

Funder Safeguarding Collaborative & Accountable Now

Safeguarding Protocol for the Joint Creation of a Donor Safeguarding Standard

Background and Context

About the Parties

[The Funder Safeguarding Collaborative](#) (FSC) is a unique network for philanthropic funders where funding institutions can share, learn, and access support from experts and peers alike. The FSC believes funders have a unique potential to make organisations safer through their grant-making. We walk alongside funders on their safeguarding journey, helping them to implement practices that make their organisation and the organisations they fund, safer.

[Accountable Now](#) (AN) is a global collective of civil society actors with a common goal to do good, better. Together with members and partners, AN seeks to build people-led, accountable, and thriving civil society ecosystems around the world. Founded in 2004 by a group of leading civil society organisations, today AN is a key platform that supports civil society actors to hold themselves to high ethical and programmatic standards while living out their values and commitments to people and communities.

About the Project

AN has been appointed as the main consultant to lead a project on behalf of the FSC. The key objective of this project is to develop a set of evidence-based, practice standards that FSC can promote among its membership and wider philanthropy to improve alignment and increase the impact of funder safeguarding requirements. The project is set in two phases, the first consisting of research, literature review and interviews alongside key informants to uncover which funder practices are the most effective in promoting and supporting safer organisations. The second phase will include using the research findings to co-create a set of safeguarding practice standards with the active engagement of funders and organisations impacted by funder policies.

The project is expected to run from January 2025 to the end of August 2026.

About this Protocol

Purpose, Scope and Applicability

This protocol outlines Accountable Now's commitments and actions to prevent harm, abuse or exploitation and promote the welfare and well-being of those who may engage or come into contact with the project as outlined above.

This protocol **does not apply** to other ongoing work, engagements and activities that Accountable Now may be currently undertaking. If you have concerns about the work of



Accountable Now beyond the project, please visit this [webpage](#). For concerns relating to Accountable Now's [member organisations](#), please visit [this statement](#).

If you have concerns about the FSC's work, please get in touch with Karen Walker-Simpson (Technical Director - kwalker-simpson@fundersafeguardingcollaborative.org) and refer to their [Safeguarding Commitments](#).

Definitions of Key Concepts and Terms

The following definitions and concepts are based on Accountable Now's institutional understanding, language and procedures. Given our collaboration with the FSC, we have furthermore incorporated the FSC's approach and commitment to safeguarding into the way we work on this project.

- **Safeguarding:** Is understood within this protocol as a commitment to promote safety and dignity, to foresee, identify, monitor, prevent and reduce all forms of harm, and to provide redress to any persons who may be harmed while engaging with or being connected to the project.
- **Harm:** Harm can take various forms, including but not limited to physical, emotional, psychological, sexual, financial, and privacy-related harm. Actions that cause harm may also cause distress, injuries, alarm, fear, or other negative feelings and effects. If you are unsure whether an action has caused harm, we encourage you to report such action for investigation.
- **Prevention of Sexual Harm, Abuse, and Exploitation (PSHEA):** 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.
- **Feedback:** Any positive or negative statement of opinion. It may include low-level concerns that may not reach the threshold of harm but require attention. It may also include positive or neutral feedback, such as a commendation or suggestion to proceed with alternative actions or a request for further information. Positive feedback may be expressed formally or informally, and may or may not require a response. Low-level concerns will always require at least a response of acknowledgement from the team.
- **Complaint:** A complaint is a sub-set of feedback, and expresses a negative opinion or dissatisfaction. It requires a response and/or resolution.
 - **Serious/sensitive complaints:** These are complaints relating to gross misconduct, such as sexual exploitation and abuse, fraud, corruption, or other actions requiring legal intervention, in-line with the boundaries of confidentiality.

Key Principles and Commitments:

- **Safe programme design:** Accountable Now is committed to ensuring that we design safe spaces, safe processes and safe engagements. This means that we apply a



dynamic approach to accountability throughout our work, implementing the [12 Accountability Commitments](#) in all aspects of our collaborations.

