

GLOBAL FRAMEWORK

# Global Faith, Financial Influence & Public Trust

A Standard for Ethical Accountability, Safeguarding,  
and Equal Access to Remedy

**WHERE INFLUENCE GROWS, RESPONSIBILITY MUST GROW FASTER.**

*Institutions exist to serve people. Public trust is earned through integrity. Accountability protects both.*

## Purpose and status

This publication is a proposed voluntary global standard and public-interest framework. It is not a legal opinion, financial-crime allegation, or factual finding about any named organization. It respects religious freedom and lawful institutional autonomy while asserting that influence over people, money, services, and public life requires transparent governance, safeguarding, fair process, and meaningful access to remedy.

**Created by Oklahoma Child Wellbeing**

[okchildwellbeing.org](https://okchildwellbeing.org)

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## EXECUTIVE SUMMARY

# A Global Standard for Power With Accountability

Faith institutions can be among the most durable and influential social infrastructures in the world. Their influence can extend through worship, education, care, disaster relief, media, publishing, property, missions, schools, employment, political engagement, donor networks, and cross-border partnerships. This influence can produce substantial public good. It can also create power imbalances when resources, authority, reputation, and access to decision-makers are concentrated without independent accountability.

This framework does not treat financial capacity, religious belief, or international work as evidence of misconduct. It identifies the conditions under which risk increases and establishes protections that make trust more credible. It is built for faith institutions, donors, regulators, journalists, advocates, boards, staff, members, survivors, and communities seeking a fairer system.

### Core proposition

No person should need wealth, institutional access, legal connections, public visibility, or insider status to be heard, protected, or treated fairly when raising an ethical concern. A fair system must make credible reporting, independent review, and remedy available to people with the least power - not only to those with the most influence.

## What this standard changes

Moves discussion from reputation management to measurable governance, financial integrity, safeguarding, and remedy.

Makes global and local influence visible through a common pathway model and comparable evidence requirements.

Defines minimum protections for staff, volunteers, congregants, beneficiaries, whistleblowers, and survivors.

Creates an evidence-based scorecard that can be used by governing bodies, donors, journalists, researchers, and regulators without making unsupported allegations.

Explains how standards can become enforceable through law, regulation, contracts, bylaws, grants, accreditation, and independent certification.

## Scope and limits

The standard applies to churches, ministries, denominations, mission organizations, faith-based charities, religious schools, media ministries, affiliated foundations, networks, and partner entities. It is designed for adaptation across jurisdictions. It does not replace local law; it calls for compliance with applicable law and adoption of stronger voluntary safeguards where lawful and proportionate.

EVIDENCE AND COMPARABILITY

## International Standards Base

A global framework must be rooted in established international principles, yet honest about the fact that no single authority governs every religious institution in every jurisdiction. This standard therefore uses a cross-sector foundation: human rights, anti-corruption controls, nonprofit risk management, whistleblower protection, and fair-process principles.

### 1. Protect, Respect, Remedy

The UN Guiding Principles on Business and Human Rights organize responsibility around three pillars: a state duty to protect, an organizational responsibility to respect human rights, and access to remedy for affected people. This framework applies the same logic to powerful faith institutions: authority has a duty to protect; institutions must prevent and address harm connected to their activities and relationships; and people need credible paths to remedy. [1]

### 2. Risk-based protection without collective suspicion

FATF guidance emphasizes targeted, proportionate, risk-based measures for nonprofit organizations. The point is not to stigmatize civil society, faith communities, or cross-border charitable work. The point is to recognize that opaque structures, weak controls, and poorly documented transfers can create preventable risk, while legitimate organizations should be protected from disproportionate burdens. [2]

### 3. Internal controls, ethics, and compliance

OECD good-practice guidance emphasizes visible leadership commitment, risk assessment, internal controls, ethics, and compliance measures. This framework adapts those concepts for institutions where moral authority, donor stewardship, and vulnerable populations create a heightened public-trust obligation. [3]

