Donor Due Diligence, Compliance and Risk Sharing

'Grab and Go' Pocket Guide

April 2025



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About ICVA

The <u>International Council of Voluntary Agencies</u> (ICVA) is a global network of 168 non-governmental organisations (NGOs) active in 160 countries, operating at global, regional, national and local levels, whose mission is to make humanitarian action more principled and effective by working collectively and independently to influence policy and practice.

What does this mean?

Due diligence and compliance: The processes that donors and intermediaries use to conduct a thorough investigation, verification, or assessment of recipient organisations before entering into partnership. This includes ensuring recipient organisations adhere to laws, regulations, standards, or ethical practices relevant to a specific industry, organisation, or jurisdiction. It ensures that activities are conducted within the boundaries of legal and regulatory frameworks, and that all relevant information is reviewed to make an informed decision and mitigate risks.

Partner capacity assessment: The processes donors and intermediaries use to assess the capacity, governance, and controls of recipient organisations to ensure accountability, transparency, and impact, while minimising risks to all stakeholders involved in the funding process. It involves evaluating policies and practices related to registration status, governance structure, compliance with humanitarian principles, programmatic capacity and expertise, monitoring, evaluation and learning frameworks, financial management and controls, and risk management and security. Some donors also have specific requirements on accountability to affected people; protection from sexual exploitation and abuse; gender and inclusion; innovation, and environmental and social safeguards. These assessments help donors and intermediaries to identify strengths, address gaps, and mitigate risks when partnering with recipient organisations.

Risk: Can be understood as "the effect of uncertainty on objectives, including both potential positive and negative outcomes". See <u>International Standards Organisation (ISO) 310000</u> which is seen as the primary international standard for enterprise risk management. In the humanitarian sector, a risk represents any uncertainty that could impact the achievement of objectives, such as the delivery of assistance or the management of resources. Risks arise from both external factors, such as political instability, and internal factors, such as governance or capacity limitations. There are eight core risk areas: Safety, Security, Fiduciary, Legal/Compliance, Operational, Reputational, Information and Ethical. See InterAction and Humanitarian Outcomes (2019) <u>NGOs and Risk: Managing uncertainty in local-international partnerships</u> and ICVA (2020) <u>Risk and Humanitarian Culture Briefing Paper.</u>

Risk management: Can be understood as "the coordinated activities to direct and control an organisation with regard to risk". See <u>International Standards Organisation (ISO) 310000</u>. Risk management is an organisation's formal reaction to risk, including guidelines, tools, and procedures. Effective risk management involves identifying, assessing, and addressing uncertainties through coordinated activities. Risk management is an intentional process that goes beyond simply reacting to risks as they become incidents. See ICVA (2020) <u>Risk and Humanitarian Culture Briefing Paper</u>.

Risk-sharing: Can be understood as "a reasonable sharing of the burden of preventative measures and reasonable sharing of responsibility for materialising risks" across the entire delivery chain, from donors to recipient organisations. See Risk Sharing Platform (2023) *Risk Sharing Framework.* Risk is inherent in delivering assistance in fragile and conflict-affected settings, where uncertainties are high. Risk-sharing emphasises equitable distribution of risks across donors, intermediaries and recipient organisations such as local and national non-governmental organisations (L/NNGOs) to prevent overburdening specific stakeholders.

Counter-terrorism legislation: Refers to legal frameworks and policies designed to prevent the financing or support of terrorist organisations. These laws impose restrictions on financial transactions, operations, and partnerships to ensure assistance does not inadvertently benefit designated terrorist groups. Such legislation can pose challenges for humanitarian agencies operating in high-risk areas, potentially limiting their ability to deliver assistance impartially. Humanitarian agencies must navigate compliance with counter-terrorism laws

while adhering to humanitarian principles, such as neutrality and independence, to ensure assistance reaches those in need without undue restrictions or risks of liability. This has led to practices including bank de-risking (where financial institutions limit or terminate services to clients or sectors perceived as high-risk, such as humanitarian agencies operating in conflict-affected or sanctioned regions); donor interference (involving the extensive vetting of recipients of assistance, partners, and vendors, or restrictions on the types of assistance that can be provided, which can complicate, limit or delay the delivery of assistance); and heightened concerns regarding risks such as aid diversion. See ICVA and InterAction (2023) *UN Security Council Resolution 2664 Reporting Process to Sanctions Committees FAQ* also in French and Arabic (available only to members). Contact Manon Glaser manon.glaser@icvanetwork.org for a copy.

