PHILANTHROPY IN UKRAINE

RESEARCH · 2026

ONE DD ASSESSMENT INSTEAD OF FOUR

A comparative analysis of donor due diligence systems in Ukraine: similarities, differences, and recommendations to address them

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INTRODUCTION

A Ukrainian organisation working with four or five international partners may undergo four or five separate due diligence assessments each year. Each time, it prepares essentially the same set of documents: registration documents, information on board composition, financial statements, safeguarding policies, and anti-corruption procedures.

Yet, for each assessment, it must submit the information using a different template, follow a different timeline, and rephrase the same answers. Inevitably, the time spent on these tasks comes at the expense of programme delivery, particularly because most Ukrainian organisations lack dedicated administrative resources for compliance.

≈80 %

The scale of the problem has already been documented. The NGO Platform's Due Diligence Taskforce identified the duplication of checks as the central problem, estimating that approximately **80%** of the requirements imposed by different donors overlap.

From a donor's perspective, however, the situation looks different, which helps explain why the problem has remained unresolved for so long. Every requirement within a given system has its own justification, whether rooted in the donor's mandate, regulatory obligations, accountability to a supervisory body, or responsibility for safeguarding taxpayer funds.

The benefits of mutual recognition for donors, however, are tangible.

A compliance team can spend less than an hour vetting each new partner if it only needs to verify a few specific items rather than conduct a full due diligence procedure.

This accelerates the contracting process that can be critical in emergencies. It also lowers barriers for smaller and newer Ukrainian organisations, for which the cost of entry can be a major obstacle, whereas large partners with long-standing collaborations are more accustomed to undergoing these checks.

Furthermore, donors can fulfil their localisation commitments through practical, measurable, and visible actions.

Participants of the 2016 Grand Bargain agreed to harmonise partnership agreements and partner capacity assessments to save time and avoid duplication. In its practical guidelines on locally led development, the OECD identifies harmonised due diligence and fair risk sharing as a standalone area of action. In 2024, the Charter for Change and Humentum piloted a joint passporting tool with seven signatories; this tool is one of the **26** systems we examined in our analysis. In July 2025, six French and Swiss international NGOs signed a framework agreement on the mutual recognition of their due diligence procedures. Discussions within the sector have already shifted from the question of "whether" to the question of "how."

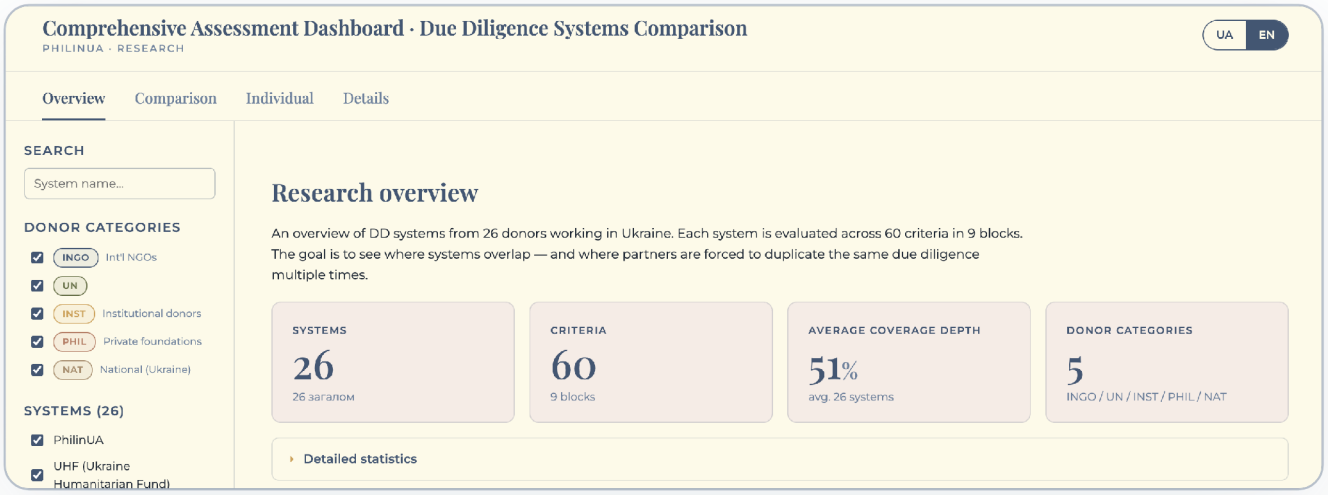
Agreements on mutual recognition that do not establish precisely how much of one DD assessment is covered by another remain merely declarative. This analysis measures coverage across 26 systems and 650 directions for recognition, identifies the donors whose existing assessments can already support mutual recognition, and proposes a tool to remove technical barriers.

Four key findings of the analysis:

1 **Donors require much of the same information,** yet the level of detail varies significantly. An average system covers **71%** of the topics on our list and details them to about half the extent possible, while 5 indicators appear in all **26** systems. The differences among donors lie in the level of detail in their requirements, whereas lists of topics largely overlap.

2 **The level of detail can now be measured and visualised.** The dashboard enables a side-by-side comparison of any two systems, showing where their requirements align fully, where they address the same topics differently, and where one requires information that the other does not cover at all.

This allows donors to examine their own systems from an external perspective and identify the specific indicators that may hinder broader acceptance of their due diligence assessments.



3

For certain donor pairs, mutual recognition is already feasible. We compared each of the **26** systems with every other system, assessing coverage separately in each direction: the proportion of Donor B's requirements covered by Donor A's assessment, and vice versa. This produced **650** directions for comparisons (26 × 25). In **193** of these cases, one donor's assessment covers more than **80%** of the other donor's requirements. In practical terms, if an organisation has already undergone due diligence with Donor A, Donor B would need to verify only a few additional items rather than repeat the entire procedure in 193 out of 650 directions. This level of recognition is possible without any changes to the existing systems.

4

Mutual recognition is most likely to happen between donors whose systems have similar levels of detail. Two scenarios should be distinguished. One-way recognition occurs when one donor accepts the other's DD assessment, but not vice versa; the sample contains **193** such possibilities. Mutual recognition occurs when both donors accept each other's assessments. This is possible for **47** pairs at the **70%** coverage threshold, but only for 6 pairs at the stricter **80%** threshold. In these pairs, each donor assesses approximately **50** indicators. Following acceptance, each donor needs to conduct extra checks on **12–14** indicators, with **8–9** indicators covered by a single document added to a topic already assessed. The key factor is not simply whether the systems cover the same topics, but whether their requirements are specified with a comparable level of detail: both written in equal detail, the costs of extra verification are broadly comparable. However, when one system is significantly more detailed than the other, the donor with more extensive requirements bears almost the entire burden of additional verification, making agreement on mutual recognition more difficult to achieve.

We assessed the systems based on their documented requirements and identified differences in the level of detail, including relatively minor ones, such as the format of confirmations or the completeness of lists of required policy elements. In practice, donors may consider such differences immaterial and resolve them through a letter or verbal clarification. As a result, the actual scope of follow-up verification may be smaller than our estimates suggest. For this analysis, we deliberately present the most comprehensive and exacting approach to ensure consistent measurement across all **26** systems, while leaving it to each donor to determine what discrepancies are important.

An important question for further study, which this analysis deliberately leaves open, is whether DD assessments based on more detailed questionnaires produce different evaluations of an organisation's capacity or identify different levels of risk than those based on less detailed questionnaires.

This analysis compares documented requirements of the systems rather than the conclusions donors draw from applying them.

Therefore, our findings do not imply that more detailed systems identify risks more accurately. Answering this question would require comparing the actual conclusions reached by different donors when assessing the same organisations. Donors' willingness to accept DD assessments conducted under less detailed systems will depend largely on the findings of such a comparison.

IMPORTANT NOTICE!

The data reveal where passporting is feasible. They do not secure that it will actually happen. Technical solutions can overcome the practical barriers to implementing passporting between two or more organisations. However, a barrier remains that this analysis and its findings cannot address — the willingness of donors and international organisations to accept another organisation's assessment, agree on the division of responsibilities, and invest the time required to create their first pair. Without this, the analysis will remain merely a description of an unrealized opportunity.

METHODOLOGY

SECTION 1

A donor's DD system, comprising the set of questionnaires, forms, and procedures it uses to assess its partners, serves as a unit of comparison in this analysis.

We did not compare organisations or examine how their due diligence processes are implemented in practice. We focused exclusively on donors' documented requirements.

Therefore, the results of this report should be understood as an analysis of similarities between donors' DD systems. To ensure comparability among documents that differ in structure, scope, and terminology, we need to develop a unified framework of topic areas for mapping each system.

In the analysis methodology, we used eight topic areas, comprising **57** indicators, as described by BDO LLP and ActionAid in the report "Due Diligence Harmonisation in Ukraine" (published in August 2025), which was co-commissioned by ActionAid and the NGO Platform for Due Diligence Taskforce and funded by the Disasters Emergency Committee.

BDO has identified these areas through previous harmonisation initiatives as common topics within the sector, focusing solely on the administrative capacity of organisations and not comparing indicators that focus on programmatic capabilities, as these are expected to differ depending on the organisation's focus and even between projects.

The ninth area ("Custom Indicators for Ukraine") was developed by our team. It comprises three indicators reflecting the specific Ukrainian context:
(1) Contacts with the Russian Federation;
(2) Information about the organisation's founder and CEO;
and (3) Communications and Partnerships.

Our analysis explores a topic other than the BDO review; thus, it builds upon rather than duplicates it. BDO analysis found alignment of requirements across various systems: full or strong alignment on **23** of **57** indicators, mixed alignment on a further 23. It demonstrated that about **80%** of key topics across the sector were highly correlated.

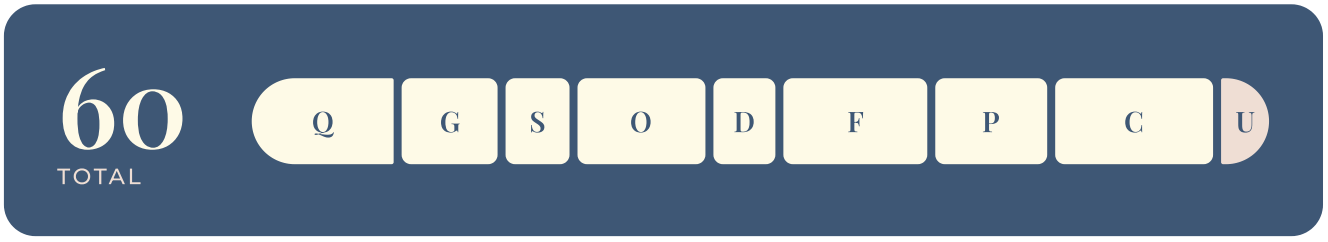
We focus on the practical implications of this issue to discover whether such alignment is sufficient for a particular donor to accept a due diligence assessment conducted by another particular donor, and what additional verifications, if any, it would still need to perform.

Answering this question requires assessing each system against a unified scale and calculating the level of alignment, both for each pair of systems and for each specific topic area.

The BDO review does not provide this analysis, as it falls outside its scope of work.

The framework comprises 60 indicators, split into nine topic areas.