### 4. Protection for reporting persons

UNCAC Article 33 calls on States Parties to consider measures protecting people who report corruption in good faith and on reasonable grounds. UNODC guidance and the EU whistleblower framework reinforce practical features such as confidential channels, trained handlers, follow-up, privacy protections, and safeguards against unjustified retaliation. [4][5]

### 5. Jurisdictional disclosure differences

Financial transparency rules differ significantly by country and entity type. In the United States, for example, churches and some church-affiliated organizations are exempted from annual Form 990 filing requirements. That fact does not establish wrongdoing; it illustrates why voluntary transparency and independent assurance can matter where public reporting differs by legal form. [6]

**FINANCIAL INFLUENCE AND POWER**

# Global Financial Influence: What Must Be Seen

There is no credible single figure for the financial wealth of all global ministries, churches, denominations, religious orders, charities, schools, media organizations, foundations, and affiliated entities. Legal structures, reporting rules, property ownership, and disclosure requirements vary across countries. A serious global framework should not invent a total. It should require institutions to make material financial power visible enough to be understood and tested.

## Material financial-power categories

Donations, tithes, offerings, grants, sponsorships, and fundraising campaigns.

Real property, land, housing, campuses, vehicles, aircraft, equipment, and other capital assets.

Schools, colleges, publishing houses, broadcasting, streaming, conferences, licensing, and media operations.

Investments, endowments, reserves, donor-advised funds, foundations, trusts, and affiliated businesses.

National and cross-border transfers, mission projects, humanitarian aid, international partners, and fiscal sponsorship arrangements.

Compensation, benefits, expense accounts, vendor contracts, family or insider transactions, and related-party arrangements.

### Global financial transparency principle

Financial scale is not the risk. Hidden influence is. The more an institution can direct money, people, information, services, or political access across borders, the stronger its documentation, governance independence, safeguarding, and public explanation should be.

## How Financial Influence Travels

A reliable global analysis does not assume that money is wrongdoing. It recognizes that funds can enable humanitarian services, education, healthcare, disaster response, community support, and faith practice. Risk rises when the path from contribution to decision-making is opaque, concentrated, or shielded from review.

Level of influence	Typical channels of power	Required protections
<b>World / Cross-Border</b>	Donor networks, missions, aid, media, publishing, property, investments, affiliated entities, international conferences, and foreign transfers.	Entity maps, country-risk due diligence, transfer records, local-partner review, sanctions/AML compliance, safeguarding coverage.
<b>Nation</b>	Tax policy, political access, national media, educational systems, major campaigns, denomination or network governance.	Public policy and lobbying disclosures where required; independent governance; financial reporting; conflict controls.
<b>State / Province</b>	Licensing, schools, child protection	Regulatory compliance review, reporting

Level of influence	Typical channels of power	Required protections
	systems, regional assets, regulatory relationships, state-level political influence.	protocols, local safeguarding requirements, conflict and procurement controls.
<b>Regional</b>	Multi-campus operations, regional leadership, shared staff, training pipelines, regional conferences, service delivery.	Affiliate agreements, complaint portability, staff support, shared incident and safeguarding data.
<b>Local</b>	Congregation, volunteers, staff, families, property, direct services, local reputation and social pressure.	Accessible reporting, anti-retaliation, transparent use of funds, independent support and referral pathways.
<b>Individual</b>	Members, employees, volunteers, students, beneficiaries, whistleblowers, survivors, and concerned community members.	Information access, privacy, accompaniment, legal/referral support, fair process, timely remedy.

## RISK AND PROTECTION

# Risk Conditions Requiring Heightened Safeguards

The conditions below are not proof of criminal conduct, abuse, or corruption. They are risk signals that warrant stronger controls, independent review, or more transparent documentation. The purpose is prevention: identify vulnerabilities before people are harmed or public trust is lost.

