



Order of the Minister of Foreign Affairs of April 6, 2022, no. Min-BuZa.2022.11583-35, laying down administrative rules and a ceiling for grants awarded under the Ministry of Foreign Affairs Grant Regulations 2006 (Safety for Voices)

The Minister of Foreign Affairs;

Having regard to articles 6 and 7 of the Ministry of Foreign Affairs Grants Decree;¹

Having regard to article 2.1 of the Ministry of Foreign Affairs Grant Regulations 2006;²

Orders as follows:

Article 1

The administrative rules appended as an annexe to this Order apply to grants awarded under article 2.1 of the Ministry of Foreign Affairs Grant Regulations 2006 with a view to financing activities aimed at promoting respect for human rights in the framework of Safety for Voices.

Article 2

1. A ceiling of €40 million applies from the date on which this Order enters into force until 31 December 2027 to grants awarded under Safety for Voices for activities as referred to in article 2.1 of the Ministry of Foreign Affairs Grant Regulations 2006.
2. The available funds referred to in paragraph 1 are divided over the following goals:
 - a. greater safety, both online and offline, for human rights defenders worldwide: €20 million;
 - b. greater safety, both online and offline, for journalists worldwide: €20 million.
3. Multiyear grants are awarded subject to the condition referred to in section 4:43 of the General Administrative Law Act (AWB) that sufficient funds are made available for them in the applicable budget.

Article 3

1. Applications for Safety for Voices grants must be submitted using the model application form as stipulated by the Minister and accompanied by the documents stipulated in that form.³
2. Grant applications may be submitted from 9:00 CEST from the first working day after the date on which this Order is published in the Government Gazette until 23:59 CEST on July 31, 2022.

¹ *Bulletin of Acts and Decrees 2005, no. 137.*

² *Government Gazette 2005, no. 251.*

³ <https://www.government.nl/topics/human-rights/human-rights-fund>.

Article 4

For efficiency reasons, grants will only be awarded to four applicants. Of the applications which meet the criteria set out in the administrative rules referred to in article 1, only the four applications that meet them best will be eligible for a grant, two of which at the charge of the means, meant in article 2, paragraph 2, sub a, and two of which at the charge of the means, meant in article 2, paragraph 2, sub b.

Article 5

This Order enters into force on the day after the date of the Government Gazette in which it appears and lapses with effect from 1 January 2028, with the proviso that it continues to apply to grants awarded prior to that date.

This Order and its accompanying annexe, excluding the appendices, will be published in the Government Gazette. The appendices to the annexe will be published on the internet.⁴

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⁴ <https://www.government.nl/topics/human-rights/human-rights-fund>.

Safety for Voices

grant policy framework

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1. Introduction

This grant policy framework is an annexe to the Order of the Minister of Foreign Affairs of April 6, 2022, no. MINBUZA-2022.11583-35, laying down administrative rules and a ceiling for grants awarded under the Ministry of Foreign Affairs Grant Regulations 2006, and contains administrative rules for the award of Safety for Voices grants. A total of €40 million is available for this grant programme.

This grant policy framework lays down the criteria to be used to assess Safety for Voices grant applications and explains how the available funds will be allocated. Applications for grants must be submitted using the model application form as stipulated by the Minister (see appendix 1).

2. Policy background

Fundamental principles

The fundamental principles of the Safety for Voices grant programme are set out in the Foreign Affairs Policy Letter of 8 March 2022:

Human rights, the legal order and democracy

Human rights, the legal order and democracy are closely interconnected and provide a solid foundation for stable, prosperous societies. Promoting these values is not only a moral imperative but also a way to shape a safer, more predictable international environment for our country. Promoting human rights is thus in our own interests. Due to the increasing pressure on the international legal order and on compliance with human rights, this government intends to ensure that the interconnected themes of human rights, the legal order and democracy are clearly reflected in Dutch human rights policy. To this end, the House will receive a new human rights policy document in the third quarter of 2022. Following on from that, the government will continue to contribute to the US-organised Summit for Democracy with a view to its successful outcome and to organising a possible follow-up summit.

The government will retain the focus of existing human rights policy on freedom of religion and belief, press and internet freedom, equal rights for women and girls and equal rights for LGBTI people. It will also work to provide additional protection to human rights defenders and to combat impunity for serious human rights violations. The new policy will elaborate for each policy theme how human rights violations can be prevented, vulnerable groups protected and perpetrators of serious violations punished. As mentioned above, special attention will be devoted to democratic values and the proper functioning of the international legal order.

