

# **GiveDirectly**

# **2024 Risk & Ethics Report**

June 2025

## 2024 Risks and Ethics Report Executive Summary

### **GiveDirectly is focused on integrity and safety in our operations**

- We deliver unconditional transfers to people in poverty while managing the risks this creates, including [fraud](#), [abuse](#), and safety threats.
- Our [code of ethics](#) and [values](#), along with national laws, guide staff conduct and set clear standards. We continuously improve our safeguards to strengthen protection for both recipients and staff.
- Staff training completion rates: 98% of staff completed risk mitigation training with >85% average score/comprehension rates resulting in more teams taking ownership of risks in their areas.

### **Which is why we created our risk & ethics report for 2024**

- In 2024, we [outlined our risk environment and protections](#).
- In this report, we share key incidents, lessons learned, and improvements made, reflecting our efforts to address concerns promptly and transparently, with a focus on supporting affected individuals.

### **This report shares specifics in how we measure and manage risk**

- It assesses our 2024 performance on safety, integrity, and risk management, covering all reported and investigated concerns from Jan 1 to Dec 31, 2024, including workplace harassment, sexual abuse, physical abuse, fraud, and safety risks.
- We detected fraud losses totalling 0.19% of the \$126M we delivered to 200K+ recipients across 12 countries, including 4 within crisis-affected regions. This is a significant reduction from the 0.31% recorded in 2023.
- We investigated and substantiated five safeguarding cases affecting our recipients that resulted in 4 staff facing disciplinary action, including termination of contracts with GiveDirectly.
- Five staff faced disciplinary action, including terminations, for violating GiveDirectly policies associated with staff relations and organizational culture.

## **A statement from the GiveDirectly Board of Directors**

GiveDirectly operates on the basis of trust. Recipients trust us to engage with them in ways that enhance their dignity and autonomy and shield them from harm and abuse; donors trust us to deliver money securely to recipients. Honoring the trust placed in us by recipients and donors is critical to achieving GiveDirectly's mission.

Our risk teams provide a clear picture of performance in risk management, identifying areas of success and areas requiring improvement. In this report we are making available to you the same information that I, in my role as board representative for risk management, review on a monthly basis with our team.

While progress has been made, particularly with the reduction in the known fraud rate and prompt investigation of safeguarding cases, we acknowledge the ongoing challenges highlighted in this report. Our known fraud rate decreased from 0.31% on transfers delivered in 2023 to 0.19% in 2024. Safeguarding cases were investigated promptly and disciplinary action taken where appropriate. We solidified senior leadership commitment to these issues, which Nick Allardice in particular has role modeled since his first day as President, and added expertise in key roles, notably Eelco Vugs who joined as our new Director of Safeguarding. We increased investment in org-wide risk prevention efforts such as staff training to improve risk awareness and response.

That said, risk management is an ongoing process due to the evolving nature of threats from external actors in our ecosystem. 2024 also saw new challenges: more scammers on social media attempting to trick recipients into surrendering some of their money, false politicization of our work in settings where we had assumed our nonpartisan status was established, and implausibly low rates of incident reporting in some of our remote programming that clearly suggest a problem (not a success). In our next report I hope to be able to share progress on these challenges, and others that will arise.

Best,  
Paul Niehaus

GiveDirectly Board Member

# GiveDirectly 2024 Risk and Ethics Review

## PREVENTION OF FRAUD AND CORRUPTION

### Spotlight: Fraud incidents responded to in 2024:

- 0.19% known transfer-related fraud losses (\$0.24M out of \$126M delivered); down from 0.31% in 2023.
- Prevented over \$800k from going to 3,288 imposters (ineligible people who tried to game our system to access the transfers).
- 345 SIM cards blocked out of the reported 400+ scammers (fraudsters impersonating GiveDirectly and tricking people out of their money with the false promise of sending them cash transfers).
- 13 allegations of staff fraud investigated, 1 confirmed.

## DIVERSION OF CASH TRANSFERS

Trend:  Detected fraud losses declined from 0.31% in 2023 to 0.19% in 2024

Fraud reduces the impact of our programs and the confidence of our donors. Our fraud prevention and investigation team focuses on preventing diversion of cash transfers to ensure recipients receive the full value of dollars delivered to them. An intergovernmental fraud [report](#) by the UK government estimates that public institutions lose between 0.5% to 5% of their total spending to fraud. The Association of Certified Fraud Examiners (ACFE), estimates in their [2020 report](#) that a [typical non-profit](#) organization loses an estimated 5% of its annual revenue to fraud.

