



CESVI Policy on Aid Diversion

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1. Introduction

CESVI is committed to ensuring that all humanitarian and development resources entrusted to the organization reach their intended beneficiaries in a principled, transparent, and accountable manner. Aid diversion undermines the effectiveness of assistance, erodes donor and public trust, and may contribute to sustaining conflict dynamics or criminal and terrorist activities.

This Policy outlines CESVI's institutional approach to preventing, mitigating, and responding to aid diversion. It is based on CESVI's key policies framework and is aligned with the expectations of institutional donors (such as the European Commission and the United Nations).

2. CESVI Policy Foundation

The following internal policies (among others) form the backbone of **CESVI's approach to risk of aid diversion**:

- Policy to Prevent Fraud and Corruption — binding requirements for all staff, partners, contractors/suppliers.
- Antiterrorism Policy — measures to ensure that CESVI resources are not diverted to terrorist actors, directly or indirectly.
- Risk Screening Guidelines / Procedures (to implement the Counter-Terrorism Policy and Policy to Prevent Fraud and Corruption) to vet staff, partners, vendors, suppliers etc. for exposure to risk.
- Whistleblowing Policy — mechanisms for safe, confidential reporting of suspicions or evidence of misuse, fraud, or wrongdoing.
- Code of Conduct, Ethical Code, Human Resources Policy, Procurement Manual — including requirements on integrity, conflict of interest, background checks, etc.

These policies are binding for all CESVI staff and stakeholders and are reflected in agreements with partners, vendors, and staff.

3. Defining Aid Diversion

In line with donor definitions, CESVI understands aid diversion as the **misappropriation of humanitarian or development assistance at any stage of the programme cycle**, including:

- Theft or looting of goods and assets.
- Bribery, extortion, or misallocation.
- Diversion of funds or resources to armed, criminal, or terrorist actors.
- Systematic manipulation of beneficiary lists or entitlements.
- Misuse of CESVI's name, resources, or reputation to gain undue advantage.

Aid diversion is distinct from other operational challenges, such as under-performance or logistical delays, and from unintentional targeting errors. While issues like logistical delays or targeting errors typically arise from specific constraints or unintentional circumstances, diversion involves deliberate actions by individuals or groups that undermine the integrity



of aid delivery and can compromise both the effectiveness of humanitarian response and the trust of affected communities and donors.

4. CESVI Policy's commitment

Zero Tolerance

CESVI has zero tolerance for aid diversion, fraud, corruption, and terrorist financing. Any substantiated allegation triggers immediate review and, where appropriate, corrective and disciplinary measures in line with CESVI's Policy to Prevent Fraud and Corruption and Counter-Terrorism Policy (available on CESVI website [here](#)).

Legal and Contractual Compliance

CESVI complies with all relevant national and international laws, including counter-terrorism legislation and sanctions regimes, as well as contractual obligations contained in donor grant agreements. At the same time, CESVI upholds International Humanitarian Law, International Refugee Law, and International Human Rights Law, ensuring that compliance does not compromise humanitarian principles.

Humanitarian Principles

CESVI reaffirms its adherence to the principles of humanity, neutrality, impartiality, and independence. In practice, this means:

- Assistance is delivered solely on the basis of need, without discrimination.
- CESVI does not vet beneficiaries against counter-terrorism lists, as this would contravene the principles of impartiality and independence and possibly prevent access.
- CESVI advocates for humanitarian exemptions in counter-terrorism frameworks where restrictions risk undermining life-saving assistance.

5. Preventing and Mitigating Aid Diversion

Due Diligence and Screening

- CESVI applies a due diligence framework and screening to staff, partners, contractors, and suppliers.
- Screening includes verification against UN and EU sanctions lists, relevant national designations, and other public information via a dedicated software Lexis Nexis Bridger.
- Personal data is managed in full compliance with EU GDPR and other applicable data protection standards.

Financial and Procurement Controls

- Segregation of duties, transparent procurement procedures, and clear authorization levels are mandatory.
- Internal compliance reviews and external audits are systematically conducted.
- Procurement and logistics processes are subject to rigorous oversight, including documentation and traceability.



Programme Cycle Safeguards

- Beneficiary targeting and selection are based on verified needs assessments and transparent, pre-established selection criteria to ensure fairness and accountability.
- Post-distribution monitoring is systematically implemented to verify delivery and use of assistance.
- Feedback and complaints mechanisms are in place to allow communities to report concerns safely and confidentially.

Reporting and Response

- Any suspicion of aid diversion must be reported immediately through CESVI's internal mechanisms, including the whistleblowing channel (available on CESVI website [here](#)).
- Investigations are impartial and respect due process.
- Where diversion is confirmed, CESVI takes corrective measures, informs relevant donors in line with contractual obligations, and seeks to recover misused resources where possible.

6. Balancing Risk Management and Humanitarian Access

CESVI recognizes that counter-terrorism and anti-diversion measures must be balanced with the imperative to deliver principled humanitarian assistance. Excessively restrictive requirements — such as beneficiary vetting — risk impeding assistance to populations in need.

In line with donor expectations, CESVI:

- Implements proportionate, context-sensitive risk management measures.
- Engages with donors to negotiate contractual terms that safeguard humanitarian principles.
- Advocates for clear humanitarian exemptions in counter-terrorism legislation and donor policies.

7. Duty of Care

Managing aid diversion risks in fragile and conflict-affected settings requires strong institutional support to staff and partners. CESVI therefore commits to:

- Providing its staff and partners with regular training on fraud prevention, anti-terrorism compliance, and aid diversion risks.
- Equipping staff with operational tools such as CESVI risk register and guidance to identify and mitigate risks.

8. Conclusion

CESVI's position is unequivocal: aid diversion is unacceptable and will be streamlined through a comprehensive framework of policies, procedures, and accountability mechanisms. At the same time, CESVI remains firmly committed to the humanitarian principles that underpin its mandate.

CESVI commits to continuous improvement: strengthening systems, balancing risk and access, cooperating with donors and partners, and ensuring that resources entrusted are used fully for their intended purpose.