



Funder Safeguarding Collaborative

Listening · Learning · Practicing Trust

Funder Approaches to Safeguarding

Challenges, positive practices, and opportunities for collaboration

Funded by:





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We would like to thank the many trusts, foundations, charities and independent experts who took time to participate in this study. We are grateful for their willingness to speak openly about the challenges they face and to share insights into positive practices that can help build organizational cultures and practices that keep people safe from harm.

About the Funder Safeguarding Collaborative:

The Funder Safeguarding Collaborative (FSC) promotes collaboration, listening, and learning among funders and organizations to support and strengthen safeguarding practices globally. The Collaborative connects funders to safeguarding expertise, provides high-quality, support; and invests in initiatives to advance safeguarding globally.

About Elevate Children Funders Group:

Elevate Children Funders Group (ECFG) aims to advance philanthropy that supports children facing adversity. ECFG focuses on the full lifespan of children and youth affected by adversity, from birth to adolescence with a focus on children facing the threats of violence, abuse, exploitation and neglect.



Executive Summary

The ability of charitable organizations to safeguard communities and protect their staff from abuse has been the subject of intense media and political scrutiny in recent years. Although trusts and foundations have limited contact with vulnerable populations, the way funders approach safeguarding has also come under scrutiny. An inquiry by the UK's International Development Committee criticized donor agencies for failing to prioritize safeguarding and warned that a chronic lack of funding was one of the main obstacles to progress (IDC, 2018).

Since then, trusts and foundations have come together to try to identify ways in which funders can make a positive contribution to keeping people safe. This included a series of events to explore the role of funders in safeguarding; the creation of a safeguarding working group by the Elevate Children Funders Group; and the development of a safeguarding framework for funders by ACF (ACF, 2018). Most recently, the Funder Safeguarding Collaborative was launched with the aim of strengthening safeguarding practices globally by promoting collaboration, listening, and learning among funders and the organizations they support.

This study documents the learning which has merged from these initiatives. It considers how funders integrate safeguarding into the grant-making cycle: from assessing applications, to monitoring safeguarding and responding to safeguarding concerns reported by grantees. Recognizing funders as charitable institutions in their own right, this study also considers how safeguarding practices have been implemented within funder institutions in order to create a safe environment for staff and others connected with their work. Finally, it identifies opportunities for collaboration and greater alignment between funders to inform the work of the Funder Safeguarding Collaborative, contributing to the Collaborative's vision of a world where organizational cultures and practices keep people safe from harm.

To date, there have been very few empirical studies examining the role of funders. This study begins to address this gap by highlighting some of the challenges inherent in funders' approaches to safeguarding and then offering concrete recommendations to help funders make a positive contribution to keeping people safe.

A Note on Terminology

Safeguarding: This study adopts a broad definition of safeguarding. It considers measures aimed at preventing and responding to all forms of harm, abuse and exploitation. Rather than restricting safeguarding to the protection of any specific group, this study considers efforts to safeguard all individuals who come into contact with funders and the organizations they support.

Funder: an umbrella term to cover a broad range of trusts and foundations who include grant-making as a core component of their organizational mission. This includes private, family, corporate and community trusts and foundations as well as intermediary funders. Although the study does not explicitly explore the approach taken by bilateral or government funders, the findings of this study are still highly relevant to these agencies.

Grantees: all organizations who receive grant funding to support their work, irrespective of location. This term encompasses service delivery and non-service delivery organizations. It also includes organizations of different sizes and structures, from small community-based groups to large international organizations.

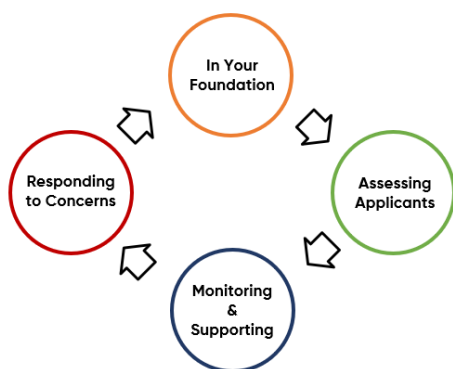
Applicants: all organizations who apply for grant funding. Again, this encompasses organizations of different sizes and structures and with different organizational missions and ways of working.

Key Findings

This study obtained evidence from three different sources aimed at capturing the experiences of funder agencies, grantees and sector experts. This included:

- A desktop review of relevant literature.
- An online survey with funders and the organizations they support.
- A series of focus group discussions conducted with funders and sector experts in Africa, Asia, Europe, Latin America and North America.

The findings of this report highlight challenges and positive safeguarding practices in four key areas:



- Assessing applicants.
- Monitoring and supporting grantees.
- Responding to concerns.
- In your foundation.

There was considerable consistency in both the challenges and positive practice principles which emerged as significant across these four areas of funder practice. While each aspect of safeguarding is considered separately in the remainder of this report, the summary below is organized according to the different cross-cutting themes, highlighting the interconnections between different areas of funder safeguarding practice.

i. Underlying Challenges

Challenge: Unclear and Inconsistent Communication

Assessing Applicants: At present, there is a lack of consistency in how funders define ‘safeguarding’ and the measures they expect organizations to have in place. This inconsistency creates confusion and uncertainty, particularly for organizations based outside the UK, where the term ‘safeguarding’ is often unfamiliar. It also increases pressure on organizational resources as applicants must fulfil different requirements depending on the needs and priorities of each individual funder.

Monitoring and Support: Although many funders stipulate their safeguarding requirements within funding agreements, these documents are often legalistic and may only be read by a small number of staff. While the aim is to build a shared commitment to safeguarding, relying on funding agreements in isolation is likely to be insufficient.

Responding to Concerns: There is considerable inconsistency around what types of safeguarding incidents funders expect grantees to report and the level of information which they require. While the lack of clarity can result in over-reporting, it can also make grantees reluctant to report cases as they are not confident that funders have appropriate systems in place to manage highly sensitive information.

Challenge: Unrealistic Expectations

Assessing Applicants: While funders acknowledge the importance of ‘proportionality’, many are unsure how to implement this in practice. Onerous or overly bureaucratic assessment requirements may deter some organizations from applying. Equally, organizations who do apply may have to divert resources away from service delivery to meet funder demands or alternatively, may simply ‘cut and paste’ policies to ensure compliance.

Monitoring and Support: Funders often overlook the time and resources required to strengthen safeguarding. Where funders do provide resources, this is often restricted to putting in basic measures, such as developing a

policy, but rarely covers the ongoing costs of implementation. Unrealistic timescales magnify the pressure on grantees. This undermines the overall impact of safeguarding measures and may lead to superficial changes which fail to shift organizational culture or practice.

Responding to Concerns: While many funders have increased the reporting requirements for grantees, they have not necessarily acknowledged the additional pressure this creates. In some cases, organizations have to divert time and resources away from managing safeguarding issues in order to respond to donor demands. While funders acknowledge a lack of capacity within organizations to conduct investigations, there is an unwillingness to cover the costs of investigation or ensure access to support for survivors.

In Your Foundation: The desire to ensure money is distributed in a timely manner can make it difficult for funders to conduct meaningful or in-depth assessments of safeguarding. Very few funders have dedicated safeguarding personnel employed, which means the pressure to monitor and support safeguarding falls to grant managers, who can feel over-stretched. Many funders want to provide support to strengthen safeguarding but find it difficult to reach all grantees or find adequate budget to support this.

Challenge: Compliance not Ownership

Assessing Applicants: The tendency for funders to use policies as an indicator of safe practice can mean that policies are developed to ensure compliance with funder requirements rather than as a tool to improve practice. Some organizations may miss out on funding simply because they don't have the required policies even though they may have strong safeguarding practice.

Monitoring and Support: The inherent power imbalance within the funding relationship means that grantees feel compelled to comply with funder requirements even where the proposed changes seem unrealistic or may have limited effectiveness within their context. This undermines local ownership and perpetuates the perception of safeguarding as a compliance issue driven by funders.

Responding to Concerns: Grantees still fear that reporting safeguarding incidents will result in funding being withdrawn, which acts as a disincentive for grantees and whistle-blowers to report cases. Where cases are reported, funders may over-step their role, initiating actions which undermine the grantee and potentially expose survivors and witnesses to additional risk.

In Your Foundation: The lack of direct contact between funders and vulnerable populations means that some staff still do not understand the importance of implementing safeguarding measures within their funding institutions. Although this is changing, more needs to be done to encourage a sense of ownership within funder agencies.

Challenge: Gaps in Funder Knowledge

Assessing Applicants: It can be difficult for funders to ensure all staff feel confident and equipped to assess safeguarding, particularly where grants are issued across diverse contexts and thematic areas. Without sufficient knowledge, there is a risk that assessors take a 'tick box' approach rather than considering what is reasonable and proportionate for each applicant.