What are some quick facts and figures?

The Money Where It Counts protocol launched by the Norwegian Refugee Council and Boston Consulting Group in 2019, aims to improve the effectiveness and efficiency of humanitarian financing by addressing burdensome due diligence and administrative processes and complex funding flows. The protocol estimates a potential gain of 2.3 million hours annually, if harmonised and simplified proposal, budgeting and reporting solutions were to be implemented across the humanitarian sector. According to the Aid Worker Security Database, 2024 is already shaping up to be the deadliest year on record for humanitarian workers. Some 300 people have been killed, of which the vast majority were national staff from United Nations (UN) agencies, NGOs and the Red Cross Red Crescent Movement. These figures highlight the significant risks humanitarian workers encounter while delivering lifesaving assistance to crisis-affected people. However, humanitarian agencies, particularly L/NNGOs, are expected to shoulder most of the risk, and are unable to access adequate funds to invest in risk management and to protect the safety and security of their staff and volunteers. According to the Grand Bargain (2023) Grand Bargain Annual Independent Report, 21 out of 59 (36%) signatories that submitted self-reports did not respond to the risk-sharing question in the narrative report.

What's the background?

The evolution of donor due diligence and compliance has been shaped by critical events and emerging challenges over recent decades. In the late 1990s and early 2000s, crises such as the Rwandan genocide (1994), Kosovo conflict (1998–1999), and Indian Ocean tsunami (2004) underscored the need for improved delivery of humanitarian assistance, coordination, and financial accountability. In response, donors implemented stricter due diligence measures, introducing partner capacity assessments and additional requirements for financial management, procurement, risk management, reporting, and audits. Concurrently, terrorist attacks, including the 1998 United States embassy bombings in Kenya and Tanzania and the 9/11 attacks in 2001, spurred significant counter-terrorism legislation and UN Security Council Resolutions (UNSCR) (such as <u>UNSCR 1267</u> in 1999, <u>UNSCR 1373</u> in 2001, UNSCR 1390 in 2002), which targeted groups such as al-Qaeda and the Taliban. Since 2018, failures involving humanitarian workers in cases of sexual exploitation and abuse have brought organisational integrity and safeguarding into focus. Since 2020, data protection issues have gained prominence with the rise of digital platforms and increased data collection on the recipients of assistance. Recent high-profile cases of aid diversion in Somalia and Ethiopia, coupled with shrinking government budgets and fear of public backlash in donor countries, have heightened scrutiny on fraud and mismanagement. In 2022, the adoption of UNSCR 2664 enabled humanitarian agencies to deliver assistance to crisis-affected people without violating counter-terrorism measures, balancing security objectives with the need to uphold humanitarian principles. See Joint Letter from NGOs on extension of humanitarian exemption (UNSCR 2664) to UNSCR 1267 (2024) (available to members only).

Why does it matter?