The new policy document will also set out how the government will step up its efforts to enhance the safety of human rights defenders and journalists. Human rights defenders play an indispensable role in protecting and promoting human rights. Together with journalists, they play a key role in exposing violations, protecting vulnerable groups and impelling government to take responsibility. Yet threats to the safety of human rights defenders and journalists continue to grow. To tackle this negative trend, the new grant round for the central funding component of the Human Rights Fund (2022-2027) will focus among other things on enhancing the safety, both online and offline, of journalists and human rights defenders. Further details will be provided to the House in the first supplementary budget for 2022.

The Dutch embassies will also continue to use the delegated component of the Human Rights Fund to support projects aimed at protecting vulnerable groups, including religious minorities such as Christians in the Middle East as well as the LGBTI community. The COVID-19 pandemic has had an especially negative impact on the position of women and

girls. Gender inequality has been exacerbated worldwide, violence against women and girls is on the rise, and people working in the informal sector (who are often women) are among those hardest hit economically. The Human Rights Fund will focus on these issues as well.⁵

Safety for Voices policy objective

In line with the policy letter cited above, Safety for Voices has the following policy objective:

Greater safety, both online and offline, for human rights defenders and journalists worldwide.

This concerns the safety of people defending a wide range of human rights,⁶ including: those defending victims of the most serious human rights violations (such as crimes against humanity), those defending the right to freedom of religion and belief, LGBTI equal rights and the rights of women and girls, environmental and climate activists, and defenders of labour and land rights, including from violations by companies. In this grant policy framework, 'journalists' refers to all media workers.

Because it is difficult to predict where threats to the safety of human rights defenders and journalists will arise, a centrally funded approach with global reach is needed to increase their safety, complementing the missions' existing efforts.

Policy relevance

The acute safety problems described in the 2020 Human Rights Report (cited below) were an important factor leading to the formulation of the policy objective above. COVID-19 has further exacerbated these existing problems. With or without an ongoing pandemic, these problems will probably continue to grow.

The year 2020 was a difficult one for human rights defenders and civil society around the world. A number of governments used the COVID-19 pandemic as an opportunity to make the lives of these groups more difficult through censorship, violence and deprivation of liberty.... Human rights defenders, political activists, lawyers and sometimes even medical workers faced persecution, harassment and surveillance after critical remarks on the authorities' response....

The importance of access to reliable and independent information was highlighted in 2020 as part of the global approach to the COVID-19 pandemic.... At the same time, journalists faced restrictions in many parts of the world. Governments used the pandemic as a pretext to introduce measures that disproportionately restrict the freedom and independence of the media, with internet shutdowns, aggression against journalists, arbitrary arrest of journalists and other forms of censorship. Such actions are in violation of international standards and agreements on freedom of expression. Freedom of expression and a free and diverse media landscape are important to every society, not only when there is a pandemic....

Many human rights defenders around the world need help because they face acute danger. The Netherlands also campaigns to enhance the legitimacy of their work at various levels, helping to make their working environment safer.... In addition, the Netherlands supports projects that take a holistic approach to supporting human rights defenders, with concern for their physical safety, digital security, organisational safety, mental wellbeing and other personal circumstances. This can also entail human rights defenders being offered refuge elsewhere, where they can take training courses to enable them to continue their work more safely and effectively in their country of origin.⁷

⁵ Letter to the House of Representatives, 8 March 2022.

⁶ OHCHR | [What are Human Rights](#)

⁷ Human Rights Report for 2020.

3. Activities for which grants are to be awarded

Goals

The overall policy objective (see above) is broken down into two goals:

1. Greater safety, both online and offline, for human rights defenders worldwide;
2. Greater safety, both online and offline, for journalists and other media workers worldwide.

A grant application should focus on one of these goals. In the interests of efficiency, grants will be awarded to no more than two applications per goal. (See chapter 6 for information on the available funds and their allocation.)

Factors in the assessment

The following factors will play a role in the qualitative assessment of applications (chapter 10 shows how these factors are reflected in qualitative criteria):

A. Safety of defenders of a wide range of human rights, regarding goal 1 (not applicable for goal 2).

B. Two dimensions of safety: (i) prevention, that is, preventing unsafe situations, for example by providing technical and other training, and advocacy at national and international level, and (ii) protection of people in unsafe situations, for example through (quick) temporary relocation (in the Netherlands or elsewhere) and the provision of legal and other assistance.