Monitoring and Support: A lack of confidence amongst grant managers can act as a barrier to monitoring and supporting safeguarding. While employing a dedicated safeguarding officer can be helpful, funders need to be careful to avoid an over-reliance on specific individuals and ensure that grant managers are provided with adequate support to help them to integrate safeguarding into their work.

Responding to Concerns: Funders recognize that not all staff feel confident in assessing risk or knowing how to respond to concerns. The lack of knowledge is particularly problematic when responding to cases in humanitarian or development settings as funders do not fully understand potential risks or the challenges that exist in accessing services for survivors.

ii. Positive Practice Principles

Positive Practice Principle: Clear Communication

Assessing Applicants: Creating an opportunity for dialogue with applicants was identified as the most effective approach to improving the quality of assessment. A discussion-based approach is less demanding on the applicant and helps move beyond tick-box compliance. While it may not be realistic for all funders to adopt a dialogue-based approach, improvements can be achieved by being more transparent about expectations and inviting applicants to explain their approach to safeguarding within the application process.

Monitoring and Support: Creating opportunities for two-way dialogue was also identified as an effective strategy to monitor and support safeguarding once funding is approved. Integrating safeguarding into monitoring reports, calls with grantees and visits means that progress can be acknowledged, and difficulties tackled as they arise. It also helps frame safeguarding as a critical part of programme delivery rather than an add-on.

Responding to Concerns: Organizations feel more confident reporting safeguarding incidents when funders have clear protocols and procedures in place. Funders need to clearly communicate what information they require and how this sensitive data will be managed. In addition to communicating *what* is expected, it is important that funders communicate *why* they require reporting and how this fits with their values.

Positive Practice Principle: Realistic Expectations

Assessing Applicants: Rather than expecting a 'perfect' system, funders need to recognise safeguarding as a continual journey of improvement. This helps ensure that assessments are realistic and may also improve the accuracy of assessments as applicants may be more honest and open if they feel that the funder understands the challenges they face.

Monitoring and Support: Embedding safeguarding is best achieved through incremental improvements over time. A realistic timescale for change is likely to be between six months to two years, depending on the capacity of the organization. Providing funding for the costs of implementation is essential to ensuring that improvements are sustainable and realistic.

Responding to Concerns: There was consensus that funding should not be removed where grantees are taking the issue seriously and are trying to address concerns. Indeed, rather than removing funding, there is a need for funders to help grantees cover the costs of responding to cases, including the costs associated with conducting investigations and ensuring access to services for survivors.

In Your Foundation: This study demonstrates the interconnected nature of safeguarding and suggests that a more integrated approach may help reduce the pressure staff feel at different stages of the grant making cycle. Instead of viewing each element of the grant-making process as a one-off event, safeguarding should be viewed as an ongoing process of learning and engagement.

Positive Practice Principle: Organisational Ownership

Assessing Applicants: Rather than checking compliance against a pre-defined set of requirements, it is important to assess what is reasonable and relevant for each organization. Making assessment criteria more open helps ensure funders move beyond mere policy compliance and increases flexibility that can accommodate differences in approach that respond to the specificities of the local context.

Monitoring and Support: There is a need to move from 'teaching' grantees about safeguarding to valuing and supporting existing good practice. This includes strengthening practice by encouraging peer-to-peer learning rather than relying on external 'experts'. Focusing on existing strengths increases organizational ownership and helps ensure changes are more relevant as they are founded on practical experience.

Responding to Concerns: Rather than auditing compliance against a pre-defined set of actions, it is important to consider the complexities of each case. Rather than imposing solutions, funders should encourage organizations to follow their own procedures and allow responses to be locally led.

In Your Foundation: Institutionalizing safeguarding within any organization takes time and requires sustained effort to embed awareness and understanding. The process does not need to be bureaucratic and promoting regular internal dialogue about safeguarding can be helpful. Engaging senior leadership is important to promote organizational buy-in and support for safeguarding.

Positive Practice Principle: Educated and Informed

Assessing Applicants: Funders should carefully consider who conducts assessments and ensure all assessors have received safeguarding training. For overseas funding, knowledge of the local context is important, and assessments may be stronger when completed by someone based in the region.

Monitoring and Support: Grant managers need to be provided with training and support to feel confident and equipped to champion safeguarding in their discussions with grantees.

Responding to Concerns: If funders are to contribute to effective, survivor-centred responses, it is important that their teams have appropriate knowledge and experience. Having a designated individual to respond to concerns is helpful, but this may not be possible for all funders. As a minimum, staff who are required to respond to concerns should receive adequate training and have access to advice and support.

In Your Foundation: Training for all staff is important, to build both knowledge of the issues and understanding of how safeguarding supports the vision and values of the organization.

iii. Opportunities for Collaboration

This study identified four key areas of potential collaboration which are likely to have a significant impact on funder efforts to strengthen safeguarding practices globally.

1. Encourage Cross-Sector Dialogue

Building on the need for clear communication as one of the best practice principles for funders, the Funder Safeguarding Collaborative could play an important role in encouraging constructive dialogue between funders, the organizations they support and the communities they serve. This will help ensure the Collaborative has a holistic understanding of the safeguarding challenge and the approaches which are most effective in promoting change.

Recommendation: *In line with its commitment to shifting power, the Collaborative should create opportunities for individuals and organizations from across the sector to:*

- *contribute to the design and delivery of services.*
- *influence the strategic priorities and direction of the Collaborative.*
- *hold the Collaborative to account, by proactively seeking feedback about the impact of any work it carries out.*

2. Promote Greater Alignment

Building on the principle of realistic expectations, the Funder Safeguarding Collaborative could play an important role in promoting greater alignment between funders to reduce the unnecessary duplication of effort caused by overlapping and inconsistent funder requirements. Priority areas include:

- the alignment of assessment criteria
- the need for a clear and consistent framework for funder reporting
- reaching agreement around what 'proportionality' means in practice.

However, efforts to achieve greater alignment must respect different funder capacities and seek practical solutions that a broad spectrum of funders can support.

Recommendation: *Rather than imposing compliance with one set of standards, the Funder Safeguarding Collaborative should promote broader alignment by:*

- *bringing funders and implementing organizations together to identify principles and practices that are achievable by a broad spectrum of funders*
- *promoting research and evaluations to identify the most effective approaches to safeguarding and then sharing these across the network.*

3. Facilitate Investment

In addition to promoting greater alignment, the Funder Safeguarding Collaborative can also help ensure that funder expectations are realistic by facilitating greater investment in safeguarding. This extends beyond simply encouraging funders to allow organizations to include safeguarding costs in their budgets, to also promoting wider investment to strengthen the safeguarding infrastructure. Key priorities include:

- funding to develop regional consultancy and capacity building support in different regions.
- funding to train local investigators.
- funding to strengthen support services for survivors.

Recommendation: *The Funder Safeguarding Collaborative can act as a conduit for funders to pool funding with the aim of addressing gaps in support services for safeguarding. Although this will inevitably be influenced by the priorities of members, it is important that decisions are informed by discussion with implementing organizations and communities to ensure that investment is targeted towards areas of greatest need and where it is likely to have the most significant impact.*

4. Cultivate a Learning Culture

The Funder Safeguarding Collaborative can help ensure that funders have access to the knowledge and skills they need through cultivating a learning culture across the network. Responses to this study suggest that a number of different strategies are worth exploring. These include creating a resource library to connect funders to research and best practice guidance, offering webinars and peer-to-peer learning spaces, providing access to specialist safeguarding advice and expertise, offering training tailored to the needs of funders and, creating a community of practice for funder safeguarding leads.

Recommendation:

- *The Collaborative should provide a range of different learning opportunities, recognizing that funders have diverse needs and may value access to different types of support.*
- *The Collaborative should facilitate opportunities for funders to learn from each other as well as ensuring access to specialist expertise where required.*
- *To ensure sensitivity to safeguarding in diverse contexts, the Collaborative should ensure the learning opportunities are developed and supported by experts from different geographical contexts and with experience of strengthening safeguarding across different thematic areas.*

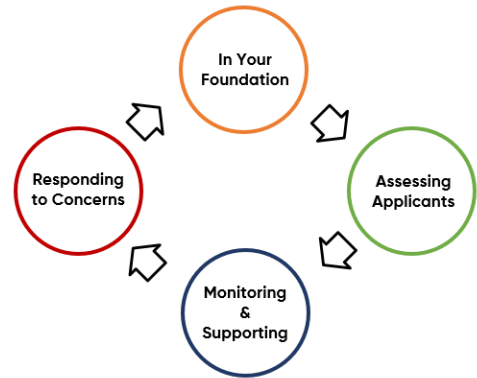


Methodology

This study aimed to answer two central research questions:

- i. *How can funders promote cultures and practices that keep people safe, within their own organization and within the organizations they fund?*
- ii. *What opportunities exist for greater collaboration and alignment between funders while respecting the unique priorities and practices within different organizations?*

Drawing on [ACF’s Safeguarding Framework for Funders](#), this study considers how funders integrate safeguarding into the grant making cycle: from assessing funding applications; to monitoring and supporting safeguarding once funding has been approved; and responding to safeguarding concerns reported by grantees. Finally, recognizing that funders are charitable organizations in their own right, this study also considers how safeguarding practices have been implemented within funder institutions in order to create a safe environment for staff and others connected with their work.



