

Mapping and Review of Existing Due Diligence (DD) Frameworks

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Acronyms

C4C	Charter For Change
CCD	Collaborative Cash Delivery
CHS	Core Humanitarian Standard
CoP	Community of Practice
CSOs	Civil Society Organisations
DD	Due Diligence
DEC	Disasters Emergency Committee
FCDO	Foreign, Commonwealth, and Development Office
GFGP	Good Financial Grant Practice
HQAI	Humanitarian Quality Assurance Initiative
ICVA	International Council of Voluntary Agencies
INGOs	International Non-Governmental Organisations
L/NAs	Local And National Actors
LOCAL	Local And National Associations
NGOs	Non-Governmental Organisations
NNGOs	National Non-Governmental Organisations

Executive Summary

Globally, due diligence (DD) reform efforts offer valuable insights but mixed results. While many humanitarian agencies use similar indicators and have attempted harmonised or shared approaches, meaningful progress has rarely been achieved in practice. Even when tools were aligned, agencies have frequently conducted their own additional reviews out of caution or institutional risk appetites.

Four broad approaches have been tested:

- **Passporting:** One organisation accepts another's DD assessment, in whole or in part, in lieu of conducting its own.
- **Harmonisation:** Two or more organisations agree to use the same DD tool, but each conducts its own assessment independently.
- **Standards and certification:** Organisations are assessed against an externally recognised standard (such as the Core Humanitarian Standard or the Good Financial Grant Practice standard), providing independent verification.
- **Hybrid approaches:** Combinations of the above, typically pairing a harmonised tool with capacity strengthening support and facilitated implementation, or agreeing to passport the results of a harmonised tool across participating organisations.

The findings that emerge from the mapping and review of these approaches are as follows:

1. Reform fatigue and fragmentation are true barriers to burden reduction.
2. Contextual adaptation is critical for trust, accuracy, and usability
3. One-size-fits-all approaches risk excluding smaller and grassroots organisations
4. Technical solutions alone cannot overcome organisational barriers
5. Accompanied implementation improves uptake and quality
6. Purpose confusion undermines both compliance and capacity strengthening

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Section 1: Project Context and Overview

1.1 Objectives of the Mapping and Review Exercise

The objectives of this review are outlined below:

- Map existing DD frameworks and passporting initiatives used internationally.
- Extract lessons learned from past DD reform efforts, particularly those funded by the DEC in Syria and Ukraine.
- Identify best practices and adaptation needs to inform the design of context-appropriate solutions.

1.2 Methodology and Limitations

1.2.1 Global Due Diligence Reform Review

A desk review was conducted of existing DD tools, frameworks, and reform initiatives implemented globally over the past decade. This review focused on documenting and analysing major reform efforts that tested different approaches to reducing duplication and burden for local actors.

Initiative Mapping

Ten DD reform initiatives were identified and mapped across diverse geographic contexts, including Burkina Faso, Syria, Türkiye, and Ukraine, and multi-country pilots in the following countries Cambodia, Colombia, Democratic Republic of Congo, Guatemala, India, Iraq, Malawi, Nepal, Nigeria, Pakistan, Philippines, Sierra Leone, South Sudan and Sudan.

For each initiative, the following information was captured in a comparative matrix:

- Implementing actors and organisational structure
- Geographic location and operational context
- Approach type (passporting, harmonisation, hybrid, or standards-based)
- Intended purpose (funding decisions, capacity strengthening, or both)
- Implementation method and phases
- DD areas covered
- Key takeaways and lessons learned
- Available documentation and source materials

A comparative matrix of all reviewed initiatives is provided in Section 3(Appendix).

1.2.2 Limitations

This review had several limitations.

First, while the desk review systematically documented ten (10) major global initiatives, not all initiatives have published comprehensive evaluations or lessons learned reports; some findings are based on internal materials shared for review purposes.

Second, a critical gap exists in outcome data across nearly all initiatives reviewed. Most DD initiatives were unable to provide evidence demonstrating whether:

- administrative burden was reduced for L/NAs;
- passporting occurred in practice; or
- measurable organisational improvements resulted from the process.

Where partner feedback was available, it primarily focused on preferences for accompanied implementation, the value of capacity strengthening support, and reactions to tool design (particularly concerns about complexity and appropriateness for smaller organisations). However, systematic data on the core question - *did these initiatives reduce duplication and compliance burden without disproportionately increasing risk?* - remains largely absent from the available literature.

Third, several initiatives described as passporting or harmonisation pilots did not fully test mutual reliance on due diligence results within the pilot period. In many cases, the pilot focused instead on developing and refining the assessment approach, strengthening organisational capacity, or preparing the conditions for future passporting. For example:

- The Start Network pilot revealed that agencies layered their own assessments on top of the harmonised tool.
- The Ukraine pilot focused on capacity strengthening with the intent that passporting would occur with other Charter for Change Due Diligence Passporting Initiative (C4C) INGOs in future funding rounds
- The Syria piloting initiative similarly placed greater emphasis on capacity strengthening than on testing reliance on shared due diligence results for funding decisions.

Section 2: Review and Synthesis of Global Due Diligence Models

2.1 Overview of the Global Due Diligence Landscape

Due diligence is a critical process through which donors and international organisations manage financial, operational, safeguarding, and reputational risks in their partnerships with L/NAs, and indeed among themselves. Over the past decade, as the global humanitarian sector has increasingly pushed for more localised responses, DD has been seen as both an increasing need and a barrier to local participation.

The wider sector context is characterised by shrinking humanitarian and development budgets, increased competition for funding, and growing donor expectations around efficiency, value for money, and risk assurance. In this environment, DD and compliance requirements tend to accumulate rather than be rationalised, as agencies add new layers in response to specific incidents, audits, or regulatory changes.

2.2 Previous Efforts to Streamline Due Diligence

In seeking to balance the need for assurance and accountability with the need to direct funding quickly to L/NAs, global reform efforts have multiplied. Reviews of individual INGO DD processes reveal convergence around a core set of thematic areas. Reform efforts have sought to use this common ground to reduce duplication and burden for L/NAs.¹

Approaches tested to date include:

- Alliance- or network-based passporting procedures that allow one organisation to rely on another's assessment (e.g., Alliance2015).
- Harmonisation reviews that map and align existing tools across multiple actors (e.g., ActionAid and BDO Ukraine review).
- Pilots of new tools and processes that link DD assessments to capacity action plans (e.g., Charter for Change DDPP Tool and DEC-funded pilots in Syria and Ukraine).
- Online platforms that host verification results and profiles of local organisations (e.g., PhilinUA online platform).