**Concentrated authority:** One person, family, or tightly connected group controls doctrine, staffing, finances, property, compensation, complaints, and public messaging without independent counterweights.

**Opaque financial pathways:** Money moves across affiliates, countries, projects, or private entities without clear purpose, documentation, reconciliation, or independent review.

**Related-party benefit:** Family members, insiders, or preferred vendors receive compensation, contracts, property advantages, or benefits without conflict review, market comparison, or public disclosure.

**Reporting barriers:** People must seek permission from the subject of a concern, report only through internal leadership, or face loss of employment, standing, housing, community, or spiritual belonging.

**Safeguarding gaps:** Institutions serving children, vulnerable adults, students, patients, employees, or aid recipients lack consistent screening, training, response protocols, independent review, or survivor support.

**Political or reputational leverage:** Institutional relationships are used to suppress scrutiny, discourage reporting, gain favorable access, or frame accountability concerns as disloyalty or persecution.

**Cross-border fragmentation:** Affiliates claim independence when concerns arise, while centralized brand, money, policy, leadership, or program control makes responsibility difficult to trace.

## Protection standards for people with less power

A person raising a concern must have access to at least one reporting route outside the direct line of command.

No reporter should be required to obtain the approval of the person or office implicated before seeking independent support, legal advice, pastoral care, or safety planning.

Institutions must prohibit retaliation and track indicators such as job changes, loss of role, discipline, exclusion, threats, housing instability, immigration pressure, or reputational attacks following a report.

Children, vulnerable adults, employees, volunteers, and beneficiaries must have age-appropriate, accessible, trauma-informed pathways to report concern and obtain support.

Where legal reporting duties apply, institutions must meet them; internal processes must never be used to delay emergency protection or legally required reporting.

**MINIMUM REQUIREMENTS**

# The Global Accountability Standard

This is a voluntary model standard. It becomes enforceable only when it is adopted through law, regulation, licensing, accreditation, contracts, grant conditions, denominational governance instruments, organizational bylaws, employment policies, or independent certification. It is designed so that journalists, regulators, donors, staff, congregants, survivors, and governing bodies can see what an institution has committed to, how compliance is tested, and what happens when it fails.

Standard	Minimum requirement	Evidence of implementation
<b>1. Independent Governance</b>	At least one independent oversight function with no family, employment, donor, or financial conflict; written conflict-of-interest register; recusals documented.	Board minutes; conflict register; independent-member roster; annual declaration.
<b>2. Financial Integrity</b>	Annual financial statements; external review scaled to revenue/risk; related-party disclosure; restricted-fund tracking; documented cross-border transfers.	Published report; audit/review letter; transaction register; donor-restriction controls.
<b>3. Safeguarding</b>	Written safeguarding policy; training; risk assessment; response protocol; mandatory reporting compliance where applicable; survivor-centered support.	Training logs; policy; incident response audit; referral pathways.
<b>4. Speak-Up Protection</b>	Multiple confidential reporting routes, including an independent route; anti-retaliation policy; time-bound acknowledgement and status updates.	Case log; retaliation-risk review; reporting-channel test; anonymized annual metrics.
<b>5. Fair Process &amp; Remedy</b>	Impartial intake, conflict screening, notice, appropriate fact-finding, support for affected persons, written outcome rationale, appeal or external review path.	Case handling protocol; decision record; appeal log; remedy tracking.
<b>6. Cross-Border Accountability</b>	Entity map; country-of-operation risk assessment; anti-corruption and sanctions controls; culturally competent safeguarding; local legal compliance.	Entity map; country risk files; transfer records; local partner due diligence.
<b>7. Public Transparency</b>	Public governance and financial summary; safeguarding and reporting policies; annual accountability report; explanation of material exceptions.	Website disclosures; annual report; archived policies; update history.
<b>8. Corrective Action</b>	Defined escalation steps; independent investigation criteria; remedial actions; leadership accountability; follow-up review.	Corrective-action plan; due dates; completion evidence; verification report.