In 2024, we protected recipients from losing their transfers to fraud:

- Out of \$126m delivered to recipients across 12 countries across Africa, Asia and USA, we detected 0.19% fraud losses from targeted theft and bribes, down from 0.31% in 2023.
- This reduction in losses coincided with investments made in strengthening our fraud detection and prevention systems following [a major incident in 2022](#).

## SCAMMERS IMPERSONATING GIVEDIRECTLY

Trend:  Worsening due to technology and increased brand awareness

In some programs, scammers impersonating GiveDirectly trick people out of their funds with the promise of sending them cash transfers ([examples](#)). In 2024, we noticed a spike in [scammers impersonating GiveDirectly](#) at rates higher than what we have recorded in the past years. Scammers tricked the public into paying to join fake GiveDirectly programs. In total 400+ local and cross border impersonation cases were reported, primarily from Kenya and Uganda. These

types of fraud occur outside our program areas and spread largely through social media.

Our risk team is working proactively to fight these scams.

- We coordinated with mobile providers, social media platforms & authorities to block 345 scam numbers/accounts.
- Launched awareness campaigns on [social media](#), our [website](#), and local news.
- Conducted ongoing education of communities we enrolled on how to prevent scams to spread awareness further.

This risk requires ongoing attention and will remain a focus in 2025

- We plan to send bulk SMS scam alerts through mobile network partners.
- We will explore new tech to auto-detect and block scam numbers.
- We will monitor industry practices, as this is anticipated to be an industry problem in the wake of AI.

## INELIGIBLE ENROLLMENTS

Trend:  Improved our ability to prevent inclusion errors


Some people outside of our selected villages, known as imposters, hear about our programs and attempt to enroll so they can receive funds. These ineligible people enrolling in our programs undermine our ability to track impact and reduce support for those most in need.

We prevented ineligible people from enrolling in our programs by detecting them using risk flags in enrollment surveys & community fraud assessments.

- Our team identified 3288 imposters (or 1.5% of all recipients) in 2024 compared to 3249 in 2023. We prevented them from receiving all their payments.
- This prevented ~\$800K from going to imposters, redirecting it to genuine recipients.

In 2025, we'll review our policies and calibrate our risk tolerance for routine imposters, while maintaining a high bar against more malicious, sophisticated, and/or higher risk gaming attempts. This policy review is intended to create more opportunities for individuals with genuine need in our program locations to access support from GiveDirectly, including those who may not meet certain current eligibility criteria

## SIM CARD SWAPPING

Trend:  Improved but need to speed up detection and response to SIM swaps

In our program in Malawi, we detected SIM card swapping; a form of mobile money diversion through which perpetrators steal cash transfers before they reach the recipients. The fraudster takes a recipient's mobile money SIM, akin to stealing a debit card. This is a key vulnerability in our model that was exploited in a large-scale [2022 fraud incident](#).

- In 2024, we detected SIM swapping from outside fraudsters in our Malawi program, impacting 1.9% of recipients in those programs.

We partnered with the local telco provider to block unauthorized swaps of recipient SIM cards.

- We expanded this approach to other country operations and other network providers.

We're also monitoring other types of mobile money fraud, including attempts by our own staff, and continuously improving automation of fraud detection to further protect our recipients.

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## SAFEGUARDING OUR RECIPIENTS FROM ABUSE

