

Policy on Safeguarding

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Key policy details

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| Approving authority | CEOs of relevant entities with input from the E-Team / UK Board of Trustees |

1. Introduction

1.1. Objectives

At GlobalGiving we are committed to conducting our work in a manner that is safe for all of our partners, the constituents they serve and any other vulnerable person who we may encounter. We expect our representatives to share this commitment to safeguarding. So the objectives of this policy are:

- To protect people, particularly children, at-risk adults and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with representatives of GlobalGiving. This includes harm arising from:
 - The conduct of staff members and associated personnel who represent GlobalGiving.
 - The design and implementation of GlobalGiving's programs and activities.
 - The content of messages communicated through various GlobalGiving platforms and media.
- To lay out the commitments made by GlobalGiving's senior leadership - see section "2.1. Our Commitment to Safeguarding"
- To inform staff and associated personnel of their responsibilities in relation to safeguarding.

1.2. Scope

The policy applies to:

- All staff contracted by GlobalGiving Foundation and GlobalGiving UK
- Staff members' activities and behaviors at work, outside work, and while on leave in all locations and at all times, on or off duty
- Associated personnel whilst engaged with work or visits related to the GlobalGiving Foundation and GlobalGiving UK, including but not limited to the following: board members, consultants, contractors, volunteers and programme visitors

While much of the content is applicable to both the GlobalGiving Foundation and GlobalGiving UK, there are some areas which apply only to local jurisdictions. These are indicated by preceding text of either "**In the USA**" or "**In the UK**" respectively.

This policy does not cover:

- Bullying or harassment in the workplace at GlobalGiving. This is dealt with:
 - **In the USA:** under the Complaint Procedure in the GlobalGiving Foundation's Employee Handbook
 - **In the UK:** under GlobalGiving UK's Anti-harassment and Bullying Policy.
- Safeguarding concerns in the wider community not perpetrated by GlobalGiving staff or associated personnel:
 - Safeguarding concerns raised against vetted GlobalGiving nonprofit partners are addressed by the GlobalGiving Investigation Team. Such concerns can be filed via a [nonprofit concern form](#).
 - Safeguarding concerns raised against GlobalGiving corporate partners and donors* are to be brought to the attention of the CEO of the GlobalGiving

Foundation or Director of Operations of GlobalGiving UK. To do this, GlobalGiving partners or members of the public are asked to complete a [Safeguarding Incident Report Form](#), and a member of the GlobalGiving Safeguarding team will securely relay the concern to the relevant individual. GlobalGiving staff and associated personnel should securely report such concerns directly to the relevant individual.

*Note: GlobalGiving does not have a formal procedure to address concerns related to corporate partners and donors. However, GlobalGiving takes these concerns seriously. So, we request that any such concerns are submitted directly to senior leadership as detailed above.

1.3. Consequences of non-adherence

Instances of non-adherence to this policy by staff will be dealt with according to the severity and nature of the violation, and based upon *GlobalGiving's Procedure for Dealing with Safeguarding Reports* and Disciplinary Policies. Instances of non-adherence by associated personnel will be dealt with on a case-by-case basis.

1.4. Definitions

The definition of terms used in this policy are as follows:

Beneficiary of assistance: Someone who directly or indirectly receives funds, goods or services from GlobalGiving.

Child: A person below the age of 18

At-risk adult: Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. In the context of GlobalGiving's work this may include adults suffering from poverty or in other humanitarian need.

Harm: Includes ill-treatment including exploitation; physical, sexual or psychological abuse; and other infringement of an individual's rights.

Physical abuse: May involve poking, pushing, hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. It can also include "fabricated" or "induced" illness where a perpetrator deliberately causes ill health in another individual.

Sexual abuse: Involves forcing or enticing an individual to take part in sexual activities, whether or not the individual is aware of what is happening and includes penetrative and non-penetrative acts. It may also include non-contact activities, such as involving individuals in looking at, or in the production of, pornographic materials, watching sexual activities or encouraging individuals to behave in sexually inappropriate ways. Sexual abuse includes abuse through sexual exploitation.