Evidence was obtained from three different sources aimed at capturing the experiences of funder agencies, grantees and sector experts.

- i. **Literature Review** – To date, very few empirical studies have explored funder approaches to safeguarding. Consequently, the review contains limited evidence from primary research but instead captures the learning generated from funder dialogues and grey literature on safeguarding. Details of the literature considered in the review are included in the bibliography at the end of this report.
- ii. **Online Survey** – Two online surveys were conducted to identify challenges and positive practices from the perspective of funders (Funder Survey) as well as the organizations they fund and other sector experts (Sector Survey).

Funder Survey	Sector Survey
Number of Respondents: 10	Number of Respondents: 38
<i>Head Office Location:</i> Europe (6); North America (4)	<i>Head Office Location:</i> Africa (11); Asia (2); Australasia and the Pacific (1); Europe (22); North America (2)
<i>Location of Funding:</i> Africa (10); Asia (5); Australasia and the Pacific (1); Europe (8); Latin America and the Caribbean (2); North America (4)	<i>Respondent Type:</i> NGO (4); International NGO (18); Sector Experts (14)

iii. **Focus Group Discussions** – Eight focus group discussions (FGD) were conducted to allow a more in-depth exploration of the key themes emerging from the literature review and online survey. To ensure diverse perspectives were considered, focus groups were conducted with funders and independent experts from Africa, Asia, Europe, Latin America and North America.

Africa	Asia	Europe	Latin America	North America
2 funders based in Africa	2 funders with country offices in Asia	1 funder network	2 funders with country offices in Latin America	4 funders based in North America
4 independent experts	1 international NGO	3 funders based in Europe	1 independent expert	
		9 private sector fund managers	1 funder based in Latin America	

Data was coded in NVivo and findings developed using thematic analysis.



Assessing Applicants

Safeguarding is increasingly included in the due diligence checks conducted by funders, with applicants expected to meet certain criteria in order to qualify for funding. Some funders also conduct comprehensive assessments of safeguarding once funding is in place to ensure that their grantees meet best practice standards.

It was clear from the sector survey that assessments can actually play a positive role in helping organizations to strengthen safeguarding practice. When done well, assessments prompt organizations to review their safeguarding policies and procedures, increase awareness of best practice standards, and can build organizational confidence by highlighting areas of positive practice. At present,

however, the approach taken by funders can place a significant strain on organizational resources without necessarily contributing to an improvement in safeguarding practice.

This section outlines some of the key challenges associated with funder assessments of safeguarding before going on to highlight positive practices which could ensure assessments make a more meaningful contribution to improving safeguarding practice.

i. Underlying Challenges

Challenge: Unclear and Inconsistent Communication

Inconsistent definitions: At present, there is a lack of consistency in terms of how ‘safeguarding’ is defined (Rhind & Owusu-Sekyere, 2018; Feather, Martin & Neville, 2020) and there is inconsistency in the assessment criteria established by funders (Sector Survey; FGD). While some funders refer exclusively to ‘child safeguarding’, others require applicants to have measures in place that safeguard both children and adults. This can create difficulties for organizations who work with children as they are unsure how to integrate adult safeguarding into their work (FGD). Equally, however, those working with adults may not see the relevance of safeguarding measures due to its traditional focus on children (FGD). These inconsistencies create confusion and uncertainty for organizations applying for funding (Sector Survey). They also increase the pressure on organizational resources as applicants have to fulfil different requirements depending on the demands of each individual funder (Sector Survey).

“There are mixed messages from different donors, different guidelines...That’s where the confusion takes place. We lack capacity because there are mixed messages coming from different people.”
FGD, INGO Asia

Unfamiliar terminology: The term ‘safeguarding’ does not translate well into other languages (Bond, 2019) and rarely has any foundation in law or regulation outside of the UK. Although organizations may take steps to keep people safe, they do not necessarily recognise these as ‘safeguarding’ measures and so struggle to demonstrate compliance with funder requirements simply because they are unclear about what is expected (FGD; Bond 2019). Small grassroots organizations are disproportionately affected as they often have less contact with international agencies and may therefore be completely unfamiliar with the concept of safeguarding (FGD).

“We work in 124 countries. When we’re talking about safeguarding, the concept means different things to different people in different countries.”
FGD, Private Sector Provider, UK

Challenge: Unrealistic Expectations

Proportionality: Although there is increasing recognition of the importance of ‘proportionality’, responses suggest that many funders still struggle to implement this in practice (Funder Survey; FGD). Some funders do adjust their

“Everyone has to follow the same process, or at least similar. The mechanisms which you have to follow may be very tough for someone who is receiving just £10,000 while another is receiving £10 million.”

FGD, INGO Asia

assessments based on the size of funding or level of perceived risk (Funder Survey; FGD; CFWG, 2019a; James, 2019), but others worry that lowering the level of due diligence may mean that potential risks go undetected (FGD; James, 2020).

A lack of proportionality at assessment stage can deter some organizations from applying (FGD; Funder Survey; Sector Survey; CFWG, 2019a). Where organizations do

apply, bureaucratic assessments that rely heavily on paperwork can mean that applicants have to divert resources away from core service delivery in order to complete the assessment (FGD; Sector Survey). Alternatively, applicants may decide to simply ‘cut and paste’ policies to meet funder demands as they do not have sufficient time or resources to initiate more meaningful changes (FGD; CFWG, 2019a).

Challenge: Compliance not Ownership

Policies not Practice: Although funders often request safeguarding policies as part of their due diligence checks, policy reviews provide very limited information about how safeguarding is implemented and are not necessarily

“While assessments may be thorough, they are often Western and all linked to paperwork. They are not grounded in practice and don’t address the specificities of the organization or the safeguarding risks.”

Sector Survey, INGO, Europe

an accurate reflection of actual practice (Funder Survey; Sector Survey; CFWG, 2019a; IDC, 2018; Feather, Martin & Neville, 2020). An over-reliance on policies as a benchmark of good practice can mean that policies are simply developed to ensure compliance with funder requirements rather than a tool to improve practice (Sector Survey; FGD; Bond, 2019). It may also mean that organizations with strong safeguarding practice miss out on funding opportunities simply because they haven’t

documented their approach in the required procedures (FGD; CFWG, 2019a).

One-size-fits-all Approach: There was widespread concern that the assessment criteria used by funders are overly rigid and fail to take into account the diversity of organizations who apply for funding (Sector Survey; FGD). For example, assessments frameworks are often designed for service delivery organizations which means that membership organizations struggle to meet the criteria as they are not in direct contact with communities (Sector Survey; FGD). In addition, requirements are often based on practice in the UK and may not be effective or appropriate in other contexts. In Latin America, for example, some organizations take a more holistic approach to keeping people safe, which includes staff welfare and spiritual well-being, but this is almost impossible to capture within narrowly defined assessment criteria (FGD).

“The organizations that are able to tick all the boxes get the funding, whether their practices are good or bad, and the others that might be doing really good stuff might lose out because they’re not able to tick the boxes.”

FGD, Sector Expert, Africa

This one-size-fits-all approach means that organizations with strong safeguarding practices may not qualify for funding if their approach falls outside the narrow safeguarding criteria set by funders (FGD; Sector Survey). Conversely, applicants may decide to implement measures simply to obtain funding, which undermines organizational ownership and perpetuates the perception that safeguarding is nothing more than a funder-driven compliance issue (Funder Survey; Sector Survey; FGD).

ii. Positive Practice Principles

Positive Practice Principle: Clear Communication

Transparent Expectations: In order to ensure that applicants have a reasonable opportunity to meet safeguarding requirements, it is important that funders are transparent about their expectations around safeguarding (FGD). This includes publishing details of their expectations in advance and carefully considering how they explain their requirements so that these are clearly understood (FGD).

- Publish information about safeguarding requirements on funder websites so organizations are aware of what is expected before they apply (FGD).
- Provide a clear definition of safeguarding and, wherever possible, ensure this aligns with the definitions and expectations of other funders (FGD; Sector Survey).
- When asking applicants to answer questions about safeguarding, explain key terms and provide concrete examples to illustrate meaning (FGD; CFWG, 2019a).