C. The contribution to various forms of safety: physical, legal, psychosocial and digital.

D. Global reach, as it is not predictable where unsafe situations will arise.

E. The contribution to reaching the most vulnerable people in the target group.

F. Cooperation with organisations that have contacts with the target group, such as embassies (of the Netherlands, other EU member states and other countries), other (local) civil society organisations, including faith based organisations, and social movements and companies.

G. A particular focus on the following cross-cutting themes wherever they are relevant: women and girls (gender) and conflict sensitivity.

Theory of change

The applicant must specify which of the two prescribed goals the proposed programme will pursue, formulate activities and results to achieve that outcome, giving reasons for these choices, with due regard for the factors listed above.

To this end, the applicant must present the intended results, and propose activities to achieve them, in a logical framework covering the entire programme duration (five years). Indicators for each result should be defined as much as possible in SMART⁸ terms. The logical framework must be part of a theory of change, which explains why these intended results make the best possible contribution to achievement of the goal, and why the

⁸ SMART: Specific, Measurable, Acceptable, Realistic and Time-related.

chosen activities make the best possible contribution to achievement of the results. Risks should also be identified. The application form includes a template for this purpose.

The theory of change must include an activity plan for the first year, including a timetable.

4. Who is eligible for a grant

Applicant or lead party of a consortium

Only civil society organisations are eligible for a Safety for Voices grant. For a definition of 'civil society organisation' see chapter 10, D.1.

A civil society organisation may submit an application either independently or as a lead party on behalf of a consortium.

It does not matter where an applicant, lead party or other consortium member has its registered office, as long as the organisation is free to work in other countries from that office.

When a lead party submits an application on behalf of a consortium, all consortium members including the lead party must be civil society organisations. If the consortium's application is approved, the lead party is the grant recipient and, as such, bears full responsibility for implementation of the proposed activities and compliance with the obligations in respect of the grant.

Number of applications per organisation

A civil society organisation is only eligible for one grant per goal (see chapter 3), either as lead party or as independent applicant. If an organisation submits more than one application for the same goal, either as lead party or as independent applicant, only the first application received will be processed. Subsequent applications will be rejected.

5. Programme duration

The proposed programme should have a duration of five years. The programme activities must start at least one day after the date on which the grant decision is received and no later than 1 January 2023; they must be completed by 31 December 2027.

6. Available funds and their allocation

The available budget (grant ceiling) is €40 million, divided as follows:

Goal 1, 'greater safety for human rights defenders': €20 million.

Goal 2, 'greater safety for journalists': €20 million.

The allocation of the funds available for Safety for Voices will take place by means of a grant tender. After the closing of the application period, all the applications received by the deadline will be considered, and ranked by quality. Each application will be assessed on the basis of the information received before the closing of the application period. The applications will be ranked on the basis of an assessment using the qualitative criteria given in this grant policy framework (chapter 10). The Minister will award grants in accordance with this ranking, on the understanding that the applications that best meet the criteria will be given priority. To qualify for a grant, an application must in any case be of sufficient quality. For efficiency reasons, no more than four applications that best meet

the qualitative criteria will be awarded a grant, and per goal, no more than two grants of €10 million each will be awarded (see chapter 3). See chapter 9 for the assessment procedure.

7. Eligible costs

The eligible costs are listed and explained in the model budget that must be used for the budget to be submitted with the application (appendix 2 to this grant policy framework).

In calculating the costs eligible for a grant, the following principles apply:

- Only costs that are necessary for carrying out activities for which grant funding is sought, and which cannot reasonably be covered from the applicant's own resources or in some other way, are eligible for a grant;⁹
- only costs incurred after the grant decision is received are eligible;
- costs of materials and depreciation costs on investments related to the implementation of the activities are eligible;
- costs of third-party services for which an external party is contracted and which are invoiced in arrears are eligible;
- costs will be compared with local standards and assessed for reasonableness;
- audit costs: under the Ministry's 2022 audit protocol a report of findings must be appended to the auditor's report. This increases the cost of an audit. Please bear this in mind when drawing up the budget.

In all cases, the funds must to the greatest extent possible be used to achieve the intended changes that will benefit the target group. Indirect costs as defined in the model budget must be kept to a minimum, and must not in no case exceed 15% of the total costs incurred by the applicant or by all the consortium partners for implementing the activities for which the grant is awarded. Further information on this subject can be found in the model budget (appendix 2).