AREA	TOPIC	NUMBER OF INDICATORS
Q	Pre-qualification for project applicants	9
G	Governance and Accountability	6
S	Safeguarding	4
O	Operational capacity to deliver programmes	8
D	Management of downstream partners	4
F	Financial capacity to manage donor funds	9
P	Payments and Cash	7
C	General systems and controls	10
U	Custom indicators for Ukraine	3



A three-level scale, *applied consistently across all systems:*

2

the requirement is clearly defined, identifying the documents or procedures required and specifying their expected key elements;

1

the topic is addressed, but the requirement lacks a comprehensive list of elements, sufficient procedural detail, or clearly defined documentary evidence;

0

no requirement addressing the topic is identified.

120 points — the maximum for an individual system

The comparative analysis was initiated and conducted by the Philanthropy in Ukraine (PhilinUA) team between May and August 2026.

During this period, **26** due diligence systems of donors operating in Ukraine were documented and analyzed. Each system was evaluated against all **60** indicators.

A total of **1,560** evaluations were conducted, each accompanied by a written analysis. To facilitate comparisons between the systems, **650** "Donor A → Donor B" pairs were established. They are presented in Section 4.

The PhilinUA team conducted an initial comparative assessment using large language models as a tool for systematising: a model was provided with a questionnaire form, a list of assessment criteria, and topic areas, and generated a preliminary assessment with justification for each score. The assessments were then analysed by seven invited specialists with expertise in financial accounting, compliance, organisational capacity assessment, and donor procedures. All **26** systems underwent the full validation process by experts.

The final scores were determined by expert judgment.

26	60	1560	650	7
systems	indicators	assessments	directions	experts

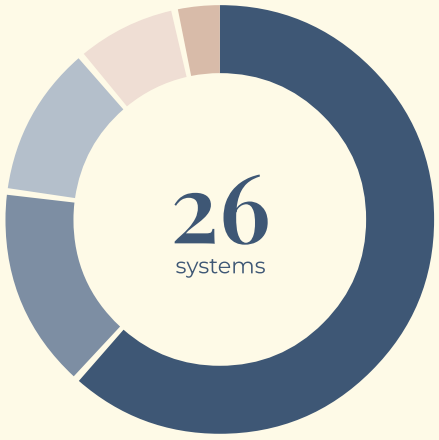
LIMITS OF INTERPRETATION

60 indicators used in our analysis do not constitute a due diligence standard. Eight of the nine topic areas were taken from the BDO/ActionAid comparative analysis report (2025), which consolidated the requirements of donors operating in Ukraine. Observations presented in the report have sparked the current discussion on due diligence harmonisation. Our team added the ninth topic area. The result is a list of topics that appear most frequently in donors' questionnaires. This represents a "common language" drawn from existing practice, but we are not establishing any new standard in this report.

Therefore, covering fewer indicators does not mean the due diligence process is inferior. It implies a different set of topics and, commonly, a different approach to risk management. A private foundation using a short questionnaire is not "weaker" than a UN agency — it deals with different funding amounts and partnerships, and often relies on checks already conducted by another organisation.

This analysis evaluates the documented requirements and a declaration governing DD, rather than procedures. When requirements are communicated by a donor through correspondence but not reflected in a questionnaire, we cannot capture them. All figures presented in this report should be interpreted as means for comparing systems, not for assessing their quality.

This analysis is not intended to rank donors!



The analysis sample comprises **16** international non-governmental organisations (NGOs), **4** institutional donors, **3** Ukrainian due diligence systems, **2** private foundations, and **1** UN fund — those that agreed to participate. The sample is non-random and does not claim to be representative of the sector; it will be expanded over time. Notably, adding a new system will not require revising the methodology, although it will not be reflected in this report.

- **16** international NGOs
- **4** institutional donors
- **3** Ukrainian systems
- **2** private foundations
- **1** UN fund

COMMON CORE OF REQUIREMENTS

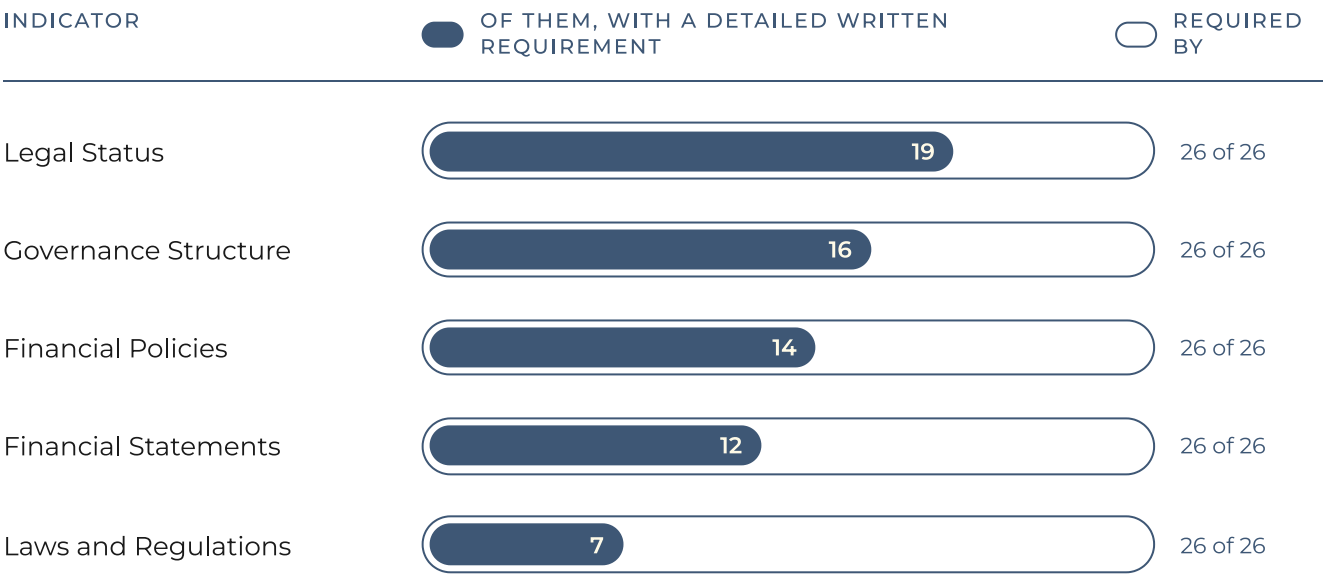
SECTION 2

Even though questionnaires look completely different, donors are mostly interested in the same things.

The following 5 of 60 indicators are consistently present across all 26 systems: Legal Status, Governance Structure, Laws and Regulations, Financial Policies, and Financial Statements. An even broader scope — **23** indicators — is referenced by at least **80%** of the systems.

This is the very fundamental basis for mutual recognition. A common core need not be created from scratch, as it already exists de facto.

However, the main challenge is as follows: while the topic areas of these 5 indicators are common, the specific requirements vary by donor (see the table below).



For instance, all **26** systems require organisations to have financial policies, yet only **14** specify the mandatory elements these policies must contain.

Similarly, all 26 systems require compliance with laws and regulations, but only **7** identify specific areas of legislation that must be covered and require organisations to disclose any violations.

We would like to dispel a common misconception from the outset. The list of **60** indicators is neither a standard nor a benchmark that organisations must reach. We do not suggest that a system covering **50** indicators is inherently better than one covering **30**. Instead, the list provides a common framework for identifying similarities and differences among donor requirements across the sector. The frequency with which individual indicators are referenced across the systems helps distinguish the requirements that constitute the common core of due diligence assessments from those that remain specific to individual donors.

For each of the **60** indicators, we calculated how many of the **26** systems reference it, at least in general terms (score **1** or **2**). On average, each indicator is present in **71%** of the systems, though this percentage varies considerably across indicators.

PRESENT IN THE SYSTEMS	NUMBER OF INDICATORS		EXAMPLES
In all 26 (100%)	5	●●●●●	Legal Status, Governance Structure, Financial Policies.
80–99 %	18	●●●●●●●●●●●●●●●●●●	Audited Accounts, Corruption / AML, Safeguarding.
60–79 %	20	○○○○○○○○○○○○○○○○○○○○	Bank Accounts, Recruitment, Vision and Mission.
40–59 %	11	○○○○○○○○○○○	Sanctions, Financing of terrorism, Reconciliations.
20–39 %	5	○○○○○	Sustainability of programmes, Litigation, Advances.
In less than 20%	1	○	Contacts with Russian Federation.

23 indicators are present in at least 80% of the systems, forming a common core with the strongest potential for mutual recognition. 17 indicators are referenced in fewer than **60%** of the systems. These are less suitable as a basis for a recognition framework, as most donor pairs do not require them, at least one donor in each pair does not include the indicators in its documented requirements.

The frequency of each indicator and the level of detail vary. Laws and Regulations are referenced in all **26** systems, yet these requirements are documented in detail in only **7** of them. **22** systems mention Financial Personnel, but only **3** describe the specific requirements involved. The sector's core topics proved broad yet lacking in depth of formulation. It is precisely this combination that makes recognition feasible at the level of topics, while complicating it at the level of specific documents.

*A complete list of all **60** indicators, along with their frequency, is presented in Annex C.*

DIFFERENCES BETWEEN SYSTEMS

SECTION 3

3.1. How we score indicators

Each indicator is scored using a three-level scale. To illustrate how the scale is applied in practice, let us consider the “Legal status” indicator, which shows whether a DD system requires an organisation to provide documentary evidence of its official registration.

SCORE	HOW IT IS PRESENTED IN A DONOR’S QUESTIONNAIRE
2 · in detail	The system sets out specific, mandatory requirements, including registration documents, an extract from the Unified State Register (USR) or its equivalent, and evidence confirming the organisation’s current legal status
1 · in general terms	The system inquires organisation registration details, but does not request a complete set of documents or verification checks
0 · no requirement	The system does not specify any requirements for confirming an organisation’s legal status

Scores of **1** and **2** both indicate that a donor addresses the topic, but they differ in the level of detail of the requirement. A score of 1 means that the topic is mentioned in the questionnaire, leaving partners to determine what supporting documents to submit. A score of 2 means that the required documents are explicitly specified in advance. This distinction has direct practical implications when comparing systems: two donors may both require proof of registration, yet expect different sets of supporting documents.

The same approach applies to more complex topics. The “Safeguarding Policies” indicator receives a score of **2** when a donor specifies the mandatory elements that a policy must address, including its scope of application, definitions, a threshold tolerance, reporting procedures, and responses to violations. A score of **1** is assigned when a donor requires a safeguarding policy but does not specify its essential elements, leaving partners to submit an existing policy.

All **26** systems were assessed using a unified reference guide that defines the three scoring levels for each of the **60** indicators. The guide is available on the dashboard, along with explanatory comments for each assigned score. This enables users to trace any figure presented in the report back to the relevant topic area and review the evaluator's rationale.

3.2. Scope of topics and the level of detail of requirements

The analysis's key finding lies in understanding the difference between the two figures. On average, a system addresses **71%** of the topics on our list, approximately **43 of the 60 indicators**, yet scores only half of the maximum possible points for the level of provided detail.

In other words, donors ask about almost everything but often fail to specify exactly what evidence or documentation is required, leaving partners to decide for themselves what to submit.

For system passporting, this presents a greater challenge than a simple mismatch in the lists of covered topics. Even when two systems formally address the same topic, it does not necessarily imply that documentation requirements are equivalent.