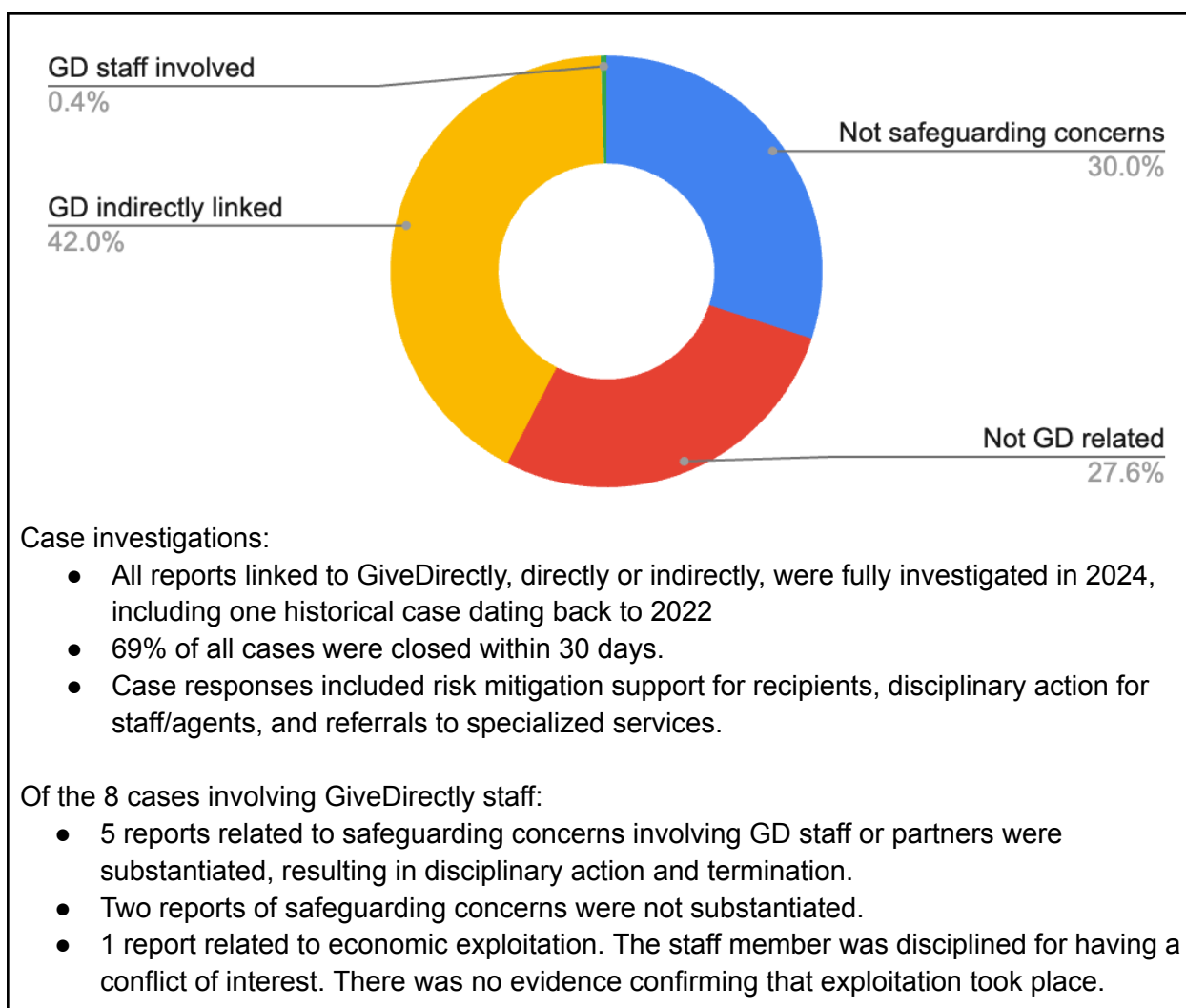
We take [a survivor-centered approach](#) to reporting abuse. While we share the number of such cases and disciplinary actions, we do not publish specific incident details — unlike our past reporting on financial fraud (e.g. [here](#) and [here](#)) — to protect the safety and dignity of those affected. This is how we balance transparency with our duty of care for survivors of abuse.

### **Spotlight:** 2024 Safeguarding Data

GiveDirectly responds to all reports that have a direct or indirect link to our programs and staff, and have the potential to cause abuse. However, we have also received reports that are not safeguarding-related or do not have any link to GiveDirectly's programs or agents.

Reports received:

- 57.6% of all reports received had no direct link to GiveDirectly programs or staff. This high volume of diverse reports may indicate recipients' comfort with and confidence in GiveDirectly's reporting channels.
- 42.4% of all reports had a direct or indirect link to GiveDirectly programs and staff, these were investigated and the necessary safeguarding actions taken to support recipients.



Discussions regarding appropriate standards for safeguarding practices and data collection are ongoing (e.g. [CHS Standard](#), and initiatives from [Project Soteria](#) and [WHO](#)). This means there are no universally agreed upon standards against which to compare our results; our aim here is to contribute to advancing those conversations.

### **Spotlight:** recipient feedback on our safeguarding systems

A feedback survey of recipients in Uganda, Rwanda, and Malawi found:

- 100% felt comfortable returning to GiveDirectly if they faced issues.
- 97% rated their experience as positive.
- 93% said concerns were handled safely and confidentially.
- 94% satisfied with the referral process.
- 87% were satisfied with external support services, highlighting the need for better coordination with these community resources and service providers where we refer

people who have experienced any form of abuse and lack of adequate referral services in certain under-served regions where we work.