Encourage Dialogue: Creating an opportunity for dialogue with applicants emerged as the most effective strategy for improving the quality of assessment (Funder Survey; Sector Survey; FGD; Bond, 2019). A discussion-based approach helps demonstrate that safeguarding is more than a mere compliance issue (Funder Survey) and helps establish an open dialogue around safeguarding with grantees who are approved for funding (Funder Survey; FGD; Sector Survey). A conversational approach also places less pressure on organizational resources and allows greater scope for applicants to explain their approach and convey some of the challenges that may prevent them meeting funder requirements (Sector Survey; FGD).

- Assessors should enter the conversation with a willingness to listen and learn, accepting that they do not understand the nuances of safeguarding in different organizational and geographical contexts (Bond Partnerships; CFWG, 2019a).
- Ask applicants to explain what safeguarding means for them and how it fits with the mission and values of their organization rather than dictating the specific approach that each organization should take (Funder Survey; FGD).
- Assessors should carefully consider who they speak to as part of the assessment. The CEO or fundraising lead may not be able to provide a comprehensive understanding of how safeguarding is implemented in practice (Funder Survey; FGD).
- Visits can be helpful as these allow you to meet different members of the team (Funder Survey; FGD).

Positive Practice Principle: Realistic Expectations

Focus on Improvement: Rather than expecting an 'ideal' or 'perfect' system at assessment stage, there is a need for funders to recognize that organizations are at different stages and improving practice takes place over time (Sector Survey; FGD; Bond, 2019). Framing safeguarding as a continual journey of improvement, helps ensure that assessments are proportional (FGD). It may also improve the accuracy of assessments as applicants may be more open and honest if they feel that the funder understands that challenges or gaps may exist (Funder Survey; Sector Survey; FGD).

- In their communications (written and verbal) with applicants, funders should explicitly acknowledge that organizations are likely to be at different stages in their safeguarding journey and that are not expecting a 'perfect' system to be in place (FGD).
- Funders who provide safeguarding support to grantees should clearly state this as it demonstrates a genuine commitment to ongoing improvement (Funder Survey; FGD; Sector Survey).
- Funders should provide feedback to applicants (Sector Survey). Feedback should highlight areas for improvement while also acknowledging strengths and positive practices as these provide a foundation for the organization to build on (FGD; Bond, 2019).

Positive Practice Principle: Organizational Ownership

Curiosity not Compliance: It may not be appropriate or realistic for all funders to adopt a dialogue-based approach as this depends on their internal systems as well as the size and location of grants (FGD). However, funders can still create an opportunity for applicants to explain their approach by carefully framing their assessment questions and criteria. Rather than seeking compliance with a checklist of pre-defined criteria, assessments can elicit a better understanding of safeguarding if they ask for practice examples and provide space for organizations to explain what is appropriate for their organization and area of work (FGD; Sector Survey).

- Ask for examples of *how* organizations approach safeguarding rather than simply including a checklist of requirements (FGD; Sector Survey; CFWG, 2019a).
- Ask scenario-based questions to gain a better understanding of how measures are implemented in practice (FGD; Sector Survey; CFWG, 2019a).
- Where assessments are based on a review of policies, look for evidence that the policy has been tailored to the specific organization and is not just a generic document (FGD).
- Use checklists or standards to facilitate discussion but avoid imposing requirements that ignore the specificities of the local context (Funder Survey; FGD; Rhind & Owusu-Sekyere, 2018; Walker-Simpson, 2021).



Monitoring and Support

To keep people safe, safeguarding measures must be implemented, strengthened, and reviewed on an ongoing basis. For funders, this implies a need to integrate safeguarding in their monitoring processes rather than simply conducting due diligence checks before a grant is approved. Although many funders who participated in this study included safeguarding requirements within funding agreements, the extent to which they monitor and support grantees to implement and strengthen safeguarding was very inconsistent.

This section outlines some of the gaps and challenges in the way funders approach safeguarding once a grant has been approved. It then outlines some positive practices which help support the implementation and strengthening of safeguarding practice within grantee organizations.

i. Underlying Challenges

Challenge: Unclear and Inconsistent Communication

Once funding is agreed, it is important for grantees to know exactly what funders expect of them in relation to safeguarding (FGD; CWFG, 2019a; CWFG, 2019b; James, 2020). At present, there is a tendency for funders to simply document your expectations regarding implementation within their funding agreements. Although most funders felt that including contractual obligations was important (FGD), there was also concern that funding agreements are overly legalistic and may only be read by a limited number of staff within the organization (FGD). Examples were also provided of Grant Managers communicating expectations which were not consistent with those that were set out in funding agreements (Sector Survey).

“If you’re signing a contract, it’s important that safeguarding is built in. But contracts contain a hundred other things and it’s easy for safeguarding to get lost. Also, contracts are held centrally and don’t reach the people who are actually delivering the work.”
FGD, INGO, Asia

Challenge: Unrealistic Expectations

Unrealistic Timeframes: Improving safeguarding requires a significant investment of time and requiring changes too quickly can be counterproductive. Too often, the timescales for implementing funder requirements are unrealistic and fail to take into account other demands on organizations’ time and resources (FGD; Sector Survey; Bond, 2019). The pressure to achieve change quickly can be overwhelming (Funder Survey) and may lead to superficial changes which fail to shift organizational culture or practice (FGD; Comic Relief & Oak Foundation, 2018).

“Funders need to consider how long we give grantee partners to complete their policy. If we don’t want them to copy and paste from the internet, then this will take time.”
Funder Safeguarding Convening, London

Insufficient Resources: The pressure on grantees is further exacerbated by the lack of financial resources allocated to safeguarding (Walker-Simpson, 2021; Bond, 2019). Although there has been increasing recognition of the need for resources to strengthen safeguarding (Funder Survey; Comic Relief & NCLF, 2018), the provision of funding is still inconsistent (Sector Survey; Funder Survey; Comic Relief & NCLF, 2018; IDC, 2018 Bond, 2019). Where funding is provided, there is a tendency to support organizations to put basic safeguarding measures in place (e.g. covering the cost of initial training or policy development) but an apparent reluctance to cover the ongoing costs of implementation (Funder Survey; Sector Survey; FGD; Bond, 2019; Comic Relief & Oak Foundation, 2018). The failure to provide adequate resources for safeguarding can limit grantees' ability to implement measures, particularly for small organizations who are already operating with very limited resources (FGD; Sector Survey; Walker-Simpson, 2021).

"In some cases, the donor will fund the initial stages such as creating awareness and getting partners to develop policies, but the critical aspects of implementation are not funded. This thwarts efforts to strengthen safeguarding."
Sector Survey, NGO, Africa

Challenge: Compliance not Ownership

Fear of Penalties: The inherent power imbalance within the funding relationship means that many organizations fear funding being withdrawn if they are not compliant with funder requirements (Sector Survey; FGD). Grantees can feel as though they have little control over the changes which are recommended and feel compelled to comply, even if the measures appear unrealistic and unsustainable (Sector Survey; CFWG, 2019b). Too often, existing good practice is over-looked and changes are determined by the funder rather than the organization themselves (Bond, 2019; Walker-Simpson, 2021). This undermines local ownership and perpetuates the perception of safeguarding as a funder-driven, compliance issue (Funder Survey; Comic Relief & NCLF, 2018; BOND, 2019).

"It feels like top-down compliance instead of a journey of improvement. We need to feel that we are in the driving seat rather than it is being pushed."
Sector Survey, NGO, Africa

ii. Positive Practice Principles

Positive Practice Principle: Clear Communication

Transparent expectations: Respondents stressed the importance of funders clearly communicating what they expect from grantees (Sector Survey; James, 2020). It is not enough simply to explain what is expected, promoting a shared commitment to safeguarding is more effective when the funder also explains why safeguarding is important to them and how it fits with their values (FGD). Consequently, it helps if funders can identify other opportunities to communicate safeguarding expectations and encourage discussion about how the requirements affect individual grantees (FGD).

- Include safeguarding within funding agreements but explore other opportunities to explain what is expected and why (FGD).
- Consider integrating safeguarding into the onboarding of grantees, whether in the information sent to them or during initial conversations during the start-up phase, or both (FGD; Comic Relief & NCLF, 2018).

Normalizing the Conversation: As with assessment, creating opportunities for two-way dialogue was seen as a simple and effective strategy to improve the monitoring of safeguarding (Bond, 2019; James, 2020). Respondents recommended integrating safeguarding into existing monitoring practices as “normalizing the conversation” (Funder Survey) helps to ensure safeguarding is viewed as a critical component of programme delivery rather than an additional ‘add-on’ (FGD). A more relational approach gives grantees an opportunity to demonstrate the measures they have in place and allows progress to be acknowledged which increases motivation (FGD; Funder Survey; Sector Survey; James, 2020). Ongoing discussion helped grantees to be more honest about challenges as it demonstrates the funder’s willingness to listen, learn and identify what works best for them in their specific context (FGD; Sector Survey; CFWG, 2020a; Bond, 2019; James, 2020; Walker-Simpson, 2021).