¹ ActionAid and BDO, Due Diligence Harmonisation in Ukraine: Learning and Recommendation Report, 2025, unpublished

- International standards and tiered compliance frameworks designed to replace dozens of overlapping, funder-specific checks (e.g., Good Financial Grant Practice Standard).

Several key trends emerge from these initiatives that merit consideration when developing DD solutions in complex contexts. These include ongoing debates around passporting versus harmonisation, questions of assessment purpose and tone, varying risk appetites and management approaches, and the critical role of partnerships and organisational culture.

The subsequent sections unpack these debates, and a list of findings and recommendations is provided in 2.4 below.

2.3 Approaches to Reducing Duplication

The most fundamental question in DD reform is which approach to take. A spectrum of options has emerged: from pure passporting (accepting another organisation's assessment with no attempt at alignment), to harmonisation (shared indicators and similar structures), to more ambitious models that aim for sector-wide standardisation or third-party certification. Each model comes with unique benefits, challenges, and appropriate use cases.

	Passporting	Harmonisation	Standards and Certification	Hybrid
Core Concept	 Mutual Acceptance of Assessments Accepting another organisation's assessment instead of a brand-new one.	 Shared Frameworks, Independent Audits Using a common tool or framework but conducting independent assessments.	 External Verification Against Global Standards Assessment against recognised standard, often with third-party verification.	 Integrated Capacity and Flexibility A mix of passporting, harmonisation, capacity-strengthening mechanisms.
Key Features	 Network-Based Cooperation Relies on existing data sharing, partner consent, and established trust.	 Common Indicators and Modular Tools Shared structure of indicators; can be tiered or modular to fit needs.	 Formal Audits and Certification Utilises established standards like CHS; involves formal, independent audits.	 Visibility Platforms and Support Shared tools, visibility platforms, structured support for improvement.
Benefits	 High Speed, Lower Burden Faster decision-making, significant reduction in duplicate work for partners.	 Reduced Variation Across Organisations Builds a foundation for collaboration; aligns requirements across entities.	 High Credibility and Capacity Building Offers high credibility; aligns with strict donor requirements for assurance.	 Balanced and Development-Focused Balances standardisation and flexibility while supporting development.
Limitations	 Trust and Ownership Challenges Unclear risk ownership; high dependency on trust between organisations.	 Implementation and Buy-in Hurdles Potential lack of buy-in; organisations may refuse to accept others' findings.	 Resource-Intensive and Costly Costs and resource heavy, making it inaccessible for smaller organisations.	 High Complexity and Coordination Complex to implement; risks increased admin burden if mismanaged.
Best Use Case	 Best for High-Trust Networks Pre-existing networks with well-aligned standards and established trust.	 Best for Leadership Driven Networks Networks committed to aligning processes despite independent operations.	 Best for Donor-Driven Compliance Environments requiring formal assurance and strict compliance validation.	 Best for Capacity-Strengthening Programmes DD reform + primary goal of strengthening partner capacity.

2.3.1 Passporting

Passporting, as defined by the International Council of Voluntary Agencies (ICVA) Due Diligence Community of Practice (CoP), refers to a situation "where an organisation agrees to accept a DD or capacity assessment (in whole or in part) carried out on an existing or potential partner by another organisation or certification body in lieu of carrying out their own."² This method is often seen as potentially simpler or more feasible than getting an entire network or sector to adopt an entirely harmonised approach.

Fundamentally, passporting is a question of power and influence: who defines the standards for passporting, and who serves as the broker for passporting arrangements? Are L/NAs included as decision-makers, or will they remain positioned as recipients of processes designed by INGOs? The likelihood of success appears limited when passporting is left exclusively to INGOs without meaningful inclusion of local actors.

The desk review and interviews revealed that, from a risk management and compliance perspective, there are legitimate concerns about the lack of clarity regarding risk ownership across different levels. Interviewees shared that INGOs often struggle to ensure risks are shared rather than simply passed down to L/NAs. Data sharing agreements become complex, particularly in sensitive contexts, where information could be weaponised. One interviewee explained that the compliance function within INGOs has such an outsized impact on organisational culture that risk aversion and fear of loss of control may undermine due diligence reform efforts. Additionally, auditor authority dynamics within the sector, combined with concerns about reputational risk, create powerful incentives to maintain individual control rather than genuinely share assessments.

One emerging example of successful passporting, led by Alliance2015 (a strategic network of seven European NGOs³), offers insight into when and how passporting might be appropriate. Alliance2015 developed a five-step passporting procedure that allows members to identify recent DD (within two years), obtain partner consent, share analysis and documents, and complete gap analysis to decide on passporting or top-ups⁴. The procedure benefits from defined validity periods, clear expectations for information sharing, and reassessment conditions. However, the core feature that interviewees said may enable its success is the existing trust and shared understanding that comes with an established

² ICVA, Due Diligence Community of Practice Terminology, 2025, unpublished

³ ACTED/France, Ayuda en Acción/Spain, Cesvi/Italy, Concern Worldwide/Ireland, HELVETAS/Switzerland, People in Need/Czech Republic and Welthungerhilfe/Germany

⁴ Alliance2015, Alliance2015 Passporting Procedure, 2025, unpublished

network. Several interviewees indicated that passporting within an established network appears to be a more feasible way to reduce the burden on L/NAs while avoiding compliance challenges.

2.3.2 Harmonisation Efforts and Their Limitations

Harmonisation, defined by the ICVA CoP as a situation "where two or more organisations develop a unified approach to DD, agreeing to use the same tool for assessments, but continue to conduct the assessment independently," appears theoretically promising ⁵.

An ActionAid and BDO review of 57 indicators across 26 due diligence tools found full or strong alignment on 46 of them. This indicates that most organisations ask similar questions regarding legal status, safeguarding policies, financial policies, governance, and core systems. This alignment suggests that harmonisation is not only feasible but also a clear path toward reducing duplication. Further, it indicates that harmonisation may particularly be achievable within established networks.

However, implementation proves considerably more difficult. Among the models reviewed, true, sustained harmonisation has yet to be achieved.

