

Due Diligence Passporting: Lessons from a journey toward localisation with Ukrainian Local and National Actors

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Благодійний Фонд "Захід Шанс"	<i>Charitable Foundation "West chance"</i>	Наша допомога_Словянськ	<i>Our help Sloviansk</i>
100% життя Черкаси	<i>100% life of Cherkasy</i>	Нехай твоє серце б'ється	<i>Let your heart beat</i>
Сподівання	<i>Hope for the future</i>	Нова сім'я	<i>A new family</i>
БО БФ ПЖ Одеса+	<i>CO Charitable Foundation PZH Odesa+</i>	Оберіг_Костянтинівка	<i>Oberig Konstantinovka</i>
БО БФ ПЖ Полтава+	<i>CO Charitable Foundation Poltava+</i>	Партнер	<i>Partner</i>
Вихід	<i>Exit</i>	Позитивні жінки Черкаси	<i>Positive women of Cherkasy</i>
Відродження нації_Чернігів	<i>Revival of the nation Chernihiv</i>	Позитивні жінки Чернігів	<i>Positive women of Chernihiv</i>
Вінниця_Незалежність	<i>Vinnytsia Independence</i>	Позитивні жінки_Хмельницький	<i>Positive women of Khmelnytskyi</i>
Віра, Надія. Любов_Одеса	<i>Faith, Hope. Love Odesa</i>	Позитивні жінки_Чернівці	<i>Positive women of Chernivtsi</i>

Го «Зурц «Волн «Твій Дім»	NGO "Zurz Waves "Your Home"	Шлях до дому	<i>The way home</i>
ГО Істок+	Istok+ NGO	Юнітус_Миколаїв	<i>Unitus Mykolaiv</i>
Джерело здоров'я	<i>The source of health</i>	Конвіктус Україна	<i>Convictus Ukraine</i>
Жіночий хаб	<i>Women's hub</i>	Благо Харків+	<i>Blago Kharkiv+</i>
Карітас Донецька область	<i>Caritas Donetsk region</i>	Наше майбутнє	<i>Our future</i>
Майбутнє без СНІД	<i>Future without AIDS</i>		

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List of acronyms:

APH	Alliance for Public Health
C4C	Charter for Change
CAFOD	The Catholic Agency for Overseas Development
CA/I	Christian Aid and/or Christian Aid Ireland
CAP	Capacity Action Plan
DDPP	Due Diligence Passporting
INGOs	International NGOs
L/NA	Local/ National Actor
NGO	Non Government Organisation

Introduction

The Local/National Actor and Due Diligence context in Ukraine

The global discussion on 'localisation' has garnered substantial enthusiasm since the 2016 culmination of the World Humanitarian Summit; with multiple further platforms, commitments and initiatives, however real progress has been slow. Several reasons have been identified as barriers to faster progress: sufficient funding, inclusion of local and national actors in decision-making forums and, most relevant to this learning paper, due diligence and aversity to risk.ⁱ

This challenge to effective implementation of the localisation agenda was echoed in the response to the Ukraine crisis where local and national actors (L/NAs)ⁱⁱ were the first to respond, making up more than 60% of responding agencies, yet received only a fraction of international humanitarian funding committed (less than 1% of the \$3.9B committed in 2022).

L/NAs' testimony shows they are often excluded from decision-making, further compounding this challenge.^{iii,iv} Both Ukrainian and international organisations have stressed the importance and urgency of a locally-led humanitarian response^v with L/NAs demonstrating an evidence base of effective adaptation in their work, integrating humanitarian approaches and meeting needs in a rapidly evolving context, accessing the hardest-to-reach areas, including areas international agencies cannot.^{vi}

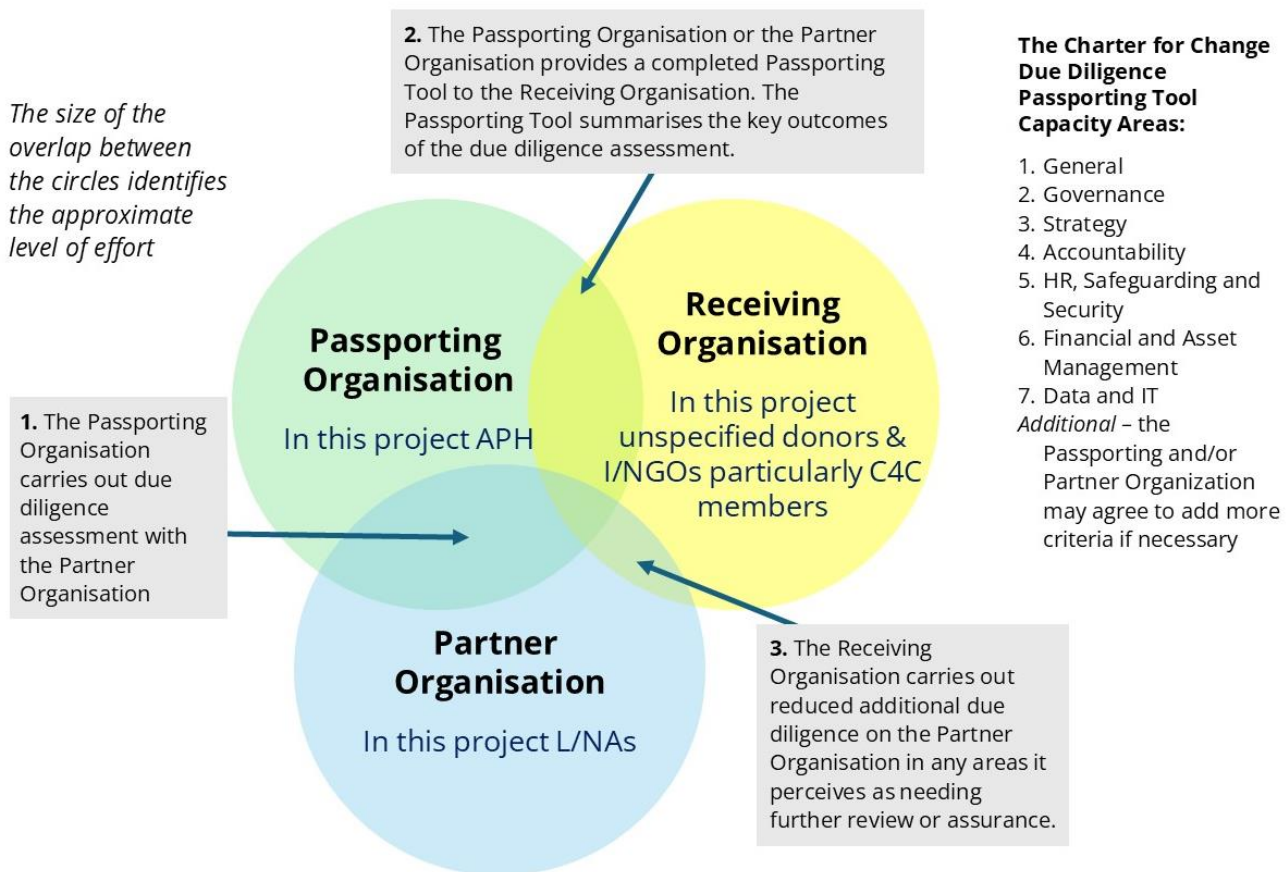
Many Ukrainian and international organisations have continued to **push for the localisation agenda** in Ukraine. Numerous L/NAs have expressed frustration over the number of due diligence processes they are required to complete to access funding, identifying this as a priority issue for the Ukraine Due Diligence Task Force.^{vii} These processes are time consuming and resource intensive. Despite having largely similar content, most INGOs and donors have their own preferred formats and process for due diligence^{viii} requiring L/NAs to adapt to each organisation's preferences. As such, many L/NAs report spending significant time completing duplicative processes for different INGOs or donor agencies. This process has led to exhaustion and frustration over INGO and UN agencies Western-focused, rigid and non-consultative processes, which are experienced by L/NAs as 'bureaucratization'.^{ix} While long-standing INGO partners are more likely to have a level of trust with INGOs, which may help in reducing due diligence burdens,^x this means