- Integrate safeguarding into ongoing contact with grantees, such as monitoring reports, check-in calls, project visits and partner meetings (FGD; Sector Survey; CFWG, 2019b; James, 2020).
- Visits can be helpful to gain a better understanding of how safeguarding sits within the overall work of the organization and to discuss the challenges in the wider context (Funder Survey; FGD; Walker-Simpson, 2021).

Positive Practice Principle: Realistic Expectations

Improvement over Time: The importance of approaching safeguarding as a continual journey of improvement was stressed repeatedly throughout this study (FGD; Sector Survey). Rather than expecting changes to be achieved immediately, the aim is for safeguarding to be ‘internalised’ within the organization’s culture and day-to-day practice (FGD), which is best achieved through incremental improvements over time (Funder Survey; Sector Survey; Rhind & Owusu-Sekyere, 2018; Bond, 2019; Walker-Simpson, 2021). This may take anything from six months to two years, depending on the needs of the organization (FGD; CFWG, 2019b; James, 2020).

- Timescales for improvement should be tailored to the grantee, acknowledging the other demands on their time and resources (Sector Survey).
- Adjust project milestones or incorporate safeguarding into existing project milestones in recognition of the time and resources involved (CFWG, 2020a).
- Develop a realistic action plan which prioritizes actions and identifies achievable milestones (FGD; Funder Survey; James, 2020; Bond, 2019).
- Acknowledge progress and allow flexibility as challenges may be encountered along the way (Funder Survey; CFWG, 2020a; Comic Relief & Oak Foundation, 2018).

Funding for Safeguarding: It was very clear that providing funding for safeguarding was critical to achieving meaningful change (James, 2020; IDC, 2018; Bond, 2019; Rhind & Owusu-Sekyere, 2018; Walker-Simpson, 2021). Although some funders have already begun to address this by providing supplementary grants or allowing a percentage of the main grant to be allocated to safeguarding (Comic Relief & Oak Foundation, 2018), there is a need for greater consistency in this area. In addition, it is important to provide funding that covers the costs associated with ensuring compliance amongst the implementing partners a grant holder may be working with, particularly when the grantee is working with small grassroots organizations who may require higher levels of assistance (Comic Relief & NCLF, 2018).

- Safeguarding is a critical component of project delivery, so funding for it should be provided as standard rather than as the exception (Sector Survey; IDC, 2018).
- Funding should extend beyond the development of policies to cover the costs associated with implementation (Sector Survey).

Capacity-Building Support: Although sharing best practice guidance can be helpful for grantees (FGD; James, 2020; IDC, 2018), capacity building support is likely to have a much greater impact on practice when it is tailored to the individual needs of each organization (Sector Survey; FGD; Rhind & Owusu-Sekyere, 2018). It is important that support is provided by experts who are familiar with the organization’s area of programmatic intervention and that they understanding the operating context (FGD; James, 2020)

It should be noted that while grantees appreciated capacity-building support, the overwhelming priority was for funders to allocate budget for safeguarding within grants so that organizations could initiate improvements for themselves (Sector Survey).

- Although finding a suitable local expert can be challenging in some regions, the benefits of local expertise justify the additional time and effort involved (FGD; Sector Survey; CFWG, 2020a; James, 2020; Comic Relief & NLCF, 2018; Comic Relief & Oak Foundation, 2018; Walker-Simpson, 2021).
- Capacity building should engage staff at different levels of the organization as this helps deepen awareness and ensure changes are practical and sustainable (Sector Survey).
- Providing capacity building can be costly. Funders may have to take a risk-based approach to prioritise which grantees qualify for this type of support (Sector Survey; CFWG, 2020a).

Best Practice Principle: Organizational Ownership

Strengths-Based Approach: While capacity building was appreciated, this study identified a need to move away from ‘teaching’ grantees to a strength-based approach that values and supports existing good practice (Sector Survey; FGD; Bond, 2019). Focusing on strengths not only increases organizational ownership but ensures changes are more relevant and sustainable as they are founded on existing ways of working (FGD; Walker-Simpson, 2021).

- Allow grantees flexibility in how they define safeguarding and the measures they put in place, so that the approach reflects their organizational mission and values (FGD).
- Ensure monitoring plans allow for progress and successes to be recognized, as this improves motivation and helps sustain momentum (Funder Survey; FGD; CPWG, 2020a)

Peer-to-Peer Support: Recognizing the knowledge that exists within grantee organizations also means that safeguarding can be strengthened through encouraging peer-to-peer learning rather than relying on external ‘experts’ (Sector Survey; FGD; Rhind & Owusu-Sekyere, 2018; Bond, 2019; James, 2020; Walker-Simpson, 2021). A peer-to-peer approach helps ensure learning is grounded in the realities of practice and can open up space for more honest dialogue (FGD; CFWG, 2020a). It is also an area where funders can add real value as they are often fund a broad range of organizations who they link up organizations to share learning and practical experiences (Sector Survey; FGD; Comic Relief & Oak Foundation, 2018).

Implementing peer-to-peer learning opportunities does require some caution, however. The competitive funding environment can inhibit collaboration and sharing, and spaces are more effective where participants are able to build relationships of trust over time (Sector Survey; FGD). Also, in some contexts, certain types of violence may be normalized, and it is important that peer-to-peer spaces are properly facilitated so that these behaviours don’t simply get dismissed as cultural norms (FGD; CFWG, 2020a).

- Explore opportunities to integrate safeguarding into convenings, webinars or other meetings between grantee partners (FGD; Comic Relief & Oak Foundation, 2018).
- Ensure the spaces are properly facilitated, ideally by someone independent (Sector Survey; FGD).
- Openness and trust are likely to improve if learning spaces are facilitated over time rather than as one-off events (Sector Survey).



Responding to Concerns

Overall, there was an acceptance that grantees may be expected to report safeguarding concerns to the agencies that fund them. When managed appropriately, the reporting of concerns can help grantees to think through their response and be a source of support. However, responses to the sector survey suggest that funders have not adequately considered the impact of their reporting requirements on grantees and that poorly considered interventions may mean that funders inadvertently expose those involved to additional risk.

This section outlines some of challenges inherent in funder reporting requirements before going on to highlight positive practices which could strengthen the current approach.

i. Underlying Challenges

Challenge: Unclear and Inconsistent Communication

Lack of Clarity: The sector survey highlighted a lack of clarity around what types of cases funders want reported, what information they require, and how this information will be used (Sector Survey). In some instances, this lack of clarity can lead to over-reporting and the unnecessary sharing of highly sensitive information (Funder Survey; Sector Survey; CFWG, 2020b).

“Lack of experience of safeguarding and the process for managing can be a concern. For example, if in-country confidentiality is breached, it can expose informants to repercussions.”
FGD, Funder, Latin America

Conversely, the failure of funders to provide clear information about their data protection protocols may makes some grantees reluctant to report cases (Sector Survey). Organizations were concerned that funders

demand too much personal information and that this may compromise survivor confidentiality (Sector Survey). This was particularly worrying when the funder is based in the same region as this increased the risks associated with confidentiality breaches (Funder Survey).

Ineffective Systems: The systems for reporting safeguarding issues to funders also adds to this uncertainty about reporting. Organizations shared examples of trying to notify funders of incidents only to find the funder reporting system didn't work (Sector Survey). A number of organizations had submitted safeguarding reports following the correct procedures but never received any form of acknowledgement, creating the impression that funders did not maintain adequate oversight of the safeguarding reports and generating additional anxiety about how sensitive information is handled (Sector Survey).

“I recently worked with a donor and reported something via their safeguarding concerns inbox. I never got a response. The email in the contract and the policy which is published online are different, and the system just doesn't function.”
Sector Survey, INGO, Europe

Challenge: Unrealistic Expectations

Resource Demands: Over recent years, many funders have increased their reporting requirements, which has placed additional pressure on grantee resources (Sector Survey). Although the priority should always be to ensure protection for survivors, in some cases, reporting to funders can actually divert time and resources away from following up the case (CPWG, 2020b). This pressure is magnified when a grantee is working with implementing partners as they are also expected to report

“When investigations happen, all organizations highlighted the fact that they needed training and support. None was given.”
Sector Survey, INGO, Europe

and follow up concerns on behalf of the partner organizations (Sector Survey).

Resource demands are not restricted to the reporting of safeguarding incidents. Funders expect grantees to ensure a robust investigation of allegations but are reluctant to cover the associated costs (Sector Survey; Walker-Simpson, 2021). While funders acknowledged a lack of capacity within some organizations to conduct investigations (Funder Survey), grantees felt there was an unwillingness to cover the costs of training staff or commissioning external experts to conduct investigations (Sector Survey). Similarly, while funders identify ensuring survivor welfare as a priority, grantees felt that funders are reluctant to cover the financial costs of accessing this support (Sector Survey; Walker-Simpson, 2021).