Psychological abuse: Includes (but is not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary

confinement and isolation.

Sexual exploitation: The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

Protection from Sexual Exploitation and Abuse (PSEA): A term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Survivor: A person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however, it is the individual's choice how they wish to identify themselves.

Serious safeguarding concern: A concern raised about a member of staff or associated personnel relating to behavior that has harmed, or may have harmed a child or at-risk adult; a possible criminal offense against, or related to a child or at-risk adult; or behavior that indicates they are unsuitable to work with children or at-risk adults.

Designated Safeguarding Officers:

- **In the USA:**
 - Chief Operating Officer (GGF)
- **In the UK:**
 - VP of Programmes
 - Director of Operations (GGUK)

Safeguarding HR Leads:

- **In the USA:** Director of People & Operations (GGF)
- **In the UK:** Director of Operations (GGUK)

Safeguarding Team: all Designated Safeguarding Officers and Safeguarding HR Leads

1.5. Related Regulations

In the USA: There are no laws or authoritative guidance for charities specifically. Various state and federal laws address relevant topics such as child welfare and protection of vulnerable adults.

In the UK: The Charity Commission provides [guidance on the responsibility of charities and Trustees](#) to keep everyone who comes into contact with their charity safe from harm

2. Requirements

2.1. *Our Commitment to Safeguarding*

Safeguarding means protecting people's health, well-being and human rights, and enabling them to live free from harm, abuse, and neglect. In the context of our work we understand it to mean taking all reasonable steps to protect people, including children and at-risk adults, from harm and abuse that arises from coming into contact with our staff, representatives, content or programs; and to respond appropriately when harm does occur. We recognise that this is the right thing to do, and is also a key part of earning and maintaining the confidence of our donors, partners, and other stakeholders as we strive to accelerate community-led change around the world.

GlobalGiving commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting, and response, described in the following sections of this policy. However, we also recognise that safeguarding doesn't stop with this policy itself. Instead, this policy provides a framework of principles, standards, and guidelines on which to base our individual and organizational practices in areas such as:

- Creating a 'safe' and 'friendly' organization (in relation to a safe environment as well as protection against physical, psychological, and sexual harm/abuse)
- Promoting awareness of appropriate and inappropriate behavior/attitudes
- Recruiting and training personnel
- Recognizing, reporting, and reacting to allegations of abuse
- Issuing communications that include children and/or at-risk adults

GlobalGiving encourages opportunities to learn about safeguarding issues, as well as sharing tools and information with others, including nonprofit partners. So, this Safeguarding Policy and relevant, supporting documents will be visible on the GlobalGiving Safeguarding Landing Page for our donors, nonprofit partners, and corporate partners to review.

2.2. *Prevention*

As part of preventing harm/abuse GlobalGiving will:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy.
- Design and undertake all programs and activities in a way that protects people from risks of harm/abuse that may arise from coming into contact with GlobalGiving. This includes the way in which information about beneficiaries of assistance is gathered and communicated.
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel.
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organization.
- Ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff, associated personnel and the communities we work with.

- Ensure that its Safeguarding Team follows up on reports of safeguarding concerns promptly and according to due process

2.2.1. Recruitment

Protecting people, including children and at-risk adults, from harm/abuse that may arise from coming into contact with our staff and associated personnel starts at the recruitment stage. So, the recruitment of individuals who will have direct contact (or unsupervised virtual contact) with children and/or at-risk adults, will include the following elements:

- All job postings, contractor/employment agreements, and offer letters will clearly state that a safeguarding policy, including screening procedures, are in place.
- GlobalGiving will conduct a background check on all such staff and associated personnel.
 - **In the UK:** such checks will be processed by the Disclosure and Barring Service (DBS) and may be undertaken at an Enhanced level. Eligibility to apply for a DBS check and the appropriate level of check is explained in the [DBS Eligibility Guidance](#).