The Collaborative Cash Delivery (CCD) Network, a network of 14 INGOs, embarked on a harmonisation initiative. Like Alliance2015, this network benefited from existing trust among its members. However, the CCD tool was ultimately not fully piloted due to internal challenges in securing buy-in from participating INGOs and concerns about duplicating other reform initiatives that emerged in 2023 and 2024. This challenge was cited more broadly by interviewees, with many practitioners expressing scepticism about the ability of INGOs to truly agree on a harmonised tool and approach⁶. Interviewees emphasised that harmonisation is unlikely to succeed without sustained leadership commitment and explicit endorsement from participating organisations and their teams.

2.3.3 Standards and Certification

A third category of reform involves external standards and certification, which the ICVA CoP respectively define as: "Where an organisation assesses a partner or potential partner against a pre-determined external standard rather than against an (individual or harmonised) DD tool" and "The process of an

⁵ ICVA, Due Diligence Community of Practice Terminology, 2025, unpublished

⁶ Collaborative Cash, "Cash Capacity Assessment Harmonisation: Learning and Reflections from the Due Diligence and Cash Capacity Assessment Harmonisation Project Lead," Collaborative Cash, n.d. https://www.collaborativecash.org/_files/ugd/eba6ae_73c662ea8d3f474fbc1a1ab82f9c9863.pdf and https://www.collaborativecash.org/_files/ugd/eba6ae_d9ab4d7aa34f4147bd7eaadfadedcb61.pdf

organisation being assessed and receiving a recognised certification that demonstrates compliance in certain areas or with a set of standards.⁷

Two primary standards exist:

- Core Humanitarian Standard (CHS), certified by the Humanitarian Quality Assurance Initiative (HQAI)
- Good Financial Grant Practice (GFGP) Standard, hosted by Global Grant Community and the African Academy of Sciences, with independent certification by several auditing firms.

These standards serve distinct but complementary roles. CHS focuses on overall quality and accountability in aid delivery⁸, while the GFGP standard targets financial governance of grants, including organisational systems and processes⁹. Notable differences include the content of the standards, the GFGP standard's tiered approach versus the one-size-fits-all CHS standard, and the GFGP standard's development by stakeholders of all sizes across low-, middle-, and high-income countries. Both have been tested and piloted in various iterations, with the CHS most recently used as part of the Danish Refugee Council's Lowering Compliance Burdens for Local and National Associations (LOCAL) Project¹⁰. Additionally, the UK Foreign, Commonwealth, and Development Office (FCDO) has also introduced a streamlined application process for organisations certified against the CHS Alliance, marking a significant endorsement of the standard's value¹¹.

2.3.3.1 *Benefits and Limitations of Standards-Based Approaches*

The benefits of both standards are remarkably similar. First, the standards align well with major donor DD requirements, with the CHS covering between 50 and 100% of those requirements, depending on the donor¹². Second, independent verification and auditing provide an additional layer of assurance that

⁷ ICVA, Due Diligence Community of Practice Terminology, 2025, unpublished

⁸ HQAI (Humanitarian Quality Assurance Initiative), "Certification," HQAI, n.d. <https://www.hqai.org/en/our-services/certification/>

⁹ Global Grant Community, 'Good Financial Grant Practice Standard,' available at: <https://globalgrantcommunity.com/standard>

¹⁰ DRC (Danish Refugee Council), "Local: Lowering Compliance Burdens for Local and National Associations," DRC, n.d. <https://drc.ngo/what-we-do/innovation/digital-innovation/local-lowering-compliance-burdens-for-local-and-national-associations/>

¹¹ CHS Alliance, "FCDO reducing duplication: Recognising CHS value for due diligence," <https://www.chsalliance.org/get-support/article/verification-news-fcdo-recognises-chs-certification-for-due-diligence/>

¹² HQAI (Humanitarian Quality Assurance Initiative), "LoCAL News Release," 7 July 2025, https://hqai.contentfiles.net/media/documents/LoCAL_News-release-2025-07-07.pdf

is attractive to many INGOs and donors. Third, both the LOCAL Project¹³ and implementations of the GFGP standard¹⁴ found that when combined with targeted capacity strengthening, partners undergoing the certification process were able to improve their organisations, build confidence, and gain external recognition with funders.

Despite these strengths, clear drawbacks exist to relying on standards and certification as the primary mechanism for DD reform. The primary concern is the lack of accessibility to L/NAs. Certification can be prohibitively expensive and time-consuming; even when donors cover the actual certification cost, preparatory work imposes substantial demands¹⁵. While the GFGP standard's tiered system mitigates this to an extent, sustainability for most local and grassroots actors remains uncertain.

Implementation reviews of GFGP revealed serious challenges with external auditing firms. In some instances, firms did not consult with the L/NAs they were reviewing, relying solely on a desk review to make certification decisions. This led to frustration among participating organisations¹⁶. Additionally, the investigative nature of these standards, combined with the perception that they would be used to make crucial funding decisions, led partners to be less forthcoming about organisational weaknesses, thereby inhibiting their ability to access capacity-strengthening support¹⁷.

Finally, there is limited evidence to suggest that these standards are truly replacing institutional DD processes. While they may provide an additional layer of assurance and visibility for L/NAs, it is unclear if they are reducing compliance burden in practice.

2.3.4 Hybrid Approaches

A fourth category of reform combines passporting and harmonisation while integrating additional elements, such as capacity-strengthening support, online visibility platforms where organisations can create institutional profiles visible to potential donors, or more hands-on support by INGOs in the implementation process.

¹³ DRC (Danish Refugee Council), "Two Pager: Overview of Local," DRC, n.d. https://drc.ngo/media/tump1jdt/two-pager_-_overview-of-local.pdf

¹⁴ Harste et al., 'Good Financial Grant Practice: A Tool for Developing and Demonstrating Institutional Financial and Grant Management Capacity in Global Health,' 2021, available at: <https://doi.org/10.1093/cid/ciab768>

¹⁵ Harste et al., 'Good Financial Grant Practice: A Tool for Developing and Demonstrating Institutional Financial and Grant Management Capacity in Global Health,' 2021, available at: <https://doi.org/10.1093/cid/ciab768>

¹⁶ Mutua et al., 'Dynamics in implementing the Good Financial Grant Practice standard across three African universities: an Indigenous realist evaluation,' 2025, available at: <https://doi.org/10.1186/s12961-025-01343-7>

¹⁷ Mutua et al., 'Dynamics in implementing the Good Financial Grant Practice standard across three African universities: an Indigenous realist evaluation,' 2025, available at: <https://doi.org/10.1186/s12961-025-01343-7>

Several initiatives exemplify this hybrid model:

- The C4C DDPP Tool brought together seven INGOs¹⁸ to develop a single harmonised assessment tool with the explicit goal of passporting results among members¹⁹. The tool was tested across 42 organisations in nine countries²⁰. Within this pilot, Christian Aid and the Alliance for Public Health tested the tool in Ukraine specifically for harmonising and passporting capacity strengthening, using a process that included participatory assessment, capacity action planning, facilitated workshops, and reassessment²¹.
- The PhilinUA Online Database Platform combines DD verification using an adapted C4C DDPP tool with a visible database of organisation profiles and educational content²².
- The Accelerating Localisation through Due Diligence Passporting and Capacity Strengthening initiative in Syria offered participating community-based organisations the choice between an organisational capacity assessment or the C4C DDPP tool, coupled with tailored training, capacity grants, and ongoing mentoring²³.