OUT OF 1,560 ASSESSMENTS*



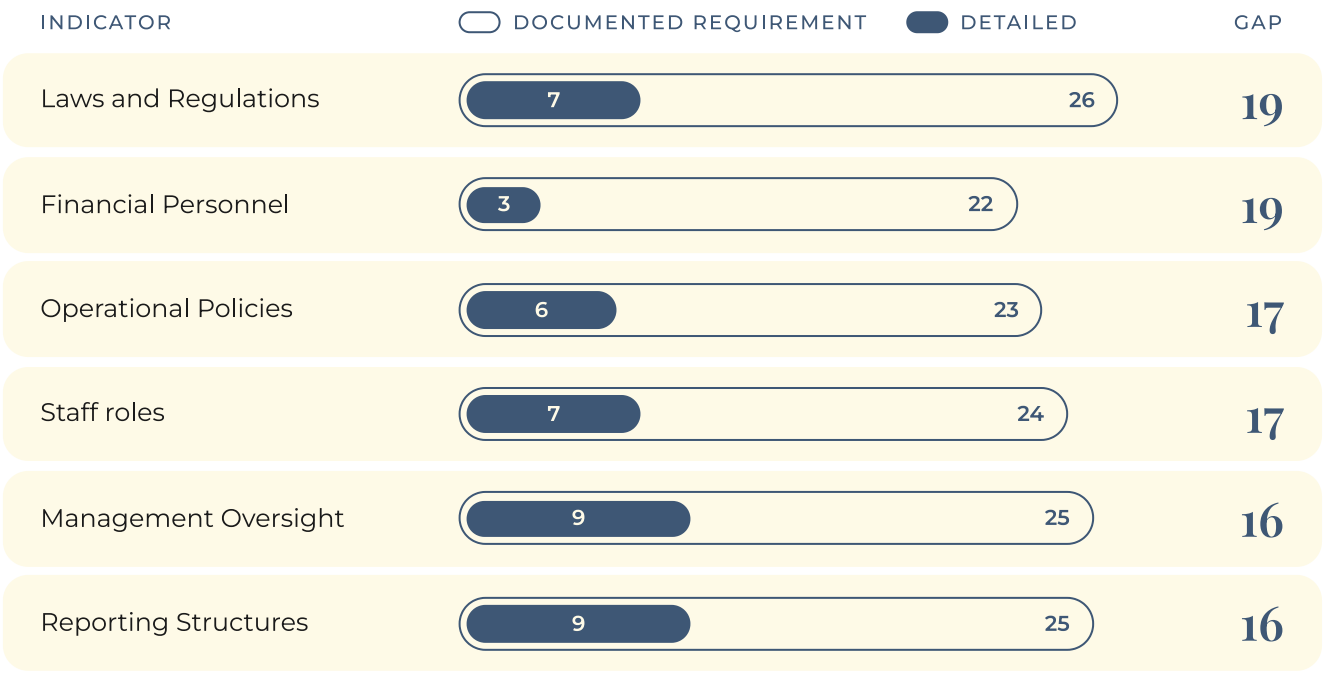
458
A requirement is detailed and includes a list of documents or procedures

655
A requirement is documented but essential elements or procedures are not specified

447
There is no requirement

** The total of **1,560** assessments corresponds to **26** DD systems, each evaluated against **60** indicators. Each system received a score for each indicator, so the assessment matrix contains no missing values.*

This difference is most pronounced for indicators that appear in nearly all systems but are rarely specified in detail. The "Difference" column captures the difference between the number of systems that address a requirement and the number of systems that define it in sufficient detail. The higher the value, the more frequently the requirement is not properly specified.



During the passporting process, these indicators create the greatest ambiguity: although both systems formally address the same topic, the information and supporting documentation they require may differ substantially, making the results difficult to compare.

3.3. Classification of systems by the level of detail

The scope indicates how many of the **60** topics a system addresses, reflecting the breadth of assessment coverage, while the level of detail measures how specifically a system defines its requirements. It is calculated as the system's total score divided by the maximum possible score of **120**, expressed as a percentage. Based on this measure, the **26** systems were split into three groups.

The groups reflect the level of detail with which each system document its requirements, rather than assess the overall quality of its due diligence process. Highly detailed systems specify the required documents and procedures for most topics. Moderately detailed systems provide this level of detail for approximately half of the topics. Poorly detailed systems generally state what information is requested but leave partners to determine how best to demonstrate compliance with the requirement.

8
Highly detailed
≥ 60%

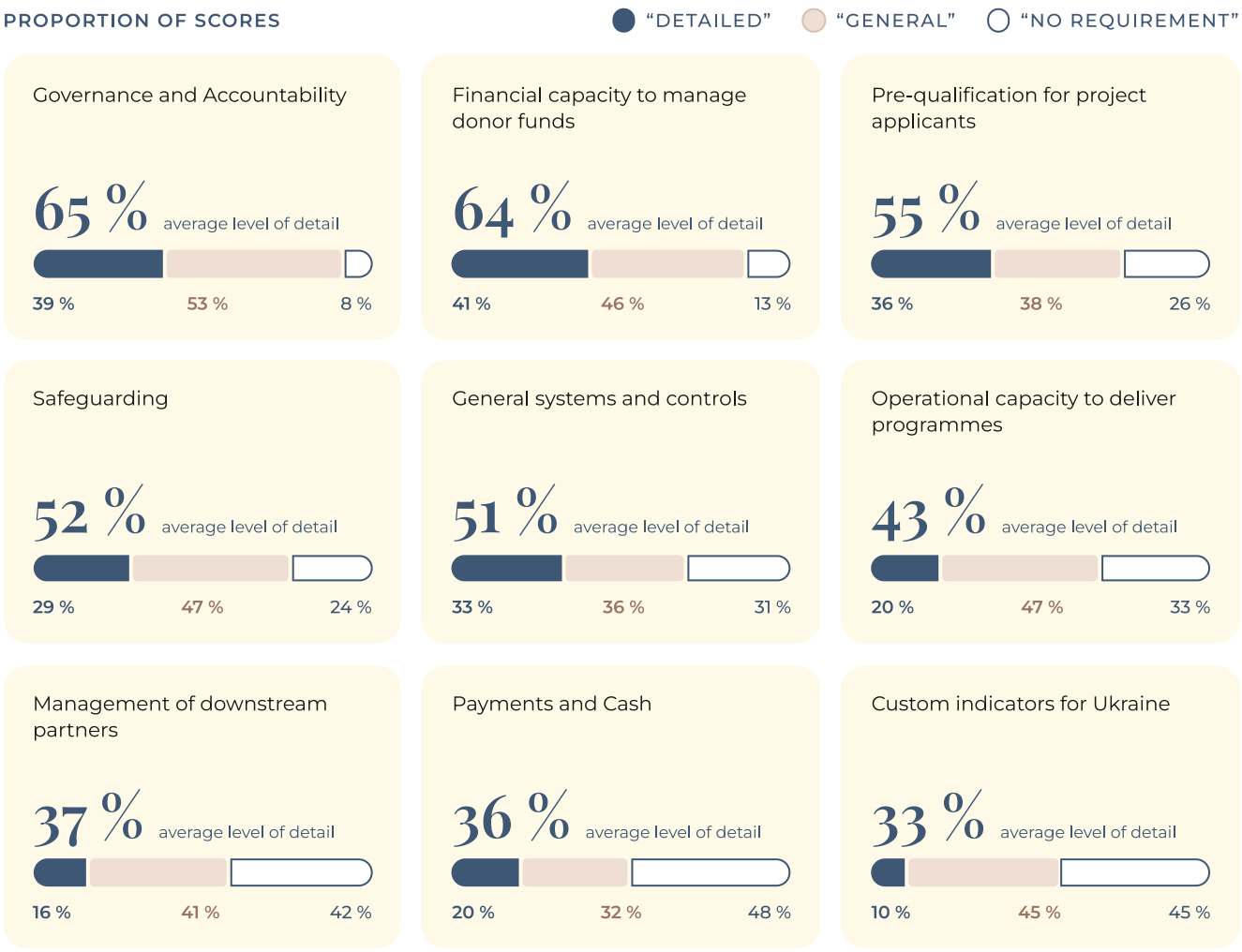
13
Moderately detailed
35–59 %

5
Briefly detailed
< 35 %

The level of detail across the sample ranges from **19%** to **91%** of the maximum possible score. The most detailed system achieves 91%, while the least detailed achieves 19% (the scores for all 26 systems are presented individually in Annex A). Most systems fall within the middle range, where mutual recognition may offer the greatest practical value: differences between them tend to lie less in the subject of assessment than in the level of detail.

3.4. Profile of requirements by topic areas

The first column shows the average level of detail for each topic area, calculated as the total points awarded across all systems in that area divided by the maximum possible score, expressed as a percentage. The next three columns show the distribution of scores within the same topic area by levels: the proportion of assessments in which the requirement is specified in detail (score of **2**), addressed without sufficient detail (score of **1**), or absent (score of **0**). Thus, the first column represents the average value, while the remaining three show how it is distributed across the three scoring levels. The percentages in the last three columns always add up to **100%**.



The indicators “Governance and Accountability” (**65%**) and “Financial capacity to manage donor funds” (**64%**) have the highest levels of detail. These areas constitute the historical core of donor oversight, established long before due diligence assessments were introduced in the Ukrainian context.

24 of the **26** systems require a safeguarding policy; however, only **13** specify the elements it must cover, particularly its scope, reporting procedures, and responses to violations. This reveals a significant gap between the widespread presence of the safeguarding requirement and the level of detail with which it is defined, despite the sector’s extensive commitments in this area.

The indicators with the lowest levels of detail are “Custom indicators for Ukraine” (**33%**), “Payments and Cash” (**36%**), and “Management of downstream partners” (**37%**). The latter finding suggests that while donors conduct thorough due diligence on their direct partners, they examine far less frequently how these partners select and oversee their own sub-partners.

3.5. Topics rarely addressed by donors

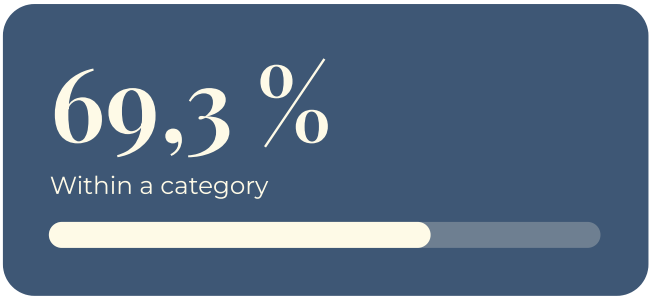
By contrast, there are indicators for which most systems contain no documented requirements at all.