All GlobalGiving staff and associated personnel are required to read and agree that they understand and will comply with this Safeguarding Policy as part of their service with GlobalGiving. This will mean signing the *Statement of Commitment* included at the end of this policy.

- **In the UK:** in compliance with the requirements of the Charity Commission for England & Wales, board members are required to sign a [Trustee eligibility declaration form](#) which includes a section on “Working with vulnerable groups”.

2.3. Reporting

If a staff member, associated personnel or a member of the public observes, hears about or becomes aware of any behavior or an incident where GlobalGiving staff or associated personnel have, or are suspected to have caused harm or abuse to people's health, well-being or human rights, they are requested to complete a [Safeguarding Incident Report Form](#) as soon as it is safe to do so. Safeguarding Incident Report Form submissions are received by all members of the Safeguarding Team. Details of the Safeguarding Team are included in the “Definitions” section of this policy.

If a staff member, associated personnel or member of the public does not feel comfortable reporting a concern to the Safeguarding Team (for example if they feel that the report will not be taken seriously, or if a person/s in the Safeguarding Team is implicated in the concern) they may contact another appropriate staff member - this could be an individual member of the Safeguarding Team, a GlobalGiving senior manager, or a member of the GlobalGiving HR Team. They can also refer to section “2.3.3. External Disclosures by staff and associated personnel”.

2.3.1. No Retaliation against staff and associated personnel

Any staff member or associated personnel reporting safeguarding concerns will be protected under the *"No retaliation / protection and support for reporters"* section of the *GlobalGiving Disclosure of Malpractice and Whistleblowing Policy*.

2.3.2. Confidentiality and Anonymity

It is essential that confidentiality is maintained at all stages of the process when dealing with reported safeguarding concerns. Information relating to the concern and subsequent case management will be shared on a need-to-know basis only and will be kept secure at all times by all parties.

Reports may be submitted anonymously, but we strongly encourage staff members and associated personnel to provide some form of contact information so they can be contacted to seek additional information with regard to the concern. Lack of information can hinder evaluation and investigation. It is also more difficult to establish whether anonymous reports are credible and have been made in good faith.

2.3.3. External Disclosures by staff and associated personnel

This policy aims to provide an internal mechanism for reporting safeguarding concerns. So, in most cases it should not be necessary for staff or associated personnel to alert anyone externally. In all cases we strongly encourage individuals to seek advice before reporting a concern to anyone external to GlobalGiving. However, we also recognise that staff and associated personnel may need help in accessing such advice, or may not feel comfortable reporting their concerns internally at all. So, reports can also be submitted via independent, third-party operators engaged by GlobalGiving. See the *"External Disclosures"* section of the *GlobalGiving Disclosure of Malpractice and Whistleblowing Policy* for details.

2.4. Response

GlobalGiving will follow up on reported safeguarding concerns according to its *Procedure for Dealing with Safeguarding Reports*, and according to all legal and statutory obligations.

GlobalGiving will acknowledge receipt of a submitted report within 48 hours, and will carry out an initial evaluation to determine the scope of the report, and how to initially proceed. This initial evaluation will be undertaken urgently if a report raises any concern of an immediate/ongoing safeguarding risk to a child or at-risk adult.

GlobalGiving will offer support to survivors of alleged harm / abuse by staff or associated personnel, regardless of whether a report has yet been investigated or substantiated. Decisions regarding support will be led by the survivor.

GlobalGiving will take appropriate action, including disciplinary measures, when alleged harm / abuse by staff or associated personnel is substantiated.

3. Roles and Responsibilities

3.1. All staff and associated personnel

- Are obliged to contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of this Safeguarding Policy.
- Are obliged to report safeguarding concerns or suspicions related to GlobalGiving staff members or associated personnel using the process described in this policy.
- Are obliged to sign the *Statement of Commitment* included at the end of this policy.

Child Safeguarding

- Must not engage in sexual activity with, or sexually abuse, a child.
- Must not subject a child to physical, emotional or psychological harm / abuse.
- Must not engage in any commercially exploitative activities with a child including child labour or trafficking.

