

PLEASE NOTE

Questions and requests for more information about the Human Rights Fund 2019-2021 or the application can only be submitted via email to:

MRF2019-2021@minbuza.nl.

If necessary, questions will be aggregated and anonymized and published every Tuesday, with their answers, on www.government.nl/topics/grant-programmes/contents/human-rights-fund.

The answers will be published as an addition to the Q&As already published, by means of updating this document. Before submitting a question, please check first if your question has not already been answered in the Q&A section, the grant policy framework or the application form.

Questions must be received **before 17:00 on Thursday** in order to be answered on the site at 17:00 on the following Tuesday.

Q&As

THE HUMAN RIGHTS FUND

Q: Is there a difference between this call, the MRF2019-2021, and possibilities of funding through local embassies? Does the funding for this specific MRF call also include funding that is made available through local embassies? Can applications for the MRF 2019-2021 be submitted through local embassies?

A: The funding available through local embassies is not related to this call (MRF2019-2021) and applications for this call cannot be submitted through local embassies. Please refer to chapter 5 of the MRF 2019-2021 policy rules for information how to submit an application for this call.

Q: Can an organization submit a project under the MRF2019-2021 call and also submit another project to an embassy? Do these projects have to have different themes and focus countries?

A: If an organization wants to submit one proposal under the MRF2019-2021 call and another one through one of the embassies, they can. However, this cannot be the same project or the same activities. This does not necessarily mean that the two projects could never focus on the same theme or on the same country.

Q: Is it possible to know which Dutch embassies have funding available from the Human Rights Fund for projects focusing only on one specific country?

A: No such list is available. However the overview in the 2017 "Human Rights Report" (<https://www.rijksoverheid.nl/documenten/rapporten/2018/05/28/mensenrechtenrapportage-2017>) can provide an indication. Please contact the embassy in question or contact dmm@minbuza.nl.

Q: Are we eligible to receive funding from MRF2019, if we are already receiving funds from the Embassy of the Kingdom of the Netherlands in Kosovo / Brasil?

A: That depends on whether this funding concerns the same project or the same activities. If the new proposal includes the same activities you will not be eligible. Please keep in mind that you would also have to meet the criterion of D.5, regarding your financial independence, and the other threshold criteria concerning the applicant (paragraph 6.1 of the policy rules).

Q: As this is the MRF 2019-2021: is there another funding round planned 2020-2021? Would the same or similar applications be accepted in that round?

A: The possibility to publish calls for proposals depends on, among others, Government priorities and available funding within the MRF. At this time we cannot provide information on any future calls.

Q: Is there a preference for regional or global initiatives?

A: As stated in the Grant Policy Framework (paragraph 2.6) there are no priority countries and there is no preference for regional or global initiatives. Please note that criteria under D.11 and I.3 have to be met.

Q: Is the Human Rights Fund coordinated by Dutch Embassies and the same as the Matra Program or is it something different? In case the Human Rights Fund operates on its own, would submission of application be acceptable?

A: The Human Rights Fund is coordinated by the Dutch Ministry of Foreign Affairs and operates on its own. Funding available through local embassies, such as the Matra Program, is not related to this call. Please refer to chapter 5 of the Grant Policy Framework for information on how to submit an application.

WHO

Q: Is this fund intended only for Dutch organisations?

A: No.

Q: Is the Human Rights Fund open to non-Dutch CSO's around the world or can only CSO's established in the Netherlands or of Dutch origin directly apply/be the prime partners in partnerships/consortia?

A: As implied in paragraph 3.1 of the Grant Policy Framework, the Human Rights Fund is open to all CSO's, regardless of origin, as long that the CSO fulfills the requirements set out in the framework. The Human Rights Fund is therefore open for non-Dutch CSO's to apply.

Q: Can a Kosovo/Bangladesh Civil Society Organisation apply for a grant?

A: There is no reason why any Civil Society Organisation could not apply for a grant under the MRF 2019-2021, provided of course that all the criteria regarding the applying organization as set out in the Grant Policy Framework are met.