Unrealistic Timescales: When a case is first identified, there is often very limited information available and sometimes it may not even be clear whether the issue actually relates to safeguarding or not (Sector Survey; CFWG, 2020b). This is not always recognised by funders. Some funders expect concerns to be reported with 24 hours and have unrealistic expectations about how much information will be available during the initial stages of a case (Sector Survey).

“Donor timescales can add pressure to already complex and difficult circumstances. It may lead to the process being rushed and compromise the ‘Do No Harm’ principle.”
Sector Survey, INGO, Europe

Funders also have unrealistic expectation about how quickly an issue can be investigated and resolved. The complexity of some cases means that an investigation may take weeks, if not months (CFWG, 2020b). Organizations reported feeling an implicit pressure from funders to reach a resolution quickly, which can lead to hasty decisions that place survivors and others at risk (Sector Survey; FGD; CFWG, 2020b). There was concern that timescales were particularly unrealistic in settings where referral to statutory agencies may be complex or might result in additional risks, and concern that many funders simply don’t appreciate the realities on the ground (Sector Survey).

Challenge: Compliance not Ownership

Withdrawal of Funding Although there is growing recognition that strong safeguarding is likely to mean that more incidents come to light (CFWG, 2020b; Rhind & Owusu-Sekyere, 2018; James, 2020; IDC, 2018), grantees still fear that reporting will result in their funding being withdrawn (Funder Survey; Sector Survey; Comic Relief & NCLF, 2018; CFWG, 2020b; Walker-Simpson, 2021). Although cases may relate to the conduct of one individual, or the response may be constrained by factors beyond the control of the grantee, organizations still worried that they would be penalized (Sector Survey; Bond, 2019). Many felt that decisions are based on risk to the funder’s reputation rather than on a fair assessment of the circumstances in each case (Sector Survey; CFWG, 2020b).

“Fear by grantees that they will lose funding if they are fully honest about the safeguarding gaps and challenges that they are dealing with.”
Funder Survey, Funder, North America

Overall, both funders and grantees felt that the withdrawal of funding was ultimately counter-productive (Funder Survey; Sector Survey; FGD; Bond, 2019). If a case highlights gaps in grantee safeguarding, withdrawing or suspending funding doesn’t help the organization strengthen their safeguarding and may compromise their ability to follow up and investigate concerns (BOND, 2019; Sector Survey). In addition, it acts as a disincentive for grantees to alert funders about cases, it may stop survivors coming forward for fear of losing services, and it may inhibit staff from reporting concerns for fear that lost funding may place their job at risk (Sector Survey; FGD; IDC, 2018).

Donor Interference: Although respondents recognized that some reporting may be required, they were concerned that funders can overstep the boundaries of their role and interfere in the progress of the case (Sector Survey; FGD; Walker-Simpson, 2021). Examples were given of funders intervening to report cases to the authorities or initiating their own investigation, which undermines the grantee and may affect the relationships they have with local agencies (Sector Survey). In some contexts, funders who push organizations to report allegations to the police may actually expose survivors and witnesses to additional risk of harm (FGD).

“When donors are too involved, it affects the autonomy of local partners and is contrary to the localization agenda.”
Sector Survey, NGO, Europe

ii. Positive Practice Principles

Positive Practice Principle: Clear Communication

Reporting Protocols: Safeguarding incidents are, by their very nature, highly sensitive and organizations feel more confident reporting safeguarding incidents when funders have clear protocols in place (Sector Survey). It is not enough to simply state that reporting is required, the funder needs to clearly communicate what information they require and how sensitive data will be managed (Sector Survey; FGD; CPWG, 2020b).

- Funder protocols should state what types of safeguarding incidents should be reported, what information is required, and why this is necessary (FGD). These protocols should be consistent with national laws and regulations (FGD).
- They should spell out how confidentiality and data protection will be maintained, including how the information will be stored, who will have access to it and whether it will be shared with any other parties (FGD; Sector Survey CFWG, 2020b).
- Recognizing that funders are not responsible for investigations, the amount of personal information requested should be kept to a minimum (Sector Survey).
- Timescales for reporting should be reasonable (Sector Survey; CFWG, 2020b). Requiring reporting within 24 hours was considered unreasonable (Sector Survey).
- The threshold for suspending or terminating funding should be clearly articulated (FGD). If the funder aims to avoid terminating funding, this should be explicitly stated (CFWG, 2020b).
- It is important that the system for reporting works effectively and incident reports receive a response, even if this is a simple acknowledgement of receipt stating that no further action will be taken by the funder (Sector Survey).

Communicating Why: Although funders may include details of their reporting requirements in funding agreements with grantees, this study demonstrates the importance of funders communicating *why* they require reporting rather than just *what* is expected (FGD; Funder Survey; CPWG, 2020b). It is important that funders demonstrate a justifiable rationale for requesting sensitive information and that this is consistent with their priorities and values (FGD; CFWG, 2020b).

It is important to note that some funders do not require grantees to report safeguarding incidents. Instead, they encourage grantees to share concerns as part of the ongoing dialogue that takes place during monitoring. In this way they aim to move away from the binary position of report or not reporting, to a position where safeguarding concerns are viewed as one of the many challenges that may emerge during the lifetime of a grant (FGD). Funders who had implemented this approach acknowledged that this was only effective where the partners had high levels of trust and felt that the funder could and would offer help and support (FGD).

- There should be a clear rationale for requiring safeguarding incidents to be reported and this should be reflected in communications to grantees (FGD; Funder Survey; CPWG, 2020b).
- Funders should explicitly communicate that they are not expecting perfection from grantees and acknowledge that safeguarding incidents may arise in any organization (FGD).
- If funders decide not to require reporting, discussion of safeguarding concerns should be encouraged within ongoing dialogue with grantees as part of grant monitoring (FGD).

Positive Practice Principle: Realistic Expectations

Focus on the Response: Respondents repeatedly stressed that reporting depends on trust which requires proactive efforts from funders to ‘de-fear the relationship’ and address the perception that funding will be removed if cases are reported (FGD). While some funders felt the right to suspend or withdraw funding was important, (FGD; Funder Survey), most respondents felt that funding should not be removed if the grantee is taking the issue seriously and initiating action to address the concerns (FGD; Funder Survey). Although there may be gaps in safeguarding that need to be addressed, continuing the funding relationships makes it more realistic and achievable for organizations to initiate these changes (FGD).

- When discussing safeguarding incidents, focus on the organization’s response rather than the incident itself in assessing whether continued funding is appropriate (FGD).
- If cases highlight gaps in organizational safeguarding, consider providing resources and support to address weaknesses rather than removing funding (Sector Survey; Funder Survey; CFWG, 2020b).
- Decisions on whether to suspend funding should be based on a clear assessment of risk, including the risks that might be generated to the survivor and communities by the removal of funds (Sector Survey).
- If funding is suspended while issues are resolved, consider releasing some funds to allow critical work to continue and to ensure the safeguarding incident is addressed (CFWG, 2020b).

Provision of Resources: Respondents urged funders not just to provide resources for day-to-day safeguarding implementation, but also to help cover the costs of responding to incidents (Sector Survey; Walker-Simpson, 2021). In some regions, strengthening the quality of response does not simply imply providing funding to cover the grantee’s costs but wider investment to improve the availability of services for survivors (FGD; Walker-Simpson, 2021).

- When cases are identified, grantees need support to cover the cost of investigations and to ensure survivors have access to support services (Sector Survey; Walker-Simpson, 2021).
- Funding should be available to train staff in how to conduct investigations or to cover the costs of commissioning and independent investigator (Sector Survey).

Positive Practice Principle: Organizational Ownership

Constructive Conversations: There are many different ways that a safeguarding issue can be resolved and so it is important that the funder remains open-minded rather than imposing solutions (FGD; Sector Survey; Walker-Simpson, 2021). Rather than auditing compliance against a pre-defined set of actions, respondents felt that the role of the funder should be to engage in constructive conversations designed to explore different options, offer support and identify learning (FGD; Sector Survey). When engaging in discussions with grantees, it is important for funders to recognize that they are several steps removed and consequently are not in the best position to determine the response (FGD; Sector Survey; Walker-Simpson, 2021). They should encourage grantees to follow their own procedures (FGD; Sector Survey) and allow them to lead the response (Sector Survey; FGD).

- Ask questions and listen to the grantee's assessment of the situation and the best course of action (Sector Survey; CFWG, 2020b).
- Acknowledge the complexities of each case and recognize that an effective response will not look the same every time (Sector Survey).
- Be mindful of the demand these conversations place on the grantee's time and resources and take care to ensure that funder conversations do not compromise the organization's ability to respond (Sector Survey).