that smaller L/NAs who are seeking new funding and relationships experience a greater burden.

The Charter for Change Due Diligence Passporting Tool (C4C DDPP Tool)

In an effort to mitigate duplication in due diligence processes and reduce the burden on L/NAs, a group of Charter for Change (C4C) signatory INGOs,^{xi} supported by **Humentum**, collaborated for a year to develop a **harmonised due diligence passporting tool**. The initial aim was to develop a tool that all piloting agencies would honour, reducing the need for duplication. The group hopes to scale this to most C4C signatories, and potentially more INGOs in the future.

This tool could only be developed with buy-in and support from staff in a range of roles and seniority across all participating INGOs, including finance and audit teams.



Above: Diagram showing the three key steps and level of effort envisaged in the C4C DDPP process. Copied, with small adaptations, from **Humentum**, **Due diligence passporting – a possible solution to a locally-identified challenge**

The tool assesses 26 standard criteria, organised into 7+1 ‘Capacity Areas’, with each criterion rated on a scale of 1 (“not met”) to 4 (“all met”). The tool includes guidance for rating against each criterion. The tool itself is a spreadsheet, and unlike similar tools is open-source and available for use by anyone interested.

An introduction to the project

Alliance of Public Health (APH) is a Ukrainian public health NGO focusing on HIV/AIDS, TB, Viral hepatitis, and emerging public health threats, through a network of L/NAs and state partners, providing financial and technical support to programmes. Their network L/NAs are led by and/or are reaching some of the hardest-to-reach, most-marginalised populations in Ukraine, reaching 218,000 people in 2023.^{xii} Following Russia’s full-scale invasion in 2022, APH adapted their existing health programming to provide humanitarian assistance to people affected by the war, providing food and non-food items, shelter, multi-purpose cash, psychosocial support and responding to emerging public health concerns.

From early 2024, APH with support from Christian Aid Ireland (CA/I),^{xiii} piloted the C4C DDPP Tool as part of a larger 14-month project funded by Irish Aid. The project worked with 28 of APH’s network members – all Ukrainian L/NAs.^{xiv} The L/NAs are a mix of regional and national level organisations with budgets ranging from €800K to €180M (€18K to €4.0M) and staff ranging from 3 to 200 people.

Title of table: Project Phases

Phase 0	Pilot within a Pilot: Before the full roll out of the C4C DDPP Tool, each participating APH staff member implemented the tool with one L/NA. APH staff then reconvened to discuss the process and compare results. They also worked with the CA Partnership & Civil Society Engagement Strategic Adviser to discuss the tool and scoring criteria, to ensure consistency in scoring.	↑ Ongoing feedback from L/NAs, monitoring, reflection and learning to inform this learning paper ↓
Phase 1	Due Diligence Passporting: Each of the 28 L/NAs conducted a participatory assessment with APH using the C4C DDPP Tool. CA/I provided technical support, using experience from previous pilots.	
Phase 2	Capacity Action Plans (CAP): Building on the DDPP assessment, each L/NA developed a tailored CAP in collaboration with APH. Additionally, APH created a general capacity strengthening plan to address common priorities.	
Phase 3	Capacity Strengthening: APH facilitated or organised workshops and learning sessions on priority topics in the L/NAs’ CAPs and the general capacity strengthening plan. These included trainings, webinars, post-training meetings, and individual and group supervisions.	

**Phase
4**

Re-assessment: At the request of the L/NAs, each was re-assessed to compare their progress on the C4C DDPP Tool after Phases 2 and 3, and have now updated their CAPs based on this reassessment. At the request of the L/NAs, each were issued a certificate of completion (“passport”) to complement the C4C DDPP Excel tool (example in Annex 2).

As the C4C DDPP Tool is still being established, CA/I used the project as a learning opportunity.^{xv} This was the largest single-country pilot of the C4C DDPP Tool for CA/I.

Learning Paper Methodology

A set of learning questions were developed by CA/I in collaboration with APH, with the anticipation that unexpected insights were likely to emerge. It was also acknowledged that the full benefits of the DDPP for L/NAs might not become evident within the project timeframe, the opportunity to have the assessment ‘accepted’ by another INGO or donor might not arise within the 12 months.

Summary of Learning Questions *Full set in Annex 1*

- What were L/NA’s experiences of the passporting process?
- How does the passporting tool compare with L/NAs’ institutional context?
- What, if anything, did L/NAs hope to gain from participating in the due diligence passporting? Did those benefits arise? What factors enabled or limited those benefits arising?
- Did completing the due diligence passporting impact L/NA’s experiences with other donors/ INGOs? If so, in what ways?
- What were donors/INGOs (in particular C4C members’, including CA/I’s) attitudes and actions towards L/NAs who had undergone a passporting process?

Two voluntary, anonymous, surveys were conducted with L/NAs participating in the project. The first asked L/NAs to share their experiences with the due diligence passporting process (13 respondents, 46% response rate), followed by a plenary session to discuss findings. The second, conducted seven months after completion of the DDPP assessment process, sought to understand any benefits or disadvantages L/NA had subsequently experienced (20 respondents, 71% response rate). A third short survey was targeted towards L/NAs who declined to participate in the project, to learn whether their rationale their decision could further inform the C4C DDPP Tool (5 responses). Three Key Informant Interviews (KIIs) were conducted with large or international NGOs operating in Ukraine to capture their perspectives on due diligence

initiatives; these insights were particularly helpful in framing recommendations.

Throughout the project periodic reflection sessions were held within APH, supplemented by informal discussions with member L/NAs during project workshops. A core group (comprising CA/I staff, an APH representative, and a critical friend from another C4C organization CAFOD) held a one-day learning session to synthesize evidence, draw conclusions and develop recommendations, culminating in this learning paper. The learning paper also leveraged a wealth of blogs and opinion pieces available on due diligence in Ukraine.^{xvi}

Limitations

There were several methodological limitations to this, largely qualitative, study. These primarily stemmed from the need to consider the operating context and its impact on the staff of APH and its network L/NAs, and the desire not to add undue burden. As a result, although a highly participatory process was ideal, in-depth discussions of insights, conclusions and recommendations with L/NAs were not feasible. This (and the anonymous nature of the surveys) meant it was not possible to follow up on specific issues being raised in the surveys. Participation in the surveys was voluntary, which likely introduced response bias. Lastly, due to the short implementation period, there was limited scope to observe whether the 'DDPP assessment' had a lasting impact on the L/NAs or influenced their experience of engaging with other donors or INGOs.