Hybrid approaches are designed to increase the likelihood that multiple INGOs will accept passported DD results, while still providing a structured and credible assessment process. They may help reduce tensions around who sets the standards by drawing on shared frameworks rather than imposing a single organisation's model.

Importantly, these approaches recognise that L/NAs often value integrated capacity strengthening, visibility opportunities, and accompanied implementation support, rather than being left to complete assessments independently. By linking funding decisions with practical capacity development, hybrid models aim to ensure that DD serves not only as a compliance requirement but also as a tool for strengthening local organisations.

¹⁸ CAFOD, Catholic Relief Services, Christian Aid, DanChurch Aid, Diakonie Katastrophenhilfe, Tearfund, Trócaire

¹⁹ Humentum, "Charter for Change: Due Diligence Passporting Tool," Humentum, n.d. <https://humentum.org/charter-for-change-due-diligence-passporting-tool/>

²⁰ Charter for Change Initiative, "Due Diligence Passporting C4C Initiative 2025 Overview," 2025, <https://charter4change.org/wp-content/uploads/2025/09/due-diligence-passporting-c4c-initiative-2025-overview.pdf>

²¹ Christian Aid Ireland, 'Due Diligence Passporting: Lessons from a journey toward localisation with Ukrainian Local and National Actors,' 2025, available at: https://www.christianaid.ie/sites/default/files/2025-03/ddpp-lessons-from-a-journey-with-lnas_ca-ireland_0.pdf

²² Christian Aid, Case study 2: Online Database Platform, n.d., unpublished

²³ LocalizedAction, Insights and Learning: Tailoring Capacity Development for Emerging CSOs, 2025, unpublished

However, experience also shows that implementation is iterative. During the initial C4C DDPP pilot, harmonising the due diligence tool did not automatically lead to widespread mutual reliance among participating INGOs. This demonstrated that technical alignment alone is insufficient; passporting depends not only on a shared assessment tool but also on a clear, shared intention to rely on one another's DD results.²⁴

Importantly, the experience from the pilot informed subsequent refinement of the approach. Building on lessons learned, the C4C due diligence tool has since been applied to support passporting and shared due diligence processes in a range of operational contexts, including Ukraine, the Democratic Republic of Congo, and Colombia, involving both C4C members and other humanitarian actors. This progression illustrates that passporting should not be viewed as a one-off technical intervention but as a process of continuous learning, adaptation, and institutional uptake.

A further complication arises when the same process is used for both funding decisions and capacity strengthening. In such cases, L/NAs may be reluctant to disclose organisational weaknesses for fear that transparency could jeopardise funding. This undermines the trust required for meaningful capacity development. Like many harmonisation initiatives, hybrid approaches can also introduce unintended complexity. Without tiered structures tailored to smaller or less formal organisations, they risk adding procedural burden rather than reducing it.²⁵ This challenge is reflected in Christian Aid's ongoing pilot of the C4C DDPP tool. Initial feedback from interviews indicates that persistent constraints, such as limitations on NGO registration, are hindering some organisations' ability to engage with and interpret the tool effectively.

Hybrid approaches appear most effective when capacity strengthening is the primary objective, with passporting treated as a secondary benefit rather than the central goal.²⁶ Clear communication about the purpose of the assessment is critical, particularly in clarifying whether and how results may influence funding decisions. Embedding the approach within existing networks where trust has already been established may increase the likelihood of meaningful uptake and success, although this has not yet been demonstrated in practice.

²⁴ Humentum, Learning Report: Due Diligence Passporting Pilot, 2024, unpublished

²⁵ Humentum, Learning Report: Due Diligence Passporting Pilot, 2024, unpublished

²⁶ Christian Aid Ireland, 'Due Diligence Passporting: Lessons from a journey toward localisation with Ukrainian Local and National Actors,' 2025, available at: https://www.christianaid.ie/sites/default/files/2025-03/ddpp-lessons-from-a-journey-with-lnas_ca-ireland_0.pdf

2.4 Summary Findings and Recommendations from Global Due Diligence Reviews

Finding 1: Reform fatigue and fragmentation are true barriers to burden reduction

Build on an established and recognised framework (e.g., C4C DDPP Alliance 2015) rather than creating new tools, adapting it to context and coordinating with other reform actors (e.g., DEC members) to prevent duplication.

Finding 2: Contextual adaptation is critical for trust, accuracy, and usability

Adapt the framework through structured contextual review, integrate operational and security constraints into guidance, engage local actors in validation, ensure professional contextual translation, and pilot with feedback refinement.

Finding 3: One-size-fits-all approaches risk excluding smaller and grassroots organisations

Structure framework in modular tiers (basic, intermediate, advanced) aligned with organisational size, maintain core safeguarding standards across tiers while allowing proportional documentation, and communicate that tier placement reflects proportionality, not legitimacy.

Finding 4: Technical solutions alone cannot overcome organisational barriers

Formalise reliance procedures with written guidelines on when to accept passported results, appoint named decision-makers, define minimum standards and limited circumstances for additional review, and monitor actual uptake.

Finding 5: Accompanied implementation improves uptake and quality

Provide accompanied implementation support through facilitated sessions, offer clarification on documentation and contextual adjustments, clearly communicate how results influence funding, and avoid mandatory capacity support as a funding precondition.

Finding 6: Purpose confusion undermines both compliance and capacity strengthening

Clearly articulate the primary purpose upfront, separate compliance from capacity development where both are included, clarify result usage and access, and reinforce that honest disclosure will not automatically result in exclusion.