The following costs are in any case not eligible for a grant:

- costs associated with developing, preparing or submitting the application and other costs that are incurred before receipt of the grant decision;
- VAT that can be offset by the applicant, lead party or co-applicant;
- costs due to inflation and exchange rate fluctuations which are greater than 5% of the total eligible costs;
- investment costs and depreciation that are not linked to activities under Safety for Voices;
- costs of registering and maintaining intellectual property rights;
- the proportion of total indirect costs that exceeds the total permitted maximum of 15% of the total costs for implementation (for example, if the total indirect costs amount to 20%, the last 5% are considered non-eligible).

These principles must be applied in the budget submitted with the application.

8. Grant application requirements

Grant applications must be submitted using the form stipulated by the Minister and accompanied by the documents stipulated in the form.¹⁰ The application must include the following:

- a theory of change, including the logical framework, the risk assessment and the activity plan for the first year (see chapter 3);
- a budget, drawn up using the mandatory model budget;

⁹ Article 14, paragraph 1 of the Ministry of Foreign Affairs Grants Decree.

¹⁰ [Human Rights Fund | Human rights | Government.nl](#)

- a liquidity forecast;
- if the application is submitted by a lead party on behalf of a consortium: a partnership agreement (see chapter 10 for details).

Application procedure

Grant applications may be submitted from 9:00 CEST from the first working day after the date on which this Order is published in the Government Gazette until 23:59 CEST on July 31, 2022. Applications submitted after the date and time stated above will be rejected. The time at which the application is received at the Ministry of Foreign Affairs will be considered the time of submission (see below). The applicant bears sole responsibility for ensuring that the application is complete and submitted on time.

With regard to the application procedure, particular attention is drawn to article 7, paragraph 3 of the Ministry of Foreign Affairs Grants Decree. If an application does not comply with the formal requirements set out in this grant policy framework, the Minister may request a supplement. In this case, the date and time of receipt of the application will be the date and time on which the supplemented application is received. The shorter the time remaining between submission of the application and the deadline, the greater the risk that, if the application is incomplete, the Minister will not use their discretionary powers to request a supplement; this in connection with the time required to check all applications are complete. In this case, no supplement will be requested and the application will be assessed as it stands. This may lead to a lower ranking or even rejection of the application.

When drawing up the grant application, it is not sufficient to refer for the sake of brevity to other parts of the application or annexes, unless the application form explicitly states that this is wholly or partly acceptable. Incomplete applications – including applications lacking annexes – may be rejected.

Applications should be submitted in English. Annexes written in another language should be accompanied by an English translation. Applicants should not include additional information (such as illustrative books, CD-ROMs, USB sticks or DVDs about their organisation) with their application, as these will not be taken into account when assessing the application.

Applications should preferably be submitted by email in PDF format to: safetyforvoices@minbuza.nl with 'Safety for Voices grant application' in the subject line. The time when the email is received on the servers of the Ministry of Foreign Affairs will be considered the time of submission. Please note that the total size of attachments accepted by the Ministry's email server is 10MB. If the size of all attachments together is more than 10MB, these should be divided over separate emails. In this case, the time at which the last email is received will be considered the time the application is submitted. If an application is split into several files which are sent in multiple emails, the emails must be numbered, with both the email number and the total number of emails clearly indicated in the subject line.¹¹

Any technical or other issues relating to submission are at the applicant's own cost and risk.

Submitting applications by post is not recommended.¹² Applicants who nonetheless choose to submit applications by post or courier or in person should contact the Ministry at: safetyforvoices@minbuza.nl with 'Safety for Voices grant application' in the subject line.

¹¹ E.g. 'email 1 of 5', 'email 2 of 5', etc.

¹² If the applicant nevertheless prefers this option, they should send their application by registered post to: Ministry of Foreign Affairs, attn. DMM secretariat; Safety for Voices grant application, Postbus 20061, 2500 EB The Hague. If an application is sent by standard post instead of registered post, the sender bears the full risk of it being received late or not at all. Applications sent by post (apart from those using a 'postage paid' envelope) and postmarked on a date before the application deadline are considered to have been submitted on time, provided they are received no later than one week after the deadline for applications has passed. Applications sent by post using a 'postage paid' envelope are considered to have been submitted on time if they are delivered to the Ministry before 23:59 CEST on July 31, 2022. An item is not considered received until it has been recorded by the Ministry's mail department. Incoming mail is not recorded in the evenings or at weekends.

Questions concerning this document or any other matters will only be accepted if they are sent by email to safetyforvoices@minbuza.nl no later than July 17, 2022. Answers to questions will be published weekly on the Q&A section on [Human Rights Fund | Human rights | Government.nl](#). Questions will be anonymised and, if necessary, aggregated. You can register via safetyforvoices@minbuza.nl for an online workshop, which will be held for interested parties within a month of publication of this grant policy framework.