## POLICIES PROCEDURES AND TRAINING

Trend:  Improved our policies and training for our staff

This year our safeguarding prevention measures focused on:

- Updating key policies including: [Safeguarding](#), [Whistleblower](#), [Anti-Bribery Anti-Corruption](#), [Close Personal Relations in the Workplace](#), [Conflict of Interest](#), [Anti-Harassment](#) & [Code of Ethics & Conduct](#)
- Further tailoring training delivered based on roles and responsibilities to protect recipients, accessible in all languages of operations.
- Mandatory safeguarding training for 700+ staff (new and existing) covering policies, standards, and accountability – with 98%+ of staff trained on all policies.
- Targeted advanced training: *Tier 2 Advanced SEAH Investigation Training* for 11 safeguarding staff through [Core Humanitarian Standard Alliance](#).


## TIMELY ESCALATION AND RESPONSE

Trend:  Improved, but need to better streamline case management

Timely escalation and response to safeguarding concerns has resulted in improved safeguarding case management. This year, we put stronger case tracking, investigation and resolution systems in place, including categorization of reports using community insights and local risk flags to separate safeguarding reports from other types of reports.

- We developed investigation guidelines to increase process consistency and accountability.
- People who have experienced abuse are provided targeted support—medical care, legal aid, psychosocial services, or safe spaces.
- A monthly safeguarding dashboard helps leadership track trends and adjust programs as needed.

## INCIDENT REPORTING

Trend:  Improvement, but more work needed in managing case data, streamlining reports, and case types

We strengthened our reporting and escalation processes to eliminate delays in the support recipients need when they face abuse. We expanded reporting awareness among our recipients:

- Added safeguarding posters in communities (e.g. [here](#) and [here](#)).
- Introduced structured community listening sessions beyond initial community meetings.
- Continued policy of hiring staff that speak local languages to make reporting clearer and



more accessible.


We improved reporting channels:

- Expanded free hotlines & [community feedback boxes](#)
- Rolled out our independent whistleblower webform ([Ethico](#)) to 100% of our countries of operation, with free hotline numbers accessible by staff in all, but 3 countries (where we have faced regulatory challenges with accessing toll free numbers)
- Streamlined internal whistleblower channel for regular case reporting.

This increased reporting volume suggests increased engagement with available reporting channels:

- The total number of reports received by GiveDirectly staff rose from 1491 in 2023 to 1882 in 2024, a 26% increase - these reports range from questions about our programme delivery to allegations of abuse, with less than 0.40% directly related to our staff.
- Reporting increased from 23 reports in the whistleblower inbox in 2023 to 38 in 2024, a 65% increase.

## Reporting in Remote Programs

Trend:  New issue resulting from implementation of a new tech innovation

GiveDirectly's remote enrollment programs present design challenges. We experienced low reporting in remote programs, which can result in recipients missing the opportunity to be supported if they experience abuse.

- In our Nigeria & Bangladesh flood response programs, we enrolled and paid 28,657 recipients fully remotely.
- We received two reports, one from Nigeria and another from Bangladesh despite known community challenges in these contexts<sup>1</sup> and large numbers of recipients.
- As we continue to explore making certain steps in our remote programs, we need to find better solutions for targeting strategies, risk reporting and building trust with communities.
- Findings will be used to improve future designs and boost safe reporting mechanisms in remote, tech-driven programs in 2025.

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## UPHOLDING STAFF SAFETY AND SECURITY

### CONFLICT AND EMERGENCIES

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<sup>1</sup> As evidence of these challenges in these contexts, our enrollment drive in Nigeria was expanded from a 4-step to a 6-step verification process and follow-up checks were expanded from 30% of recipients to 100% of recipients with the aim of mitigating high imposter rates

Trend:  Improved, but need to better integrate with governments and local risk responders

Conflict and emergencies can impact staff and recipient experience and wellbeing, derailing program activities. GiveDirectly increasingly operates in fragile, violence-affected areas:


- In 2024, conflicts in DRC and Mozambique forced temporary suspension of our operations.
- While no GiveDirectly staff were reported harmed in 2024, teams operate in high-risk areas where threats – often compounded by adverse weather – are prevalent.
- In DRC's North and South Kivu regions alone, 24 humanitarian workers were killed in 2024.

