

## Annual Safeguarding Report

1 January - 31 December 2025

### Purpose of the Report

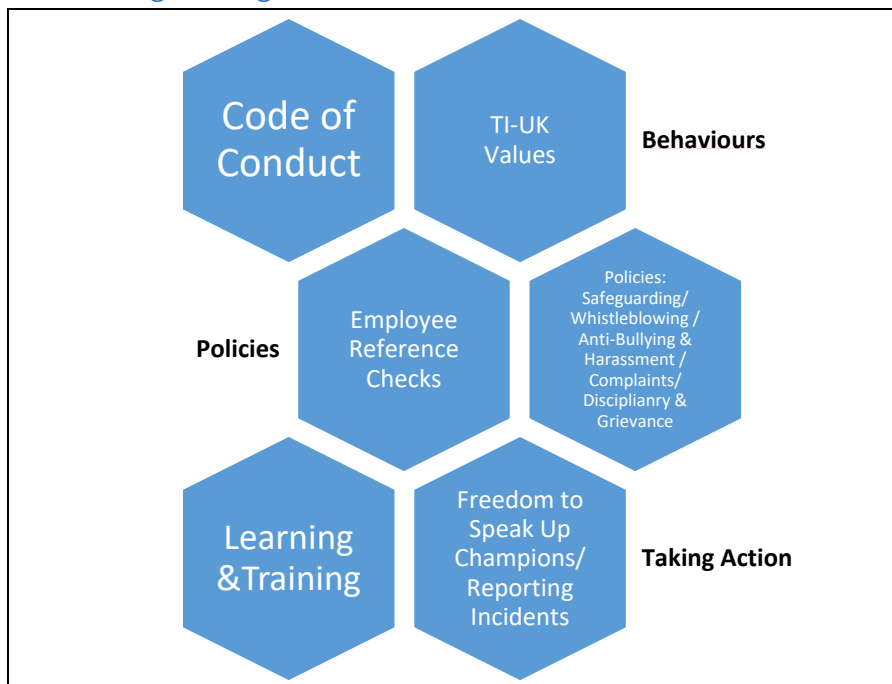
The purpose of the annual Safeguarding report is to:

- ensure the Board (of Trustees) periodically review the Safeguarding framework;
- demonstrate publicly the importance of transparency in relation to a culture of integrity and trust; and
- provide guidance on the different components of TI-UK's safeguarding framework.



**We will act with integrity.**  
**We will value and respect differences.**  
**We will work collaboratively across Transparency International, our global Movement and with partners.**  
**We will have the courage to demand better of ourselves and others.**

### TI-UK Safeguarding Framework



### Board

The Board of Trustees of TI-UK recognise that they have collective responsibility to ensure that the charity is accountable to employees, beneficiaries, funders and the wider public in relation to Safeguarding.

Board members are all required to sign the TI-UK Code of Conduct on their appointment. They are also provided with induction into matters related to Safeguarding.

The Board have outlined their commitment to Integrity and Accountability in relation to Safeguarding and this is emphasised in the formal induction process undertaken for all our people.

**We as a Board take collective responsibility to ensure that policies and procedures are in place to uphold high standards of integrity and accountability, to create an environment that reflects the core values and guiding principles of the TI Movement and to promote such standards and principles.**

But we recognise that from time to time, things at work may go wrong. Whether it is Safeguarding, Bullying and Harassment, Racism, Fraud, Bribery, Corruption or other matters that require Whistleblowing. We assure you that we shall act on your concerns.

We recognise that negative and unethical behaviour can be undertaken by colleagues, consultants, board members or project partners. Our policies outline the reporting channels to utilise for the different type of issues and these include line managers, The People Team or our Safeguarding Officer (Chief Operating Officer). Guidance can also be obtained from the Freedom to Speak Up Champions.

In the event that these routes are not appropriate or that they have proved not to be effective then the policies indicate how and when these should be channelled through the Chair of the Board ([Mike.Millward@transparency.org.uk](mailto:Mike.Millward@transparency.org.uk)) who may choose to refer it to the Ethics Advisory Panel of TI-UK. The panel Chair, David Nussbaum can be contacted via [ethics@transparency.org.uk](mailto:ethics@transparency.org.uk). Alternative reporting routes exist if this is something you would welcome and the People team have those to share with you.