Donor due diligence and compliance are essential for ensuring humanitarian financing is used effectively and efficiently, reaches crisis-affected people and achieves its intended impact. These processes verify that recipient organisations have the capacity, governance and controls to manage funds responsibly. Humanitarian agencies and their workers operate in high-risk environments marked by fragility, conflict, and instability. This means it is critical for NGOs to identify and manage risks effectively, while adhering to the humanitarian imperative and principles such as the International Committee of the Red Cross (ICRC) Code of Conduct, Sphere Humanitarian Charter, and United Nations Office for the Coordination of Humanitarian Affairs (OCHA) Humanitarian Principles. Discussions around risk management are deeply tied to the Grand Bargain's localisation commitment, however, due diligence, compliance and risk management processes can be complex and burdensome for NGOs, particularly L/NNGOs who shoulder disproportionate security, financial and operational risks in the delivery of humanitarian assistance without adequate support. Unilateral approaches to risk may address immediate concerns for one actor but often create or transfer risks for others, potentially undermining the shared goal of effective delivery of humanitarian assistance. To address this imbalance, donors and intermediaries must adopt collaborative risk-sharing models to distribute responsibility more fairly, by providing predictable, multi-year and flexible funding, increasing coverage of overhead costs, and investing in capacity-strengthening and organisational development. Transparent communication, mutual trust, and context-specific approaches are essential to balancing accountability with operational realities. See Hughes (2022) Risk Sharing in Practice -Success Stories, Enablers, and Barriers to Risk Sharing in the Humanitarian Sector and Humanitarian Outcomes and InterAction (2019) NGOs and Risk: Managing uncertainty in local-international partnerships.

What's been achieved?

Some progress has been made on streamlining donor due diligence, compliance and risk management requirements for NGOs. The Grand Bargain has spearheaded efforts to simplify and harmonise donor reporting requirements, supported by the Less Paper, More Aid initiative and the rollout of the Harmonised Reporting (8+3) Template. Both the Central Emergency Response Fund and Country-Based Pooled Funds have introduced simplified partner capacity assessments, and the Start Network has designed tiered partner capacity assessments based on the risk and resource level associated with the size and complexity of the grant being sought. The OCHA Grant Management System and UN Partner Portal have streamlined processes for conducting partner capacity assessments, applying for funding opportunities, and submitting reports and audits. The COVID-19 pandemic and the associated travel restrictions and operational disruptions accelerated innovations in risk management, prompting donors to allow for remote and third-party monitoring and flexible reporting. There has also been some attempt to promote the harmonisation of risk management policies, frameworks, approaches and measures through a number of initiatives including the <u>UN High-Level Committee on Management</u> which oversees a Task Force on Risk Management and the establishment of the Risk Sharing Platform co-chaired by the Netherlands Ministry of Foreign Affairs, International Committee of the Red Cross (ICRC) and InterAction. Risk sharing also remains a priority crosscutting issue under the Grand Bargain 3.0.

What's left to do?

Despite progress in simplifying and streamlining due diligence, compliance and risk management requirements for NGOs, significant challenges persist, many of which disproportionately affect L/NNGOs. Most donors and intermediaries enforce a 'zero-

tolerance approach to risk' rather than a 'zero-tolerance approach to inaction', sidelining L/NNGOs as subcontractors instead of equal partners. This leads to risk transfer from international to local organisations, with donor conditions passed on to downstream partners who often lack the resources and logistical capacity to comply. Often L/NNGOs lack the necessary tools, such as vehicles, communication equipment, and security training, leaving them vulnerable in high-risk environments. Inadequate coverage of administrative and overhead costs further prevents L/NNGOs from investing in organisational development, risk management, and safety measures. Additionally, L/NNGOs face numerous administrative and financial hurdles, including duplicative partner capacity assessment and reporting processes, highly earmarked funding, delayed payments, rigid requirements to return unspent funds, short expenditure windows, and inflexible conditions for no-cost extensions. Risk management measures, including due diligence, auditing and counter-terrorism requirements exacerbate these difficulties. There can also be inconsistent enforcement of due diligence within donor organisations, particularly those that are highly decentralised, which can contribute to conflicting messages and delays. Inequitable power dynamics and lack of direct communication channels between donors, intermediaries, NGOs and L/NNGOs can also hinder risk-sharing discussions. See Hamsik et al. (2022) Making the Most of Uncertainty: Common Risk Management Traps and How to Escape Them, Hughes (2022) Risk Sharing in Practice - Success Stories, Enablers, and Barriers to Risk Sharing in the Humanitarian Sector and Humanitarian Outcomes and InterAction (2019) NGOs and Risk: Managing uncertainty in local-international partnerships.

