EXECUTIVE SUMMARY

Funder Approaches to Safeguarding
Challenges, positive practices, and opportunities for collaboration

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Funder Safeguarding Collaborative promotes collaboration, listening, and learning among funders and organizations to strengthen safeguarding practices globally. www.fundersafeguardingcollaborative.org

Elevate Children Funders Group aims to advance philanthropy that supports children facing adversity, with a focus on children facing the threats of violence, abuse, exploitation and neglect. www.elevatechildren.org
Introduction

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. At present, however, there is very little empirical data to support efforts to improve funder approaches to safeguarding. 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.

Drawing on ACF-FSC 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. 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. 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.

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. 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.

Methodology

This study aimed to answer two central questions:

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

The study was designed to capture the experiences of funder agencies, grantees and sector experts. Evidence was obtained from:

i. **Literature Review** to capture existing learning about funder approaches to safeguarding.
ii. **Online Survey** to identify challenges and positive practices. The survey was completed by 10 funders and 38 NGOs and sector experts.
iii. **Focus Group Discussions** to allow a more in-depth exploration of the key themes. Eight focus groups were conducted with funders, NGOs and sector experts from Africa, Asia, Europe, Latin America and North America.

Data was coded in NVivo and findings developed using thematic analysis.
This study identified four cross-cutting challenges that have the potential to undermine the effectiveness of funder efforts to strengthen safeguarding within their own institution and the organizations that they fund.

i. 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 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.

ii. 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 for funding. Equally, organizations who do apply may have to divert resources away from service delivery to meet funder demands or alternatively, may simply submit ‘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.
iii. 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.

iv. 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.
Positive Practice Principles

In order to address the challenges outlined above, this study identified four positive practice principles which funders can apply in order to strengthen safeguarding within their own institution and the organizations that they fund. This Executive Summary only provides a broad overview of these principles, but the full report which accompanies this study contains concrete, practical steps that funders can take to put these principles into practice.

i. 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.

ii. 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.
iii. 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 ensures 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.

iv. 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.
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. 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 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.

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. 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.

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 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.

iv. **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.

The Funder Safeguarding Collaborative was founded by Comic Relief, Global Fund for Children, The National Lottery Community Fund, Oak Foundation, and Porticus. The collaborative is housed within Global Fund for Children.