Adult Safeguarding

- Must not engage in sexual activity with, sexually abuse or exploit an at-risk adult.
- Must not subject an at risk adult to physical, emotional or psychological harm / abuse.

- **Protection from Sexual Exploitation and Abuse**

- Must not exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Must not engage in any sexual relationships with beneficiaries of assistance since they are based on inherently unequal power dynamics

3.2. All supervisors / managers

- Are required to follow the *GlobalGiving Procedure for Dealing with Safeguarding Reports* when receiving any such report.
- Are responsible for consulting with their local Safeguarding HR Lead about the potential need to include safeguarding information, including the need for background checks in recruitment materials.

3.3. Safeguarding HR Leads

- Are required to follow the *GlobalGiving Procedure for Dealing with Safeguarding Reports* when receiving any such report related to their jurisdiction.
- Are responsible for supporting hiring managers in their jurisdiction with the potential need to include safeguarding information, including the need for background checks in recruitment materials.
- Are responsible for ensuring that any necessary background checks are undertaken, and the results considered according to the objectives of this policy.
- Are responsible for ensuring that all staff and associated personnel in their jurisdiction sign the *Statement of Commitment* included at the end of this policy.

- **In the UK:** are responsible for ensuring that board members sign a [Trustee eligibility declaration form](#), and that is securely filed in an appropriate location.
- Are responsible for ensuring that staff and associated personnel in their jurisdiction attend safeguarding training at a level commensurate with their role in the organization.
- Are responsible for supporting other Safeguarding Team members with their responsibilities under this policy and the *GlobalGiving Procedure for Dealing with Safeguarding Reports*, and where these responsibilities link to HR obligations.

3.4. **Designated Safeguarding Officers**

- Are required to follow the *GlobalGiving Procedure for Dealing with Safeguarding Reports* when receiving any such report
- Are responsible for ensuring that all legal and statutory obligations are met in their local jurisdiction, consulting with appropriate advisors including internal and/or external legal counsel, and/or the Director of Enterprise Risk Management as appropriate.
- Are responsible for influencing and encouraging all levels of the organization to adhere to this policy.
- Are responsible for supporting other Safeguarding Team members with their responsibilities under this policy and the *GlobalGiving Procedure for Dealing with Safeguarding Reports*, based on their individual areas of expertise and role within the organization.

3.5. **Board of Directors**

- **In the UK:** the Charity Commission is clear that Trustees have primary responsibility for Safeguarding at their charity. This includes, but is not limited to:
 - Reviewing and approving this policy periodically
 - Considering notifying the Charity Commission of any serious incidents relating to safeguarding in line with the [Charity Commission's Reporting Serious Incidents Policy](#) (see *GlobalGiving Procedure for Dealing with Safeguarding Reports*)
 - Confirming their compliance with the "Working with vulnerable groups" section of the [Trustee eligibility declaration form](#).

4. **Monitoring Mechanism**

Adherence to this policy will be monitored by the Director of Operations (GGUK) and the Director of Human Resources (GGF), in their local jurisdictions, through the following mechanisms:

- Periodically sampling staff and associated personnel to check they are aware of and understand their responsibilities as laid out in the policy.
- Checking that signed Statements of Commitment are securely filed (via periodic sampling and/or annual audit of personnel files).
- Monitoring that any reported concerns are responded to in a timely manner and in accordance with the *GlobalGiving Procedure for Dealing with Safeguarding Reports*.

- Verifying that any staff and associated personnel reporting safeguarding concerns are not subject to retaliation.

GlobalGiving Statement of Commitment by Staff and Associated Personnel

I, _____(Full Name), have read and understood the standards and responsibilities outlined in the GlobalGiving Safeguarding Policy. I have reviewed the Safeguarding training. I agree and commit to adhering to the standards and responsibilities contained therein and understand and accept the importance of following safeguarding policies and practices while working with GlobalGiving.

Print full name

Job title/role

Signature

Date