9. Assessment procedure

Applications must first satisfy all the threshold criteria listed in chapter 10 of this grant policy framework. Applications that fail to meet one or more threshold criteria will be rejected and will not be assessed further.

Applications that satisfy the threshold criteria will then be assessed and ranked on the basis of qualitative criteria, as explained in chapter 10. The better an application satisfies the qualitative criteria, the higher its score and its ranking. To qualify for a grant, an application must in any case be of sufficient quality. A provisional selection will be made on the basis of the outcome of the ranking.

Under article 4, paragraph 1 of the Ministry of Foreign Affairs Grants Decree, grants are awarded solely to legal persons who are in a position to ensure adequate financial management and can guarantee effective and efficient implementation of the activities through experience and expertise in relation to activities of the kind for which grant funding is sought.

The applicant/lead party must also demonstrate that it and, in the case of a consortium, all co-applicants have adopted an integrity policy and that it and they have introduced procedures to apply that policy. This integrity policy and these procedures should serve to prevent as far as possible any sexual misconduct and other serious forms of inappropriate behaviour towards employees and other individuals during the implementation of the proposed activities by the lead party, its co-applicants and other parties they involve in the activities, and in the event of such incidents ensure that they are investigated and appropriate measures are taken to put an end as promptly as possible to the misconduct or inappropriate behaviour and mitigate the consequences. These procedures must be structured in a way that guarantees prompt reporting of any such incidents to the Minister.

For the reasons set out above, before any grant is awarded, an assessment will be made of the organisational capacity and integrity policy of up to four applicants/lead parties whose application has passed the threshold check and has a sufficiently high score on the qualitative criteria to make it eligible for a grant. Therefore, applicants/lead parties do not immediately need to submit the required information with their application. These applicants/lead parties will be invited by the Ministry of Foreign Affairs to demonstrate within a prescribed time limit that they and any co-applicants have sufficient organisational capacity and an adequate integrity policy. The introduction to the application form explains what documents must be provided for these two assessments.

If these checks result in a positive assessment, the applicant/lead party will be eligible for a grant. Otherwise the application will be rejected. Applications will also be rejected if any additional information requested for assessing organisational capacity and/or integrity policy is not provided or not provided on time. If an application is rejected at this stage, the applicant/lead party whose application is next highest in the ranking will be invited to demonstrate that they have sufficient organisational capacity and an adequate integrity policy.

The two applications, per goal, definitively selected for a Safety for Voices grant will have met the threshold criteria, best satisfied the qualitative criteria, and been assessed positively for organisational capacity and integrity policy.

10. Assessment criteria

The provisions of the General Administrative Law Act, the Ministry of Foreign Affairs Grants Decree and the Ministry of Foreign Affairs Grant Regulations 2006 are fully applicable to the assessment of applications under this grant policy framework. Applications will be assessed in accordance with the above legislation and pursuant to the criteria set out in this grant policy framework.

Threshold criteria concerning the applicant

D.1 Type of organisation

Criterion

- a. The applicant or, in the case of an application on behalf of a consortium, the lead party is a civil society organisation whose objectives as set out in its constitution are in line with the objective set out in this Safety for Voices grant policy framework.
- b. In the case of an application on behalf of a consortium: every co-applicant (consortium member other than the lead party) is a civil society organisation.

Definitions:

- Civil society organisation: a not-for-profit organisation not connected to a public authority either de facto or under its constitution, which serves a public interest and possesses legal personality under civil law, and which either was not established by a public authority or has become fully autonomous from the public authority that established it.
- Consortium: a group, without legal personality, of two or more civil society organisations which have concluded an agreement to work together.
- Lead party: the consortium partner that submits the application on behalf of the consortium.

Explanatory note

This should be evident from the applicant's constitution or, in the case of an application on behalf of a consortium, the lead party's and all co-applicants' constitutions.

D.2 Requirements for partnerships

Criterion

Applications submitted on behalf of a consortium must include an initial partnership agreement signed by all consortium partners (the lead party and the co-applicants), which has been concluded with a view to implementing the activities for which Safety for Voices grant funding is requested. As a minimum, the agreement must include undertakings on:

- i. how each of the partners will contribute to the consortium's activities; and
- ii. how the consortium will ensure the fulfilment of obligations towards the Minister in respect of the grant.

If the grant is awarded, a definitive partnership agreement must be drawn up (see chapter 12).

Explanatory note

The lead party must append a partnership agreement signed by all consortium partners (the lead party and the co-applicants) which in any case includes undertakings with regard to the subjects listed above.