## ENFORCEMENT AND REMEDY

# Turning Principles Into Enforceable Practice

A framework becomes meaningful only when noncompliance has consequences and affected people can reach a remedy. This document cannot impose law. It specifies the mechanisms by which its requirements can become binding and independently tested.

**Law and regulation:** Applicable criminal, labor, charity, tax, child-protection, anti-discrimination, data-protection, anti-money-laundering, and reporting laws remain controlling.

**Governing documents:** Denominations, churches, ministries, schools, and networks can incorporate the standard into bylaws, constitutions, policies, codes of conduct, employment agreements, and affiliate agreements.

**Funding conditions:** Donors, grant makers, foundations, and partner organizations can require annual disclosure, independent review, safeguarding standards, and non-retaliation commitments as conditions of funding.

**Accreditation and certification:** Independent accrediting or certification bodies can assess evidence against the standard and publish results, corrective actions, or loss of status.

**Contracts and procurement:** Government and institutional contracts can require safeguards, audit rights, conflict controls, reportable incidents, and corrective-action timelines.

**Public accountability:** Annual reports, scorecards, audits, and aggregate complaint-handling data can let communities judge whether values are being put into practice.

## Minimum response protocol

Acknowledge a report promptly; assess immediate safety, retaliation risk, and legal-reporting obligations.

Screen conflicts. No person with a direct or material conflict should control intake, investigation, decision-making, or communication.

Provide a written process explanation, support information, and a reasonably predictable timeline.

Use qualified, independent reviewers when allegations involve senior leadership, significant financial interests, safeguarding, cross-border operations, or institutional conflicts.

Document findings, corrective actions, reasons for decisions, and measures to prevent recurrence. Provide an appeal or external-review route where feasible.

Publish anonymized annual data on reports, response timing, retaliation concerns, substantiated process failures, and corrective actions - while protecting privacy and legal rights.

### **Non-retaliation is not a slogan**

A policy is not enough. Institutions should actively examine whether reporting is followed by demotion, lost hours, loss of housing, social exclusion, threats, spiritual coercion, legal intimidation, or reputational attacks. Where retaliation risk exists, the response must include practical protection, not simply a written prohibition.

**MEASUREMENT AND PUBLIC ACCOUNTABILITY**

## Comparability: A Public Accountability Scorecard

A standard carries more weight when the same questions can be asked across institutions, countries, and networks. This scorecard is not a finding of wrongdoing. It is a transparency and improvement tool. Scores should be supported by evidence, independently reviewed where possible, and reported with explanations for local legal or security constraints.

Domain	0 - Absent	1 - Developing	2 - Implemented	3 - Independently Assured
<b>Governance</b>	No independent oversight	Policy exists but not tested	Independent oversight operating	External assurance or credible independent review
<b>Financial transparency</b>	No public summary	Partial summary; gaps remain	Annual disclosures and controls	Independent audit/review and public explanations
<b>Safeguarding</b>	No written framework	Basic policy only	Training, response, referral, review	Independent safeguarding audit and trend reporting
<b>Reporting &amp; non-retaliation</b>	No safe channel	Internal channel only	Multiple routes and documented protection	Independent channel, public metrics, retaliation audit
<b>Remedy &amp; corrective action</b>	No clear process	Process exists but outcomes unclear	Written process, remedy tracking, leadership review	External review/appeal option and published aggregate lessons
<b>Cross-border stewardship</b>	No entity/country mapping	Informal partner records	Entity map, due diligence, transfer controls	Independent country-risk review and assurance

### Reporting format for institutions

Institutions seeking alignment should publish a short annual accountability statement that identifies: legal entity structure; governing body and independent members; revenue categories and material assets; related-party disclosures; safeguarding training and response capacity; reporting channels; aggregate case and retaliation data; corrective actions; and the scorecard level for each domain. Where disclosure could create a serious safety or security risk, the institution should explain the limitation and describe alternative assurance methods.