Findings from the Pilot

Finding 1: **Benefits experienced by L/NAs**

Expectations: In an early survey asking L/NAs what benefits they hoped the C4C DDPP process would bring, the most common responses related to strengthened organisational capacity, followed by attracting new donors^{xvii} through “certification”. This contrasts with the Ukrainian L/NAs of the Ukraine NGO Platform, who had previously raised concerns about the duplication of due diligence processes (addressing this is one of the stated aims of the C4C DDPP initiative). Of the L/NAs participating in this project, it was the first time that 62% had completed a process like this; and so it follows that duplication is not a priority issue for them.^{xviii}

Addressing duplication: In the anonymous survey 85% L/NAs reported that they felt a complete C4C DDPP assessment would affect processes of applying for or receiving grants in the future. According to survey responses, however, none of the participating L/NAs have yet experienced more efficient access to funding or decreased duplication of due diligence (where relevant). It is still too early to say that this won't happen; several L/NAs had applied for funding, including with other C4C INGOs, and were still awaiting feedback as this paper was being written. As ‘Efficient and Streamlined Processes’ are the first stated aim of the C4C DDPP initiative, CA/I and APH will be keenly following up to see whether these benefits were experienced by any of the targeted L/NAs. Some L/NAs reported that they felt the absence of a ‘passport certificate’ is a missing piece of the puzzle for these types of benefits.

Through a separate project, CA/I and Ukrainian partner [Philanthropy in Ukraine](#) have arranged for all L/NAs who completed the DDPP process to be listed on ‘[PhilinUA](#)’; a platform where Ukrainian L/NAs can be ‘verified’, listed online and thus linked with INGOs and donors for collaboration. In a similar vein, two L/NAs responding to anonymous surveys shared that they felt that C4C DDPP will make organisational characteristics clear for donors.

Confidence and seeking future funding: L/NAs reported that the DDPP assessment boosted their confidence – an unexpected, positive outcome. Smaller L/NAs, in particular, felt that DDPP helped them better position themselves to seek

additional funding. It also gave them a clearer understanding of INGO and donor expectations, as well as insight into their own strengths and gaps and fundraising processes. As a result, they gained a better sense of their organisation's current capacity, and steps needed to strengthen it in the future.

In-house efficiency: Some the larger L/NAs shared that the C4C DDPP assessment helped them organise key documents, making funding applications easier and improving their readiness to seek funding. 50% of L/NAs reported that C4C DDPP positively impacted the funding application process (in respect of confidence, identifying organizational gaps, or streamlining documents and policies).

Capacity Strengthening: A key aspect of project design was L/NA capacity strengthening; tailored CAPs (Phase 2) built on the conclusions of the DDPP process (Phase 1). Near the project's conclusion L/NAs provided feedback specifying that this capability strengthening through technical accompaniment an important benefit of the project; enabling them to strengthen their organisation as a whole and achieve higher scores in the C4C DDPP Tool during the reassessment with APH (Phase 4).

This point endorses CAI's approach and philosophy to partnership due diligence;^{xix} combining compliance requirements with capacity, and a commitment to further strengthening the capacity of partner L/NAs.^{xx} While many INGOs share this approach, it is not standard practice, and L/NAs report finding due diligence processes to be bureaucratic and extractive. A key reflection from the learning group was that although the focus of the C4C DDPP initiative is on an agreed 'tool', its value is also in pointing L/NAs to practical areas and actions to strengthen their own organisations.

This raises a question: *what should happen when an INGO 'accepts' a C4C DDPP tool previously conducted with another INGO?* Findings from this pilot suggest that even with passporting INGO and new L/NA partners can still have valuable capacity discussions to identify priority gaps and risks, or complement existing capacity commitments from other INGOs. In this way passporting can strengthen partnership by fostering a more equitable and reciprocal relationship. If DDPP successfully reduces the time spent on due diligence it creates more space for meaningful conversations on shared risks and opportunities, and trust building – moving away from traditional top-down checklist.

Recommendations

- ▶ Donors and INGOs should provide resources to support L/NA capacity strengthening after due diligence assessments. This support should continue even when an INGO 'accepts' a previously completed DDPP assessment.
- ▶ Capacity strengthening should ideally be 'owned' by the L/NA rather than driven by an INGO, with INGOs providing complementary support. Plans should be developed and implemented through collaborative discussion and co-creation. Plans can build on the findings from the DDPP process, as well as the strategy and preferences of the L/NA.

Finding 2: The Journey, not the Passport

A key takeaway from this pilot is that the process matters more than the final output. The way the C4C DDPP assessment was conducted, paired with capacity-strengthening support provided in the wider project, is more valuable than simply producing a completed assessment document.

Feedback from L/NAs demonstrated appreciation for APH's accompaniment during the DDPP process. Some INGOs conduct due diligence through an online portal or by requesting a list of documents for L/NAs to complete alone, whereas in this pilot APH worked directly with L/NAs. This approach was particularly welcomed by L/NAs who had not completed a due diligence process previously and were largely unfamiliar with its associated terminology and documentation. Of those who *had* completed similar exercises previously, two L/NAs noted that in other processes they had to complete it independently and through an online portal.

As part of this project, APH and CA/I reflected that their philosophy towards partnership is of *'wanting to go on a journey together'*. It is the *passportisation process*, and the subsequent capacity strengthening action plans and support, that are more meaningful than a 'passport' type document.

The project facilitated spaces for L/NAs to share experience. L/NAs shared that they appreciated these horizontal exchanges, and in response to the anonymous survey question, *"Write your suggestions, how this process can be improved for other NGOs?"* two L/NAs suggested more opportunities for exchange: *"Holding meetings on the exchange of experience between partners"*, and *"Exchange of experience"*. This highlights the benefits of a broader view of the DDPP process as one between peers, rather than just an INGO-L/NA relationship. Smaller L/NAs in particular appreciated learning larger L/NAs with more experience in the INGO sector, as it helped demystify the grant application process. CA/I reflected that the C4C DDPP initiative is essentially one of coordination between INGOs; and that it is important to maintain a similar lens for L/NAs; emphasising the value of connection and collaboration within civil society.

An early anonymous survey with L/NAs did identify some challenges with the process (e.g., "fatigue", "Embarrassment", "A

Recommendations

▶ As well as focus on the 'tool' INGOs conducting due diligence assessments of any type should seek to provide a process that feels safe and supportive for the L/NA, centring the self-identified needs of the L/NA

▶ The C4C DDPP Tool, guidance and website (or other tools with a similar intent) should include clear content on the *process* for using the DDPP Tool in an assessment, with guidance on:

- Accompanying the process
- Proactively seeking opportunities to de-duplicate
- Communications
- Pairing the DDPP process with Capacity Strengthening budgets and resources, where possible

▶ As well as addressing issues of INGO-to-INGO coordination and INGO to L/NA relationships, Donors and INGOs should consider the importance of L/NA to L/NA relationships and create safe spaces where L/NAs can coordinate, share and exchange.

little confusion”),^{xxi} as well as positives. These challenges were addressed within the project, and are also discussed in sections ‘[Clear Communication](#)’ and ‘[Findings on the C4C DDPP Tool](#)’.