D.3 Extent of applicant's/consortium's financial independence

Criterion

In the 2019-2021 period on average at least 25% of the applicant's total annual income must have come from sources other than direct grants and/or contributions from the Ministry of Foreign Affairs (including missions). If the applicant is the lead party of a consortium, this criterion applies to the consortium as a whole.

If one of the consortium members derives less than 25% of its total annual income from sources other than direct Ministry of Foreign Affairs grants or contributions, this may be offset by another member in the consortium.

Explanatory note

The applicant/lead party must demonstrate this by completing an overview in the application, based on its own annual accounts of the last three years and, in the case of a consortium, all co-applicants' annual accounts of the last three years. References must be given to the relevant page numbers in these annual accounts, which must be appended to the application. If an organisation's annual accounts are contained within its annual reports, the relevant pages from these annual reports can be appended to application instead. See the application form for more information.

D.4 Remuneration

Criterion

A. Applicant/lead party and co-applicants with legal personality established in the Netherlands or in another EU member state

The maximum gross remuneration of individual management and board members of an applicant, lead party and any co-applicants established in the Netherlands or in another EU member state must not exceed €199,000 (gross) per calendar year for a 36-hour working week, as from the start of the period for which the grant is being requested.

This amount includes:

1. the total of periodically paid salary, profit shares and bonuses;
2. taxable fixed and variable expense allowances; and
3. payments made at set times of year, such as holiday pay, thirteenth-month bonus, the employer's share of pension contributions, etc.

For organisations with legal personality established in an EU member state that does not use the euro, this amount is converted into local currency using the Ministry corporate rates (appendix no. 3) as at 1 January 2022.

B. Applicant/lead party and co-applicants established in the UK, Norway, Switzerland, Japan, the US or Canada

With reference to the data on purchasing power published by EUROSTAT (comparative price levels 2020),¹³ the following remuneration ceilings based on a 36-hour working week apply to applicants/lead parties and any co-applicants established in any of the following countries:

- United Kingdom GBP 177,136
- Norway NOK 2,427,977
- Switzerland CHF 313,392
- Japan YEN 28,500,537
- US/Canada USD 243,013.

¹³ See: [Statistics | Eurostat \(europa.eu\)](https://ec.europa.eu/eurostat/).

C. Applicant/lead party and co-applicants established elsewhere

The maximum gross remuneration of individual management and board members of an applicant, lead party and any co-applicants established in other countries, as from the start of the period for which the grant is being requested, may not exceed twice the gross remuneration per calendar year of a senior local staff member of the Dutch embassy in the country or region where the organisation is established. This gross remuneration concerns pay scale 10 for a 36-hour working week in the most current overview of pay scales for local employees¹⁴. The maximum gross remuneration thus calculated must include all the components listed under A (supplemented with any country-specific allowances) for a 36-hour working week.

Explanatory note

Evidence that this criterion has been satisfied can be provided in one of the following ways:

- For Dutch organisations that fall within the scope of the Top Incomes (Standardisation) Act (WNT):

A reference to the organisation's WNT notification published annually no later than 1 July will suffice, unless this data is no longer valid as at 1 January 2022 due to a change in remuneration (in that case, please refer below, under 'For other organisations').¹⁵ The WNT data must be published on the internet for a period of at least seven years and must be easily accessible and available to the general public.

- For other organisations:

In the table below, the applicant/lead party must specify the remuneration of the individual managers and board members of the organisation(s) concerned, as of the start of the grant period:

- the total of periodically paid salary and bonuses;
- taxable fixed and variable expense allowances; and
- payments made at set times of year, such as holiday pay, thirteenth-month bonus, the employer's share of pension contributions, etc.

The applicant/ lead party must also indicate the extent of employment (hours worked) to which the remuneration relates.

Job title	Total of periodically paid salary, profit shares and bonus payments	Taxable fixed and variable expense allowances	Payments made at set times of year, such as holiday pay, thirteenth-month bonus, employer's share of pension contributions, etc.	Working hours per week

¹⁴ [Human Rights Fund | Human rights | Government.nl](#)

¹⁵ For more information on remuneration, especially the individual components it comprises, and the publication thereof, see: <https://www.topinkomens.nl/>.