**EQUAL ACCESS TO PROTECTION**

## Leveling the Field for Individuals

The central injustice in many institutional conflicts is not simply that an organization has resources. It is that a person facing the organization may lack information, money, representation, time, physical safety, spiritual support, legal access, or a place to go. A public-trust standard must reduce that gap.

### Individual access commitments

Plain-language explanation of how to raise an ethical concern, what will happen next, and where to seek outside help.

An independent navigator or ombuds-style contact for people who cannot safely approach the institution directly.

Free or low-cost referral pathways for legal aid, child protection, domestic violence services, counseling, financial advocacy, and trauma-informed support.

Preservation of records: people should be able to retain their own communications, employment records, complaint submissions, and outcome notices, subject to lawful privacy and safety limits.

Accessible participation: translation, disability access, remote participation, support persons, and protection against religious or cultural coercion.

No forced choice between personal safety and community belonging. Accountability should not require a person to sacrifice housing, employment, custody, immigration status, family access, or spiritual community to be heard.

#### Shared invitation

Can you see the harm created when money, networks, access, and reputation outweigh the voice of an individual? This framework calls institutions, donors, regulators, journalists, advocates, and communities to work together - not to weaken faith, but to make power answerable to the people it is meant to serve. Equal protection is not anti-institution. It is the condition that makes trust possible.

## IMPLEMENTATION

# A 12-Month Adoption Roadmap

**0-30 days:** Adopt a public commitment; appoint an implementation lead; map legal entities, affiliates, and reporting channels; complete a conflict and safeguarding baseline review.

**31-90 days:** Establish independent reporting access; adopt anti-retaliation and conflict-of-interest controls; publish core governance and financial transparency information; train leaders and staff.

**3-6 months:** Complete financial pathway review, related-party analysis, child/vulnerable-adult safeguarding review, cross-border risk assessment, and scorecard self-assessment.

**6-12 months:** Obtain independent review where risk is material; publish an accountability report; implement corrective-action plans; create an annual public update cycle.

## Call to action

International advocates, journalists, policy leaders, regulators, governing boards, donors, and major organizations can use this standard as a common starting point. The immediate work is to test it against different legal systems, cultures, faith traditions, survivor needs, and real-world implementation constraints. A global standard must be rigorous enough to matter and flexible enough to protect people without silencing legitimate religious life.

## VERIFICATION

# References and Standards Base

The framework adapts principles from established human-rights, anti-corruption, financial-integrity, nonprofit-risk, and whistleblower-protection sources. It does not claim that these sources create a single global law governing all faith institutions. Requirements vary by jurisdiction; institutions must comply with applicable local law and should adopt stronger safeguards where lawful and proportionate.

- [1] Office of the United Nations High Commissioner for Human Rights. Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework (2011). [Official source](#)
- [2] Financial Action Task Force. Best Practices on Combating the Abuse of Non-Profit Organisations (2023), and amendments to Recommendation 8 emphasizing targeted, proportionate, risk-based measures. [Official source](#)
- [3] OECD. Good Practice Guidance on Internal Controls, Ethics and Compliance; annexed to the 2021 Anti-Bribery Recommendation. [Official source](#)
- [4] United Nations Convention against Corruption, Article 33; and UNODC, Good Practices in the Protection of Reporting Persons (2015) and Practical Toolkit for Developing Whistle-blower Protection Frameworks (2025). [Official source](#)
- [5] European Union. Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law. [Official source](#)
- [6] United States Internal Revenue Service. Filing Requirements for Churches and Religious Organizations. U.S.-specific context: churches and some church-affiliated organizations are excepted from annual Form 990 filing requirements. [Official source](#)

Accessed June 26, 2026. Sources are provided for verification and further research; their inclusion does not imply endorsement of Oklahoma Child Wellbeing or this framework.

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