Finding 3: Clear Communication

Due diligence exercises typically occur in a context of an unequal power relationship, primarily based on funding, which is unidirectional, and where one organisation might or might not have plans to support the strengthening of the other organisation. It is only natural that different parties have differing expectations, hopes and fears around DDPP processes and outcomes. The C4C DDPP tool has a further set of ambitions, and is inextricably linked with the funding landscape, further complicating potential messaging.

In this project, conversations with L/NAs and survey results demonstrated that there was a variety of expectations of what the C4C DDPP could potentially deliver for each L/NA. Despite intentional efforts to communicate the purpose of the C4C DDPP at many levels, the project demonstrated that there were opportunities to enhance communication further, to prevent false expectations and misaligned objectives.

Language: The project team reflected that communication could have been improved if the team had developed a clear summary document outlining the full process in Ukrainian, to be shared with the L/NAs from the outset of the project. Despite regular communication (written and verbal), L/NAs did not receive documentation in Ukrainian clearly outlining the purpose and process of the C4C DDPP tool, and the associated capacity strengthening strategies. By providing accessible and summary resources in the local language, the project could have reduced any potential misunderstandings.

Significant benefits will require sector-wide change: While individual INGOs can sign up to the C4C DDPP process, the success of the C4C DDPP initiative ultimately depends on take up across the sector, including buy-in and coordination of institutional donors. As part of the process, INGOs and L/NAs need to discuss their expectations from the outset, and clearly communicate what they can control and what they can only try to influence. While the C4C DDPP tool has potential to reduce duplication, many agencies will insist on their own due diligence approaches, and it is important to mitigate against false

Recommendations

- ▶ Since DDPP is so closely tied to funding relationships, INGOs should be cautious in communicating the purpose of passporting to avoid raising false expectations about funding opportunities that are beyond the INGO’s control.
- ▶ For INGOs developing communications on DDPP it is important to consider the nature of the L/NA. An L/NA that frequently participates in due diligence assessments may experience different benefits compared to an L/NA that infrequently (or has never before) conducted such a process. For the latter group, duplication is less of a concern, and they may value additional support and guidance.
- ▶ A resource explaining the intention of C4C DDPP tool and associated process in the primary language/s of a context would aid in communicating the intended purpose and process.

expectations. For the tool's broader benefits to take hold, donors must actively support and assess learning from various due diligence passporting efforts to drive wider sector adoption.

'Scoring': During the DDPP process pilot there was a sense that some L/NAs interpreted a lower score on the DDPP Tool as 'worse' than a higher score.^{xxii} This might highlight the barriers faced by some L/NAs who wish to be eligible under criteria that larger donors can impose. While many INGOs do have minimum requirements for funding, it should be recognised that lower scores are generally not inherently bad and might be satisfactory for some L/NAs who act on a more grassroots level. This should be clearly communicated to L/NAs.^{xxiii xxiv} In fact, INGOs who are part of C4C, or who are committed to a partnership approach should see varying scores as a potential opportunity to support growth, if so desired by the L/NAs, as well as a more holistic civil society.

Capacity Strengthening: L/NAs targeted by this project were appreciative of the organisational strengthening and confidence building that was instigated by the DDPP. This project found that there is a key difference between the sense of burden that larger, more established L/NAs who may have done many due diligence exercises feel, versus smaller organisations who are completing one for the first time. It is very important that this group does not see the main benefit of this tool as a "passport" that *will* open doors, but rather an initial step in capacity strengthening that *could facilitate the process of* opening doors to new funds. A strength of this project is that it was paired with budget and technical resources to support capacity strengthening. At the project end, APH reflected that although they initiated the DDPP assessment with L/NAs, clearer, shared responsibilities from the outset would have been beneficial. While APH can introduce and support DDPP and capacity strengthening, L/NA ownership is crucial to success. A successful strategy was the joint development of the CAPs by each of the 28 L/NAs, supported by APHs. This outlined which issues L/NAs would address independently and where they needed support, from APH or other sources.

Recommendations

- ▶ INGOs or donors should consider how the 'scoring' of the DDPP Tool might be interpreted, as there is no single "pass score" and expectations vary across the sector. It is important for passporting organisations to clearly communicate that a 'low score' is not necessarily negative, if that is the case.
- ▶ INGOs should recognise the strengths in L/NAs that have lower passporting scores, not only as this represents opportunity for growth, but also in the diversity of organisations within the sector. In particular, partnership-based INGOs should identify ways of working that complement L/NAs, following the World Humanitarian Summit' principle that humanitarian response be: "*as local as possible, as international as necessary*".
- ▶ INGOs should support willing L/NAs in developing joint advocacy efforts urging international actors to accept DDPP and requesting new INGO partners and donors to review completed DDPP Tool, before requiring their own templates be used.

Finding 4: The C4C DDPP Tool

Modifications to the C4C DDPP Tool

The pilot yielded useful recommendations for the content and guidance of the C4C DDPP Tool, some of which have already been applied by C4C as the Ukraine feed-back were incorporated into a now revised version. Recommendations notwithstanding, it should be noted that 69% anonymously surveyed L/NAs felt that the current DDPP Tool criteria provided a good reflection of their organisational capacity.

Contextual modifications: The C4C Tool was translated into Ukrainian using Google Translate and verified by APH team members. While some translations were technically accurate, the true meaning of the criteria (some of which are very technical) was sometimes unclear and required several reviews to 'get it right'.^{xv}

In response to the survey question, "Write your suggestions, how this process can be improved for other NGOs?" some LNAs suggested:

- "In simpler language, create sentences"
- "Systematize and adapt the questionnaire, since the questions are very difficult to understand, some questions are repeated."
- "... it would be great to get an explanation of filling out and answering in the letter. We had a template and did not understand whether we needed to answer each question and whether to give each question the desired support (if we see a need for it) and approximate time, or only to some questions. For us, this would make it much easier to understand, minimizing the time to fill out and during the meeting with the supervisor."

Recommendation

► Before implementing the C4C DDPP Tool, it is essential to translate the language and terminology appropriately and contextualise its legal, political and cultural components to ensure relevance. Ideally this should be led by C4C members before humanitarian crises arise, so that each country has a pre-agreed, contextualised C4C DDPP Tool ready for passporting.