Some of the precautions we have taken to protect our team include:

- Security training, risk assessments, and emergency response plans rolled out for all teams.
- Mental health support provided to help staff manage stress and trauma.
- Dedicated safety and security team created at the global level.
- 'Security Focal Points' assigned in every program country.

These precautions aim to reduce risks associated with staff presence in vulnerable areas.

## **ROAD AND TRAVEL HAZARDS**

Trend:  Improved our strategies and tactics for protection of staff during travel


Road and travel hazards to and from recipient communities can harm our staff, derailing program activities. Road travel can be dangerous, especially in high-risk environments:

- In most of our program locations in Africa, staff often use motorcycles to access remote areas where roads are poor or impassable by car.
- Risks include bad weather, rough terrain, accidents, and potential ambushes.

We take precautions to protect staff from harm resulting from travel:

- All work travel is pre-approved through a security review process.
- Staff are equipped with protective gear, first aid kits, and follow strict communication protocols.
- Emergency plans are in place for quick response if incidents occur.
- Travel is actively monitored to keep staff safe at every step.

## **NATURAL DISASTERS AND SOCIAL UNREST**

Trend:  Improved protections for staff during disasters and crises

Natural disasters and social unrest can disrupt program operations and pose safety risks to our staff. In some program locations, staff are exposed to floods, cyclones, and landslides, both at home and while traveling for work.

- In December 2024, Cyclone Chido hit Memba, Mozambique, causing major damage to roads and infrastructure, closure of our local field office, and delays in program delivery as staff prioritized their families' safety.
- In Bangladesh, Nigeria, and Kenya, violent protests unrelated to our programs forced our teams to adapt quickly and closely monitor risks to keep programs running safely.
- We have not received any reports of any of our staff having been harmed by these natural disasters or unrests while on duty.

We developed emergency preparedness plans with:

- Backup travel routes
- Real-time weather monitoring systems
- Local and national information networks to monitor political situations.

## THREATS OR POLITICAL VIOLENCE

Trend:  Need stronger government and community relations

Threats or political violence can result from our cash distribution work, endangering our staff and operations. Giving out large sums of direct cash can create risks:

- Cash programs can unintentionally create safety issues, such as targeting by criminals or being misused by political actors.
- Lack of community engagement can lead to missed early warnings, rumors, and tensions, putting both staff and recipients at risk.
- In December 2024, we paused our Mozambique operations and evacuated staff in response to a false rumor that our cash payments were part of a political suppression effort

Building community trust helps mitigate security risks:

- We build trust with local communities and leaders to gather timely security information.
- We're careful with how we communicate and deliver aid to avoid sparking conflict or misinformation.
- Communities are sensitized about risks and their role in preventing, reporting, and responding to threats.

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## LEADERSHIP, OVERSIGHT AND ORGANIZATIONAL CULTURE

### **Spotlight:** Summary of 2024 disciplinary cases

All reports of staff violation of policy and code of ethics and conduct statements or actions that cause harm to our recipients and staff were investigated. Implicated staff were taken through

standard GiveDirectly Disciplinary process including termination of employment with the organization.		
Case type	No. of substantiated cases	No. of staff receiving disciplinary action
Workplace harassment	6	5
Sexual abuse	5 <sup>2</sup>	4
Financial exploitation	1	1
Physical abuse	0	0

## LEADERSHIP AND ACCOUNTABILITY

Trend:  Leadership oversight improved, with a stronger tone at the top

Strong leadership and accountability reinforces a safe work culture and ensures oversight of key risks. Proper training of our board and leaders empowers them to manage risks effectively, strengthening the organization's response. Top leadership completed more in-depth training in 2024:

- All board members (4) & senior leaders (12) received tailored governance-focused safeguarding training, covering risk oversight, organizational risk tolerance, and response monitoring.
- In 2024, senior leaders began reviewing monthly dashboards with incident metrics.

A majority of staff and teams completed a comprehensive training:

- 98% of GiveDirectly staff completed risk mitigation training and more teams are proactively addressing risk factors in their domains.
- Staff reported stronger alignment on risk roles following updated training.

## ORGANIZATIONAL OVERSIGHT

Trend:  Strategic leadership roles were filled providing direction for risk management

Lack of oversight means our board and senior leadership cannot effectively track risks, leading to poor accountability. We made new key appointments to strengthen our leadership oversight capabilities:

- Board representative for risk (Paul Niehaus)
- Non-interim CEO aligned with organizational increased focus on risk (Nick Allardice)
- VP of Risk, Internal Audit, Safeguarding, and Compliance (Caroline Teti)

<sup>2</sup> This includes a historical incidents in 2022 that implicated individuals who were no longer working with GiveDirectly at the time of the investigation

- Director of Safeguarding (Grace Jackson, now Eelco Vugs)

This new oversight improved risk analysis and tracking: The board's representative reviewed safeguarding and internal audit incident reports every month and followed up on what they thought could be concerning cases or trends.

