

HARP-F Guidance Note: Due diligence questions for partners working with downstream humanitarian actors in RMP contexts in Myanmar

Purpose: It is recognized that in Remote Management Programming (RMP) contexts, different types of organizations and non-traditional and/or unregistered informal networks might provide humanitarian access where formal structures can not. These actions should be timebound. HARP-F wants to facilitate a situation where by it's partners can innovate partnership approaches and try different access modalities, however HARP-F recognizes that this comes with different types of risk than in direct implementation contexts. HARP-F has an obligation to seek assurances from our funded partners about their local implementing agencies and the extent to which downstream partners can demonstrate their ability to use and account for funds / resources in an effective and transparent manner and to ensure that they uphold humanitarian principles. In order to address these different types of risks, and in addition to vetting (which is a standard requirement of funding agreements), HARP-F is advising that due diligence checks should be strengthened by priming agencies in RMP contexts. The purpose of this guidance note is to offer HARP-F partners guidance on the type of additional questions we advise to HARP-F partners to assess in identification processes to appropriately manage risks. Identified risks are ideally addressed with mitigation measures through a risk assessment process which is transparently communicated and mutually agreed in partnership with HARP-F.

Governance

- Downstream partners should be able to demonstrate an overview of their operational status (i.e. is the organisation a registered charity, private business, faith-based group etc.). Non-registration with local authorities should not be a bar to partnership, but each status needs different risk mitigation measures deployed to manage the partnership.
- Partners should be able to demonstrate a structure, purpose and objectives and they should be able to provide an organogram; partners should be able to explain and demonstrate how decisions are taken within the organisation and what processes guide decision making.
- Partners should be able to demonstrate their understanding of and commitment to principles of humanitarian action and how they will deliver assistance in-line with humanitarian principles.
- Priming agencies should be able to understand how their local partners interact / coordinate with parties to the conflict and political actors including townships administrators and state level and union level authorities. Do No Harm and Conflict Sensitivity approaches should be integrated into the program design.

Financial Robustness

- Downstream partners should be able to provide details of how they will account for and report on usage of UKAID funds - UKAID funded resources.
- Downstream partners should be able to demonstrate their current financial status and share the organisation's most recent audited statement of accounts. If the partner does not have the latter, they must be able to demonstrate an alternative function/process that shows financial transparency and the priming agency needs to demonstrate how it will mitigate risks.
- Partner identification processes should be able to show which other donors, in addition to UKAID, supports (either directly or indirectly) the local partner.
- If the partner indirectly benefits from US Government funds, has the local partner undergone Office of Foreign Assets Control and Patriot Act compliancy assessments when required? Details of any US Government compliancy checks that the local partner has undergone should be mapped and documented.
- Priming agencies should be encouraged to look at alternative/non-traditional cash transfer mechanisms when appropriate to improve the humanitarian operating space. However, in these instances, priming agencies should be able to map how funds are transferred to their local partners i.e. via bank-to-bank transfer/ the informal banking system/cash in hand? And then how funds are secured at programming sites inside Myanmar. Appropriate risk mitigation mappings should be applied.

Program Capacity and Capability

- Downstream partners should be able to demonstrate their capacities in terms of technical skills and relevant experience to manage activities funded by the programme.
- Downstream partners need to demonstrate their capacities in terms of monitoring and evaluation. Priming agencies should be able to explain how monitoring is conducted in the field and how this is related the size and technical level of the programme.

Security

- Downstream partners need to be able to demonstrate minimum. security management procedures for staff working in insecure environments and/or show how they will work the priming agency to put these in place

Visibility

- Priming agencies and downstream partners need an agreed visibility policy in place – and to agree with HARP-F on appropriate visibility for the program vis-à-vis contractual obligations depending on risks identified.