C4C DDPP Tool Question & Criteria	Comment on the Ukraine Context
<p>16. Does the Partner Organisation demonstrate safe recruitment practice for all staff and affiliates? iv Is Police vetting conducted (as appropriate)?^{xxvi}</p>	<p>Some L/NAs raised concerns that a requirement for police vetting is potentially discriminatory, as some L/NA staff may have been incarcerated or used drugs in the past (particularly the case as many L/NAs work on issues of HIV/ AIDS or addiction).</p>
<p>19. Does the Partner Organisation prepare timely comprehensive annual financial statements in line with accounting standards requirements, approved by the Board and, where appropriate, published on the website? Where required by regulation or due to the Partner Organisation's own requirements, the annual financial statements should be audited by a suitably qualified external auditor. The auditor should also provide a management letter.</p>	<p>Ukraine law does not require external financial audits of small L/NAs, an annual financial statement is sufficient. A full audit would not be affordable for most L/NAs.</p>
<p>23. Does the Partner Organisation have and implement policies to secure, insure and protect its assets, including offices and any warehouses?</p>	<p>Many LNAs and other organisations are not able to get insurance, as insurance providers don't have a policy relevant to a conflict context.</p>

The tool's criteria should also be adjusted for each context. APH staff and participating L/NAs shared feedback on some criteria.

These modifications were possible due to the flexible nature of the C4C tool which allows it to be broadly applicable in multiple contexts, while maintaining compliance standards in due diligence. The importance of this flexibility also helps build more widespread acceptance of the tool, as it would be almost impossible to create a one-size-fits-all tool for all countries and contexts.

Certification: The majority of the smaller targeted L/NAs had never undergone a due diligence process of this size. Many of these L/NAs have requested a formal certification which they can present to potential international partners or donors in the future ('Receiving Organisations'), to signify they have undergone the C4C DDPP and to share the findings and scores. To support this request, CA/I has developed a summary sheet of the C4C due diligence tool as a kind of "snapshot" which can be referenced for passporting requests in the future by other Receiving Organisations ([Annex 2](#)). APH and CA/I had assumed that the completed C4C DDPP tool itself, with details and scoring, would be sufficient for L/NAs and any 'receiving' INGOs/ donors, and so it was useful to receive this feedback from L/NAs. ^{xxvii}

Recommendations

- ▶ If requested, the Passporting Organisation (INGO) should provide L/NAs with a certificate or 'snapshot' which can be presented to other Receiving Organisations in due diligence processes to complement the C4C DDPP Tool itself. This should clearly state the date of the DDPP, the name of the reviewing organisation and role of the reviewer.
- ▶ When asked to complete a due diligence process by a new or prospective donor / partner, L/NAs are encouraged to first share the existing processes they have completed and ask for these to be accepted, or else used as the starting point to complete the new due diligence process.

Explicitly seek to reduce duplication: The C4C DDPP Tool does not provide sufficiently explicit guidance for INGOs to consider prior assessment instead of repeating the process. While Questions 2a and 2b ask about past assessments they do not prompt INGOs to determine if a previous assessment is sufficiently compatible for acceptance. To avoid unnecessary burdens on L/NAs, INGOs and donors should actively seek ways to reduce duplication. As the C4C DDPP Tool gains wider use, it cannot be assumed that L/NA staff will suggest that the INGO accepts a prior assessment.

Recommendation

► Guidance for the C4C DDPP tool should include explicit instructions to explore the possibility of ‘accepting’ a previous assessment instead of repeating the exercise. Where the international partner organisation wishes to support capacity strengthening, this completed assessment can then be considered the “jumping off point”.

#	Question/Criteria	Guidance for completing the Assessment Comments
2a	<p>2.1 What is the date of the last due diligence or Organizational capacity assessment carried out by the Passporting Organization?</p> <p>2.2 What is the name and job title of the person that carried out the assessment on behalf of the Passporting Organization?</p> <p>2.3 What is the date that this Passporting Tool was completed by the Passporting Organization?</p>	<p>2.1 Should be the last recorded date when substantial review work was carried out by the Passporting Organization in assessing the capacity of the Partner Organization.</p> <p>2.2 Should be the name and job title of the person, or persons, that carried out the assessment on behalf of the Passporting Organization.</p> <p>2.3 Should be the date the Passporting Tool was completed.</p> <p>These dates and the relevance of the job titles of staff involved are useful to the Receiving Organization in determining what level of assurance they may wish to place on the content of the Passporting Tool.</p>
2b	<p>2.4 List any other relevant frameworks that the Partner Organization has been assessed against, for example the Core Humanitarian Standard or the Start Networks due diligence assessment framework.</p> <p>2.5 Provide the dates of these assessments and links to the outcomes of these, if available.</p>	<p>2.4 Partner Organizations are encouraged to share information about previous assessments and provide links to any written outcome of these, where possible. This can inform the level and focus of assessment work that is undertaken by the Passporting Organization. Where the Passporting Organization has relied significantly on the outcomes of these previous assessments - it should note this in its comments in Column F.</p> <p>2.5 This should ideally be the date the previous assessment was carried out. These dates are relevant to the level of assurance that the Passporting Organization may wish to place on the outcomes of these previous assessments.</p>

Above: *Reproduction of the relevant sections of the C4C DDPP Tool*

Perceived Subjectivity

To support quality and consistent DDPP assessment processes and scoring across five regions, APH first conducted a mini pilot (Phase 0) where participating APH team members went through the C4C DDPP tool with one L/NA each. The APH team then came together to talk about the process, compare results, and discuss. They also worked with CA Partnership & Civil Society Engagement Strategic Adviser, who is closely involved in the wider C4C DDPP pilot. This ensured as close to a standardised score as possible.

When the process was complete with all 28 participating L/NAs, a cross-divisional CA/I team took a random sample of completed tools, to review the scores and the rationale for each one. This review found that CA/I and APH judgment of scores broadly aligned. While some Regional Supervisors may have scored certain aspects of the tool differently, this difference ultimately equated to a few questions receiving a rating higher or lower by no more than one point, having little to no impact on the overall score of the organisation. This project drew the conclusion that subjectivity was not a challenge when considering the ratings and the accompanying comments together.

Finding 5: Building Trust and Organisational Buy-In for the C4C DDPP Tool

“While the Tool was initiated by C4C signatories, we welcome and encourage participation from other international actors in the passporting process.”

Reducing duplication of processes requires collaboration among INGOs to accept initiatives like the C4C DDPP, or their equivalent. KIIs with INGOs illustrated the complexity and challenge in securing internal buy-in for the C4C DDPP Tool or similar collaboration. While many programme staff are keen to advance such initiatives, discussions often remain limited to implementation, programme and advocacy teams without reaching senior management levels or involving decision-makers in finance and compliance. Gaining formal organisational buy-in is challenging due to perceived risk implications and legislative requirements for INGOs.

Recommendations

- ▶ It is crucial that INGOs provide sufficient staff training on the DDPP tool and scoring. Ideally INGOs would go further and support staff to cross check each other’s scoring approaches, and implement ‘spot checks’ of completed processes to support greater harmony and consistency. This could be done within an INGO, or through collaboration across INGOs, to strengthen trust and consistency in application of the DDPP Tool.
- ▶ C4C members should conduct further exercises where two INGOs simultaneously conduct the DDPP process with the same L/NA but score independently. Comparing scores at the end of the process (if sufficiently similar) could help to build trust in the C4C DDPP Tool across the sector.

