

GOVERNANCE & POLICIES



POLICY

Partner Due Diligence Policy

Adopted by the Board of Directors

25th May 2026

KENT WITH UKRAINE LTD
www.kentwithukraine.co.uk

Partner Due Diligence Policy

This policy was formally approved by Kent With Ukraine's Board of Directors on 25th May 2026 and this policy will be reviewed annually.

Kent With Ukraine will only work with partners who support its mission, uphold appropriate ethical standards, and can deliver safely, lawfully and accountably. KWU values trust and partnership, but trust must be supported by proper due diligence, clear responsibilities, safeguarding, transparency and responsible oversight.

1. Purpose

Kent With Ukraine works with Ukrainian local authorities, public institutions, civil society organisations, schools, community groups, donors, businesses and delivery partners.

This policy sets out how KWU assesses, approves, monitors and reviews partners to ensure that all partnerships are lawful, ethical, safe, transparent and aligned with KWU's charitable and not-for-profit objectives.

The purpose of partner due diligence is to reduce risks relating to:

- fraud, bribery and corruption;
- safeguarding and SEAH;
- aid diversion;
- sanctions breaches;
- political misuse;
- reputational harm;
- poor governance;
- financial mismanagement;
- data protection breaches;
- unsafe delivery;
- conflicts of interest;
- misuse of KWU funds, assets or name.

2. Scope

This policy applies to all organisations and individuals working with or on behalf of KWU, including:

- Ukrainian local authorities and regional administrations;
- UK local authorities and public bodies;
- NGOs and charities;
- community groups;
- schools, colleges and educational institutions;
- hospitals, rehabilitation centres and social care institutions;
- veteran organisations;
- suppliers and contractors where they have a delivery role;
- implementing partners;
- downstream partners;
- informal delivery partners;
- donors where reputational or compliance risk is relevant.

This policy applies in the UK, Ukraine and any third country where KWU operates.

3. Core Principles

KWU's approach to partner due diligence is based on:

- proportionality — checks should match the level of risk;

- transparency — decisions should be documented;
- accountability — partners must use resources properly;
- safeguarding — vulnerable people must be protected;
- political neutrality — resources must not be used for party-political purposes
- legal compliance — partnerships must comply with UK, Ukrainian and applicable international law;
- Ukrainian leadership — KWU will respect local ownership while maintaining proper controls;
- do no harm — partnerships must not increase risk to communities, staff, volunteers or beneficiaries.

4. Risk-Based Due Diligence

KWU will apply due diligence proportionate to the partner's role, risk and value of activity.

Low-risk partnerships may include:

- informal civic links;
- attendance at events;
- non-financial collaboration;
- letters of support;
- low-value donations in kind.
- Medium-risk partnerships may include:
 - aid distribution support;
 - school or youth links;
 - use of KWU branding;
 - local project delivery;
 - small grants or shared public activity.
- High-risk partnerships may include:
 - transfer of funds;
 - delivery to vulnerable groups;
 - work with children, veterans or displaced people;
 - procurement or asset management;
 - construction or infrastructure projects;
 - work near conflict-affected areas;
 - politically sensitive activity;
 - large-value projects;
 - donor-funded programmes;
 - use of vehicles, equipment or restricted goods.

Higher-risk partnerships require enhanced checks and senior approval.

5. Minimum Partner Checks

Before entering a partnership, KWU should always consider:

- legal name and status;
- registration details where applicable;
- address and contact details;
- key representatives;
- purpose and objectives;
- relevance to KWU's mission;
- reputation and public profile;
- previous experience;
- relationship to public authorities or political actors;
- potential conflicts of interest;
- safeguarding risks;
- sanctions or restricted-party risks;
- capacity to deliver safely and properly.

Where documentation is not available due to war, displacement or emergency conditions, KWU may rely on alternative evidence, but the rationale must be recorded.

6. Enhanced Due Diligence

Enhanced due diligence should be undertaken for higher-risk partnerships. This may include:

- registration documents;
- constitution or governing documents;
- board or leadership details;
- beneficial ownership where relevant;
- financial accounts or management information;
- bank account verification;
- references from trusted organisations;
- safeguarding policy review;
- SEAH policy review;
- anti-corruption policy review;
- procurement policy review;
- data protection arrangements;
- sanctions screening;
- politically exposed person checks;
- review of media or public allegations;
- assessment of links to military, political or sanctioned entities;
- assessment of ability to manage funds, assets or beneficiaries safely.

Enhanced checks should be documented before funds, assets or delivery responsibilities are transferred.

7. Sanctions and Legal Compliance

KWU will not knowingly work with any partner that is subject to UK, Ukrainian, EU, US or UN sanctions, or that is controlled by a sanctioned person or entity.

- Particular care must be taken where partners are involved in:
 - logistics;
 - vehicles;
 - fuel;
 - energy equipment;
 - dual-use goods;
 - border movements;
 - reconstruction contracts;
 - military-adjacent environments;
 - politically exposed networks.

If sanctions concerns arise, KWU must pause the partnership until the issue is reviewed.

8. Safeguarding and SEAH

Partners working with children, vulnerable adults, displaced people, veterans, injured persons, survivors of trauma or war-affected communities must have appropriate safeguarding standards.

KWU may require partners to confirm that they:

- prohibit sexual exploitation, abuse and harassment;
- have a reporting process;
- protect children and vulnerable adults;
- respond to safeguarding concerns;
- prevent retaliation against complainants;
- ensure staff and volunteers act appropriately;
- handle personal data safely.