**By ALL of us working together to uphold high standards of behaviour we can ensure we have a workplace built on trust and respect which are vital elements to deliver our strategy and mission.**

The TI-UK Risk Register includes Safeguarding. This ensures that the risks are monitored on a regular basis by the Senior Leadership Team and the Finance, Risk & Audit Committee.

### Delegation

Day to day delegation in 2025 for Safeguarding at TI-UK was within the role responsibilities of the Chief Operating Officer, Colin Munro. The COO had direct line management reporting to the Chief Executive. They also have direct access to the Chair of the Board. This responsibility transferred to the Financial Controller, James Evans, in December 2025. There are documented procedures in place to ensure that matters related to Safeguarding are reported in a timely manner to the Charity Commission and donors through Serious Incident Reports.

### Risk Assessment

The Safeguarding Policy (*updated November 2025*) outlines the risk-based approach taken. Assessment is made of how likely it is that a safeguarding matter could arise in programmes with the aim to put in place mitigation measures to reduce this risk.

TI-UK recognises that power imbalances exist in society and need to be considered in identifying areas of risk as well as designing systems and processes to address incidents. We have identified specific areas of higher risk:

- culture of bullying, sexual harassment and other forms of sexual misconduct in the Houses of Parliament. This recognises that colleagues involved in advocacy work with politicians,

researchers, aides etc. may experience significant power in-balances that allow for inappropriate behaviour to occur.

- employees and consultants travelling overseas who may not act in accordance with our core values and guiding principles in their on or off-duty time.
- our third-party relationships overseas - principally other TI chapters and occasionally other NGOs to whom we make transfers of funds or grants.
- TI national chapters with legal advisory centres or similar functions that are funded by TI-UK and may come into contact with children or adults at risk.
- we are not complacent about the possibility of safeguarding concerns arising within our workplace in TI-UK, and that employees and consultants may not act in accordance with our core values and guiding principles at work or in their own time.

Whilst overseas travel continues to be lower than pre-pandemic, power dynamics at conferences and working on advocacy across of range of cultures was highlighted by our colleagues as an area that required specific guidance. This was published in November 2023 to ensure that colleagues feel they can report unacceptable incidents/ behaviour and those that may need to support and investigate them are aware of good practice. Our policies also recognise that safeguarding issues can occur in virtual working situations.

### Matters Reported

Type of Report by Potential Wrongdoer	Employee	Partner	Volunteer	Contractor	2025 Total	2024 Total	2023-2019 Total
Sexual Abuse	-	-	-	-	-	-	-
Exploitation	-	-	-	-	-	-	-
Sexual Harassment	-	-	-	-	-	-	1
Harassment	-	-	-	-	-	-	1
Bullying	-	-	-	-	-	-	4
Conflicts of Interest	-	-	-	-	-	-	-
Code of Conduct	-	-	-	-	-	-	-
Other	-	-	-	-	-	1	1
Retaliation	-	-	-	-	-	-	-
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>7</b>

With low historic levels of reported wrong-doing various ways of promoting a Speak Up culture continue to take place. It is recognised that raising concerns or complaints is not an easy decision but colleagues who do so are assured of support and guidance. Speak Up Champions continue to provide guidance and signposting to colleagues who were considering making a complaint. Eight colleagues across teams agreed to undertake the role and received training. It is hoped that these additional resources provide confidence that reports will be investigated and retaliation that is often a barrier to raising complaints will also be taken seriously.

### Outcome of Reports Investigated

No matters were raised in 2025.

### Charity Commission Serious Incident Reports

No Serious Incident Reports in relation to Safeguarding were made in 2025 (2024: zero) to the Charity Commission.

### Progress against 2025 Priorities

We set out key areas identified for focus in 2025 and are pleased to report progress against each of these:

Focus area	Progress in last 12 months
Continuing engagement with colleagues to ensure our culture of integrity and trust is promoted and understood. This will include Listen into Action survey results and induction/refresher training on safeguarding, whistleblowing and anti-bullying and harassment.	We undertook surveys in March, June and October 2025 to monitor level of confidence ( <i>see section below</i> ). Speak Up Champion remain in place throughout 2025.
<ul style="list-style-type: none"> <li>We shall continue to promote and engage with Speak Up Champions and evaluate their value over time.</li> </ul>	
Continued engagement with the sector on developments including BOND and the Charity Speak Up Network.	We continue as a BOND member to utilise their expertise in this area. We continued to participate in the charity sector network promoting a Speaking Up culture.