In Your Foundation

Trusts and foundations are charitable institutions and consequently have a responsibility to implement safeguarding measures within their own organizations. Where funders ‘walk the talk’, it helps to convey their commitment to safeguarding, builds credibility and contributes to greater trust and transparency. It is important to acknowledge, however, that funders face similar challenges to other organizations and safeguarding must be implemented in a way that is realistic and sustainable for each individual funder.

This section outlines some of challenges funders face when trying to embed safeguarding within their organizations before going on to highlight positive practices which could support stronger safeguarding practices within funder agencies.

i. Underlying Challenges

Challenge: Unrealistic Expectations

Need for Expediency: The need for expediency to ensure money is distributed in a timely manner can make it difficult for funders to conduct meaningful assessments of safeguarding at the application stage (FGD). Assessments must cover a broad range of issues and adding safeguarding can make assessors feel overwhelmed (FGD). This was a particular challenge in smaller trusts and foundations as due diligence is conducted by a limited number of personnel (FGD).

“The grant assessment cycle incentivizes speed and efficiency. This doesn’t always translate into good safeguarding assessments.”
FGD, Funder, North America

Capacity Constraints: Although many funders want to provide grantees with support to strengthen their safeguarding, this is often constrained by limited staff capacity and budget constraints (Funder Survey; FGD). Very few funders had dedicated safeguarding personnel, which means the pressure to monitor and support safeguarding falls to grant managers. Adding safeguarding to existing responsibilities can leave grant managers feeling over-stretched (James, 2020) and safeguarding may get missed during monitoring as there are so many other areas that grant managers are expected to monitor (Funder Survey; James, 2020).

“We would absolutely love to do more and we’ve talked about taking a funder-plus approach. But we can’t at the moment. It’s a resources issue. It’s an idea we’ve talked about but never actioned.”
FGD, Funder, UK

Although many funders want to provide grantees with support to strengthen their safeguarding, this is often constrained by limited staff capacity and budget constraints (Funder Survey; FGD). Very few funders had dedicated safeguarding personnel, which means the pressure to monitor and support safeguarding falls to grant managers. Adding safeguarding to existing responsibilities can leave grant managers feeling over-stretched (James, 2020) and safeguarding may get missed during monitoring as there are so many other areas that grant managers are expected to monitor (Funder Survey; James, 2020).

Challenge: Compliance not Ownership

Not our Problem: Although attitudes are changing, funders still have to contend with the perception that safeguarding is primarily a concern for service delivery organizations (Funder Survey). Funders who rely on public donations were seen to place a higher priority on safeguarding but this was often related to minimizing reputational risk as, concerns about safeguarding could negatively impact public donations (FGD). There was a consensus that more needs to be done to ensure funders understand their role in keeping people safe, even where their contact with vulnerable populations may be limited (FGD).

“The perception, at least initially, was that safeguarding is not something that we need to worry about given our role as a funder and our set up.”
Funder Survey, Funder, USA

Challenge: Gaps in Funder Knowledge

Assessing Applicants: Although many funders had implemented basic safeguarding training within their organizations, it can be difficult to ensure that all staff feel confident and equipped to assess safeguarding issues (Funder Survey; FGD). Ensuring assessors have adequate knowledge can be particularly challenging for larger funders with grants covering a diverse range of geographical contexts and thematic areas (FGD).

Without sufficient knowledge, there is the risk that assessors use a ‘tick box’ approach rather than considering what is reasonable and proportionate for each applicant (FGD; Sector Survey). The risk of a ‘tick box’ approach was particularly prominent where assessments are contracted out to independent auditors who often approach safeguarding in a similar way to financial compliance, with little acknowledgment of the added complexities involved in keeping people safe (FGD).

“It appears the individual undertaking the process on behalf of the funder is not knowledgeable on safeguarding and so tends to approach it as some mechanical process”

Sector Survey, INGO, Europe

Monitoring and Support: Responses to the funder survey repeatedly identified the lack of specialist expertise within funder agencies as a barrier to monitoring and supporting safeguarding (Funder Survey; FGD). Although funders tended to feel more confident when they employed a dedicated safeguarding officer (Funder Survey; FGD), there was also concern that this could lead to over-reliance on specific individuals rather than supporting grant managers to integrate safeguarding into their own work (FGD; CFWG, 2019c; Comic Relief & NCLF, 2018).

“Even after all this time and everything that has happened, it still feels like it’s early days for a lot of funders. You see that in the number of people who turn up to training. Actually, I think there is still a bit of a fear factor preventing people from getting into this.”

FGD, Funder, UK

Responding to Concerns: There is a particular need for specialist knowledge when responding safeguarding cases due to the risks involved. Funders were worried that their staff did not always have enough knowledge to assess risk and may not feel confident responding to incidents (FGD; Funder Survey). This difficulty was most problematic when funders in the Global North were responding to concerns in humanitarian or development settings and had a limited understanding the specific risks in that context and didn’t recognise the gaps in infrastructure which made the response more complex (Sector Survey; Walker-Simpson, 2021).

“They said the organization had to report to the police but here, it’s putting the children at more danger. In many countries in Latin America, the police, the government, they are the danger.”

FGD, Funder, LA

ii. Positive Practice Principles

Positive Practice Principle: Realistic Expectations

Integrated Approach: This study demonstrates the interconnected nature of safeguarding and suggests that a more integrated approach may help reduce the pressure staff feel at different stages of the grant making cycle. For example, it is difficult to fully understand how an organization approaches safeguarding at assessment stage and this may only become clear over time (FGD). Instead of viewing each element of the grant-making process as a one-off event, the pressure on funder personnel and grantees can be reduced by seeing safeguarding as an ongoing process of learning and engagement (FGD; CFWG, 2019b)

- Acknowledge the limitations of safeguarding assessments and see them as the first step towards understanding the grantee approach, which will develop through ongoing monitoring and engagement (FGD; Funder Survey).
- Rather than relying on reporting requirements as the only mechanism to identify concerns, consider monitoring visits and dialogue with grantees as opportunities to understand potential gaps in safeguarding and build sufficient trust for concerns to be shared (FGD).

Positive Practice Principle: Organizational Ownership

Normalizing the Conversation: It is important that training is not the only strategy funders use to strengthen safeguarding within their organizations. As one respondent stated 'there is no magic bullet' to embedding safeguarding (Funder Survey) and changes are likely to be more effective if safeguarding is integrated into organizational systems and routines so that it becomes second nature (Funder Survey; James, 2020). This is likely to take time, but it doesn't need to be a bureaucratic process. Simply encouraging internal discussions on safeguarding can help build awareness and ensure that safeguarding becomes a normalized component of day-to-day practice (Funder Survey; CFWG, 2019c).

- Involve staff in discussion on safeguarding as part of policy development and/or review as this deepens understanding, helps build ownership and reduces the perception that safeguarding is one person's responsibility (CFWG, 2019c; Funder Survey; FGD).
- Include safeguarding in staff meeting agendas. Providing updates on progress helps maintain momentum and build pride in what has been achieved (Funder Survey; Comic Relief & NLCF, 2018).
- Maintain a log of incidents so that you have a clear sense of the frequency and types of issues that arise (CFWG, 2020b). Use case studies to help challenge that belief that "it can't happen here" (CFWG, 2020b).

Engage Senior Leadership: The engagement of senior leadership, including trustees, was identified as important to ensuring organizational buy-in and support for safeguarding (James, 2020; CFWG, 2019c). Senior leadership can help frame safeguarding as part of the organization's vision and strengthens overall commitment (James, 2020).

- Find a champion at board level to advocate for the importance of safeguarding among their peers (Funder Survey; CFWG, 2019c).
- Provide training to trustees so they understand safeguarding (FGD; Funder Survey; CFWG, 2019c). Using relevant scenarios can be helpful (CFWG, 2019c; Comic Relief & NLCF, 2018).
- Provide senior leadership with regular top-line updates to share successes and ensure they understand the types of risks the organization has to manage (Funder Survey; CFWG, 2020b).

Positive Practice Principle: Educated & Informed

Well-Informed Assessors: In general, assessments are most productive when the assessor has a good understanding of safeguarding and is familiar with the context in which the grantee is operating (Sector Survey; FGD; CFWG, 2019a). This knowledge helps assessors to feel more confident to make informed judgements about what types of safeguarding measures are reasonable and appropriate across different types of organizations, rather than taking a one-size-fits-all approach (FGD).

- Carefully consider who conducts assessments and ensure assessors have all received safeguarding training (Funder Survey; FGD; CPWG, 2019a).
- When funding work in a different country, consider using assessors who are based in the region as they are better placed to assess what is reasonable and appropriate in the local context (FGD; Sector Survey; CFWG, 2019a).

