

Institute of Domestic Violence, Religion & Migration Due Diligence Policy

This Due Diligence policy applies to any institution collaborating or partnering with IDVRM, or any funder/donor providing funding

First drafted: 26 June 2025

1. Purpose

This policy outlines IDVRM's procedures for evaluating institutional collaborators, project partners, and funders or donors. It ensures that all formal affiliations reflect:

- Full compliance with **UK regulatory standards**
- **Financial and ethical integrity**
- Alignment with IDVRM's **decolonial, anti-violence, and survivor-centred values**

2. Scope

This policy applies to all:

- **Organisations receiving funds** from IDVRM
- **Institutions partnering** on joint research or delivery projects
- **Funders/donors not affiliated with UK or EU research councils**, especially individual philanthropists and foundations providing financial or in-kind support to IDVRM

3. Regulatory Compliance

The policy aligns with:

- **UK Charity Commission guidance** on due diligence and grant-making
- **Anti-Money Laundering and Counter-Terrorism Financing** regulations
- **UK Modern Slavery Act 2015**
- **UK GDPR** and related data governance rules

4. Due Diligence Requirements

Before entering into a formal relationship, all eligible organisations must:

Complete IDVRM's Due Diligence Form, and must provide:

- Legal and tax registration certificates
- Financial statements or audited accounts (past 1–2 years)
- Funding history and list of current donors

- Risk and compliance policies
- Leadership structure and governance details

Partners and collaborators must submit the below policies (non-exhaustive):

- **Ethics Policy**
- **Data Management and Protection Policy**
- **Safeguarding Policy**
- **Modern Slavery Statement** (or equivalent)

In addition, IDVRM reserves the right to conduct External Sanctions and Risk Checks, using the open source and screening lists below:

- **UN Sanctions List**
- **UK Sanctions List**
- **Financial Action Task Force (FATF) and other terrorism finance lists**
- **Watchlists (e.g. World-Check, OFAC, Interpol, where accessible)**
- **Open-source media analysis** for political controversy, human rights violations, or other red flags

In high-risk contexts, where there is limited open-source information, or where grant terms require it, IDVRM reserves the right to do a comprehensive credit and risk assessment check through Credit Safe.

5. Risk Categorisation

Level	Definition	Action
Low Risk	Fully compliant, strong policy infrastructure, no adverse flags	Approve
Medium Risk	Gaps in documentation or minor concerns	Conditional approval with monitoring
High Risk	Ethical, legal, or financial concerns; sanctions listing; political incompatibility	Decline or terminate engagement

6. Record-Keeping

All due diligence materials and assessments will be securely documented and stored in accordance with **UK GDPR**, including:

- Submitted policies
- Completed forms
- Screening results and decisions

7. Monitoring and Renewal

- Relationships may be reviewed annually or upon any significant change in funding, governance, or external risk.
- Partners must notify IDVRM of any legal or reputational risks as they arise.

8. Ineligibility Criteria

IDVRM will not engage with or fund any organisation that:

- Has built its wealth on colonial practices and the transatlantic slave trade, without taking full ownership of this history and working on reparative actions
- Is on any official sanctions or terrorism-related list
- Is implicated in financial fraud, extremist ideology, or harmful political activity
- Lacks transparent financial systems or minimum governance standards
- Contradicts IDVRM's decolonial, anti-violence, safeguarding-first stance

9. Appeals

Declined applicants may submit a formal appeal in writing. Reviews will be conducted by at least two senior members of IDVRM leadership.

10. Due Diligence Form/Checklist

*All partner organisations seeking collaboration or funding from IDVRM must complete this checklist **and submit the required documentation** as part of the due diligence process.*

1. Organisational Information

Please provide:

- ☐ Full legal name of organisation
- ☐ Registration number and country of registration
- ☐ Legal status (e.g. charity, NGO, university, company)
- ☐ Website URL (if available)
- ☐ Contact information (address, phone, email)
- ☐ Names and roles of senior leadership or board members

2. Financial and Governance Documentation

Please submit:

- ☐ Most recent **audited financial statements** or **annual report** (last 1–2 years)
- ☐ Summary of **current funding sources** (including major donors)
- ☐ Declaration of any **pending legal proceedings or financial irregularities**
- ☐ Organisational chart or governance structure (if applicable)

3. Policy Documentation (as applicable)

Please submit a copy of each of the following:

- ☐ **Ethics Policy** (or equivalent)
- ☐ **Safeguarding Policy** (or equivalent)
- ☐ **Modern Slavery Statement or Policy** (or equivalent)
- ☐ **Data Protection and Management Policy** (or equivalent)
- ☐ **Anti-fraud, whistleblowing or risk management policy** (if available)

4. External Verification and Risk Screening

IDVRM will independently conduct checks via:

- **UN Sanctions List**
- **UK Sanctions List**
- Terrorism financing and money laundering watchlists
- Open-source media scan for reputational or political risk
- IDVRM also reserves the right to do a comprehensive credit and risk assessment check through external platform, Credit Safe.

☐ By submitting this checklist, you agree to be screened as part of this standard process.

5. Declarations

Please confirm the following (check all that apply):

- ☐ We have not built our wealth or secured our funding from **colonial activities or the transatlantic slave trade**, or any other illicit and unethical manner.
- ☐ We are not listed on any national or international **sanctions or terrorism financing list**.
- ☐ We are **not affiliated with extremist political or ideological movements**, and we do not support such platforms.
- ☐ Our activities and funding sources are **consistent with IDVRM's decolonial, anti-violence, and survivor-centred ethos**.
- ☐ We commit to **not using IDVRM funds for partisan political, discriminatory, or harmful purposes**

6. Authorisation

Organisation Name: _____

Authorised Signatory Name: _____

Position: _____

Date: _____

Signature: _____