- **Risk reduction and prevention:** Accountable Now is committed to maintaining a clear and regularly updated risk register for our collaborations with the FSC, actively soliciting inputs from stakeholders on potential risks, and closely monitor and mitigate risks as they emerge.
- **Inclusion, Equity and Anti-Discrimination:** We celebrate, respect, and value diverse perspectives. We are committed to proactively creating spaces where people feel comfortable showing up as their true selves, discussing and opening up without judgement, and feeling respected in terms of their identities and experiences.
- **Rights-based approach:** We take a rights-based approach to our collaborations and related engagements. We implement our projects, and learn and improve our processes while respecting the rights of people, survivors, their data, and privacy. We are upfront about communicating how participants can share their feedback and experiences with us, and actively seek informed consent at every point.
- **Balancing confidentiality and learning:** As an organisation that seeks to learn from its previous failures and experiences, we learn from the complaints and feedback that we receive. We do so through retaining a high-level record of complaints being made to us, our approach to resolution and feedback from the complainant while redacting personally identifiable information. We will never disclose and share personally identifiable information, unless necessary, without explicit and informed consent.
- **Accountability and governance:** We communicate upfront, and put in place appropriate processes to ensure that all of our engagements are safe. We listen carefully to the feedback that we receive, adapt our practices when applicable, and close the loop. We set clear expectations, alongside clear roles and responsibilities for safeguarding processes.
 - **Obligation to report:** All of Accountable Now's staff, contractors and volunteers are obligated to report potential breaches of commitments. We understand that over-reporting leads to safer organisations and actively encourage everyone to report to us when something does not look or feel "right".
 - **Roles and responsibilities:** The responsibility to promote safety, dignity and respect rests on all staff, volunteers and contractors working with and for Accountable Now.
 - The person responsible for receiving all feedback and complaints is AN's Head of Accountability Practices and Reporting, Bao Han Tran Le (baohan@accountablenow.org).
 - AN's Executive Director, Megan Colnar, is responsible for the implementation of our policies and is an alternative point of receipt for feedback and complaints. Contact her at megan@accountablenow.org.
 - It is ultimately the responsibility of Accountable Now's Board to manage and resolve escalated complaints. Our current Board Chair is Rachel Smith; contact her at: rachel.eg.smith@gmail.com.



Related Processes

Risk Identification, Reduction, and Mitigation

- While AN considers this project as low risk, we believe that clear risk management processes are still necessary.
- AN and the FSC both hold responsibility for maintaining, monitoring, and mitigating the risks that may materialise during the project; this is done through the joint development of a risk matrix/framework, which will be reviewed once every two weeks, as a standing talking point in FSC-AN bilateral catch ups.
- The risk framework includes the risk itself, a description of the risk, the source of the risk, our understanding of the probability of occurrence and potential impact, the responsible parties/personnel, as well as mitigation and contingency measures.
- Once a new risk is identified, AN will enter it into the risk matrix and propose ways forward. Depending on the severity of the risk (severe, moderate, or low), AN will reach out to the FSC immediately (in severe cases) or wait until the next check-in for discussion (in moderate or low cases).
- Beyond our mechanisms, we encourage partners, interviewees, and all interested parties to share risks about the project that they may have identified with us.

Promotion of Safe Spaces

- Accountable Now operates in line with the [12 Accountability Commitments](#), and as a part of this, we actively promote equity, justice, and safety throughout our work. We expect that all of our staff, contractors and volunteers follow these commitments in their work with us to create safe environments and engagements.
- In all of our work, we do not discriminate or use language that may marginalise people or communities. We value diverse voices and expertise, and we strive to listen carefully to all those who bring their opinions and perspectives to us.
- At the beginning of each engagement, we strive to co-create a common set of expectations around respectful and collaborative conduct among participants and our staff. Throughout the engagement, we uphold, review, and improve these expectations to ensure that everyone enjoys a safe space where their ideas are respected. At the end of our engagements, we will ask participants to optionally share any feedback with us regarding how we may improve the experience.
- We will communicate our safeguarding protocol, our processes, and any key expectations regarding confidentiality and safety upfront, to ensure that all participants have the right information and know how to report potential concerns, feedback, or suggestions.

Confidentiality, Data Protection and Privacy

- As an organisation, Accountable Now complies with [General Data Protection Regulation](#) (GDPR) requirements and strives to protect personal data and people's right to privacy.
- As part of this project, we will be working with a lot of data. We foresee that at times, data that may be considered sensitive or confidential might be shared with us. To



avoid this, we will ask participants at the beginning of each engagement to respect the boundaries of confidentiality, and not disclose sensitive or personally identifiable information to us while providing examples or discussing their experience.

- We will also be asking interviewees and other participants for informed consent, and be clear with participants in terms of how we will handle and use the data that is shared with us at the beginning of each engagement.
- We will take appropriate measures if disclosed information falls under the scope of this protocol or requires legal intervention.