2.5 Detailed Findings and Recommendations from Global Due Diligence Reviews

2.5.1 Finding 1

Reform fatigue and fragmentation are true barriers to burden reduction.

Despite broad consensus on the need to streamline DD, multiple overlapping reform initiatives continue to operate in parallel. L/NAs are often asked to engage with different tools, templates, and reform pilots simultaneously, each with slightly different requirements and expectations.

Rather than reducing the burden, this fragmentation creates confusion, increases transaction costs, and weakens trust in reform processes. L/NAs must repeatedly interpret new frameworks, adapt internal documentation, and respond to competing standards. Over time, this contributes to reform fatigue.

Consolidating around an established framework reduces duplication, strengthens credibility, expands the evidence base for a single approach, and increases the likelihood of actual passporting among participating INGOs.

2.5.2 Finding 2

Contextual adaptation is critical for trust, accuracy, and usability

DD tools developed for stable environments often rely on operational assumptions that may not hold in fragile, conflict-affected, or highly regulated contexts.

When tools are insufficiently contextualised or poorly translated, they can create confusion, reduce the accuracy of responses, and undermine trust between international and local partners. Questions that fail to reflect legal realities, security constraints, or operational limitations may appear disconnected from lived experience. In some settings, compliance requirements that are routine in stable environments may carry heightened legal or security risks.

If local organisations perceive a DD tool as unrealistic or misaligned with context, engagement becomes transactional rather than collaborative. This weakens the credibility of the passporting initiative and reduces the reliability and quality of the information collected.

2.5.3 Finding 3

One-size-fits-all approaches risk excluding smaller and grassroots organisations

DD tools that are highly detailed, rigid, or designed around fully formalised organisational structures can unintentionally exclude smaller, community-based, or early-stage actors. These organisations may

lack extensive written policies, formal governance documentation, or sophisticated financial systems, even where they demonstrate strong operational capacity and community legitimacy.

When tools assume a uniform level of institutional maturity, smaller organisations may struggle to engage meaningfully with the process. This can result in exclusion not because of high risk, but because of structural differences in size, resources, or formality. Overly complex tools may therefore reinforce inequities and undermine localisation objectives.

If DD frameworks do not account for varying levels of institutional development, they risk becoming gatekeeping mechanisms.

2.5.4 Finding 4

Technical solutions alone cannot overcome organisational barriers

Experience across multiple initiatives shows that harmonised due diligence tools and passporting arrangements can struggle to translate into practice. Even when organisations agree on common assessment criteria or adopt a shared tool, technical alignment alone does not automatically lead to mutual reliance on each other's due diligence results.

Implementation is often constrained by a combination of institutional and governance factors, including:

- Limited leadership buy-in within participating INGOs;
- Donor accountability requirements and audit concerns;
- Differing institutional risk appetites and tolerance thresholds;
- Compliance cultures with little room for contextual judgement or perceived non-compliance;
- Concerns about liability when relying on an assessment completed by another organisation;
- The absence of written procedures, both within individual INGOs and across participating organisations, setting out when and how a passported assessment may be accepted in place of a new review; and
- Unclear decision-making authority for approving reliance on passported results.

Without these governance arrangements, passporting remains discretionary rather than systematic. Staff may continue to conduct additional reviews to manage perceived institutional risk, even where a harmonised tool or passport already exists. In such cases, the shared framework becomes an additional layer rather than a substitute for existing processes, and the intended reduction in burden does not materialise.

2.5.5 Finding 5

Accompanied implementation improves uptake and quality

L/NAs consistently report that they benefit more from supported completion of DD tools than from self-directed assessments. Hands-on engagement, including clarification of questions, discussion of documentation, and joint review, improves the accuracy of responses and reduces inconsistencies in scoring.

Where accompanied implementation is provided, organisations are more confident in engaging with the process. It also creates space to clarify misunderstandings and address contextual constraints. In contrast, self-completion may result in incomplete responses, misinterpretation of questions, or reluctance to disclose challenges.

However, where capacity strengthening is embedded within DD processes, the purpose must be clearly defined. If organisations believe that disclosure of weaknesses may affect funding decisions, transparency may be reduced.

2.5.6 Finding 6

Purpose confusion undermines both compliance and capacity strengthening

When a single assessment process is used for both funding decisions and capacity strengthening, it can create unintended tension. L/NAs may hesitate to disclose organisational weaknesses if funding is perceived to be at stake.

This dual-purpose design undermines compliance accuracy and weakens capacity strengthening outcomes.

Section 3: Appendix

3.1 Passporting and Harmonisation Initiative Matrix

Initiative: Alliance2015 Passporting Procedure

Actors	Alliance2015 members
Location	Global
Approach	Passporting
Intended Purpose	Assessment for funding decisions
Method	Five-step flow: (1) Identify need (2) Contact other members to find recent due diligence (≤ 2 years) (3) Obtain partner consent to share documents (when a previous due diligence exercise is identified) (4) Provider shares analysis and documents (5) User completes Annex 1 checklist to decide on passporting/top-ups. Includes QA, gap analysis (Annex 2 comparative tool analysis), optional top-up questions (Annex 3), and documented sign-offs.
DD Areas Covered	(1) Pre-qualification (2) Safeguarding (3) Management of Downstream Partners (4) Payments incl. Cash and Bank Management (5) Governance and Accountability (6) Operational Capacity to Deliver Programmes (7) Financial Capacity to Manage Donor Funds (8) General Systems and Controls
Key Takeaways	(1) Pre-existing alliances and networks are conducive environments for passporting. (2) It is essential that passporting procedures include a clear scope, validity periods, and conditions for repeating assessments. (3) Further streamlined tools can be useful to quickly conduct DD and deploy funds in crisis and emergency situations.
Sources	Internal materials and reports provided for desk review