Additionally, many INGOs have their own due diligence tool(s) and processes, some of which are built into IT systems that are difficult to modify. The issue of trust *between* INGOs – specifically the willingness to accept an assessment led by another INGO – was also identified as a major barrier.

CAI's journey: Across the C4C community there has been progress in 'formal acceptance' of the C4C DDPP Tool, particularly among the INGOs who led the initiative. During the timeline of this project the CAI Directors and Board approved accepting the C4C tool, as equivalent to the existing CAI 'Partner Organisational Capacity and Risk Assessment', with the same three-year validity. This occurred as part of a separate, existing initiative on 'Diverse Partnerships' and brought together staff from various teams including audit, finance, programme, and advocacy. CAI's internal IT system for partner and project management has been updated to reflect these changes. CAI recognizes that DD passporting requires a minimum scale, and therefore buy-in from a critical mass of INGOs, ideally working from a single template. CAI Directors and Humanitarian team have promoted use of the tool by other INGOs in a variety of external spaces, and are willing to share learning on their internal journey with other interested INGOs. Since conducting this pilot, CAI has committed to engaging a similar C4C INGO with whom there are several shared partners, to systematically map shared partner organisations, and identify opportunities for due diligence de-duplication.

A lesson from CAI's journey is the importance of identifying well-positioned champions who are willing to promote DDPP internally. Engaging a diverse range of due diligence stakeholders, particularly those in finance and compliance, is crucial for success. Bringing the C4C DDPP Tool to existing working groups or ongoing organisational projects provided receptive ground to advance the initiative. Horizontal accountability among peers/management to ensure CAI was complying to its localisation commitments (**Pledge for Change**, **Charter for Change**, **Grand Bargain**) also helped to maintain momentum of the initiative.

Recommendations

- ▶ Donor agencies should go beyond asking about 'due diligence' in granting agreements and encourage INGO grantees to use C4C DDPP Tool, or similarly advanced passporting tools. This was encouraged by the Disaster Emergencies Committee (DEC) for the Ukraine Humanitarian Appeal although it was later removed from the Operations Manual. It is suggested that DEC reinstate this recommendation.
- ▶ The C4C DDPP Tool appears to be the most piloted and widely accepted DDPP initiative. C4C signatories and endorsers are encouraged to pilot, and ultimately accept, the tool. Other INGOs are encouraged to also pilot and accept the tool.
- ▶ INGOs that have reservations with the C4C DDPP Tool itself, should explore conducting small pilots to deepen the trust in the tool, or to identify organisation-specific innovations that could address shortcomings.
- ▶ The sector, in particular INGOs and donors, should actively build on the learning from the due diligence initiatives in the Ukraine response, so that mechanisms and agreements are in place for the next humanitarian response.

Conclusion

The influx of funding to Ukraine from 2022, paired with a strong and enthusiastic civil society provided a strong opportunity to advance localisation efforts. The call by Ukrainian L/NAs for INGOs and donors to address the duplication and other challenges associated with due diligence passporting meant that this was a promising environment to pilot the C4C DDPP Tool, although the full potential benefit is yet to be realised.

While it is premature to see increased efficiency or reduced duplication of due diligence for the L/NAs participating in this pilot, there were myriad other benefits to the DDPP assessment process reported by L/NAs.

Much of the focus in harmonising due diligence efforts focus on 'a tool'; while this pilot did identify recommendations to enhance the C4C DDPP Tool, stronger learning emerged on the importance of the DDPP process and accompanying capacity strengthening.

Due diligence should consider the specific needs of smaller L/NAs, and work in partnership with them to support their capacity strengthening efforts. This is essential as donor, UN, and INGO approaches to due diligence often involve levels of complexity and systems for risk management designed for larger international agencies, and thus are not suitable for smaller L/NAs, and risk excluding them from the sector. As demonstrated in this project, accompanying smaller L/NAs in due diligence processes can improve L/NAs confidence in navigating the fundraising and grant writing landscape of the sector. These L/NAs are typically the ones reaching the furthest behind, first.

In addition to DDPP assessment process and capacity strengthening, support for L/NAs should extend to advocacy and coordination efforts for passporting across the sector. Advocacy from C4C members and donors will be key in increasing uptake and driving sector-wide acceptance. In line with this, at the time of writing CA/I is reaching out to another Irish INGO with a similar partner portfolio to explore opportunities to proactively use the C4C DDPP process under another Irish Aid-funded programme.

The current shift in the funding landscape in Ukraine underscores a core principle of localisation: *L/NAs are the first and last responders in any crisis*. Often, by the time the sector is sufficiently organised to collaborate on due diligence, significant funding has already trailed off. It will be key for the next large scale humanitarian response that there is one or more DDPP Tools which can be completed by L/NAs and passported by international actors.








At the end of this all 28 L/NAs requested a reassessment through the C4C DDPP tool with APH, using these results to update their action plans. CA/I and APH will continue to work in partnership with the L/NAs to identify support needs moving forward so that even the smallest L/NAs are positioned to continue their programming, if they choose to do so.

Recommendations Overview:

Recommendations made throughout the document are brought together here, and labelled for: donor agencies ●, INGOs ■, INGO C4C members □, for the C4C DDPP Tool itself ▣ and for L/NAs ◆.

- 1 ● Donor agencies should go beyond asking about 'due diligence' in granting agreements and *encourage* INGO grantees to use C4C DDPP Tool, or similarly advanced passporting tools. This was encouraged by the Disaster Emergencies Committee (DEC) for the Ukraine Humanitarian Appeal although it was later removed from the Operations Manual. It is suggested that DEC reinstate this recommendation.
- 2 ● ■ The sector, in particular INGOs and donors, should actively build on the learning from the due diligence initiatives in the Ukraine response, so that mechanisms and agreements are in place for the next humanitarian response.
- 3 ● ■ As well as addressing issues of INGO-to-INGO coordination and INGO to L/NA relationships, Donors and INGOs should consider the importance of L/NA to L/NA relationships and create safe spaces where L/NAs can coordinate, share and exchange.
- 4 ● ■ Donors and INGOs should provide resources to support L/NA capacity strengthening after due diligence assessments. This support should continue even when an INGO 'accepts' a previously completed DDPP assessment.
- 5 ● ■ INGOs and donors should consider how the 'scoring' of the DDPP Tool might be interpreted, as there is no single "pass score" and expectations vary across the sector. It is important for passporting organisations to clearly communicate that a 'low score' is not necessarily negative, if that is the case.
- 6 ■ As well as focus on the 'tool' INGOs conducting due diligence assessments of any type should seek to provide a process that feels safe and supportive for the L/NA, centring the self-identified needs of the L/NA
- 7 ■ Since DDPP is so closely tied to funding relationships, INGOs should be cautious in communicating the purpose of passporting to avoid raising false expectations about funding opportunities that are beyond the INGO's control.
- 8 ■ For INGOs developing communications on DDPP it is important to consider the nature of the L/NA. An L/NA that frequently participates in due diligence assessments may experience different benefits compared to an L/NA that infrequently (or has never before) conducted such a process. For the latter group, duplication is less of a concern, and they may value additional support and guidance.