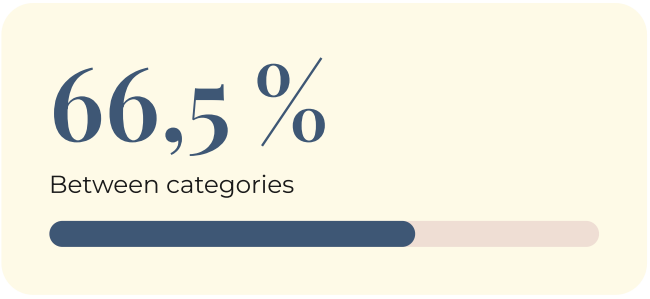
INDICATOR	AREA	DOCUMENTED REQUIREMENT	DETAILED
Contacts with Russian Federation	Custom indicators for Ukraine	**5 of 26**	0
Online Payments	Payments and Cash	**6 of 26**	0
Trip Management	General systems and controls	**6 of 26**	3
Advances	Payments and Cash	**8 of 26**	3
Litigation	Pre-qualification for project applicants	**10 of 26**	3
Sustainability of programmes	Operational capacity to deliver programmes	**10 of 26**	4

Collectively, these six indicators appear in only **45** out of the **156** possible cases (**29%**), with requirements explicitly detailed in just **13** of those cases. Two indicators — Contacts with the Russian Federation and Online Payments — have no detailed requirements in any of the systems. The requirement to check for contacts with the Russian Federation is the least common, appearing in only **5** of the **26** systems. At the same time, none of the **60** indicators is absent across all systems, although fewer than half of the systems address **7** indicators.

3.6. Correlation between the donor type and alignment

We expected acceptance of DD assessments to be easiest among donors of the same type, for instance, between international NGOs or between institutional donors. However, the data did not support this assumption. The average alignment rate was 69.3% within donor categories and 66.5% across categories, a difference of less than **3** percentage points.





The decisive factor is the level of detail, rather than the type of donor. The principle of starting within one's "immediate circle" remains valid, but for other reasons, such as similar processes, a shared risk culture, and established communication channels. However, this does not guarantee alignment of requirements.

SECTION 4

TARGETED COVERAGE: POTENTIAL FOR MUTUAL RECOGNITION

4.1. Why it is not enough to say: "The systems are 65% similar"

The statement "systems A and B are **65%** similar" sounds informative, but it provides limited practical guidance. For a donor, the key question is different:

> *"To what extent does what my colleagues have already checked cover my own requirements?"*

These are two values, and the difference between them is significant. If Organisation A conducts a detailed assessment while Organisation B performs a general one, Organisation A's assessment may match nearly all of Organisation B's requirements. In contrast, Organisation B's assessment may cover only a portion of Organisation A's requirements. A symmetric similarity metric averages these two scenarios, thereby losing the very information that the passporting process is intended to capture.

Therefore, we calculate targeted coverage — the proportion of one donor's requirements that is already met by a due diligence assessment conducted under another donor's system. This metric is calculated separately for each direction, because "the proportion of B's requirements already met by A" and "the proportion of A's requirements already met by B" are two different figures.

This report uses two distinct terms, which we clarify here. A direction refers to one-way recognition (Donor B accepts a due diligence assessment conducted by Donor A and determines whether it meets its own requirements, while Donor A may not necessarily accept Donor B's assessment). Each direction has its own coverage figure. Across **26** systems, there are **650** such directions. A pair represents mutual recognition when both donors accept each other's assessments. A pair is therefore established only when both directions between two systems meet the applicable acceptance criteria. The sample contains **325** pairs, exactly half the number of directions.

DIRECTION · A → B

650

one-way recognition

PAIR · A ⇄ B

325

mutual recognition

Both scenarios offer practical value. One-way recognition reduces the partner's workload, and even when one donor accepts another's DD assessment without reciprocity, the resulting benefit remains significant. Nevertheless, mutual recognition remains the primary focus because it does not require either party to compromise and is therefore more likely to pass internal approval processes in both organisations much more easily.

4.2. Calculation methodology illustrated by the example of two organisations

Let us consider two donors. Organisation A is an international NGO with a detailed questionnaire. Organisation B is a donor with a shorter procedure. A partner has already undergone a full due diligence process with A and is now applying to B.

Question: How much of what is required for B is already covered by the DD assessment for A?

We calculate this for each of the **60** indicators and take the lower of the two scores, since only what is present in both systems can be counted.

INDICATOR	REQUIRED BY A	REQUIRED BY B	COUNTED	REASON
Legal Status	in detail (2)	in detail (2)	2	B's requirement fully met
Governance Structure	in detail (2)	in detail (2)	2	B's requirement fully met
Sanctions	in general (1)	in detail (2)	1	B's requirement partially met: B requires more detail than A collected
Safeguarding Policies	in detail (2)	in detail (2)	2	B's requirement fully met
Financial Statements	in detail (2)	in general (1)	1	B's requirement fully met; A's extra detail adds no points
Advances	in general (1)	not required (0)	0	B has no requirement; excluded from the calculation
Trip Management	in detail (2)	not required (0)	0	B has no requirement; excluded from the calculation

This is a simple arithmetic calculation. The denominator represents the total points for Organisation B's requirements: **61** points (Organisation B addresses **44** topics, **17** of which have detailed requirements and **27** of which are addressed in general terms (17 × **2** + 27 × **1** = 61). The numerator represents the points for requirements that Organisation A's assessment already covers at the level required by Organisation B: **51** points.

51 ÷ 61 = 84 %

of Organisation B's requirements are already met by Organisation A's assessment.

9 of the **44** items required by Organisation B remain unaddressed. Of these, **4** relate to topics that Organisation A does not cover at all, while the remaining **5** relate to topics that Organisation A does address but for which its assessment does not include the specific documents required by Organisation B.

Practical implication: the partner needs to verify only **9** items rather than undergo the full **44**-item procedure. This is not "a zero workload," but it also does not require starting an assessment "from scratch."

In the reverse direction, the figure will be different. Organisation B's DD assessment will cover a considerably smaller portion of Organisation A's requirements because Organisation A requests more extensive information and documentation. Recognition is inherently directional, which is precisely why this process should be established for pairs of systems rather than "in general."

Both directions are displayed on the dashboard, which shows not only the coverage percentage for each pair of systems but also an indicator-by-indicator breakdown of what has already been covered and what remains to be verified. Asymmetry in coverage is not an argument against recognition, as even in the "weaker" direction, a partner can address the remaining requirements by providing only the missing portion of documentation, rather than undergoing the entire procedure from scratch. For organisations that undergo multiple DD assessments each year, this reduction in workload is the primary practical benefit of the proposed mechanism.

4.3. Results of comparing of DD assessments across 650 directions

Each system can be paired with each of the other **25** systems, with coverage assessed separately in both directions. For **26** systems, this creates **650** pairs (26 × 25). The analysis, therefore, focuses on comparisons between systems: the sample comprises 26 donor systems and 650 directions for comparison.

67,6 %
Average coverage across all 650 directions

193 (30 %)
Directions with coverage ≥ 80%

325 (50 %)
Directions with coverage ≥ 70%

5 indicators on average
Remain to be verified in directions ≥ 80%

18 of 26
Systems whose assessment another donor can recognise with coverage ≥ 80%

For directions where coverage already exceeds **80%**, recognition can reduce a full due diligence procedure to extra checks of just 5 items out of the approximately 40 required by a donor recognising a DD assessment. This is precisely the kind of time- and effort-saving that makes establishing such a mechanism worthwhile.

The average value well illustrates a typical case. In **116** of the **193** directions, that is, approximately **6** out of **10**, no more than **5** indicators require further verification. In another **52** directions, between 6 and **9** indicators remain to be checked. Only **25** directions involve 10 or more indicators, with a maximum of **20** indicators, for extra verification. In 4 directions, no further checks are required.

Here, an "indicator" refers to a single item being assessed, such as safeguarding policies, audited accounts, or bank accounts. Verifying **5** indicators therefore means addressing 5 individual questionnaire items. These 5 items consist of two parts that differ significantly in the workload they require.

About **2** out of the **5** items relate to topics that Donor A did not request at all; consequently, the partner is gathering the documentation for the first time that requires additional effort. The remaining 3 items relate to topics that Donor A had already verified, but defined in broader terms than Donor B requires. In these cases, the topic has already been checked, and only more specific evidence is needed; therefore, a clarification or an additional document supplementing the already verified information is usually sufficient to address the gap.

In **33** of the **193** directions, extra verification involves no new topics: the donor recognising a DD assessment simply requests confirmation of checks that the other donor has already performed. In 4 of these cases, no further action is required at all. In **111** directions (more than half of the total) no more than 2 new topics need to be addressed. The topics most frequently requiring new verification include Contacts with the Russian Federation, Development of Sub-partners, Sustainability of programmes, Shared Costs, Trip Security, and Cash Payments. These indicators appear in the lower section of the checklist presented in Annex C.

4.4. How to interpret analysis results

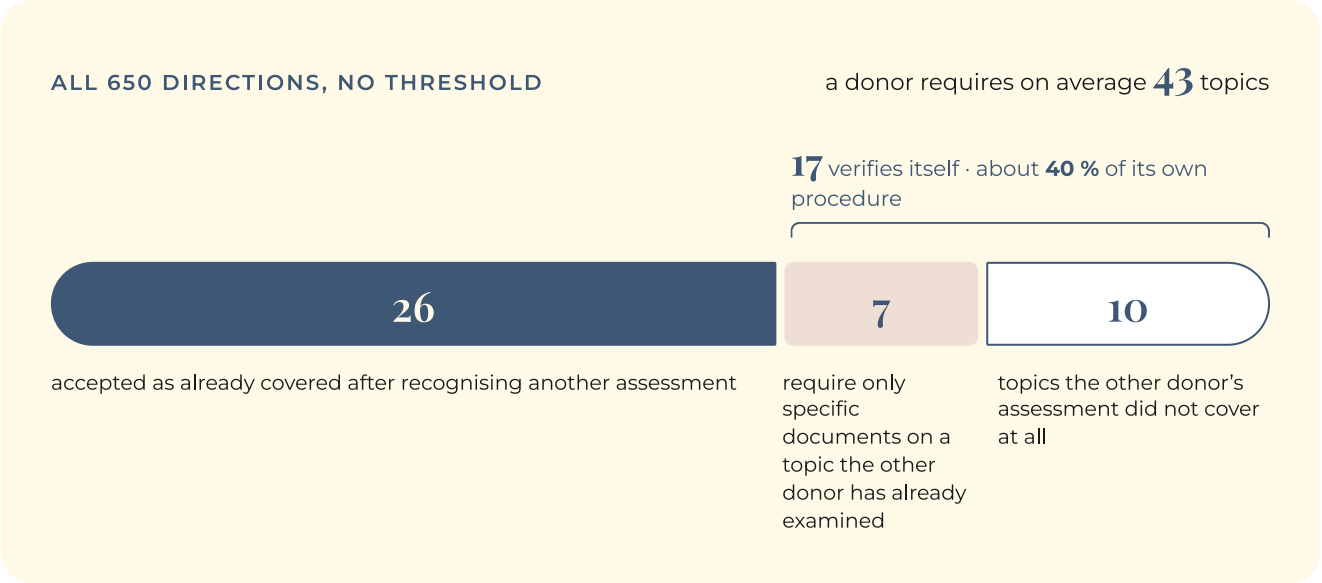
The targeted coverage metric is straightforward, but several important considerations should be kept in mind to avoid misinterpretation, they are outlined below. None undermines the main findings; rather, they provide further guidance on how the metric should be interpreted and applied.