Initiative: Due Diligence Harmonisation in Ukraine

Actors	ActionAid, Humanitarian NGO Platform in Ukraine (NGOP), DEC
Location	Ukraine
Approach	Review of DD Approaches
Intended Purpose	Understanding of Ukrainian context
Method	(1) Desktop review of existing literature and tools (2) Two surveys (DEC members and NGOP members) (3) Two focus group discussions with 10 organisations (4) Interviews with 2 institutional donors and 1 Ukrainian organisation (5) Comparative analysis using 57 indicators across 8 topic areas
DD Areas Covered	Eight (8) Core Topic Areas (57 indicators) (1) Pre-qualification: Legal status, governance, sanctions, corruption, etc. (2) Governance and Accountability: Oversight, reporting, code of conduct, and feedback mechanisms (3) Safeguarding: Policies, training, monitoring, culture (4) Operational Capacity: Policies, work plans, risks, monitoring, evaluation (5) Downstream Partner Management: Selection, contracting, monitoring (6) Financial Capacity: Policies, systems, segregation of duties, audits (7) Payments and Cash Management: Bank accounts, signatories, reconciliations (8) General Systems and Controls: Procurement, assets, HR, DEI, IT security
Key Takeaways	(1) Overlapping initiatives risk reform fatigue and fragmentation. (2) Proportionality remains a major challenge, although modular and tiered tool designs are beneficial, especially when designed to accommodate smaller and less formal organisations. (3) Reliance on external certification can risk exclusion due to cost and accessibility.
Sources	Internal materials and reports provided for desk review

Initiative: Ukrainian Due Diligence Passporting Pilot

Actors	Christian Aid Ireland, Alliance for Public Health, Irish Aid
Location	Ukraine
Approach	Passporting using a harmonised tool
Intended Purpose	Assessment for capacity strengthening
Method	Excel tool: 26 criteria, 7+1 capacity areas, 1–4 scoring; 4-phase pilot: i. Pilot within a pilot: each APH staff member implemented the tool with 1 L/NA

	(1) DD Passporting: 28 L/NAs conducted a participatory assessment with APH, using the C4C DDPP Tool (2) Capacity Action Plans (CAP): Each L/NA developed a CAP with APH (3) Capacity Strengthening: APH facilitated workshops and learning sessions (4) Re-Assessment: Each L/NA requested to be reassessed and receive an updated CAP; L/NAs requested certificates of completion (a "passport")
DD Areas Covered	(1) General (2) Governance (3) Strategy (4) Accountability (5) HR, Safeguarding and Security (6) Financial and Asset Management (7) Data and IT (8) Additional – the passporting and/or partner organisation may agree to add more criteria if necessary.
Key Takeaways	(1) Integration of capacity support is valued by participating L/Nas. (2) Accompanied implementation (vs. self-completion of the tool) is valued by L/Nas. (3) Some organisations desire a more formal “passport” or verification. (4) Quality translation and contextualisation are essential.
Sources	Internal materials and reports provided for desk review

Initiative: Online Database Platform

Actors	Philanthropy in Ukraine (PhilinUA), Christian Aid, DEC
Location	Ukraine
Approach	Online verification using a harmonised tool
Intended Purpose	Assessment for visibility and funding decisions
Method	The online platform integrated multiple functions: 1) Due diligence verification using an adapted version of the C4C DDPP Tool 2) A visible list of organisations and profiles 3) Educational content, knowledge sharing, and research dissemination
DD Areas Covered	DD areas not specifically listed, but the platform utilised an adapted version of the C4C DDPP Tool, which focuses on the following areas: (1) General (2) Governance (3) Strategy (4) Accountability (5) HR, Safeguarding and Security

	(6) Financial and Asset Management (7) Data and IT (8) (8) Additional – the passporting and/or partner organisation may agree to add more criteria if necessary.
Key Takeaways	(1) Depending on context, simple, online interfaces can support uptake. (2) Partners value integrated capacity-strengthening resources. (3) Partners value platforms that increase funder visibility. (4) Limited coordination with other passporting and harmonisation initiatives potentially constrained the impact.
Sources	Internal materials and reports provided for desk review

Initiative: Accelerating Localisation through Due Diligence Passporting and Capacity Strengthening

Actors	Age International, Christian Aid, HelpAge International, Action for Humanity, Violet, DEC
Location	Syria
Approach	Capacity strengthening using an OCA or DD tool
Intended Purpose	Assessment for capacity strengthening
Method	(1) Mapping and Recruitment: Mapped CBOs in Northwest Syria to identify suitable participants and engage in the selection process (2) Assessment: Participants received training sessions on both OCA and C4C DDPP tools, guiding them to select and complete the appropriate tool (3) Capacity Strengthening: Tailored training and workshops based on assessment reports and shared gaps; Capacity strengthening grants provided to implement action plans; Ongoing mentoring and coaching throughout implementation (4) Monitoring and Learning: Regular monitoring of action plan implementation; Learning reflection with 10 CBOs via survey; Key Informant Interviews with 6 CBOs.
DD Areas Covered	OCA Tool categories are not indicated C4C DDPP Tool: (1) General (2) Governance (3) Strategy (4) Accountability (5) HR, Safeguarding and Security (6) Financial and Asset Management (7) Data and IT

	(8) (8) Additional – the passporting and/or partner organisation may agree to add more criteria if necessary.
Key Takeaways	(1) Provision of capacity grants allows organisations to implement recommended actions and improve their systems. (2) While due diligence and capacity strengthening often overlap, it is essential to clarify the purpose of completing any tool.
Sources	Internal materials and reports provided for desk review

Initiative: Due Diligence Harmonisation Project (HDDT) + Cash Capacity Assessment Harmonisation Project (HCCAT)

Actors	CCD Network (Action Against Hunger, Concern, Oxfam, Save the Children, World Vision), DEC
Location	Türkiye, Syria, Ukraine
Approach	Harmonisation
Intended Purpose	Assessment for funding decisions and cash capacity
Method	Two Excel-based harmonised assessment tools: (1) Due Diligence Tool: tiered approach with a structured questionnaire and embedded guidance; flexible document requirements; clear scoring system with automatic calculations; plain English guidance, capacity strengthening plan tab; Note: there was very limited piloting of this tool due to challenges with INGO buy-in and concerns over duplication (2) Cash Capacity Tool: 18 questions with a focus on capacity and understanding, embedded scoring guidance, no rigid pass/fail system, translated into Ukrainian, Turkish, Arabic, Spanish, French; Note: this tool was fully piloted and integrated into CCD's repertoire of tools and training
DD Areas Covered	Full technical breakdowns of the due diligence and cash capacity domains are not provided. However, the learning report indicates that the HDDT was heavily influenced by both the C4C DDPP tool and the START Network's Due Diligence Process.
Key Takeaways	(1) The due diligence reform space is highly saturated with overlapping and occasionally competing initiatives; this can confuse participating agencies and undermine progress. (2) Any tool that is developed or used should be: Excel-based to ensure accessibility, include requirements explained in plain language, and be tiered or modular in nature. (3) Buy-in from INGO leadership and careful alignment with existing initiatives are crucial for success.