Handling of Feedback and Complaints

Roles and Responsibilities

- AN and its staff are responsible for making sure that people are aware of how to share feedback and complaints at the start of any engagement and for promoting safe collaborative environments.
- The person responsible for receiving, registering and following up on all feedback and complaints is AN's Head of Accountability Practices and Reporting, **Bao Han Tran Le** (baohan@accountablenow.org or WhatsApp/Signal at +447534595747).
- AN's Executive Director, **Megan Colnar**, is responsible for the implementation of our policies; she is also an alternative point of receipt, register and follow-up for feedback and complaints. Contact her at megan@accountablenow.org.
- It is ultimately the responsibility of Accountable Now's Board to manage and resolve escalated complaints. At each Board meeting, whenever applicable, Accountable Now provides its Board with a high-level summary of the complaints received and the outcomes and actions taken in response.
 - Our current Board Chair is **Rachel Smith**; if you have a concern about Megan and Bao Han's conduct, please contact her at: rachel.eg.smith@gmail.com.

Role of the FSC

- AN will share a log of only the number and high-level nature of the complaints and feedback that we received and the steps that we took to address them, with the FSC. This log is a tool for mutual accountability and learning between AN and the FSC. This log **will not** include any personally identifiable information or any further details about the complaints and/or the feedback that we received.
- While the FSC is not the primary respondent to feedback and complaints regarding AN's work under the scope of this project, in cases of grave complaints or if you are uncomfortable reporting your complaints to Accountable Now, we ask that you contact Karen Walker-Simpson, the Technical Director at the FSC (kwalker-simpson@fundersafeguardingcollaborative.org).
- If the concern relates to AN staff, operations or actions, FSC will inform the appropriate channel at AN so that they can follow up on the matter in line with the procedures set out in this protocol.



How to submit feedback and complaint

- Feedback and complaints can be submitted to any of the Accountable Now email or phone addresses outlined above.
- If you wish to remain anonymous, please submit your complaint through our [online feedback and complaint form](#), and specify that the complaint is related to our project with the FSC. Submissions on this form is monitored by our Head of Accountability Practices and Reporting, Bao Han Tran Le.
 - Unfortunately, we currently cannot follow up on anonymous complaints, but we will still investigate and address any issues raised by the complainant.

What are the steps when it comes to feedback and complaints?

- **Recording the complaint:** The complaint, once received, will be recorded in a newly created, unique, secure and password-protected online folder by the AN personnel who received the complaint (please refer to sections on Roles and Responsibilities above). All communication and documents relating to the issue will be saved in the same folder.
 - This folder will be accessible by AN's Executive Director, Megan Colnar, AN's Head of Accountability and Reporting, and AN's Board Chair, Rachel Smith. In cases where one of these personnel is the subject of the complaint, the folder will not be accessible by them.
 - **If we receive a feedback or a low-level concern**, we will acknowledge receipt, and close the feedback loop by sharing how we have course-corrected; in cases of commendations or positive feedback, we may not follow up with a formal response.
- **Acknowledgement of receipt:** The personnel who received the complaint will acknowledge receipt within two working days, and follow up within five working days of the initial receipt to offer the complainant options to meet virtually or to continue correspondence via email. Using the appropriate platform, we will then learn more about the situation and the complainants' perspectives, share further information about our mandate, next steps, and scope/limits of actions.
- **Investigation and response:** We will investigate the complaint to assess whether it is well-founded, speak to any staff or other affiliated persons involved in the issue, and agree on a plan to respond to the issue. During this period, we may reach out to the complainant (if contact information was provided) to request further information or clarification.
- **Following up with the complainant:** We will share in writing with the complainant the outcome of the investigation of the complaint, including any actions we are planning to take in response, within a month of receiving the complaint.
- **Appeals:** We take seriously the proper and fair functioning of our complaints handling process, and will look into any issues raised in this regard. Appeals will not necessarily result in a different decision, but if the complainant believes the complaint has not been handled fairly, they may take the issue to the Chair of Accountable



Now's Board: rachel.eg.smith@gmail.com.

- **Learning:** We learn as an organization from each incident reported to us. We do so by retaining a high-level record of feedback and complaints made to us, our approach to resolution and feedback from the complainant while redacting personally identifiable information and using this record to inform our future practices.

Referrals

- In cases where we receive complaints that are **not** about AN or the FSC that we deem necessary to investigate, we will encourage the complainant to report it to the relevant organisation themselves; if they are unable or unwilling to do so, AN will ask the complainant for their consent to refer the complaint to the appropriate organisation or legal instrument.