First, the high coverage percentage is partly explained by the relatively limited information and documentation required by a recognising donor. In **163** of the **193** directions with coverage exceeding **80%** (**84%** of cases), the recognising donor's system is classified as moderately or poorly detailed, making its requirements easier to meet. In practice, a donor using a brief **30**-item questionnaire will often show a high coverage rate simply because those 30 items are likely to be addressed by any comprehensive system. Thus, a high rate may reflect the limited scope for recognising donor's own requirements rather than strong alignment between the two systems. If we narrow the analysis to directions in which both systems have the level of detail of at least **60%**, the number of qualifying directions falls to 30. In these cases, recognising donors' requirements cover an average of **53** indicators, leaving only about **10** for further verification, **7** of which relate to topics that have already been checked. These 30 directions, including **6** pairs that meet the threshold in both directions, are the strongest candidates for a pilot project.

Second, certain checks must be conducted by the donor itself, regardless of any mutual recognition agreement. These include non-transferable duties, requirements explicitly imposed on the donor by law or internal regulations, such as sanctions screening at contract signing, checks related to the financing of terrorism, and anti-corruption procedures required under the donor country's legislation. Checks performed by another organisation cannot cover these obligations, even if they have been conducted thoroughly.

Third, the metric measures documented requirements rather than actual compliance, with each indicator scored based on the information provided in questionnaires. We assume that a donor that has already vetted an organisation has collected all the information and documentation required by its system. The resulting coverage figure, therefore, represents the maximum potential, not an assurance.

In any case, extra assessment results in a lighter workload than conducting due diligence from scratch. Across all **650** directions, regardless of the coverage threshold, a recognising donor needs to verify an average of **17** out of the **43** indicators it requires, which is approximately **40%** of its standard DD procedure. Of these 17 indicators, only **10** relate to topics that the other donor's assessment did not cover at all. In short, if a donor requires information on 43 topics, recognising another donor's assessment means that it needs to verify only 17 topics by itself, while accepting the remaining **26** as already covered. Moreover, of those 17, seven require only specific documents relating to a topic that the other donor has already examined.



There is not a single one of the **650** directions in which an external verification fails to address at least some of the requirements. In the category with coverage exceeding **80%**, extra checks account for an average of just **14%** of the donor's total requirements. Thus, even in a randomly selected direction, a donor needs to verify less than half of what would be required from scratch. In the "easiest" pairs, this falls to approximately one-seventh.

4.5. Mutual recognition: the cost for each side

So far, we focused on one-way recognition, in which Donor B accepts an DD assessment conducted by Donor A. However, the sector's practical interest lies in mutual recognition, whereby both donors accept each other's assessments. Such an arrangement avoids unilateral measures and is therefore more likely to secure internal approval from both parties. Reciprocity is a more demanding condition than one-way recognition because the coverage threshold must be met in both directions simultaneously. Of the **325** possible pairs of DD systems, only six meet the **80%** threshold in both directions, while lowering the threshold to **70%** increases this number to 47 pairs.

The “bidirectional threshold” means that coverage exceeds the specified level in both directions: from Donor A to Donor B and from Donor B to Donor A. In other words, each donor can accept the other’s DD assessment.

BIDIRECTIONAL THRESHOLD	NUMBER OF PAIRS	EACH REQUIRES	EACH VERIFIES	OF THEM PARTIAL / NONE
≥ 80 %	6	55 indicators	12	9 / 3
≥ 75 %	19	53 indicators	13	9 / 4
≥ 70 %	47	50 indicators	14	8 / 6
≥ 60 %	129	48 indicators	15	9 / 6

The scope of additional verification in these cases is greater than in those described in Section 4.3. This reflects the selection process rather than a contradiction. In “reciprocal” pairs, each donor requests approximately **55** indicators instead of **39**. This results in a greater absolute number of additional checks, although their percentage remains roughly the same, accounting for about one-fifth of each donor’s own requirements. The composition of this remaining portion is more significant. Of the twelve items, nine relate to topics the partner has already verified but documented in less detail than the other organisation requires. In these cases, a single additional document from the existing documentation package is sufficient. This leaves only around three genuinely new topics per organisation that the partner’s assessment did not address at all.

It is also important to analyse how evenly the additional verification workload is distributed between the two donors. An arrangement in which one organisation needs to verify only two items while the other must verify twenty is unlikely to be perceived as equitable, thereby making internal approval more difficult for the organisation facing the heavier workload. Across all **325** pairs, the imbalance is striking: the donor with fewer requirements needs to verify an average of seven indicators, while the donor with broader requirements must check **27** — a difference of 20 indicators. In only **31** of the 325 pairs, or about one in ten, does the difference in workload between the two organisations amount to no more than three indicators.

The reason for this imbalance is clear. In **99%** of pairs, the greater verification workload falls on the donor with the more detailed system. Because it has more extensive requirements, it requests more information and consequently identifies more gaps in the DD assessment conducted by the other organisation. The relationship between the difference in the level of detail of the two systems and the difference in the required verification effort is almost perfectly linear, with a correlation coefficient of 0.98.

This is precisely why the reciprocity requirement acts as a fairness filter. This is the section's key practical insight. By the metric's design, systems that meet the threshold in both directions tend to have similar levels of detail: in six pairs with an **80%** threshold, the difference is merely **4** percentage points, compared with an average of **21** percentage points across all pairs. The result is perfectly measurable: in 4 of these **6** pairs, the organisations' inputs differ by no more than three indicators, meaning the exchange is almost equivalent, whereas across the entire set of **325** pairs, only **10%** demonstrate such parity.

The threshold level affects not only the number of potential agreements but also which organisation qualify for them. Among the 6 pairs with bidirectional coverage exceeding **80%**, none involve a Ukrainian system; however, at the **70%** threshold, there are **47** such pairs (**14** of which include a Ukrainian system). This observation reinforces the finding in Section 5 regarding the risk of gatekeeping: the choice of threshold is a political rather than a technical decision, and it determines whether mutual recognition will be accessible only to a few of the largest international organisations.

Taken together with the results presented in Section 4.3, these figures provide a more comprehensive picture of the potential for recognition. The **193** directions with coverage exceeding **80%** indicate where at least one-way recognition may be feasible, providing the broadest estimate of what is technically possible today. The **6** pairs with bidirectional coverage exceeding 80% and the **47** pairs with bidirectional coverage exceeding **70%** identify where mutual recognition may be possible. Although this is a narrower set of options, it offers a more realistic starting point for a pilot project from a political perspective. This leads to a practical recommendation: prospective partners for mutual recognition should be sought among donors whose systems have similar levels of detail. The dashboard enables this alignment to be assessed before negotiations begin.

To translate all of the above into practical terms, we identify **20** pairs that offer the easiest starting point. For each pair, the table shows the number of indicators covered by each donor's DD procedure and the number of items each organisation would need to verify after accepting the partner's DD assessment. The final column stands alone because the remaining verification checks fall into two categories: (1) items the partner did not check at all, which require fresh assessment; and (2) items the partner addressed but documented in less detail than required, which can be resolved by supplementing or clarifying existing information. The latter involves significantly less effort. The rows are ranked by the proportion of each organisation's requirements that the other's DD assessment covers. Thus, a pair in which donors have 10 and 11 items left to verify out of 54 and 53 items, respectively, ranks higher than a pair in which one organisation has only 7 items remaining to verify while the other has 18.

DONOR A	DONOR B	REQUIRES A / B	VERIFIES A / B	OF THEM NEW A / B
FCDO	Save the Children	54 / 53	**10 / 11**	5 / 4
UHF (Ukraine Humanitarian Fund)	FCDO	51 / 54	**11 / 13**	4 / 7
People in Need (PAT)	World Vision International	58 / 54	**14 / 12**	4 / 0
UHF (Ukraine Humanitarian Fund)	Save the Children	51 / 53	**13 / 14**	4 / 6
FCDO	People in Need (PAT)	54 / 58	**11 / 16**	1 / 5
People in Need (PAT)	Save the Children	58 / 53	**16 / 11**	6 / 1
UHF (Ukraine Humanitarian Fund)	People in Need (PAT)	51 / 58	**12 / 16**	0 / 7
PhilinUA	CARE	45 / 44	**11 / 13**	6 / 5
UHF (Ukraine Humanitarian Fund)	World Vision International	51 / 54	**11 / 16**	3 / 6
Action Aid Ukraine	CAFOD	53 / 45	**16 / 11**	12 / 4
People in Need (PAT)	Ukrainian Education Platform	58 / 50	**18 / 7**	9 / 1
UHF (Ukraine Humanitarian Fund)	Ukrainian Education Platform	51 / 50	**16 / 9**	5 / 4
FCDO	World Vision International	54 / 54	**14 / 17**	5 / 5
Action Aid Ukraine	CARE	53 / 44	**17 / 13**	12 / 3
Norad	CAFOD	46 / 45	**14 / 15**	7 / 6
Norad	Danish Refugee Council	46 / 45	**11 / 15**	7 / 6
PhilinUA	Caritas	45 / 40	**15 / 12**	10 / 5
PhilinUA	Danish Refugee Council	45 / 45	**12 / 15**	8 / 8
PhilinUA	POCRA (Christian Aid)	45 / 46	**15 / 13**	7 / 8
PhilinUA	Action Aid Ukraine	45 / 53	**11 / 18**	4 / 12

7 of these 20 pairs include a Ukrainian system. PhilinUA ranks highest among them in its partnership with CARE (with the organisations needing to complete verification of **11** and **13** items out of **45** and **44**, respectively). Next is the Ukrainian Education Platform, partnered with People in Need and also UHF. In these latter two cases, the distribution of tasks is notably uneven: the Platform has **7** and **9** items left to verify out of **50**, whereas a partner has **18** and **16**. Such pairs are most advantageous for the Ukrainian side and are the best foundation for discussions on a pilot project involving Ukrainian organisations.

Breaking down follow-up verification into new inquiries and clarifications shows how straightforward initial discussions could be. In two cases, no entirely new inquiries are needed: when accepting People in Need's DD assessment, World Vision International needs to clarify **20** items, none of which require collecting information from scratch. UHF likewise needs to clarify 20 items based on the same assessment. FCDO, Save the Children, and the Ukrainian Education Platform are close behind, each needing to address just one genuinely new topic after recognising an assessment conducted by People in Need.

ActionAid Ukraine needs to cover the largest number of new information requirements: in its pairs with CAFOD, CARE, and PhilinUA, each partner's DD assessment leaves **20** items entirely unaddressed. Overall, each pair in this group has to address an average of approximately **11** new items and **16** clarifications. Across all **325** pairs, the pattern is reversed, with an average of 20 new items and **15** clarifications. This distinction is what sets these "easiest" pairs apart: very few of the topics requiring follow-up checks are entirely absent from the partner's DD procedures. The topics requiring verification from scratch recur across different pairs. The most frequent are "Litigation" and "Sustainability of Programmes," followed by "Trip Security," "Vision and Mission," "Cash Payments," "Advances," "Shared Costs," and "Online Payments." 3 of these 8 indicators fall within the "Payments and Cash" topic area, which has the second-lowest level of detail, after "Custom Indicators for Ukraine." Another indicator belongs to "General Systems and Controls." The gap identified in Section 3.4, therefore, has a direct practical implication: regardless of any existing recognition agreements, a donor will still need to verify these topics itself.

This ranking also indicates pairs whose DD systems lack sufficient detail. For example, after mutual recognition, CDP and the Estonian Refugee Council would still need to verify **10** and **11** additional items, respectively. However, their systems cover only **21** and **19** indicators, meaning that each organisation would still need to verify roughly half of its own requirements after accepting the other's DD assessment. As a result, this pair ranks in the lower half of the list. This does not mean that they should not pursue recognition. Any form of recognition can reduce the verification workload. Rather, the ranking indicates that agreements between pairs near the top of the table are likely to be the easiest to implement.