Explanatory note for the criterion

The maximum remuneration for organisations established in the Netherlands or in another EU member state is linked to the salary of the Director-General for International Cooperation (DGIS) at the Ministry of Foreign Affairs, who falls under the collective labour agreement for Dutch civil servants, under which a 36-hour working week constitutes full-time employment. If a management or board member is employed for less than 36 hours per week, the maximum remuneration of €199,000 is prorated by the part-time factor of their employment (weekly number of working hours / 36 × €199,000). If a management or board member is employed for more than 36 hours per week, the maximum remuneration remains €199,000. If the organisation includes the part-time factor in the grant application, it will be used to calculate the reduced income ceiling. If no part-time factor is provided, it will be assumed that the salary is paid for a 36-hour working week.

For organisations established in the UK, Norway, Switzerland, Japan, Canada and the US, the maximum gross remuneration is converted into local currency and adjusted for purchasing power based on current data published by EUROSTAT.

For organisations established in other countries, the maximum gross remuneration may not exceed twice the gross remuneration of a senior local staff member of the Dutch embassy in the country or region where the organisation is established. This calculation is made by analogy with the ratio between the gross remuneration of a Dutch senior policy officer and that of DGIS.

D.5 Number of applications

Criterion

A civil society organisation may submit only one application, either as an applicant or as the lead party on behalf of a consortium of civil society organisations.

Explanatory note

A civil society organisation is only eligible for one grant per goal, either as lead party or as independent applicant (see chapter 3). If an organisation is an applicant/lead party for more than one application for the same goal, only the first application received will be processed. Subsequent applications will be rejected.

Threshold criteria concerning the programme

D.6 Size of the grant

Criterion

The grant amount requested is:

- a) €10,000,000 for goal 1, 'greater safety, both online and offline, for human rights defenders worldwide';
- a) €10,000,000 for goal 2, 'greater safety for journalists and other media workers worldwide, both online and offline'.

Explanatory note

This must be clear from the budget appended to the application.

D.7 Duration of activities

Criterion

The activities for which grant funding is sought have a duration of 60 months.

Explanatory note

This must be clear from the theory of change and the budget appended to the application.

D.8 Start and end date of the activities

Criterion

The activities must start at least one day after the date on which the grant decision is received and no later than 1 January 2023. They must be completed by 31 December 2027 at the latest. Activities that start on or before the date on which the grant decision is received are not eligible for a grant under this grant policy framework.

Explanatory note

This must be clear from the theory of change and the budget appended to the application.

D.9 Thematic focus

Criterion

The activities for which grant funding is sought must focus on:

- a) goal 1, 'greater safety, both online and offline, for human rights defenders worldwide,
- or**
- b) goal 2, 'greater safety, both online and offline, for journalists and other media workers worldwide'.

Explanatory note

This must be clear from the theory of change and the budget appended to the application.

D.10 Activities not eligible for funding

Criterion

The application must not relate to:

- initiatives aimed wholly or partly at proselytisation;
- for-profit activities;
- activities which already receive grant funding or a contribution directly or indirectly from the Ministry of Foreign Affairs budget;
- activities of a local civil society organisation which already receive a contribution indirectly from the Ministry of Foreign Affairs budget;
- activities of organisations already receiving core funding from the Ministry of Foreign Affairs budget during the Safety for Voices grant period.

Explanatory note

This must be clear from the description of the activities in the grant application and the appended budget.

Qualitative criteria

Qualitative assessment

The criteria below are used to assess the quality of applications for a Safety for Voices grant. These criteria relate to the theory of change (including the logical framework, risks and activity plan for the first 12 months) that must accompany each application. The maximum number of points that can be awarded for each component is given in brackets. The maximum attainable score is 130 points for applications directed at goal 1 (see criterion D.9) and 115 points for applications directed at goal 2 (see criterion D.9). To be eligible for a Safety for Voices grant, an application must obtain at least 60% of the maximum attainable points.

1. The extent to which it is clear from the theory of change that (i) the proposed activities and results (outputs) are a suitable means of achieving the desired goal (outcome) (as indicated in criterion D.9) (6 points), that these are interconnected (2) and (ii) that they are complete (2).
2. The extent to which the logical framework is elaborated in a SMART¹⁶ manner, including indicators for each result and activity. (5)
3. The extent to which the timetable given in the activity plan for the first year (included in the logical framework) is realistic. (5)
4. For applications directed at goal 1 (see criterion D.9): The extent to which (i) the programme focuses on defenders of a wide range of human rights (10) and (ii) the

¹⁶ SMART: Specific, Measurable, Acceptable, Realistic and Time-related.

application makes clear how the programme will do this (5). (For applications directed at goal 2 (see criterion D.9) this criterion does not apply.)

