formats with other funders to ensure consistency and make incident reporting simpler for grantee partners.
- » Consider sharing (anonymised) lessons learned from incidents reported to you with grantee partners, peer funders and the wider sector to support improvements in the sector more widely (see also Commitment 3).
- » Invest in building the capacity of the sector to respond to incidents (e.g. increasing availability of high-quality investigators, survivor support services).