- 9 ■ INGOs should recognise the strengths in L/NAs that have lower passporting scores, not only as this represents opportunity for growth, but also in the diversity of organisations within the sector. In particular, partnership-based INGOs should identify ways of working that complement L/NAs, following the World Humanitarian Summit's principle that humanitarian response be: "as local as possible, as international as necessary".
- 10 ■ INGOs should support willing L/NAs could be supported in developing joint advocacy efforts urging international actors to accept DDPP, and requesting new INGO partners and donors to review completed DDPP Tool, before requiring their own templates be used.
- 11 ■ If requested, the Passporting Organisations (INGOs) should provide L/NAs with a certificate or 'snapshot' which can be presented to other Receiving Organisations in due diligence processes to complement the C4C DDPP Tool itself. This should clearly state the date of the DDPP, the name of the reviewing organisation and role of the reviewer.
- 12 ■ It is crucial that INGOs provide sufficient staff training on the DDPP tool and scoring. Ideally INGOs would go further and support staff to cross check each other's scoring approaches, and implement 'spot checks' of completed processes to support greater harmony and consistency. This could be done within an INGO, or through collaboration across INGOs, to strengthen trust and consistency in application of the DDPP Tool.
- 13 ■ INGOs that have reservations with the C4C DDPP Tool itself, should explore conducting small pilots to deepen the trust in the tool, or to identify organisation-specific innovations that could address shortcomings.
- 14 ■ 📄 Before implementing the C4C DDPP Tool, it is essential to translate the language and terminology appropriately and contextualise its legal, political and cultural components to ensure relevance. Ideally this should be led by C4C members before humanitarian crises arise, so that each country has a pre-agreed, contextualised C4C DDPP Tool ready for passporting.
- 15 ■ C4C members should conduct further exercises where two INGOs simultaneously conduct the DDPP process with the same L/NA, but score independently. Comparing scores at the end of the process (if sufficiently similar) could help to build trust in the C4C DDPP Tool across the sector.
- 16 ■ ◆ Capacity strengthening should ideally be 'owned' by the L/NA rather than driven by an INGO, with INGOs providing complementary support. Plans should be developed and implemented through collaborative discussion and co-creation. Plans can build on the findings from the DDPP process, as well as the strategy and preferences of the L/NA.

- 17  The C4C DDPP Tool, guidance and website (or other tools with a similar intent) should include clear content on the *process* for using the DDPP Tool in an assessment, with guidance on:
- Accompanying the process
 - Proactively seeking opportunities to de-duplicate
 - Communications
 - Pairing the DDPP process with Capacity Strengthening budgets and resources, where possible
- 18   A resource explaining the intention of C4C DDPP tool and associated process in the primary language/s of a context would aid in communicating the intended purpose and process.
- 19  Guidance for the C4C DDPP tool should include explicit instructions to explore the possibility of ‘accepting’ a previous assessment instead of repeating the exercise. Where the International partner organisation wishes to support capacity strengthening, this completed assessment can then be considered the “jumping off point”.
- 20   The C4C DDPP Tool appears to be the most piloted and widely accepted DDPP initiative. C4C signatories and endorsers are encouraged to pilot, and ultimately accept, the tool. Other INGOs are encouraged to also pilot and accept the tool.
- 21  When asked to complete a due diligence process by a new or prospective donor / partner, L/NAs are encouraged to first share the existing processes they have completed and ask for these to be accepted, or else used as the starting point to complete the new due diligence process.

Reflections from Learning Team:

APH: The project is extremely effective and even exceeded expectations. L/NAs received better and more diverse results than we initially planned. As it turned out, the process of participating in the project was as important as the result. Some participants noted that it was very good that the project was stretched over time and there was an opportunity to receive various support over the months. Such projects allow the public sector in Ukraine to develop, feel more independent and confident, and promote interaction and close cooperation between local NGOs.

CA Ukraine: This project has provided valuable insights into how the C4C Due Diligence Passporting tool is not merely about replication, but adapting to the specific context. Some things to consider: First, continuous feedback loops are essential in ensuring the tool remains relevant and meaningful to the intended users. It was through routine dialogue that the local NGOs shared they found the combination of the tool with the Capacity Action Plan more effective and provided a comprehensive view of their growth journey. Second, is the importance of focusing on the impact over the instrument to ensure that we are reflecting and rethinking how elements are working towards the goal. At different points in the project the stakeholders had to be reminded that rather than getting fixated on the immediate result of the passport, the focus should be on the 'what' and the bigger 'why'.

CAI Senior Management: When reflecting on due diligence passporting in partnership, a numeric scoring system might not necessarily be the right metric, but some other classification might create a more motivational path for newer or less established L/NAs. A more solutions-focused approach that uplifts L/NAs may be approaching DDPP in a manner that reflects the scale of attainment: Absent, Acquiring, Achieved, Advanced, rather than numeric scores that suggest a pass/fail binary. Establishing a scale of attainment could identify areas of focus in a continuous improvement plan, which creates an open, honest and supportive environment to enable L/NAs to recognise due diligence as a continuous journey of development, for all organisations, and support work towards shared solutions to emerging challenges. This could promote better understanding and more realistic expectations for the L/NA on the type of donor or funding mechanism that might be most strategic, at a particular moment in their journey / scale or attainment.

CAI Advisor: This learning paper created space for reflection and listening to APH and L/NAs, without the focus on indicators or key evaluation questions; this was very much appreciated and yielded rich, nuanced insights. While the benefits of the C4C DDPP process to L/NAs are evident, I feel it is important to reflect that due diligence criteria and processes reflect the power imbalances within the international aid sector. By laying out criteria of what 'fundable civil society' looks like (largely informed by a Westernised viewpoint), such processes contribute to the professionalisation of civil society organisations, which is not necessarily an inherent good. I feel that the C4C DDPP Tool, and others like it, are helping to address the symptoms of a poor system but may ultimately be contributing to sustaining that system.

CA Partnership Advisor: This project positively contributed to a wider global C4C pilot that aims at reducing duplication, yet also went beyond passporting by connecting it with partner capacity strengthening and has shown it to be compatible with both these aspects. As CA we acknowledge the expectation by many local NGOs who wish to engage more formally in the sector in an attempt to diversify donors. This tool can help them to be clearer on sector expectations, but one must also guard against this creating false expectations. A passporting tool as such does not create more funds and that should not be the main purpose, but rather when opportunities arise to be able to systematically show capacities – if the L/NA desires to be part of this formal global sector. However, we should not inadvertently pressure small CBOs and other locally-rooted groups down such a route: diverse interpretation of capacity exist also valuing and respecting local knowledge, not all partners desire or require a standardized northern-initiated NGO-style capacity process.