Equipping Grant Managers: Providing training was consistently identified as an effective strategy for embedding safeguarding (FGD; Funder Survey; CPWG, 2019c; Comic Relief & NCLF, 2018). Training not only increases knowledge and awareness but helps grant managers move away from viewing safeguarding as a compliance issue to understanding why it is important and how it aligns with the organization's vision and values (Funder Survey; CFWG, 2019c). It is important that grant managers should not feel under pressure to become safeguarding experts. Rather, that the training allows them to champion and support safeguarding in their discussions with grantees (James, 2020; CFWG, 2019c).

- Provide training that is tailored to needs of funders as this helps staff see how safeguarding is relevant to their day-to-day work (Funder Survey).
- Ensure the training is participatory and conversational so that underlying attitudes and beliefs can be explored (FGD; Funder Survey).
- Use scenarios wherever possible as concrete examples help build understanding (FGD).

Responding to Concerns: In order for funders to contribute to effective, survivor-centred responses, it is important that staff who receive reports have adequate knowledge and experience. Having a designated safeguarding lead is helpful (Sector Survey) but may not be possible for all funders due to the cost implication (FGD). In such cases, it is important to carefully consider which staff are responsible for managing concerns, and to provide them with additional learning opportunities and ensure they have access to support and advice (FGD; Funder Survey).

- Provide specific training around the management of safeguarding concerns, confidentiality and data protection (Sector Survey).
- Safeguarding is a constant learning process and reflecting on cases can help strengthen the funder's response (CFWG, 2019c; FGD).
- Ensure individuals who are responsible for responding to concerns have access to additional support, advice and training (Funder Survey; FGD).



Opportunities for Collaboration

As well as identifying changes that individual funders can make within their own organizations, a key objective of this study was to identify opportunities for greater alignment and collaboration between funders. The recommendations build on the best practice principles outlined in the previous sections.

Although the findings in this section may be of interest to all funders, the recommendations which are offered here are specifically designed to inform the work of the Funder Safeguarding Collaborative

i. Encourage Cross-Sector Dialogue

Building on the need for clear communication as one of the best practice principles for funders, the Funder Safeguarding Collaborative could play an important role in encouraging cross-sector dialogue. In addition to improving their communication with applicants and grantees, there is a need for funders to listen and learn from the organizations they fund and the communities they serve. Top-down approaches mean that the wealth of knowledge that exists within organizations is overlooked and can leave grantees feeling disempowered and unheard (Bond, 2019; FGD). This contributes to the perception that safeguarding is a funder-driven compliance issue and potentially

“In my opinion, it’s important to approach this process and understand safeguarding as a collective learning process. As funders, we are also learning, and we can learn together with others because nobody has the answer.”
FGD, Funder, Latin America

undermining the effectiveness of any changes that are initiated.

By listening to diverse perspectives, funders will be able to obtain a more holistic understanding of the safeguarding challenge and the issues which need to be addressed (NCP, 2020; IVAR, 2017; IVAR, 2018). In addition, individuals and organizations across the sector are best placed to judge the impact of any changes initiated by funders and it is critical that their voices and experiences are at the forefront of any decisions (IVAR 2018).

Recommendation: In line with FSC’s commitment to shifting power, the Collaborative should create opportunities for individuals and organizations from across the sector to:

- Contribute to the design and delivery of services.
- Influence the strategic priorities and direction of the Collaborative.
- Hold the Collaborative to account through proactively seeking feedback about the impact of any measures which are initiated.

ii. Promote Greater Alignment

Building on the principle of realistic expectations, the Funder Safeguarding Collaborative could play an important role in promoting greater alignment between funders to reduce the unnecessary duplication of effort caused by overlapping and inconsistent funder requirements.

This study identified three priority areas for the Collaborative to explore:

“We hear this a lot: ‘Can all you funders just make up your minds and ask us to do one thing?’”
FGD. Funder. USA

- Safeguarding Assessments: There is a need for greater alignment on the criteria used to assess applicants and the measures that grantees are expected to have in place (Sector Survey; FGD; Funder Survey).
- Reporting and Response Protocols: The reporting of safeguarding concerns can be encouraged through developing a common framework to ensure that funder requests for information are reasonable and proportionate. This framework must include guidelines on confidentiality, data protection, and survivor-centred practice (Sector Survey; FGD).
- Proportionality: Despite recognition and support for the concept of proportionality, more needs to be done to explore what it means in practice and identify what ‘good enough’ looks across different organizations and programmes (Funder Survey).

In discussing the options for greater alignment, it was clear that the Funder Safeguarding Collaborative should

“We should also give room to the uniqueness of each funder as we all come to this with our own unique systems, structures and areas of work. Harmonization is key but at the same time we need to hold onto our uniqueness.”
FGD, Funder, North America

avoid imposing a one-size-fits-all approach (Funder Survey; FGD). Funding agencies, like grantees, are unique organizations with their own structures, systems and institutional priorities. Building on learning from past collaborations, efforts to achieve greater alignment must respect different institutional capacities and approaches and seek practical solutions that a broad spectrum of funders can support (NCP, 2020; IVAR, 2020).

Recommendation: Rather than imposing compliance with one set of standards, the Funder Safeguarding Collaborative should promote broader alignment by:

bringing funders and implementing organizations together to identify principles and practices that promote greater alignment.

Continuing to promote research and evaluations to identify the most effective approaches to safeguarding and then sharing these across the network.

This study also explored the possibility of establishing a centralized system for managing assessments and responding to safeguarding incidents as a potential strategy for reducing duplication. While there was some support for this, a number of significant challenges also emerged. As noted above, funders have different systems and processes in place which would make a centralised system more complex. Also, in some contexts, the charity regulator requires funders to carry out their own due diligence assessment and holds them individually accountable for following up safeguarding concerns. Finally, the centralisation of safeguarding functions require a significant investment of time and resources and may be better achieved when the Funder Safeguarding Collaborative is more established.

iii. Facilitate Investment

In addition to promoting greater alignment, the Funder Safeguarding Collaborative can also help ensure that funder expectations are realistic by facilitating greater investment in safeguarding. This extends beyond simply encouraging funders to allow organizations to include safeguarding costs in their budgets, to also promoting wider investment to strengthen the safeguarding infrastructure. Key priorities identified in this study include:

- Funding to develop capacity building in regions where there is limited access (FGD; Funder Survey)
- Funding to train local investigators (Sector Survey)
- Funding to strengthen support services for survivors (Sector Survey)

Recommendation: The Funder Safeguarding Collaborative can act as a conduit for funders to pool funding with the aim of addressing gaps in support services for safeguarding. Although this will inevitably be influenced by the priorities of members, it is important that decisions are informed by discussion with implementing organizations and communities to ensure that the investment is targeted towards areas of greatest need and where investment is likely to have the most significant impact.

iv. Cultivate A Learning Culture

Finally, the Funder Safeguarding Collaborative can help ensure that funders have access to the knowledge and skills they need through cultivating a learning culture across the network. Responses to the online survey suggest that a number of different strategies may be helpful:

- *Resource Library:* At present, there are very few resources tailored to the needs of funders. This study found a clear desire for a resource library that allows funders to share policies and create central repository of good practice (Funder Survey; Comic Relief & NCLF, 2018; Comic Relief & Oak Foundation, 2018).
- *Webinars:* Creating opportunities for funders to meet and share experiences was consistently raised as a priority (Comic Relief & NCLF, 2018; Comic Relief & Oak Foundation, 2018; Funder Survey; Sector Survey; FGD). Creating shared learning opportunities has also been highlighted as an effective strategy by past evaluations of funder collaboratives (IVAR, 2018; IVAR, 2017; NCP, 2020).
- *Access to Technical Expertise:* There was considerable interest in providing funders with access to specialist safeguarding expertise to help them as they develop their approach to safeguarding concerns (Funder Survey; FGD). This was particularly important in supporting funders who are unable to employ dedicated safeguarding personnel (FGD).
- *Funder Training:* Additional training tailored to the specific needs of funders was repeatedly identified as important (FGD). Funders stressed the importance of training being tailored to the needs of funders and exploring the specifics of safeguarding in different geographical contexts and thematic areas (FGD).
- *Community of Practice for Funder Safeguarding Leads:* Creating a network for funder safeguarding leads was not actually included in the survey but emerged as important in the responses to this study (FGD; Funder Survey; Sector Survey). Peer learning spaces can help to reduce isolation and ensure access to support for individuals responsible for strengthening safeguarding within their own organizations (FGD).

Recommendation:

- The FSC should provide a range of different learning opportunities, recognizing that funders have diverse needs and therefore may value access to different types of support.
- The FSC should facilitate opportunities for Funders to learn from each other as well as ensuring access to specialist expertise where required.
- To ensure sensitivity to safeguarding in other contexts, FSC should ensure the learning opportunities are developed and supported by experts from different geographical contexts and with experience of strengthening safeguarding across different thematic areas.

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