Sources	(Collaborative Cash, "Cash Capacity Assessment Harmonisation: Learning and Reflections from the Due Diligence and Cash Capacity Assessment Harmonisation Project Lead," Collaborative Cash, n.d. https://www.collaborativecash.org/_files/ugd/eba6ae_73c662ea8d3f474fbc1a1a82f9c9863.pdf and https://www.collaborativecash.org/_files/ugd/eba6ae_d9ab4d7aa34f4147bd7eaadfadc61.pdf
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Initiative: Lowering Compliance Burdens for Local and National Associations (LOCAL) Project

Actors	Danish Refugee Council (DRC); Humanitarian Quality Assurance Initiative (HQAI); International Council of Voluntary Agencies (ICVA); Secrétariat Permanent des Organisations Non Gouvernementales (SPONG), EU/DG ECHO
Location	Burkina Faso
Approach	Passporting using an existing standard and certification process
Intended Purpose	Passporting using an established standard
Method	(1) Brought assessors and partners together to recognise existing due diligence efforts (2) Identified overlaps, synergies, and gaps in compliance requirements (3) Built a beta online passporting tool and database (internally owned and maintained) (4) Tested using CHS audit data from 10 national NGOs and used pilot feedback to improve the tool (5) Provided trainings and support to help L/NAs strengthen compliance with the CHS
DD Areas Covered	The passporting tool was populated with and tested using CHS audit data, which includes: Background on the organisation, including activities, management structure, quality assurance and risk management mechanisms, governance, plus performance against each CHS commitment: (1) Appropriate and relevant assistance (2) Effective and timely response (3) Strengthening local capacities and avoiding negative effects (4) Response based on communication, participation, and feedback (5) Complaints are welcomed and addressed (6) Response is coordinated and complementary (7) Continuous learning and improvement (8) Fair and equitable treatment for staff (9) Responsible resource management and use

Key Takeaways	(1) Existing standards (like the CHS, verified through HQAI) can provide robust coverage (50-100%) of major donor due diligence requirements and can provide an extra layer of assurance. (2) Partners found that the external verification process, coupled with targeted capacity strengthening, helped them improve their organisations, build confidence, and gain external recognition with funders.
Sources	(1) DRC (Danish Refugee Council), "Local: Lowering Compliance Burdens for Local and National Associations," DRC, n.d. https://drc.ngo/what-we-do/innovation/digital-innovation/local-lowering-compliance-burdens-for-local-and-national-associations/ (2) DRC (Danish Refugee Council), "Two Pager: Overview of Local," DRC, n.d. https://drc.ngo/media/tumpljdt/two-pager_-_overview-of-local.pdf (3) HQAI (Humanitarian Quality Assurance Initiative), "LoCAL News Release," 7 July 2025, https://hqai.contentfiles.net/media/documents/LoCAL_News-release-2025-07-07.pdf (4) HQAI (Humanitarian Quality Assurance Initiative), "Certification," HQAI, n.d. https://www.hqai.org/en/our-services/certification/ (5) CHS Alliance (Core Humanitarian Standard Alliance), "The Standard — Language Versions," Core Humanitarian Standard Alliance, n.d. https://www.corehumanitarianstandard.org/the-standard/language-versions

Initiative: Charter for Change Due Diligence Passporting (C4C DDPP) Tool Pilot

Actors	C4C signatory INGOs (CAFOD, Catholic Relief Services, Christian Aid, DanChurchAid, Diakonie Katastrophenhilfe, Tearfund, World Vision International), Humentum
Location	Sierra Leone, DRC, Malawi, Sudan, South Sudan, Iraq, Cambodia, Nepal, Ukraine
Approach	Passporting using a harmonised tool
Intended Purpose	Assessment for funding decisions
Method	Excel-based Due Diligence Passporting Tool; three pilot modalities: (1) Dry runs using existing data (2) Joint live pilots with two INGOs and one L/NGO (3) Live pilots with intent to passport results; qualitative learning review through interviews, surveys, and pilot reflections.
DD Areas Covered	(1) General (2) Governance (3) Strategy (4) Accountability

	(5) HR, Safeguarding and Security (6) Financial and Asset Management (7) Data and IT (8) Additionally, the passporting and/or partner organisation may agree to add more criteria if necessary.
Key Takeaways	(1) The use of a harmonised tool between INGOs increases the likelihood of passporting. (2) Consider whether to structure the tool in a way that allows for some INGO specification or customisation (can reduce barrier to use for INGOs but increase burden for L/NAs). (3) Lack of modular or tiered structure limits usability for smaller or less formal L/NAs.
Sources	(1) Humentum, "Charter for Change: Due Diligence Passporting Tool," Humentum, n.d. https://humentum.org/charter-for-change-due-diligence-passporting-tool/ (2) Charter for Change Initiative, "Due Diligence Passporting C4C Initiative 2025 Overview," 2025, https://charter4change.org/wp-content/uploads/2025/09/due-diligence-passporting-c4c-initiative-2025-overview.pdf

Initiative: Good Financial Grant Practice (GFGP) Standard

Actors	Global Grant Community and the African Academy of Sciences
Location	Global; assessed in India, Nigeria, Colombia, Philippines
Approach	International standard
Intended Purpose	Assessment for funding decisions (with capacity strengthening element)
Method	Four-Tier Compliance System: (1) Bronze: CBOs/CSOs with regional/country-level activities (2) Silver: NGOs with activities across one or more countries (3) Gold: Larger INGOs/research institutes with continental/international activities and sub-awards (4) Platinum: Global NGOs/international institutes with global activities (300 questions) Three-Phase Implementation: (1) Pre-Certification Assessment: Online self-assessment completed by grantees (2) Audit Process: Desk review and validation by licensed certification bodies (3) GFGP Certification: Valid for 2-3 years, depending on tier
DD Areas Covered	Over 300 detailed requirements across four practice areas: (1) Financial Management