Annex 1: Learning questions

- What were L/NAs' experiences of the passporting process?
- How does the passporting tool compare with L/NAs' institutional context?:
 - Are the questions and responses reflective of L/NAs' features?
 - Do the questions reflect what L/NAs' see as their trustworthiness?
 - To what extent, if at all, were any recommendations or changes emerging from the Due Diligence Passporting in line with L/NAs' existing strategic or policy priorities?
- What, if anything, did L/NAs' hope to gain from participating in the due diligence passporting? Did those benefits arise? What factors enabled or limited those benefits arising?
- Did completing the due diligence passporting impact L/NAs' experiences with other donors/ INGOs? If so, in what ways? *In particular*:
 - Did completion of the due diligence passporting affect L/NAs' likelihood of engaging with donors/INGOs, for example, by applying for more or different funding opportunities?
 - To what extent did the due diligence passporting facilitate quicker, smoother or greater access to funding for the L/NAs'?
 - What were L/NAs' general experiences when engaging other donors/ INGOs with a 'passport'?
 - By mid-2025, what are L/NAs' reflections on the due diligence passporting?
- What can we learn from the L/NAs' who declined to participate in the due diligence passporting?
- What were donors/INGOs (in particular C4C members', including CA) attitudes and actions towards L/NAs' who had a passport?
 - What factors influenced their willingness to accept the passport, or otherwise?
 - What would encourage or enable greater acceptance in the longer-term? Is there any benefit to the donors of this DDP process?

Annex 2: Example Certificate^{xxviii}

[НАЗВА ПАРТНЕРА] Підсумковий звіт за результатами комплексного юридичного аудиту

Підсумковий рейтинг ризиків станом на січень 2025 року

Зона спроможності	Середня оцінка	Коментарі
Загальні дані	N/A	N/A
Управління	4.0	Всі критерії виконані або перевиконані з низьким ризиком
Стратегія	4.0	Всі критерії виконані або перевиконані з низьким ризиком
Підзвітність	4.0	Всі критерії виконані або перевиконані з низьким ризиком
безпека	4.0	Всі критерії виконані або перевиконані з низьким ризиком
Управління фінансами та активами	4.0	Всі критерії виконані або перевиконані з низьким ризиком
Дані та ІТ	3.0	Критерії в основному виконані і ризик є прийнятним

Шкала оцінювання

- 1 = Критерії не виконані, отже, високий ризик
- 2 = Деякі критерії виконані, але залишаються
- 3 = Критерії в основному виконані і ризик є
- 4 = Всі критерії виконані або перевиконані з

Підсумковий план дій

Пріоритетні напрями зміцнення	Запропоновані дії
A. Управління	Розгляньте можливість створення веб-сайту для забезпечення видимості та прозорості
B. Організаційні політики	Розробити політику захисту
C.	
D.	
E.	

Підписано організацією, що проходила паспортизацію	Назва організації Ім'я Посада Підпис та дата
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Підписано супервізором, який супроводжував паспортизацію	Ім'я Підпис та дата
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Підписано організаціями, що надавали технічну підтримку	Назва організації Christian Aid Ім'я ██████████ Посада Programme Manager - Ukraine Response Підпис та дата	МБФ "Альянс громадського здоров'я" ██████████ Керівниця відділу кризового реагування
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Endnotes

ⁱ Viswanathan, Vijayalakshmi (2023) Learning to be more 'locally led'? Current practice and evidence gaps in the international humanitarian system. London: ODI/ALNA

ⁱⁱ Local/national actors (L/NAs) will be used throughout this paper to refer to Ukrainian partners of APH, which includes civil society actors and community-based organisations (CBOs), among others.

ⁱⁱⁱ ICVA, 'A Humanitarian Localization Baseline for Ukraine' (September 2023)

^{iv} <https://aph.org.ua/en/about-alliance/impact/>

^v Press Release (2022) in which Christian Aid is a signatory

^{vi} ICVA (niii)

^{vii} Source: key informant interview with the co-found and co-chair of Ukraine Due Diligence Task Force, a group of eight international and local organisations under the NGO Platform

^{viii} Estimated by the Due Diligence Task Force as approximately 80% overlap.

^{ix} ICVA (niii)

^x ICVA (niii)

^{xi} These are CAFOD, Catholic Relief Services, Christian Aid, Kerk in actie, SCIAF, Tearfund and Trócaire, with DanChurchAid and Diakonien Katastrophenhilfe later joining the initiative.

^{xii} <https://aph.org.ua/en/news/more-than-218-000-ukrainians-received-help-thanks-to-new-initiatives-people-s-life-stories-and-ways-to-overcome-the-problems-brought-on-by-the-war/>

^{xiii} The acronym CA/I is used to conveniently refer to both Christian Aid Ireland, and Christian Aid.

^{xiv} Several L/NAs declined to participate in the project (which CA/I feels is an indication of strong trusting relationship). The learning team were curious whether this related to concerns of duplication. In an anonymous survey, most responding L/NAs cited lack of time as the main reason for not participating. Two of the five responding L/NAs felt they had sufficient organisational capacity and other priorities in a humanitarian setting. The size of the organisation – whether in staff numbers or budget – did not seem to impact whether L/NAs chose to participate.

^{xv} Separately, the C4C DDPP Tool is being piloted by seven C4C INGOs with 42 local or national partners across nine countries.

^{xvi} For example, see this piece from Philanthropy in Ukraine, "Navigation due diligence: Enhancing due diligence practices in Ukrainian philanthropy"

^{xvii} This question was asked through a free text format, rather than providing a list of potential responses.

^{xviii} While decreased duplication is a stated aim of the C4C DDPP Tool it was not an explicit outcome of this project.

^{xix} See CA/I's Partnership policy [here](#).

^{xx} This is in line with a key recommendation of, 'Accelerating Localisation Through Partnership'. "Commitments and funding for organisational development and capacity development should

be outlined, along with a strategy for meeting the needs identified by the L/NNGO partner themselves (or as a minimum identified through a joint assessment process). Christian Aid, CARE, Tearfund, ActionAid, CAFOD, Oxfam (2019) *Accelerating Localisation through Partnerships: Recommendations for operational practices that strengthen the leadership of national and local actors in partnership-based humanitarian action.*

^{xxi} Responses to the question, *“What words would you use to describe how you felt during the passportization process?”* These responses have been translated from Ukrainian to English using the app DeepL. The survey was conducted some months after the process, when there was a small delay in implementing capacity strengthening activities, which may account for some of the responses.

^{xxii} This was reflected in the L/NA surveys where one respondent noted that they felt ‘embarrassed’ during the DDPP process.

^{xxiii} Oxfam (via Bond) highlights interlinkages of INGO compliance norms and coloniality; some L/NAs might well reject some of the criteria outlined in the C4C DDPP tool. Compliance for INGO partners is riddled with colonial attitudes. Here’s how that can change... | Bond

^{xxiv} CA/I team members reflected that as a partnership-based organisation that supports civil society CA/I should seek to work with a variety of L/NAs, and not only those who are high-scoring.

^{xxv} For example, the term ‘safeguarding’ has multiple translations in Ukrainian, each with varying nuances.

^{xxvi} APH, supported by CA/I, is providing ongoing support to L/NAs to implement appropriate safeguarding measures.

^{xxvii} APH have reiterated communications that the overarching intended benefit of this project is not a certificate, but the process of assessing organisational strength and identifying capacity strengthening priorities.

^{xxviii} Names of L/NA and individuals removed.