

# SAFEGUARDING POLICY

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## I. Purpose

The David and Lucile Packard Foundation (“Foundation”) is committed to safeguarding those with whom we and our partners work in our grantmaking programs. The purpose of this Safeguarding Policy (“Policy”) is to set out the principles that inform our decision-making and actions, our expectations of Foundation Employees<sup>1</sup> and Related Personnel<sup>2</sup>, and the steps we will take to ensure safeguarding concerns are timely and appropriately addressed.

## II. Statement of Values and Guiding Principles

The Foundation is committed to adhering to international human rights principles;<sup>3</sup> the principles of promoting confidentiality, safety, and non-discrimination when responding to any allegations of harm, including abuse or exploitation; and protecting the rights and well-being of populations with whom we work in our grantmaking programs.

## III. Scope of Application

This Policy currently applies to all Foundation Employees and Related Personnel in the scope of their interactions with existing Grantees, organizations with which the Foundation is actively considering a grantmaking relationship, and the people and communities who are impacted by Grantee work. This Policy is complementary to [Grantee Experience Standards](#) and the set of standards that all Foundation Employees are required to adhere to, including but not limited to the following Foundation policies:

- [Code of Conduct](#)
- [Whistleblower Policy](#)
- [Workplace Safety Policy](#)

## IV. Safeguarding Commitments

The Foundation is committed to incorporating Safeguarding measures into its direct engagement activities and grantmaking programs. All Foundation Employees and Related Personnel are required to enter into the Safeguarding Code of Conduct Acknowledgement and Agreement in Appendix A. Goal teams will work together to develop and implement safeguarding practices as appropriate in their grantmaking and interactions with grantees. The Foundation will consider the known facts of any situation and may take appropriate steps as outlined in this Policy to protect the human rights of and prevent harm to those impacted by our grantmaking, and report and respond to Safeguarding concerns.

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<sup>1</sup> All Foundation employees as defined in the Foundation [Employment Categories Policy](#).

<sup>2</sup> Related Personnel include Foundation Trustees, temporary employees, country and regional advisors, research analysts, and interns.

<sup>3</sup> The principles of international human rights include the Universal Declaration of Human Rights, the UN Declaration on the Rights of Indigenous Peoples, the Convention on the Rights of the Child, the Convention on the Elimination of All Forms of Discrimination against Women, and the UN Declaration on the Elimination of Violence Against Women.



The Foundation recognizes some populations and issues within its grantmaking focal areas may require specific attention under international laws and norms (see Footnote 3) and the Foundation will take these into consideration when implementing this Policy. The Executive Team will have the discretion to consider population-specific safeguarding guidelines as appropriate, with consideration of grantee burden, and in alignment with globally recognized human rights standards.

## **V. Reporting Procedures**

All Safeguarding concerns shall be reported by Foundation Employees and Related Personnel as soon as possible and no later than 24 hours after being informed or becoming aware of the concern. When allegations are reported in good faith, the Foundation will take appropriate actions to the best of its abilities to protect complainants from retaliation.

All Safeguarding concerns shall be reported to the Chief People Officer or the General Counsel, unless the concern is related to the actions of either individual. Concerns can also be reported anonymously to EthicsPoint, a third party authorized by the Foundation to receive such reports. The Foundation's EthicsPoint Reporting website is <https://secure.ethicspoint.com/domain/media/en/gui/12445/index.html> and its telephone number is (800) 963-5942 within the United States, Guam, Puerto Rico, and Canada. For other locations, please visit the Foundation's EthicsPoint Reporting website.

## **VI. Responding to Safeguarding Concerns**

The Foundation seeks to ensure all allegations are thoroughly examined, risk-assessed, and where legally required, investigated and/or referred to law enforcement or another agency.

If the Safeguarding concern is about a Foundation Employee or Related Personnel, investigations and disciplinary decisions will be undertaken consistent with the Whistleblower Policy and other existing policies and practices regarding allegations of staff misconduct. A decision may be made to terminate a contractor or consultant based on the actions of their staff or subcontractors.

If the Safeguarding concern is about a Grantee, the Foundation will follow existing protocols, which include consideration of the relevant geographical, cultural, linguistic, and legal factors. If the Foundation does not have the appropriate expertise, immediate assistance should be sought, through external specialized support if necessary. Potential remedial actions include requiring a refund of the active grant funds and/or suspending or terminating the eligibility of the Grantee for future grants.

All decisions must be documented in writing and kept confidential to the extent permitted by applicable law.

## **VII. Training**

The Foundation is committed to continuous learning and improvement around Safeguarding. The Foundation will ensure Foundation Employees and Related Personnel receive ongoing training on the Policy and relevant guidelines.



### **VIII. Schedule for Review of Policy**

The Foundation will work towards monitoring and reviewing our Safeguarding performance and seeking feedback from Employees and relevant stakeholders on the effectiveness of our Safeguarding measures. The Foundation is committed to continuous learning and improvement to prevent and respond to harm, abuse, or exploitation.

This Policy will be reviewed by the Board of Trustees on the same schedule as other Foundation policies, when there is a change in law, or when an incident occurs that highlights a need for change—whichever occurs first. The Office of the General Counsel is responsible for implementation of the Policy.



## Appendix A. Safeguarding Code of Conduct Acknowledgment and Agreement

All Foundation Employees and Related Personnel must uphold and promote the highest standards of ethical and professional conduct and abide by the Foundation's policies, including this Safeguarding Policy and Safeguarding Code of Conduct.

I, \_\_\_\_\_, acknowledge that I have read and understand this Policy and agree that as a Foundation Employee or Related Personnel, I **will**

1. comply with this Safeguarding Policy and help create and maintain a safe and equitable organizational culture that seeks to prevent and oppose harm to the vulnerable populations with whom the Foundation and grantees work;
2. treat everyone with dignity and respect and challenge attitudes and behaviors that contravene the Safeguarding Policy and Safeguarding Code of Conduct;
3. immediately report any concerns I have regarding possible violations of the Safeguarding Policy and Safeguarding Code of Conduct by a Foundation Employee or Related Personnel. I understand that failure to report any concerns may lead to disciplinary action. I will ensure I am aware of the options available to me to report and that I will uphold confidentiality;
4. share sensitive information I may be aware of that relates to concerns of harm within the scope of the Safeguarding Policy whether involving staff, Grantees, program participants or others in the communities where the Foundation engages in grantmaking, through the reporting options available to me. I understand that for the respect, dignity, and safety of everyone involved, it is essential that I maintain confidentiality about any concerns or information I am aware of and only share information with staff of the appropriate function who need to know such information. I will remain aware that any breach of confidentiality may put others at risk; and
5. if applicable, work with my Goal team to adopt and implement Safeguarding practices where appropriate including working with Grantees to ensure projects funded by the Foundation assess risk and potential impacts on vulnerable populations, only move forward with meaningful consultation, and obtain free, prior, and informed consent when working with rights holders such as Indigenous Peoples.

Date: \_\_\_\_\_

By: \_\_\_\_\_  
(Signature) (Printed Name)