	(2) Human Resources (3) Procurement (4) Governance
Key Takeaways	(1) Tiered structure effectively accommodates diverse organisation sizes, including small CBOs. (2) Providing capacity strengthening guidance and templates leads to actual policy improvements where systems are under-documented or underdeveloped. (3) It is essential to include partners in the audit/certification process; desk reviews without input generated frustration and reinforced power imbalances. (4) The cost associated with engaging an external actor to certify a partner against a standard continues to exclude some organisations. (5) When partners perceived the assessment as a mandatory pre-condition for funding, they were less forthcoming about true organisational weaknesses.
Sources	(1) Mutua et al., 'Dynamics in implementing the Good Financial Grant Practice standard across three African universities: an Indigenous realist evaluation,' 2025, available at: https://doi.org/10.1186/s12961-025-01343-7 (2) Harste et al., 'Good Financial Grant Practice: A Tool for Developing and Demonstrating Institutional Financial and Grant Management Capacity in Global Health,' 2021, available at: https://doi.org/10.1093/cid/ciab768 (3) Gichuru et al., 'How GFGP has helped a prominent African research organisation and its partners to strengthen governance practices,' 28 August 2023, available at: https://scienceforafrica.foundation/media-center/how-gfgp-has-helped-prominent-african-research-organisation-and-its-partners (4) Global Grant Community, 'Global Grant Community Platform,' available at: https://globalgrantcommunity.com/ (5) Global Grant Community, 'Good Financial Grant Practice Standard,' available at: https://globalgrantcommunity.com/standard

Initiative: START Network Due Diligence Process

Actors	START Network Members
Location	Global + contextualised modules; piloted in India, Pakistan, GRC, Guatemala, Ukraine
Approach	Due diligence tool with intent to passport
Intended Purpose	Assessment for funding decisions (with capacity strengthening element)
Method	Tiered risk-based framework linked to access (tiers define what funding or services an organisation can use); repeated assessments (e.g., every three years for members); reliance on professional DD providers and grant custodian for formal checks; contextualisation through country-specific modules (Bangladesh) and crisis-specific arrangements (Ukraine pooled fund); integration with funding mechanisms (Start Fund, Start Ready, Ukraine LPF).

DD Areas Covered	Organisations are assessed across nine areas: (1) Governance (2) Financial controls/oversight (3) Legal compliance (4) Ability to deliver/operational efficiency (5) Risk management (6) Commitment to best practices in humanitarian action (7) Data protection and privacy (8) Safeguarding (9) Downstream partner management. In Ukraine and Bangladesh, emphasis was placed on contextual legal compliance, sanctions and AML checks, and realistic programme/financial controls for smaller organisations operating under crisis or restrictive environments.
Key Takeaways	(1) Tiered structure provides partners with a clear assessment of their systems and guidance for how to improve and move tiers. (2) Link between tier and amount of funding can be seen as motivating for some partners to improve their systems. (3) Add on contextual or crisis-specific modules are useful when appropriate resources are invested in reviewing the context, ensuring fit for all actors, and providing professional translations.
Sources	(1) Start Network, 'Fund Localisation Pilot Evaluation Summary,' 2023, available at: https://startnetwork.org/learn-change/resources/library/start-fund-localisation-pilot-external-evaluation (2) Start Network, 'Due Diligence,' 2023, available at: https://startnetwork.org/about/governance-and-assurance/due-diligence (3) Start Network, 'Ukraine Local Pooled Fund,' 2024, available at: https://startnetwork.org/sites/default/files/2024-02/Ukraine%20Local%20Pooled%20Fund.pdf (4) Triangle, 'Review of the Ukraine Local Pooled Fund – Start Network,' 2025, available at: https://thinktriangle.net/wp-content/uploads/2025/10/Final-PDF-Ukraine.pdf (5) Start Network, 'Start Fund Localisation Pilot (English),' 2019, available at: https://startnetwork.org/learn-change/resources/library/start-fund-localisation-pilot-english (6) LightCastle Partners, 'Developing and Piloting a Country-Level Due Diligence Module,' February 2024, available at: https://lightcastlepartners.com/cases/developing-and-piloting-a-country-level-due-diligence-module/

About Humentum

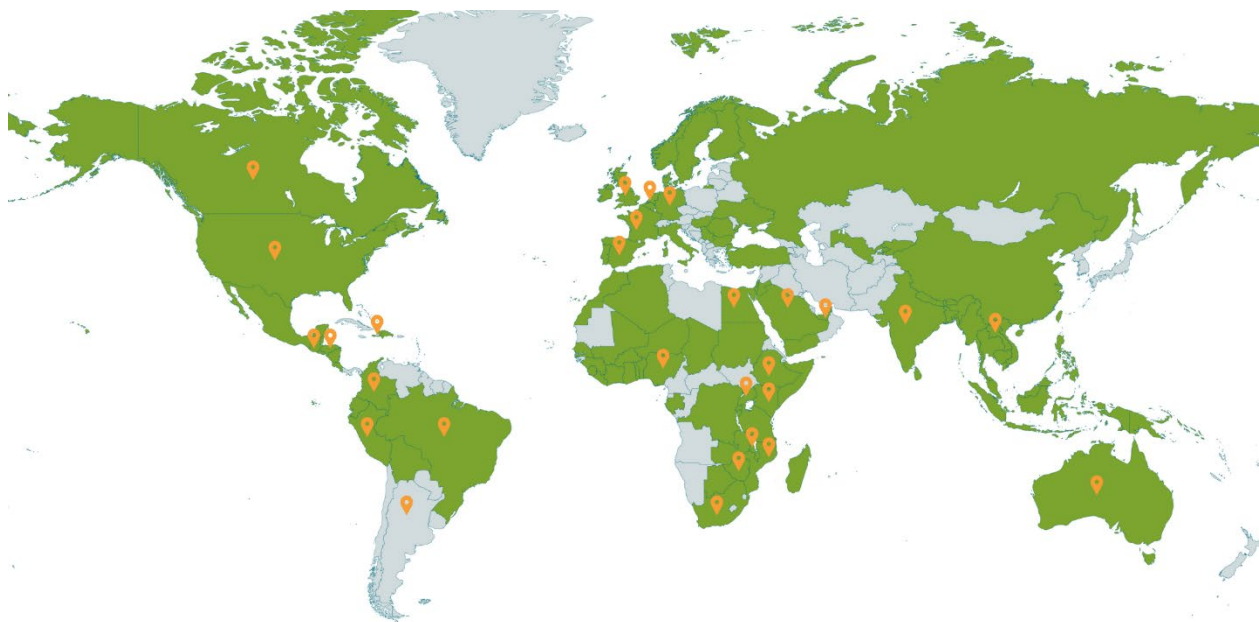
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