Leadership set specific risk tolerance levels:

- Our loss from fraud rate: <0.5% of dollars delivered per year
- Our operations have no less than 80% of our safeguarding standards in place (see [here](#) for details about the measures we take)

## ORGANIZATIONAL CULTURE


### Spotlight: 2024 staff-related policy violations

GD received 18 reports of staff-related policy violations:

- 8 bullying
- 3 conflict of interest
- 3 close personal relationship at the work place
- 2 fraud

All 18 reports were investigated:

- Cases closed, on average, within 55 days.
- 6 reports were substantiated, validating the grievance.
  - 5 reports led to disciplinary action (warnings, suspensions, or termination).
  - 1 was substantiated, though the staff resigned before the investigation concluded.
- 7 reports were unsubstantiated (the grievances were invalidated) and the cases were closed accordingly.
- 4 reports lacked credible evidence to make a conclusion, and have been paused.
- 1 report was withdrawn.

Trend:  Improved uptake of policy trainings and comprehension

Healthy conduct from our staff and their relationship with each other, our partners, and our recipients are vital for a well-functioning organization. Erosion of organizational norms can lead to abuse of our staff and a lack of adherence to other policies on fraud and safeguarding.

Following updates to key policies, we improved staff comprehension of all relevant policies to reflect GD's values and culture:

- 98.2% of staff trained on the *Anti-Harassment Policy*, covering bullying, discrimination,

harassment, and retaliation.

- 96.5% of staff trained on the *Close Personal Relationships at the Work Place Policy*, which was updated with stricter rules and disclosure protocols.
  - Risk responsibilities now embedded into [\*Risk Management within GD's Staff Leveling Framework\*](#) — all staff, from junior to executive level, are assessed quarterly on how they manage risk in their roles.
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## **In 2025, we're improving our risk oversight and reporting**

### **We'll expand leadership oversight**

- Creating a risk rating matrix for all GD countries to track trends over time and use them to update the global risk register.
- Building a visual global risk dashboard for a clearer, holistic view.

### **We'll strengthen fraud & safeguarding controls**

- Maintaining our targets: known fraud <0.5% and a high bar for safeguarding standards across all countries.
- Tracking key performance indicators:
  - % of recipients audited within 30 days of program launch.
  - Speed of case resolution and risk de-escalation.
  - Inclusion and exclusion errors.
  - % of staff trained on critical policies and safeguarding standards within 30 days of assignment.
  - 80%+ implementation of safeguarding standards across all our activities.
  - Quarterly risk oversight initiatives by senior leadership and the board.
- Standardizing data reporting and automating fraud detection for internal & external threats.
- Further investing in AI-powered fraud detection tools for scalable and high-impact monitoring.

### **We'll build recipient trust & community engagement**

- Expanding recipient feedback surveys across all countries.
- Institutionalizing community dialogue sessions to improve program design and reporting of abuses.
- Monitoring gender equality and equity metrics in 2025 risk reporting.

### **We'll respond to the voices of our recipients by reconsidering our low imposter risk tolerance**

In 2025, we plan to review our policies and calibrate our risk tolerance for routine imposters, while maintaining stringent controls against malicious, sophisticated, and/or higher risk gaming attempts. This initiative is expected to create more opportunities for individuals with genuine need in our program locations to access support from GiveDirectly, including those who may not meet certain current eligibility criteria.

#### **Voices from GiveDirectly recipients**

William from Kenya said, *"I feel some of the policies of the organization should be amended. The criteria of registering only the people who have houses should be revised because some*

*deserving people were left out yet it wasn't their fault not to have houses but poverty is the one which has made them unable to have the houses. Therefore I urge if possible some investigations be done to determine the reason as to why someone doesn't have a house."*

### **Help Us Improve**

Have concerns about GiveDirectly's operations or staff that could risk abuse to recipients?

Share feedback or report concerns: Internal whistleblowing: [whistleblower@givedirectly.org](mailto:whistleblower@givedirectly.org)

General information: [info@givedirectly.org](mailto:info@givedirectly.org) External whistleblowing: [Ethico](#)