### Listen into Action Results

As part of our regular employee surveys we ask specific questions to help us understand how our current culture supports integrity and trust with specific thoughts around Safeguarding, Bullying and Harassment and Whistleblowing. For these questions we also used gender data to identify trends or aspects we need to consider.

Results	October 2025 29 responses (78%)		June 2025 19 responses (58%)		March 2025 23 responses (66%)	
	Yes	No/Not sure/Too early to say	Yes	No/Not sure/Too early to say	Yes	No/Not sure/Too early to say
I know where to access information on rumours and allegations related to safeguarding, bullying and harassment and whistleblowing?	93%	7%	100%	0%	96%	4%
I feel confident to act on rumours and allegations related to safeguarding, bullying and harassment and whistleblowing?	72%	28%	95%	5%	83%	17%
Are you confident that management will act on allegations of <b>safeguarding*</b>	*	*	*	*	*	*
Are you confident that management will act on allegations of bullying and <b>harassment*</b>	*	*	*	*	*	*
Are you confident that management will act on allegations of <b>bullying*</b>	66%	34%	79%	21%	70%	30%
Are you confident that management will act on allegations of <b>harassment*</b>	72%	28%	84%	16%	83%	17%
Are you confident that management will act on allegations of <b>sexual harassment*</b>	83%	17%	84%	16%	91%	9%
Are you confident that management will act on allegations of <b>fraud</b>	83%	17%	84%	16%	87%	13%
Confidence that <b>wouldn't experience negative treatment</b> from TI-UK if raised a complaint	62%	38%	74%	26%	65%	35%

While results in the last survey of 2025 dropped, colleagues still report high levels of awareness in relation to accessing information with confidence that management will then act and that they won't experience negative treatment. Our team discussions on the barriers to reporting identified concerns highlighted the broader societal aspects of power and gender that can leave people aware but not

confident to act. Changes in management can also take the necessary time to build trust and confidence. On-going dialogue with Speak Up Champions seeks to identify further steps that can be taken to ensure those who may receive reports are trained, receptive and non-judgemental whilst being alert to retaliation.

### Sector Engagement

TI-UK recognises that engagement with the sector is a vital element to promote confidence that safeguarding remains a priority. It also wishes to ensure it can learn and develop using the evidence from organisations that operate in a larger scale and with higher levels of resources to dedicate to this area.

BOND's 2024 safeguarding survey<sup>1</sup> reported that since 2018, 34 per cent had seen their reported incidents increase, 57 per cent reported same number of incidents and 9 per cent reported a decrease. However, 57 per cent believe they are still seeing under-reporting.

We continue to promote a safeguarding framework where:

**People report to those they trust:** Building relationships and trust is essential, so organisations must understand any barriers to reporting and why people might not report concerns.

**Power and privilege matter:** Sexual exploitation, abuse and harassment are fundamentally about gender inequality and power imbalances. As a sector, there is a need to understand our own power and privilege. We must call out power dynamics that exist within our organisations and programmes. We must demonstrate a long-term commitment to address deep-rooted inequalities based on gender, race, age, sexuality and disability, and how vulnerabilities intersect.

**Safeguarding is everyone's responsibility and culture shift takes time:** We know shared codes of conduct and standards of practice already exist, but these tend to be driven by policies and procedures. We must address the norms, values, attitudes and behaviours that may shape how those policies and procedures are implemented

**Commitment to get safeguarding right:** progress in many different areas, including better systems, updated policies, more training, and increased oversight and involvement of CEOs, senior leaders and trustees in safeguarding work.

### 2026 Priorities

In 2026 our priorities will include:

- Continuing engagement with colleagues to ensure our culture of integrity and trust is promoted and understood. This will include Listen into Action survey results and induction/refresher training on safeguarding, whistleblowing and anti-bullying and harassment.
- We shall continue to promote and engage with Speak Up Champions and evaluate their value over time.
- Continued engagement with the sector on developments including BOND and the Charity Speak Up Network.