How can you get involved?

- Ensure donor due diligence and compliance readiness: Familiarise yourself with the due diligence, compliance and risk management requirements of relevant donors to ensure eligibility for funding. Ensure your organisation has the right policies and procedures in place. Review and complete partner capacity assessments and pre-award surveys for relevant donors.
- Enhance knowledge of risk: Improve your understanding of donor risk perceptions, appetites, and compliance priorities. It is important to recognise that different actors face different risks, with different risk appetites and sensitivities. In general, donors have a strong focus on financial, reputational and legal risks, while local and national actors tend to be focused on safety and security risks. Strengthen your organisation's capacity to identify, manage, and mitigate risks specific to your operational context. Also keep up to date with relevant research and frameworks. In June 2024, ICVA commissioned new research on 'Risk Sharing in Humanitarian Contexts' among grantees and sub-grantees of pooled fund mechanisms to identify obstacles, best practices, and solutions that can be scaled across similar high-risk contexts, enhancing global humanitarian responses. The IASC is also working with donors and humanitarian actors to develop an Aid Diversion Charter. Both resources are due to be released in early 2025.
- Review and negotiate partnership agreements: Evaluate risks associated with different funding sources and opportunities. Carefully read partnership agreements before signing, checking for risk-related clauses and their terms. Seek legal advice if needed to ensure clarity on obligations and liabilities. Negotiate terms where possible, recognising that donor laws and trust dynamics may limit flexibility. INGOs and L/NNGOs can also work together to better communicate how they balance considerations around humanitarian need and programme criticality against risk management measures; and inform donors and intermediaries about emerging and materialising risks through frank and timely dialogue.
- **Engage in policy dialogue:** Participate in collective platforms to advocate to donors and intermediaries on the importance of equitable risk-sharing practices and harmonisation of risk management practices; highlight challenges in donor due diligence, compliance and risk management policies and practices; and ensure a unified and consistent narrative

amongst humanitarian agencies on key issues. These platforms include the Risk Sharing Platform co-chaired by the Netherlands Ministry of Foreign Affairs, ICRC and InterAction; Grand Bargain Risk Sharing Community of Practice co-chaired by ICRC and InterAction; ICVA Humanitarian Financing Sub-Working Group on Counterterrorism, Sanctions and Aid Diversion; and Community of Practice on Due Diligence Reform co-chaired by ICVA, Humanitarian Quality Assurance Initiative, Danish Refugee Council and SPONG, otherwise known as the LOCAL Consortium, and supported by Save the Children. One of the key focus issues for these platforms has been the renewal of the application of the humanitarian exemption to asset freeze measures (UNSCR 2664, 2022) to the Da'esh, Al-Qaida sanctions regime adopted by the UN Security Council in December 2024 (UNSCR 2761, 2024), as NGOs have requested a standing extension due to the positive impacts for enabling the delivery of lifesaving assistance. See Joint Letter from NGOs on extension of humanitarian exemption (UNSCR 2664) to UNSCR 1267 (2024) (available to members only).

Top tips: United States Bureau for Humanitarian Assistance (BHA)

All NGOs are eligible for BHA funding. To apply, NGOs need a <u>Unique Entity Identifier (UEI)</u> number and an active <u>System for Award Management (SAM)</u> registration. These take at least two weeks for processing, normally longer for NGOs based outside of the United States. NGOs will also need access to BHA's <u>Application and Award Management Portal (AAMP)</u> and to create an awardee organisational profile in the system. To get access, send an email to <u>BHA.AAMP@usaid.gov</u>. The AAMP Support team will email you a User Agreement Form, which you must complete and submit to create a user profile account. Once the support team creates an account, you will get an email with instructions for logging into the system and setting a password. If your organisation has not received United States Government or USAID funding in the past five years for grants or cooperative agreements, BHA is required to conduct a pre-award survey. Funding opportunities are published on the <u>Grants website</u> and proposals are submitted on the AAMP. For more information, see the <u>Common Requirements</u>, <u>Sector Requirements</u>, and <u>Indicator Handbook</u> and other guidance and resources on the <u>BHA Emergency Application Guidelines website</u>.