One further exception is worth explaining with an example. In Section 4.4, we identified **6** pairs that meet the **80%** threshold in both directions as the most promising candidates for recognition arrangements. However, only **5** appear in the list of the **20** "easiest" pairs. The pair comprising People in Need and ADRA Ukraine is not on the list, despite coverage rates of **97%** and **81%**, respectively. The reason is that, although both systems are highly detailed, their requirements differ in important ways. After accepting each other's assessments, People in Need would need to verify only three additional items. In contrast, ADRA Ukraine would need to verify 20, **19** of which are clarifications of topics already covered. Thus, despite high bidirectional coverage, the exchange remains highly asymmetrical, requiring substantially more verification effort from one organisation than from the other.

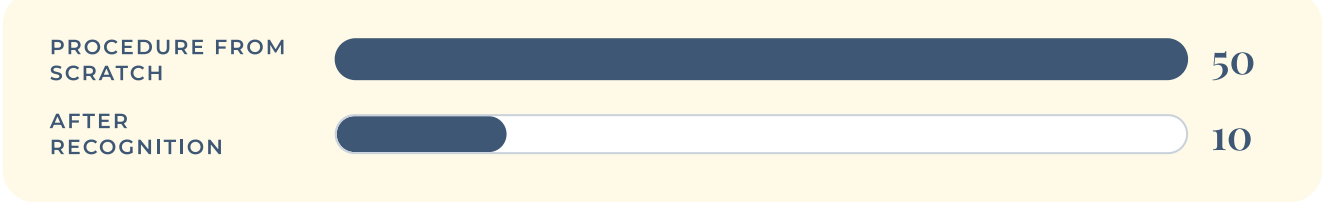
HOW THE LOCALISATION AGENDA MAY ADVANCE

SECTION 5

The primary value of this analysis lies in providing the sector with a practical tool for comparing DD systems and also establishing a basis for technical solutions that reduce the time and effort required by both parties through mutual recognition of their DD assessments. Our consultations with international organisations have confirmed that readiness for the certification process is already largely in place. What remains are practical steps toward cooperation and development of a clear procedure.

In this context, passporting is a critical element of localisation, as it directly reduces the administrative burden imposed by sector fragmentation on local organisations. We therefore recommend making it a priority area of work, recognizing its practical value for partners as comparable to that of other commitments under the localisation agenda.

It is also important to acknowledge the limitations of our perspective. All calculations in this report are based on the standpoint of Donor A: we measure how many items a donor still needs to verify after accepting an assessment conducted by another organisation. For a Ukrainian organisation, however, the burden looks different. It is not measured by the number of questionnaire items, but by how many times the organisation must compile and submit the same set of documents from scratch for a new partner. We did not collect data on the actual cost of this duplication for partners (we consider it to be a separate area for future research). Nevertheless, our findings offer an indication of its potential scale: when a donor needs to verify only 10 of 50 items, the organisation submits five times less documentation than it would when undergoing the DD procedure from scratch.



SECTION 6

DASHBOARD AS A TOOL FOR COMPARING SYSTEMS

All results are presented in an interactive, bilingual dashboard that requires no installation and opens in a standard web browser. Each chart includes a “how to read this” explanation, making it easy to share the link with colleagues without additional verbal guidance.

Note: the dashboard is available exclusively to analysis participants.

What you can do with it:

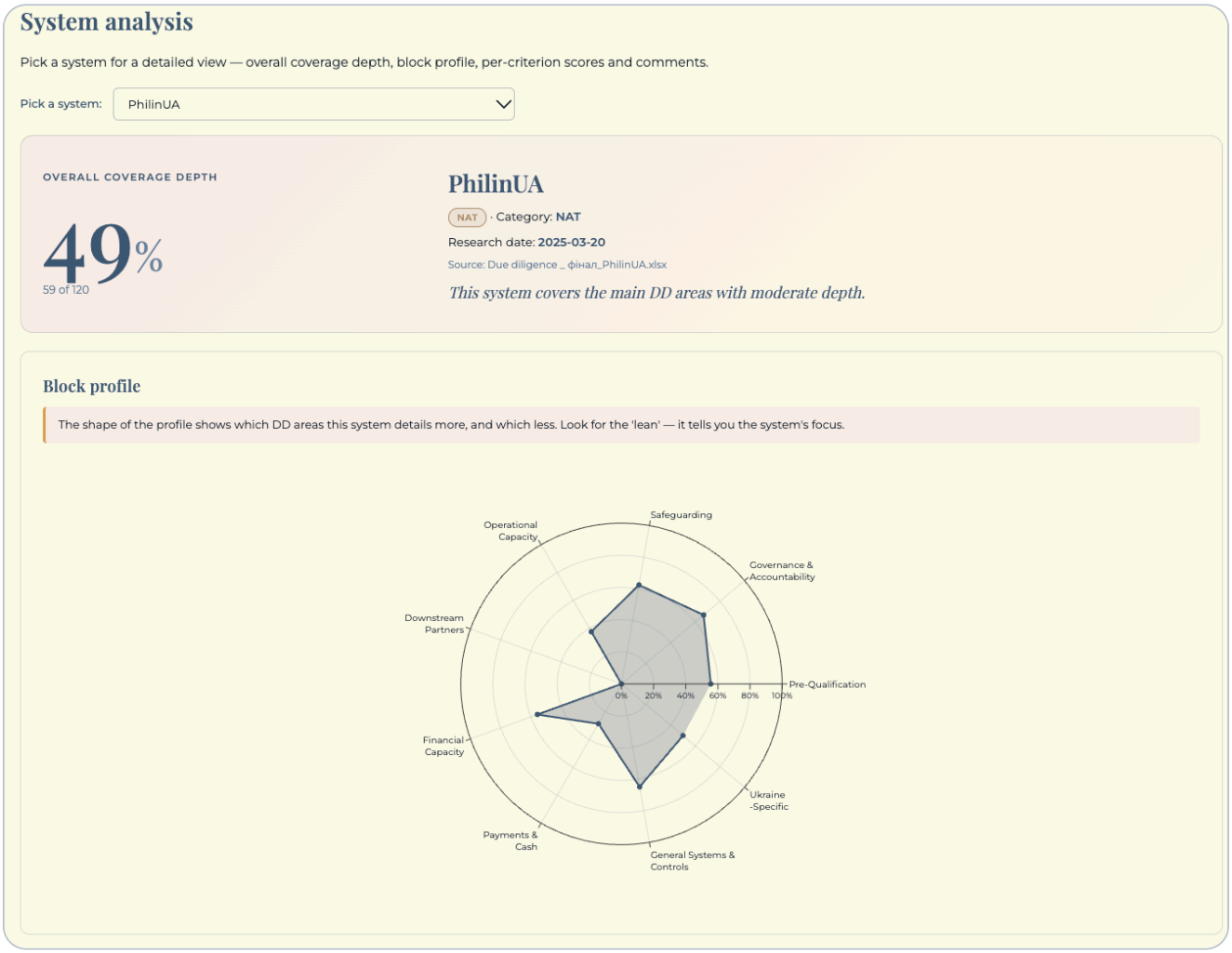
1. **Compare two or three systems.** For each of the nine topic areas, the dashboard shows how many indicators are fully aligned, how many address the same topic but differ in the level of detail, and how many are covered by only one system. For example, two systems in our sample cover **54** and **53** indicators, respectively, with **50** indicators in common. Of these, only **27** match in their level of detail, while the remaining **23** address the same topics but impose different requirements.

2. **View your own profile.** Donors can assess their systems from an external perspective, identifying where their requirements are more detailed or less comprehensive than the sector average and which indicators may limit broader recognition.

3. **Click on any figure to see its explanation.** Each of the **1,560** scores is accompanied by a bilingual written comment explaining exactly what the system requires for that indicator and why it received that particular score. This is what sets the dashboard apart from a standard ranking: every figure can be explored in greater detail and linked to an explanation, which in turn links directly to the original questionnaire.

4. **Download data in excel format — an indicator-by-indicator table containing scores,** comments, and matching topic areas.

5. **Verify our logic.** The guide describes all **60** indicators and explains how each is scored on the 2/**1**/**0** scale, allowing users to verify the scores rather than take them on trust.



The practical value of this tool becomes clear when considering the effort required to conduct such a comparison without it. Based on Philanthropy in Ukraine's experience conducting similar exercises with representatives from various sectors, manually reconciling two DD systems can take weeks of work for both teams. The process involves reviewing two questionnaires, translating different formulations into a common framework, resolving discrepancies, and documenting the results in a usable format. The dashboard reduces this work to minutes, providing both parties with a shared factual basis for negotiations on recognition.

Applying the analysis findings in practice does not require agreements between donors, as each can use them independently to review and update its own due diligence system. A donor might discover that its questionnaire covers sustainability of programmes, a topic not addressed by **16** of the **26** peer organisations, or that it omits complaint and feedback mechanisms, which are covered by **22** of the 26 systems. This comparison provides a clear picture of how a donor's system differs from practice in the sector, offering practical value in its own right, regardless of the passporting process.

PRACTICAL BARRIERS TO PASSPORTING

SECTION 7

The dashboard provides a clear picture of the similarities between various DD systems, yet its functional capabilities end there. Several barriers remain between measured similarity and actual recognition. They need to be listed and further explained, as addressing them should be a focus of future practical efforts.

The first barrier — different formats.

The first barrier is the lack of standardised formats. Even two donors with a high bidirectional coverage use entirely different DD templates, with different section structures, varying wording for similar questions, different scoring scales, and distinct requirements for supporting documents. Transferring an assessment information from one questionnaire to another therefore requires manual work — a task that partners currently have to repeat from scratch.

The second barrier — different internal systems.

The second barrier lies in different internal systems. Most international organisations conduct due diligence assessments using their own software approved at the headquarters level. Since these systems were designed for internal record-keeping, they generally lack external channels for data exchange. Even with full political agreement between the two parties, the technical capability to transfer the assessment does not exist.

The third barrier — different teams and procedures.

The third barrier lies in differing teams and procedures. In every organisation, the DD assessment is carried out by a dedicated team with its own internal protocols, procedures for escalating disputed issues, and its own understanding of what constitutes sufficient evidence. Accepting another organisation's assessment requires trust in their procedures, and building that trust takes longer than any technical integration.

The fourth barrier — the cost of time and effort.

The fourth barrier is the cost of time and effort. Until the first three barriers are removed, the full cost of this mismatch falls on a Ukrainian organisation, which must enter the same information into every new template. Filling out forms consumes the bulk of the partner's time.

It is also important to understand the gap between intention and action, as this helps explain why the **193** identified viable directions have not yet translated into actual agreements. During most of our consultations, donors expressed willingness to accept assessments from their peers, yet this rarely led to formal arrangements. The underlying challenge is that decisions on recognition are made at the organisational policy level, while implementation rests with operational teams who work with specific templates and procedures within their systems. This is precisely where the consensus stalls: an assessment is produced, comprehensive and documented, yet there is no way to transfer it from one organisation's format to another's. We believe the sector is currently constrained more by a lack of technical solutions than by a lack of political will. That is why we view the development of technical solutions to translate declared readiness into actionable practice as the next step. This is outlined in our recommendations.