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<sup>1</sup> BOND, [Keeping people safe in international development: the progress of NGOs | Bond](#), Published on BOND.ORG.UK

## Summary of Safeguarding Framework Components

Component	Key aspects
Code of Conduct	The Code of Conduct is available for different types of engagement with TI-UK: employees, consultants, interns, Board members and ordinary members. Copies are available on the TI-UK web-site within the Policies and Procedures document <a href="#">here</a> .
<p>Movement's Strategic commitment to values of transparency, integrity and accountability.</p> <p>TI-UK's commitment to act with integrity, value and respect differences, work collaboratively &amp; the courage to demand better of ourselves and others</p>	<p>The TI-UK Strategic Plan (2021-2030) outlined the movement's commitment to safeguarding:</p> <p><i>"Across the Transparency International Movement, we are striving for the highest standards of transparency, integrity and accountability. These values and behaviour are promoted and recognised across our organisation. We will do all we can to ensure equality of opportunity and to prevent any kind of discrimination on the basis of race, gender or religion. We will continue to safeguard all colleagues and stakeholders through our systems for reporting and resolving issues, as well as ensuring we have a culture where people have the confidence to speak-up."</i></p> <p>TI-UK have developed four key values of which acting with integrity and respecting differences are vital to our strategic success.</p>
People Team priorities	The People Team priorities are centred on ensuring that a high trust culture is in place that will not only support our colleagues to perform at their best, but also ensure the environment allows them to focus on delivering our strategic mission. In line with that, resources are focused on ensuring that we have a Speak Up culture where colleagues have the tools to promote whistleblowing, safeguarding, harassment and anti-bullying.
Pre-Employment Reference Checks	Whilst many employers will only provide factual references confirming dates of employment, job title, and reason for leaving requests are made to confirm that the candidate is not subject to an on-going safeguarding investigation/ or left before such an investigation concluded. Certain donors also stipulate that Disclosure & Barring Service checks are undertaken and therefore specific roles are subject to these checks.
<p>Policies:</p> <ul style="list-style-type: none"> <li>• Safeguarding</li> <li>• Whistleblowing</li> <li>• Anti-Bullying &amp; Harassment</li> <li>• Complaints</li> <li>• Disciplinary &amp; Grievance</li> </ul>	<p>The safeguarding policy, whistleblowing and anti-bullying and harassment policies are available on a dedicated Speak Up intranet area, the internal HR system, Iris, and on the TI-UK web-site.</p> <p>The Complaints Policy and Procedure allows external parties the opportunity to raise concerns and have these investigated. <a href="#">reporting-concerns</a></p> <p>The policy is available on the main website. The Whistleblowing Policy also outlines how complaints may be handled.</p> <p>A standard email address for reporting matters is in place (<a href="mailto:reportingconcerns@transparency.org.uk">reportingconcerns@transparency.org.uk</a>) with these being received by the People Team and the Financial Controller who is also the Safeguarding Officer.</p>

<b>Component</b>	<b>Key aspects</b>
Learning & Training	<p>Induction training is available for all new starters. The sessions set out the Board commitment, Safeguarding Framework, policy and procedure and scenarios to encourage discussion and debate. Feedback is received after these sessions to ensure that the approach to training remains relevant and timely. Refresher training is provided at least annually (<i>last November 2024</i>).</p>
Reporting Incidents	<p>The Chief Executive’s report to each Board meeting includes a formal confirmation as to the number of safeguarding incidents reported. The Board action list that is updated after each Board meeting and is available for all employees to view on the Shared drive also has details published.</p> <p>A written procedure is in place to provide guidance as to how to report Serious Incidents to the Charity Commission.</p> <p>A standard report is in place for raising complaints related to safeguarding. This highlights that rumours as well as actual complaints can be registered. The report also ensures that the next steps are logged and details of any investigation required is outlined.</p> <p>A glossary of terms is in place to help ensure we promote a culture that utilises sector wide terminology.</p>

## Guidance and Support to those affected by Safeguarding

The following organisations can provide guidance and support:

Topic	Find more details
<p><b>TI-UK Employee Assistance Provider:</b> Helps you deal with personal and professional problems that could be affecting your home life or work life, health and general wellbeing. It provides a complete support network that offers expert advice and compassionate guidance 24/7, covering a wide range of issues.</p>	<p>Log-in and registration details are supplied to all employees. Speak to the People Team if you require further details.</p>
<p><b>Trade Unions:</b> if you are a member of a trade union they may have advice and information to support you.</p>	
<b>Whistleblowing</b>	
<p>Protect: Speak Up and Prevent Harm. Provides free, confidential whistleblowing advice.</p>	<p><a href="https://protect-advice.org.uk/">https://protect-advice.org.uk/</a></p>
<p>ACAS: Impartial advice on workplace rights, rules and best practice</p>	<p><a href="https://www.acas.org.uk/">https://www.acas.org.uk/</a></p>
<b>Sexual Abuse / Violence</b>	
<p>Sexual Abuse and Support Campaign: Provides a range of different organisations that can provide information and support for those who have experienced sexual abuse or sexual violence.</p> <p>If you are over the age of 16, living in England &amp; Wales, and have been affected by any form of sexual violence or abuse, specialist and confidential support is available 24/7.</p> <p>The Victim Supports 24/7 Support line can also be accessed on 08 08 16 89 111 or via <a href="#">live chat</a>.</p> <p>A range of groups and organisations that provide 24 hour free and confidential support are listed and these cover sexual violence and abuse, male survivors of rape or sexual abuse (including trans or cis gender and non-binary people who have experienced unwanted sexual activity), adult survivors of childhood abuse and LGBTI+.</p>	<p><a href="https://sexualabusesupport.campaign.gov.uk/">https://sexualabusesupport.campaign.gov.uk/</a></p> <p>Call 0808 500 2222</p> <p>Details of services available in Scotland can be found at <a href="https://www.mygov.scot/rape-assault">https://www.mygov.scot/rape-assault</a></p>
<b>Hate Crime</b>	
<p>Stop Hate Crime: Provides a range of different organisations that provide support and offer guidance on those who have experienced hate crime. As well as dedicated charities that support Hate Crime there are groups focused on race, religion, sexual orientation, transgender, disability, alternative sub-cultures, domestic abuse and bullying and cyber-bullying.</p>	<p><a href="https://report-it.org.uk">https://report-it.org.uk</a></p>
<b>Other Support Organisations</b>	
<p>Samaritans MIND Citizens Advice</p>	<p><a href="https://www.samaritans.org/">https://www.samaritans.org/</a> <a href="https://www.mind.org.uk/">https://www.mind.org.uk/</a> <a href="https://citizensadvice.org.uk">https://citizensadvice.org.uk</a></p>

## Glossary of Terms

Based on the [BOND guidance](#) the following definitions are used wherever possible by TI-UK. For certain terms (#) we indicate a preference for an alternative term to be commonly used.

<b>Allegation</b> -potential wrongdoing (#)	An allegation is a claim that someone has done something wrong, but there is not yet evidence that proves the claim to be true. <u>We prefer to use the term “potential wrongdoing” instead of “allegation”</u>
<b>Complainant</b> - person raising a concern/an incident; or reporter. (#)	A complainant is commonly understood as a person who files a complaint (see below). The term complainant may cause stigma for the person who raises a concern or shares details of an incident. Use of this word may stop people from reporting. Given that safeguarding issues include serious misconduct, criminal acts and human rights violations, and cannot simply be called complaints it may be <u>better to use terms such as: person raising a concern/an incident; or reporter.</u>
<b>Case Closure</b>	A case is considered closed when one of the following conditions is satisfied: (a) “A case was decided to be unsubstantiated or for which further investigation was not warranted and for which a closure report has been issued. (b) Alternatively, a case was concluded to be substantiated, accountability measures have been implemented and completed. (c) Where circumstances prevented a full investigation of the case.
<b>Complaint</b> - concern, report or incident (#)	Specific grievance of anyone who has been negatively affected by an organisation’s action or who believes that an organisation has failed to meet a stated commitment. <u>We prefer to use concern, report or incident.</u>
<b>Concern</b>	A cause of anxiety or worry”. A safeguarding concern is a feeling or worry that a child or adult may be at risk of harm, or may have been harmed, by the organisation’s staff, associates, programmes or operations. Concerns may relate to something directly seen or heard, or may relate to information which has come to the organisations through any means. A concern is not yet confirmed or fact-checked.
<b>Conclusion of an Investigation</b>	The conclusion of an investigation is...the point where a decision is made that either: (a) There is sufficient factual information to make recommendations about the reported possible misconduct; or (b) The matter can no longer be effectively pursued and must be closed. The conclusion of an investigation is not the same thing as the closure of a case. An individual survivor/victim as well as the potential wrongdoer may need ongoing support whether or not the investigation is complete. There will likely also be administrative actions, Human Resource actions and internal and external reporting requirements to be completed and documented prior to a case being closed. New evidence may come to light after a case is concluded. The case would then be reopened and further enquiries may be necessary.
<b>Confidentiality</b>	Maintaining confidentiality means not disclosing any information at any time to any party without the informed consent of the person concerned. Confidentiality promotes safety, trust and empowerment.
<b>Fact Finding</b>	Ensuring the investigation of allegations of misconduct that involve people or entities with a direct contractual link. The word fact-finding is commonly used in one of two ways, either: (a) As a preliminary action to establish if there are grounds for further enquiry – this may include collection of written statements. (b) As the term used in place of investigation, with a similar meaning and function. The terms inquiry and investigation generally cover formal legal proceedings.
<b>Incident</b>	A safeguarding incident refers to an act or series of acts of violence or abuse by one perpetrator or group of perpetrators. May involve multiple types of violence (physical, sexual, emotional, economic, socio-cultural); and may involve repetition of violence over a period of minutes, hours, or days. Safeguarding incidents are specifically those where: firstly the incident intentionally or unintentionally causes harm, or risk of harm, to staff, associates or members of the community – children or adults; and secondly harm is caused by the organisation’s staff, programmes, or operations. Incidents can also refer to frauds, thefts, significant financial losses, criminal breaches, terrorism or extremism allegations. This can include actions of partners, including partners based overseas.
<b>Investigation</b>	A fact finding and analytical process designed to gather information in order to determine whether wrongdoing occurred and, if so, the persons or entities responsible.