Top Tips: Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO)

All NGOs that have been registered for at least three years in a European Union (EU) Member State or in a country member of the European Economic Area with experience in humanitarian action are eligible for DG ECHO funding. NGOs must also have no records of bankruptcy, fraud or corruption, with a minimum turnover in humanitarian action EUR €200,000 each year for the last three years. To apply, NGOs will need to apply for a Framework Partnership Agreement (FPA) and EU Humanitarian Partnership Certificate. The registration process may take between six to 12 months. Funding opportunities are published in the Worldwide Decision and Humanitarian Implementation Plans (HIPs) for specific regions or thematic areas; and proposals are submitted through APPEL. Access to APPEL and related resources is provided on the DG ECHO Partners' Helpdesk. Interested NGOs should also engage with the FPA Watch Group chaired by VOICE as an ongoing consultation process between DG ECHO and its NGO partners.

Top Tips: Germany's Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) and the Federal Ministry for Economic Cooperation and Development (BMZ)

All NGOs are eligible for GIZ funding. Funding opportunities are published on the <u>GIZ</u> <u>website</u>. German NGOs are eligible for BMZ funding, however L/NNGOs can access BMZ funding by partnering with German NGOs.

What messages can you share with donors and funding partners?

- Simplify and harmonise due diligence and compliance processes: Streamline proposal, budgeting, reporting and audit requirements by recognising the <u>Less Paper</u>, <u>More Aid initiative</u> and the <u>Money Where It Counts protocol</u>; rolling out tools such as the <u>OCHA Grant Management System</u>, <u>UN Partner Portal</u> and <u>Harmonised Reporting (8+3)</u> <u>Template</u>; and adopting due diligence tiered arrangements and passporting models, along with common partner capacity assessments. In some cases, alternative methods of reporting may also be appropriate, such as video updates or field visits.
- Provide greater clarity on risk management policies: Ensure greater clarity on risk
 management policies, guidance and practical support, including key definitions for
 humanitarian agencies. For donors and intermediaries with decentralised operational
 structures it is crucial to ensure that clear and consistent guidance is provided across
 different countries and regions.
- Prioritise risk sharing approaches: Replace 'zero tolerance for incidents' approach
 with 'zero tolerance for inaction' approach. Embrace 'risk-sharing' models, rather than
 'risk transfer' or 'risk avoidance' approaches. Ensure partnership agreements align with
 'do no harm' and 'conflict sensitivity' principles, avoiding inequitable and unfair risk
 transfer to L/NNGOs. Facilitate collaborative risk assessments to define roles,
 responsibilities, and action plans, and address residual risks collaboratively.
- Invest in capacity strengthening initiatives: Provide predictable multi-year and flexible
 funding directly to L/NNGOs to enable them to strengthen organisational development,
 establish robust risk management systems, and ensure adequate staffing. Allow for
 mentoring, secondments, and funded capacity-strengthening initiatives as a funded
 objective in proposals to prepare L/NNGOs to implement larger value and more complex
 grants. Allocate adequate resources for safety, security, and fair administrative and
 overhead costs for L/NNGOs. See IASC (2022) <u>Guidance on the Provision of Overheads
 to Local and National Partners</u>.
- Encourage collaboration and trust: Engage with platforms such as the Risk Sharing Platform, Grand Bargain Risk Sharing Community of Practice, Community of Practice on Due Diligence Reform, and ICVA Humanitarian Financing Sub-Working Group on Counterterrorism, Sanctions and Aid Diversion to establish dialogue, share learning, and promote collective risk-sharing approaches among donors, intermediaries, and L/NNGOs.