5. The extent to which (i) the programme focuses on two dimensions of safety (10):
 - prevention, that is, preventing unsafe situations, for example by providing technical and other training, and advocacy at national and international level, and
 - protection of people in unsafe situations, for example through (quick) temporary relocation (in the Netherlands or elsewhere) and the provision of legal and other assistance;
 and (ii) makes clear how the programme will help ensure both dimensions of safety (5).

6. The extent to which (i) the programme focuses on safety as a whole – physical, legal, psychosocial and digital (10) – and (ii) makes clear how the programme will be used to help ensure all these forms of safety (5).

7. The extent to which (i) the programme has a global reach (10) and (ii) makes clear how the programme will be used to help achieve this (5).

8. The extent to which (i) the programme focuses on the most vulnerable people within the target group (10) and (ii) makes clear how the programme will be used to enhance their safety (5).

9. The extent to which (i) the programme focuses on cooperation with organisations that have contacts with the target group, such as embassies (of the Netherlands, other EU member states and other countries), other civil society organisations, such as faith-based organisations, and companies (10), and (ii) makes clear how the programme will promote this cooperation (5).

10. The extent to which the programme focuses on the following cross-cutting themes wherever they are relevant: women and girls (gender) (5) and conflict sensitivity (5).

11. The extent to which contextual (5) and programmatic (5) risks are analysed, and adequate measures are planned to prevent or overcome/mitigate these risks.

11. Timetable

A decision will be taken on the applications no later than October 28, 2022. This means specifically:

Submission of grant application	From 9:00 CEST from the first working day after the date on which this Order is published in the Government Gazette	To 23:59 CEST on July 31, 2022.
Decision on grant applications submitted before the deadline	No later than October 28, 2022	

12. Reporting and other grant obligations

The grant decision will set out obligations tied to the grant, including an obligation to notify the Minister of facts and circumstances that may have a significant impact on the grant award, such as the applicant's temporary or complete inability to implement the activities for which a grant is awarded or to fulfil its reporting obligations, including the submission

of interim and final narrative and financial reports, annual plans and auditor's reports (including reports of findings).

If a grant is awarded to a consortium, the grant decision will include an obligation to submit a definitive partnership agreement,¹⁷ which must in any case include stipulations on:

- i. how each of the partners will contribute to the consortium's activities;
- ii. how decisions will be made within the consortium;
- iii. how costs and risks are shared among the consortium partners;
- iv. how the consortium will ensure that the lead party fulfils the obligations towards the Minister in respect of the grant, including responsibility for the joint aggregated financial and narrative reports (where possible IATI-compliant reports);
- v. how supply chain responsibility¹⁸ will be fulfilled with regard to the implementation of the activities for which the grant is requested;
- vi. how the consortium partners will keep each other informed about, in particular, their financial health;
- vii. how the partnership can be adapted.

The following obligation will also be included: The grant recipient must ensure that the implementation of activities funded by the grant is not in conflict with bilateral agreements made between the Netherlands and third countries.

13. Administrative burden

In the interests of transparency, information is provided below on the administrative burden connected with the implementation of this grant policy framework. Applicants do not have to incorporate this information into their application.

The administrative burden of the implementation of this grant policy framework will amount to €630,000 for the entire grant period. The administrative burden consists of work associated with the obligations to provide information as part of the application process and, if a grant is awarded, the work involved in meeting the reporting obligations under the grant. €630,000 amounts to 1.6% of the total grant budget. This calculation is based on an estimate that no more than 12 organisations/consortia will be interested in the grant policy framework and will submit an application for which a grant can be awarded.

In drafting the grant policy framework, critical attention has been paid, first, to ensuring that the criteria for grant applicants and the intended results are clearly formulated, and second, to providing clarity about how the grants awarded will be funded and accounted for. Applicants must consider whether the administrative burden entailed in submitting a grant application are in reasonable proportion to the grant amount requested and the likelihood of obtaining it. The Ministry aims in this way to keep the administrative burden for applicants to a minimum.

14. Appendices¹⁹

- Application form
- Model budget
- Corporate rates

¹⁷ If the application is approved, the lead party is the grant recipient and, as such, is responsible to the Minister for implementation of the activities and compliance with the obligations in respect of the grant. The partnership agreement should in any case ensure that the lead party can fulfil this responsibility. Under European law, however, all the consortium partners will be deemed grant recipients.

¹⁸ Under the terms of the grant award, the grant recipient must take responsibility for the implementation of the project as a whole for which the grant is awarded, including project activities implemented by the consortium partners or other local partners.

¹⁹ [Human Rights Fund | Human rights | Government.nl](#).