SCOPE OF THE ANALYSIS

SECTION 8

To avoid excessive expectations regarding the proposed mechanism, it is worth clearly defining its limits.

WE MEASURED

the comparability of questionnaire texts.

WE DID NOT EVALUATE

- whether a donor has the legal authority to rely on another donor's assessment;
- who would be held accountable if an accepted assessment proved flawed;
- whether internal audit would accept evidence collected under another organisation's procedures;
- whether two donors examined the same document with an equivalent level of rigour;
- the actual cost of this duplication to partners in terms of time and money.

A high degree of alignment between requirements is a necessary, but not sufficient, condition for recognition. The data show where perceptual barriers are lowest. They do not replace decisions.

RECOMMENDATIONS

SECTION 9

9.1. Recommendations for donors

1. The simplest first step is to explore your own DD system on the dashboard —there is no commitment involved. The tool is free to use and helps identify the specific indicators that impede your current due diligence process from achieving broader recognition.

2. We recommend starting a pilot project with a single pair of donors and deferring a sector-wide agreement to a later stage. The 20 “easiest” pairs are listed in Section 4.5. For each pair, after accepting the partner’s assessment, both parties would need to verify no more than 18 items, and often only 10–15, with only some requiring new information or documentation. If none of these pairs is suitable, the next best option is to identify two donors whose systems have similar levels of detail. This can be checked on the dashboard within minutes.

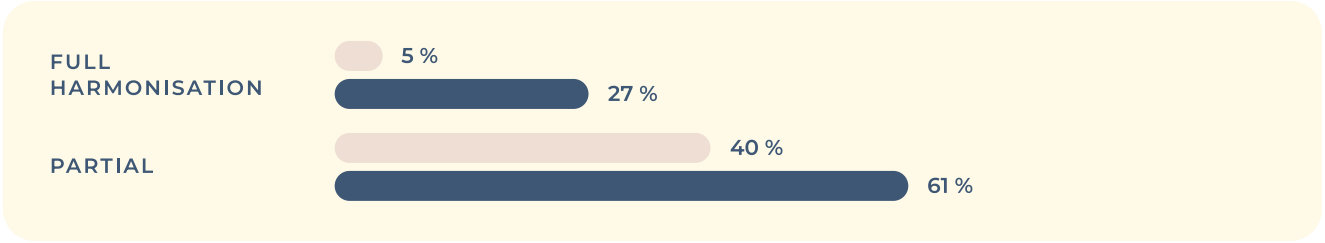
3. It makes sense to set the recognition threshold as a two-part requirement: an overall coverage percentage plus a specific list of indicators that must be fully met, regardless of the percentage.

4. We recommend categorising requirements in advance into two groups: those that must be fully met and independently verified, and those where a deviation from the donor’s own questionnaire does not materially affect the risk assessment. Our calculations represent the maximum scope of extra checks, counting even the smallest differences in the level of detail. This categorisation can therefore help reduce the actual workload and shift negotiations on recognition away from debating an overall coverage percentage towards agreeing on concrete, actionable steps.

5. It is worth identifying in advance which aspects a donor will need to verify independently, regardless of any recognition arrangements. The following areas are most frequently excluded from external assessments: Shared Costs, Inventory, Financing of Terrorism, Development of Sub-partners, Partner Monitoring, Trip Security, Evaluation of Results, and Cash Payment. Each of these areas is not covered by approximately one-quarter of the **650** directions. If these indicators are critical to your system, we recommend classifying them from the outset as matters for internal verification rather than including them in negotiations on recognition.

9.2. Recommendations for groups of donors and consortia

Passporting is best suited to small groups of organisations that already share a sense of community, allowing recognition arrangements to be established once and applied across the group. In the Alliance2015 case study referenced by BDO, full alignment across the group increased from **5%** to **27%** of indicators, while partial alignment rose from **40%** to **61%**.



Alliance2015 illustrates harmonisation through developing one assessment tool. It demonstrates what can be achieved within a trusted group, but it does not establish that mutual recognition without harmonising requirements would produce the same results.

9.3. Technical solutions to overcome key challenges

The challenges described in Section 7 and missing information in requirements identified in Sections 3 and **4** have a technical dimension, and some can be addressed without changing donors' internal systems. We recommend treating the development of such solutions as a distinct area of work for the sector.

Different questionnaire formats.	Solutions that compare different donors' requirements against a unified set of indicators, enabling previously gathered information and supporting documents to be transferred into another donor's template. This would eliminate the manual process partners currently undertake to re-enter the same information in different forms.
Absence of channels of sharing information between internal systems.	A standardised format for presenting DD assessment results, indicating which of the accepting donor's requirements are fully met, partially met, unmet, or not transferable. This would enable assessment results to be exchanged without requiring integration between donors' internal systems.

Different understandings of evidence sufficiency.	A unified reference guide to indicators, structured by the level of detail and developed for this comparative analysis, can provide a common basis for defining a recognition threshold and identifying the indicators that each donor must verify individually.
Mixed alignment.	Automated identification of topics where two donors' requirements only partially overlap, followed by mandatory human review, would enable verification efforts to focus on these specific areas rather than repeating the entire procedure.
Outdated evidence.	Record the date of each document and response, and apply a relevance threshold established by a recognising donor. This would help ensure that only up-to-date information is transferred.

Whatever these decisions may be, they should be guided by four fundamental principles:

1. no data is shared between donors without the consent of the organisation to which it relates;
2. the source of each response is transparent;
3. a human makes the final assessment in each case;
4. the decision on recognition and cooperation remains with a donor, as institutional donors often cannot delegate responsibility for risk assessment to a third party.

9.4. What is required from partners?

FORMAT	WHAT EFFORTS ARE EXPECTED?
Working Group	Defining criteria, thresholds, and recognition rules, and then piloting the passporting process with a single partner.
Funding	Developing technical solutions for passporting, ongoing expert revision, dashboard maintenance.
Access to Partners	Surveying Ukrainian organisations to assess the actual cost of DD requires access to appropriate channels to reach respondents.

Advocacy	Promoting mutual recognition within one's own leadership, among colleagues, and at the government level.

This leads directly to our immediate objectives, which are the main reason we are bringing this analysis up for discussion:

1. Establish a working group comprising stakeholders to discuss practical steps: recognition criteria, thresholds, the distribution of responsibilities, and the implementation of a pilot project.

2. Develop and launch technical solutions based on a needs assessment, ensuring that their functionality aligns with the actual procedures of donors and partners.

3. Share the findings of this analysis within the sector, as recognition is more likely to be effective when more stakeholders understand how the comparison of DD systems is structured and what it has already revealed.

CONCLUSION

The analysis shows that donors request much of the same information, albeit with varying levels of detail, suggesting that a common core of requirements already exists de facto. This alignment can now be measured: an interactive dashboard compares any two DD systems side by side and shows a "distance" between them. Where this "distance" is small, technical solutions can support the practical aspects: completing questionnaires, transferring previously gathered information and documents, and adapting internal procedures. Together, this provides a basis for launching passporting today: **193** directions in which a DD assessment conducted under one donor's system covers more than **80%** of another donor's requirements. Within this scope, 6 pairs meet the 80% coverage threshold in both directions, while 47 pairs meet a **70%** threshold in both directions. These pairs provide a strong framework for mutual recognition.

A calculated possibility has no practical value on its own, as the decision to grant recognition ultimately rests with donors. Passporting will begin when the first pair reaches an agreement: two donors will compare their DD systems using the dashboard, confirm that each has approximately 12 of 50 items remaining to verify, and agree to accept a partner's assessment for other items.

METRICS MEASURING THE 26 SYSTEMS

ANNEX A

“Level of detail” is the total points divided by **120** and reflects how thoroughly a system specifies its requirements. “Scope” is the proportion of the **60** indicators addressed by a system. A large gap between the two indicates broad coverage with relatively limited detail. In contrast, similar values suggest a focused system that addresses a narrower range of topics but examines them in greater depth.

The list is arranged in alphabetical order. This is not a ranking.

SYSTEM	TYPE	LEVEL OF DETAIL	SCOPE
ADRA Ukraine	INGO	91 %	95 %
Action Against Hunger	INGO	36 %	53 %
Action Aid Ukraine	INGO	54 %	88 %
C4C / Humentum Passporting Tool	INST	58 %	73 %
CAFOD	INGO	48%	75 %
CARE	INGO	51 %	73 %
CDP (Center for Disaster Philanthropy)	PHIL	21 %	35 %
Caritas	INGO	47 %	67 %
Danish Refugee Council	INGO	52 %	75 %
Estonian Refugee Council	INGO	23 %	32 %
FCDO	INST	70 %	90 %
Global Giving	PHIL	19 %	35 %
Helvetas Swiss Intercooperation	INGO	40 %	63 %
Mercy Corps	INGO	41 %	65 %
Nonviolent Peaceforce	INGO	28 %	47 %
Norad	INST	48 %	77 %
POCRA (Christian Aid)	INGO	49 %	77 %

SYSTEM	TYPE	LEVEL OF DETAIL	SCOPE
People in Need (PAT)	INGO	76 %	97 %
PhilinUA	NAT	49 %	75 %
Save the Children	INGO	70 %	88 %
Stiftelsen Fryshuset	INGO	63 %	85 %
Swiss Cooperation	INST	33 %	63 %
Team 4 UA	NAT	37 %	68 %
UHF (Ukraine Humanitarian Fund)	UN	70 %	85 %
World Vision International	INGO	74 %	90 %
Ukrainian Education Platform	NAT	62 %	83 %

See the full **60** × **26** matrix with comments for each score on the dashboard.

COMPOSITION OF TOPIC AREAS

ANNEX B

Eight of the nine topic areas and their component indicators are taken from Annex A of the report “Due Diligence Harmonisation in Ukraine” (published in August 2025) produced by BDO and ActionAid. The names of topic areas follow BDO’s terminology, while individual indicators are named as they appear in the reference guide and dashboard. Where these differ from BDO’s terminology, the original terms are provided in parentheses. Please note that for brevity, the dashboard interface uses shortened names for all nine topic areas: Pre-qualification, Governance and Accountability, Safeguarding, Operational Capacity, Sub-partners, Financial Capacity, Payments and Cash, General systems and controls, and custom indicators for Ukraine. These names refer to the same nine topic areas, with the same composition.

- Pre-qualification for project applicants, 9 indicators: Legal Status, Governance Structure, Vision and Mission, Background Checks, Sanctions, Financing of terrorism, Corruption / AML, Disclosures / PEP, Litigation.

- Governance and Accountability, 6 indicators: Management Oversight, Reporting Structures, Laws and Regulations, Code of Conduct, Participation of affected populations, Feedback and complaints mechanisms.

- Safeguarding, 4 indicators: Safeguarding Policies, Awareness and Training, Safeguarding Controls, Safeguarding Culture.

- Operational capacity to deliver programmes, 8 indicators: Operational Policies, Work Plans, Risk Management, Project management systems, Monitoring of programmes, Evaluation of results, Information Security, Sustainability of programmes (in BDO report — Sustainable Development).

- Management of downstream partners, 4 indicators: Partner Selection, Contracting, Partner Monitoring, Development of Sub-partners.

- Financial capacity to manage donor funds, 9 indicators: Financial Policies, Financial accounting systems, Segregation of duties, Financial Personnel, Financial Statements, Budget Monitoring, Shared Costs, Audited Accounts, Audit Findings.