What are some good practices?

Some donors and intermediaries have streamlined due diligence and partner capacity assessments by recognising independent quality assurance processes and introducing due diligence passporting. These systems allow NGO partners to complete a single comprehensive assessment, which is then recognised across multiple donors or funding agencies. Donors including Denmark, Dutch Relief Alliance, Germany, Ireland and the United Kingdom recognise previous assessment against the Core Humanitarian Standard;

and the <u>UN Partner Portal</u> established by the UN Refugee Agency (UNHCR), UN Children's Fund (UNICEF), and UN World Food Programme (WFP) enables the sharing of harmonised partner capacity assessments for implementing partners. The <u>Collaborative Cash Delivery Network</u> is also developing harmonised due diligence and capacity assessment tools to be piloted by Action Against Hunger, Concern, Oxfam, Save the Children, World Vision and their partners in Türkiye, Northwest Syria and Ukraine.

Some donors and intermediaries have simplified proposal, budgeting and reporting templates and processes. For example, the USAID Community Solidarity Fund in the Philippines accepts video proposals; many donors have committed to the Money Where It Counts protocol and adopted the Harmonised Reporting (8+3) Template; and UNHCR has introduced simplified reporting for refugee-led organisations. Some donors and intermediaries have developed policies on the sharing of overhead costs with downstream partners, such as those by the Dutch Relief Alliance, DG ECHO, the United Kingdom and UNHCR. There are also a range of resources which provide more examples of good practices and learnings. This includes the IASC Good Practices and Initiatives of Grand Bargain Signatories with specific sections on Risk Sharing and Reduced Requirements. The Risk Sharing Platform has also documented success stories, including examples of NGOs negotiating specific provisions on data sharing and counterterrorism requirements. See ICRC and the Netherlands Ministry of Foreign Affairs (2022) Risk Sharing in Practice: Success stories, enablers, and barriers to risk sharing in the humanitarian sector.

Who can you contact?

ICVA NGO members are eligible to join the ICVA Humanitarian Financing Sub-Working Group on Counterterrorism, Sanctions and Aid Diversion, contact Manon Glaser manon.glaser@icvanetwork.org. For more information on the Grand Bargain Risk Sharing Community of Practice, contact Christine Knudsen cknudsen@interaction.org (copying Emma Dunn edunn@interaction.org) and <a href="mailto:sign up to the mailto:

We may not always get everything right! If you have suggested comments on the Grab and Go Pocket Guides, or more information you think we should add, including good practices and policy and advocacy messages, contact Manon Glaser manon.glaser@icvanetwork.org. We will regularly update these materials, so keep an eye out for the latest versions.

Where can you go for further information?

Essential reading

Hughes, E. (2022) Risk Sharing in Practice - Success Stories, Enablers, and Barriers to Risk Sharing in the Humanitarian Sector. International Committee of the Red Cross and Netherlands Ministry of Foreign Affairs. Available at:

https://interagencystandingcommittee.org/sites/default/files/migrated/2022-10/Risk%20Sharing Case%20studies%20report %20June%202022.pdf

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Inter-Agency Standing Committee (2024). *Joint Letter from NGOs on UNSCR 2664*. Contact Manon Glasser manon.glaser@icvanetwork.org for a copy

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Guidance, tools and templates

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Inter-Agency Standing Committee (2020) *United Nations Implementing Partner Protection from Sexual Exploitation and Abuse Common Assessment*. Available at: https://psea.interagencystandingcommittee.org/resources/un-ip-psea-common-assessment-final

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International Committee of the Red Cross (2017) *Handbook on Data Protection in Humanitarian Action*. Available at: https://www.icrc.org/en/data-protection-humanitarian-action-handbook

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United Nations Refugee Agency, United Nations Children's Fund, and World Food Programme (WFP) (n.d.) *UN Partner Portal.* Available at: https://www.unpartnerportal.org/landing/

Training courses

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