<b>Mandatory Reporting</b>	Mandatory reporting may refer to either: (a) The <b>contractual obligation to report</b> safeguarding concerns or incidents internally, to an organisation. (b) The <b>legal obligation to report</b> certain concerns or incidents to local or national authorities, including police. (c) The <b>obligation of organisations working outside their country</b> of registration to report certain incidents or concerns to regulatory, legal, or other entities in their country of registration.
<b>Report</b> of an incident, concern or suspicion	A report is the term used to describe any incident, concern, or suspicion being raised with an organisation, once the organisation receives information and logs the case for action. A report on the conduct of a staff member may cover a range of issues – including but not limited to: general programme feedback; concerns about general misconduct such as fraud, inappropriate use of organisational resources, and use of illicit substances; and disclosure of incidents of abuse, neglect, exploitation, violence, or harassment.
<b>Safeguarding</b>	Safeguarding is an umbrella term that covers <b>Protection from Sexual Exploitation and Abuse, sexual harassment</b> and used in the international humanitarian community, as a broad term that covers all forms of maltreatment or harm caused by staff, associates, operations, or programmes, where survivors are affected populations and/or other staff members – either adults or children. Globally, safeguarding is not always a recognised term and can be difficult to translate.
<b>Suspicion</b>	A suspicion is a concern or reported incident that is, as yet, not proven by evidence to be true.
<b>Survivor</b>	The terms ‘victim’ and ‘survivor’ can be used interchangeably. ‘Victim’ is a term often used in the legal and medical sectors. ‘Survivor’ is the term generally preferred in the psychological and social support sectors because it implies resiliency. <u>Individuals themselves must also be able choose whether they are referred to as a survivor or a victim.</u>
<b>Survivor-centred</b>	A survivor-centred approach means that the survivor’s rights, needs and wishes are prioritised.[...Where the individual has rights:] - To be treated with dignity and respect. - To choose. - To privacy and confidentiality. - To non-discrimination. - To information. A survivor-centred approach puts the safety, wishes and interest of the individual survivor first. A survivor-centred approach indicates that the survivor’s wellbeing should be prioritised over and above other actions such as internal reporting requirements, protecting an organisation’s reputation, completing a fact-finding process or reporting a concern or incident to legal authorities.
<b>Wrongdoer/ potential wrongdoer</b> - not perpetrator or alleged perpetrator	A wrongdoer is a person who does things that are immoral or illegal. The term wrongdoer is more easily understood as the person who is thought to have caused harm compared to alternatives such as subject of the complaint/report. Subject of the complaint may be misunderstood as the survivor. <b>Potential wrongdoer is preferred over perpetrator and alleged perpetrator</b> as it encompasses a wider range of behaviours relevant to safeguarding. Common understanding of the term perpetrator is that it describes a person who has committed a crime. Not all safeguarding concerns are criminal acts.
<b>Whistleblower</b>	A whistleblower is someone who shares details of a concern or incident. They may be a witness or advocate or they may have heard about the concern or incident by some other means. They themselves are not the survivor. An advocate is a person selected by the survivor to share details of a concern or incident on their behalf.