- **Payments and Cash, 7 indicators: Bank Accounts, Signatories, Cash Payments, Advances (in BDO report — Advanced Funds), Reconciliations, Online Payments, Payments and cash security.**

- **General systems and controls, 10 indicators: Procurement, Assets, Inventory, Information Security, Trip Management, Trip Security (in BDO report — Travel and Travel Security), Human resources, Staff roles, Recruitment, Diversity, Equity, and Inclusion.**

- **Custom indicators for Ukraine, 3 indicators, added by our team: Contacts with Russian Federation, Information about the organisation's founder and CEO, Communications and Partnerships.**

The number of indicators in each of the eight BDO topic areas fully matches ours, with no differences, allowing the results of the two analyses to be compared. However, a potential source of confusion should be noted: the BDO review also analysed **26** systems and cites the figure **23**, but this refers to 23 indicators showing full or strong alignment across systems. In our analysis, the figure refers to 23 criteria present in at least **80%** of the systems. These are different metrics.

PRESENCE OF EACH INDICATOR ACROSS THE 26 SYSTEMS

ANNEX C

The indicators are ordered by frequency of occurrence. “Present” means that a system addresses the topic at least in general terms, corresponding to a score of **1** or **2**. The “Covered in detail” column shows how many systems specify requirements in detail, for instance, by listing specific documents or procedures, corresponding to a score of 2. This is not a ranking of indicators by importance, but a snapshot of the requirements most frequently addressed across the sector.

INDICATOR	AREA	PRESENT	OF THEM DETAILED
Legal Status	Pre-qualification for project applicants	26 of 26 (100%)	19
Governance Structure	Pre-qualification for project applicants	26 of 26 (100%)	16
Financial Policies	Financial capacity to manage donor funds	26 of 26 (100%)	14
Financial Statements	Financial capacity to manage donor funds	26 of 26 (100%)	12
Laws and Regulations	Governance and Accountability	26 of 26 (100%)	7
Audited Accounts	Financial capacity to manage donor funds	25 of 26 (96%)	15
Financial accounting systems	Financial capacity to manage donor funds	25 of 26 (96%)	14
Corruption / AML	Pre-qualification for project applicants	25 of 26 (96%)	13

INDICATOR	AREA	PRESENT	OF THEM DETAILED
Management Oversight	Governance and Accountability	25 of 26 (96%)	9
Reporting Structures	Governance and Accountability	25 of 26 (96%)	9
Procurement	General systems and controls	24 of 26 (92%)	18
Code of Conduct	Governance and Accountability	24 of 26 (92%)	16
Safeguarding Policies	Safeguarding	24 of 26 (92%)	13
Human resources	General systems and controls	24 of 26 (92%)	12
Segregation of duties	Financial capacity to manage donor funds	24 of 26 (92%)	12
Staff roles	General systems and controls	24 of 26 (92%)	7
Operational Policies	Operational capacity to deliver programmes	23 of 26 (88%)	6
Feedback and complaints mechanisms	Governance and Accountability	22 of 26 (85%)	14
Financial Personnel	Financial capacity to manage donor funds	22 of 26 (85%)	3
Audit Findings	Financial capacity to manage donor funds	21 of 26 (81%)	10
Risk Management	Operational capacity to deliver programmes	21 of 26 (81%)	9
Budget Monitoring	Financial capacity to manage donor funds	21 of 26 (81%)	8
Participation of affected populations	Governance and Accountability	21 of 26 (81%)	6
Assets	General systems and controls	20 of 26 (77%)	11

INDICATOR	AREA	PRESENT	OF THEM DETAILED
Monitoring of programmes	Operational capacity to deliver programmes	20 of 26 (77%)	9
Communications and Partnerships	Custom indicators for Ukraine	20 of 26 (77%)	5
Background Checks	Pre-qualification for project applicants	20 of 26 (77%)	4
Recruitment	General systems and controls	19 of 26 (73%)	12
Bank Accounts	Payments and Cash	19 of 26 (73%)	10
Diversity, Equity, and Inclusion	General systems and controls	19 of 26 (73%)	7
Safeguarding Culture	Safeguarding	19 of 26 (73%)	4
Project management systems	Operational capacity to deliver programmes	19 of 26 (73%)	3
Vision and Mission	Pre-qualification for project applicants	18 of 26 (69%)	11
Awareness and Training	Safeguarding	18 of 26 (69%)	8
Signatories	Payments and Cash	18 of 26 (69%)	6
Safeguarding Controls	Safeguarding	18 of 26 (69%)	5
Disclosures / PEP	Pre-qualification for project applicants	18 of 26 (69%)	4
Information about the organisation's founder and CEO	Custom indicators for Ukraine	18 of 26 (69%)	3
Partner Selection	Management of downstream partners	17 of 26 (65%)	8
Contracting	Management of downstream partners	17 of 26 (65%)	2
Information Security	General systems and controls	16 of 26 (62%)	6

PRESENCE OF EACH INDICATOR ACROSS THE 26 SYSTEMS

ANNEX C

INDICATOR	AREA	PRESENT	OF THEM DETAILED
Learning from experience	Operational capacity to deliver programmes	16 of 26 (62%)	3
Work Plans	Operational capacity to deliver programmes	16 of 26 (62%)	3
Reconciliations	Payments and Cash	15 of 26 (58%)	11
Sanctions	Pre-qualification for project applicants	15 of 26 (58%)	8
Payments and cash security	Payments and Cash	15 of 26 (58%)	1
Cash Payments	Payments and Cash	14 of 26 (54%)	6
Financing of terrorism	Pre-qualification for project applicants	14 of 26 (54%)	6
Partner Monitoring	Management of downstream partners	14 of 26 (54%)	5
Evaluation of results	Operational capacity to deliver programmes	14 of 26 (54%)	4
Trip Security	General systems and controls	14 of 26 (54%)	2
Inventory	General systems and controls	13 of 26 (50%)	7
Shared Costs	Financial capacity to manage donor funds	13 of 26 (50%)	7
Development of Sub-partners	Management of downstream partners	12 of 26 (46%)	2
Sustainability of programmes	Operational capacity to deliver programmes	10 of 26 (38%)	4
Litigation	Pre-qualification for project applicants	10 of 26 (38%)	3
Advances	Payments and Cash	8 of 26 (31%)	3
Trip Management	General systems and controls	6 of 26 (23%)	3
Online Payments	Payments and Cash	6 of 26 (23%)	0
Contacts with Russian Federation	Custom indicators for Ukraine	5 of 26 (19%)	0

GLOSSARY

The glossary is arranged in chronological order of terms used in the report.

TERM	DEFINITION
BDO / ActionAid	Authors of the fundamental comparative analysis of the due diligence sector in Ukraine (published in 2025). 8 out 9 topic areas of our list of indicators were taken from their methodology.
DD, due diligence	Synonyms for checking that a donor conducts on a potential partner before providing funds; in the BDO report and in Ukrainian-language materials created by the sector, the term “comprehensive assessment” is used. It covers the legal status, governance, financial capacity, safeguarding, and integrity.
DD system	A set of questionnaires, forms, and procedures used by one donor to check its partners. The unit of comparison in this analysis; a total of 26 systems were compared.
INGO	International non-governmental organisation. There are 16 systems in the sample.
INST	Institutional (government) donor. There are 4 systems in the sample.
NAT	National (Ukrainian) system. There are 3 systems in the sample.
PHIL	Private foundation. There are 2 systems in the sample.
UN	UN agency or fund. There are 1 system in the sample.
Area	Topic area of indicators. Overall, there are 9 areas: Pre-qualification for project applicants, Governance and Accountability, Safeguarding, Operational capacity to deliver programmes, Management of downstream partners, Financial capacity to manage donor funds, Payments and Cash, General systems and controls, and Custom indicators for Ukraine. On the dashboard, the same topic areas have shorter names, which are listed correspondingly in Annex B.
Mutual recognition	It is the same as passporting but with an emphasis on reciprocity: both sides are ready to accept/recognise each other’s due diligence assessments.
Harmonisation	Developing and approving a unified assessment tool that all donors accept. Unlike passporting, it concerns requirements rather than results and requires the consent of the sector as a whole.
Dashboard	An interactive bilingual webpage featuring all analysis results: a comparison of systems, a profile of each system, and a full 60 × 26 matrix with explanations on each score.
Reciprocal pair	A pair of donors with targeted coverage exceeding the threshold in both directions. Recognition becomes an advantageous exchange rather than unilateral measures.
Donor that has already conducted a due diligence assessment (A)	A donor whose due diligence assessment has already been conducted and is proposed for recognition.
Recognising donor (B)	A donor who decides whether to accept a due diligence assessment performed by another donor instead of conducting its own. They are the ones who set the threshold for sufficiency.

GLOSSARY

TERM	DEFINITION
Compliance	Organisations conforming to laws, sanctions regimes, and donors' internal policies.
Indicator	Unit for comparison. There are 60 indicators in total on our list, including "Legal Status" and "Safeguarding."
Localisation	The practice of shifting resources, decision-making agency, and leadership toward local and national organizations. In this report, lenses for identifying organizations to provide their DD assessments for recognition.
Legal authority	The legal and statutory framework governing a donor's operations, which determines, among other things, whether it is authorised to accept a due diligence assessment conducted by a third party.
Non-transferable verification duties	Requirements explicitly imposed on the donor by law or internal regulations, such as sanctions screening at contract signing, checks related to the financing of terrorism, and anti-corruption procedures required under the donor country's legislation.
Scope of coverage	The proportion of the 60 indicators that a system addresses to some extent (scores of 1 or 2). This indicates the breadth of the assessment scope.
Unilateral recognition and pair	Unilateral recognition is a one-way recognition, the combination "Donor A → Donor B"; there are 650 such directions for 26 systems. A pair consists of two donors who accept each other's DD assessments; a pair works effectively only if both directions between them provide sufficient coverage, and there are 325 such pairs.
Sub-partner	An organization that receives funds not directly from the donor, but through its partner.
Passporting	Acceptance by a donor of the DD assessment already conducted by another organization, rather than carrying out its own from scratch. Is result-focused and formalized through a bilateral arrangement between two specific donors.
Gap	An indicator required by a recognizing donor that is not covered by the DD assessment of another donor. It falls into two categories: (1) the topic is unaddressed, or (2) it is covered in less detail than a recognizing donor requires.
Level of detail	Total points of a system divided by the maximum points of 120. It shows how well a system documents its requirements.
Sanctions screening	The process of comparing an organization, its founders, and top managers against sanctions lists.
Safeguarding	Policies and procedures designed to protect aid recipients and staff from harm, exploitation, and neglect caused by the organisation.
Common core	Indicators present in almost all systems, which are assessed. They establish a foundation for mutual recognition.
Targeted coverage	The key metric of the analysis, indicating the proportion of one donor's requirements covered by a DD assessment conducted under another donor's system. It is calculated separately for each direction, as A→B and B→A may yield different results.
Scale 2 / 1 / 0	Three-level scale scoring the level of detail of donors' requirements: 2 — required documents or procedures and their expected key elements are specified; 1 — the topic is addressed, but the requirement lacks a comprehensive list of elements, sufficient procedural detail, or clearly defined documentary evidence; 0 — no requirement addressing the topic is identified.