Where a partner does not yet have formal written policies, KWU may require them to adopt minimum standards or operate under KWU's safeguarding requirements for the relevant activity.

9. Anti-Corruption, Fraud and Aid Diversion

KWU expects partners to prevent:

- fraud;
- bribery;
- kickbacks;
- false invoices;
- inflated costs;
- duplicate claims;
- theft;
- aid diversion;
- unauthorised sale of donated goods;
- political or personal misuse of resources.

Partners receiving funds, equipment or aid from KWU must use them only for the agreed purpose.

KWU may require evidence of delivery, including:

- receipts;
- invoices;
- beneficiary records where appropriate;
- photographs and videos;
- handover documents;
- asset records;
- monitoring visits;
- written reports.

10. Conflicts of Interest

Partners must disclose actual, potential or perceived conflicts of interest.

This includes links between:

- KWU representatives and partner staff;
- partner staff and suppliers;
- public officials and procurement decisions;
- political figures and aid allocation;
- family members and paid roles;
- donors and beneficiaries;
- decision-makers and contractors.

Conflicts do not automatically prevent partnership, but they must be declared, assessed and managed.

11. Political Neutrality

Due to the nature of our work, Kent With Ukraine will work with public authorities, elected representatives and civic leaders where this supports KWU's objectives. However, KWU resources must not be used for:

- party-political campaigning;
- electioneering;
- political donations;
- partisan propaganda;
- personal political promotion;
- activities inconsistent with KWU's humanitarian and civic mission.

Partners must not use KWU's name, funds, aid, equipment or branding to imply party-political endorsement.

Please see our Policy on Political Neutrality.

12. Financial Due Diligence

Where funds are transferred to a partner, KWU should assess whether the partner has adequate financial controls.

This may include:

- named bank account;
- segregation of duties;
- approval processes;
- accounting records;
- ability to provide receipts and reports;
- audit trail;
- fraud reporting process;
- financial capacity to manage the funds.

Cash transfers should be avoided where practical. Where cash is unavoidable, additional controls must be recorded.

13. Use of KWU Name, Branding and Public Association

Partners may only use KWU's name, logo or public endorsement with permission. KWU may withdraw permission where a partner:

- acts unlawfully;
- breaches safeguarding expectations;
- misuses aid or funds;
- behaves in a politically partisan manner;
- damages KWU's reputation;
- fails to meet agreed standards.

14. Written Agreements

For medium- and high-risk partnerships, KWU will use a written agreement, memorandum of understanding, grant agreement or project document. This should normally cover:

- purpose of partnership;
- roles and responsibilities;
- use of funds or assets;
- safeguarding obligations;
- SEAH obligations;
- anti-corruption requirements;
- sanctions compliance;
- procurement standards;
- reporting requirements;
- data protection;
- monitoring and audit rights;
- communications and branding;
- termination provisions;
- incident reporting.

15. Monitoring and Review

Due diligence is not a one-off process. KWU will monitor partners throughout the relationship by reviewing:

- delivery progress;
- financial records;
- safeguarding concerns;
- complaints;

- media or reputational issues;
- changes in leadership;
- changes in conflict or security conditions;
- donor feedback;
- community feedback;
- use of assets or aid.

Higher-risk partnerships will be reviewed more frequently by the Board of Directors and Advisory Council.

16. Red Flags

The following may require enhanced review, suspension or termination:

- refusal to provide basic information;
- unexplained urgency or pressure;
- unusual payment requests;
- cash-only arrangements;
- links to sanctioned individuals or entities;
- adverse media;
- safeguarding allegations;
- unexplained asset loss;
- political misuse of aid;
- conflicts of interest not disclosed;
- resistance to monitoring;
- poor record-keeping;
- requests to hide end users;
- inflated prices;
- diversion of aid;
- unsafe treatment of beneficiaries;
- reputational concerns raised by trusted sources.

17. Approval Process

Partnerships should always be approved according to risk.

- Low: Operational lead approval
- Medium: Senior leadership approval
- High: Board of Directors and Head of Mission,
- Donor-funded/high-value: Board of Directors and Head of Mission, plus Advisory Council or designated governance lead

Approval should be recorded, including the rationale and any risk mitigations.

18. Suspension or Termination

KWU may suspend or terminate a partnership where:

- safeguarding risk is identified;
- fraud, bribery or corruption is suspected;
- sanctions risk arises;
- funds or assets are misused;
- monitoring is refused;
- political misuse occurs;
- serious reputational risk emerges;
- the partner cannot safely deliver;
- the partnership no longer aligns with KWU's objectives.

Where donor funds or vulnerable people are involved, KWU will consider whether external reporting is required.

19. Record-Keeping

KWU will retain due diligence records, including:

- partner information forms;
- risk assessments;
- approval records;
- signed agreements;
- financial records;
- correspondence;
- monitoring reports;
- incident reports;
- review decisions;
- closure records.

Records will normally be retained for at least six years, unless a donor or legal obligation requires longer.

20. Responsibilities

The Board of Directors and Advisory Council are responsible for oversight of high-risk partnerships.

Senior leadership (Head of Mission and Directors) is responsible for ensuring that due diligence is completed before commitments are made.

Project leads are responsible for monitoring partner performance and reporting concerns.

All KWU representatives are responsible for raising concerns about partner conduct, safeguarding, misuse of resources or reputational risk.

21. Review

This policy will be reviewed annually, or sooner following:

- a serious incident;
- donor feedback;
- legal or regulatory change;
- significant change in Ukraine operating conditions;
- major programme expansion;
- a high-risk partnership concern.