Q: If an organization functions -in practice- as an independent organization but is operating under the fiscal sponsorship of a larger non-profit organization that is not solely devoted to human rights, would they be eligible?

A: The applicant/lead party itself must meet the threshold criteria concerning the applicant, D.1 – D.7. So amongst others it needs to have legal personality and must work to improve human rights. If this is not the case the organisation is not eligible as applicant/lead party. Organisations with a *broader* objective (that do focus on human rights, but not solely) may demonstrate that they satisfy this criterion on the basis of their most recent annual report and/or internal policy documents. Therefore, if applying with the larger nonprofit organisation as the lead-applicant, this larger non-profit organisation will have to meet the criteria.

Q: Can the Ministry look at the personal track record of the organization's principal officers instead of the organization's history per se, to show it has at least two years' experience with the theme in question and one year's experience in the countries proposed.

A: No, the criterion is directed at the organisation as such, not at its founders or employees. If it cannot be substantiated that the organization can meet this requirement itself, joining a consortium to obtain the required experience would be advisable.

Q: Can an organization be the lead at one project proposal and partner at other project proposal(s)?

A: Yes, it can.

Q: Can an organization be the lead at two project proposals?

A: Yes, it can.

Q: Are international organisations eligible for funding?

A: Yes, they are, assuming that they will meet the criteria regarding the organization, such as criterion D.1 and D.2. This means, amongst others, that they cannot be affiliated with a government in any way. NB: intergovernmental organisations are not eligible for a grant.

Q: While the application states that a legal personality is needed at the time of the application, our organization is still in the process of registering as a coalition.

However, individual organizations within the coalition are registered - would this be enough to fulfil the legal personality requirement?

A: The lead party and the co-applicants have to meet the requirements of D.1. A consortium as a whole has to meet the requirements of D.3. If the coalition intends to be lead party or co-applicant it will have to have legal personality itself.

Q: One of the local implementing organisations does not have legal responsibility. Does this make the project ineligible?

A: When an implementing organisation does not have legal responsibility or is not able to register, provide information on why the organisation is not able to obtain this. It is possible to make an exemption to the criterion when the organisation is operating under circumstances in which it is not able to register.

Q: Our organization consists of many different members. A joint application with all these members would be too complicated. Can we submit an application as the overarching organisation?

A: If the overarching organisation itself meets the necessary requirements of D.1 and implements the project completely by itself, you can submit an application as such. The applicant will then be assessed as a single applicant, not as a lead applicant submitting the application on behalf of a consortium. This is relevant for threshold criterion D.5, for example. The members in that case aren't part of a consortium because they are not contributing as such. A consortium is a partnership between two or more civil society organisations that carry out a joint project to which each party contributes. In certain cases the members could be considered local implementing organisations, because they are merely forming a partnership to implement the project of certain of its components. In that case the criterion of D.4 should be met.

If the members are in fact a consortium with the overarching organisation being the lead applicant, the requirements of D.3 will have to be met and an agreement will have to be drafted and signed for the course of the project. Also all consortium members need to meet the requirements of D.1.

Please note that the applicant has to make clear whether or not the application is submitted on behalf of a consortium, in order to apply criteria such as criterion D.6. It is the applicant's responsibility to then meet the criteria that are applicable.

Q: We are an umbrella organization. We would like to apply as the sole applicant but once the grant is awarded, we would implement the project via our membership by signing memoranda of understanding. Activities would be implemented by staff members hired by us as consultants but deployed in the local centres and operating from there. Is such an operational structure allowed?

A: Please note that your project has to be in fact a project and not core funding of regular activities. If it is indeed a project the following applies.

If the overarching organisation itself meets the necessary requirements of D.1 and D.2 and implements the project completely by itself, you can submit an application as such. The applicant will then be assessed as a single applicant, not as a lead applicant submitting the application on behalf of a consortium. This is relevant for threshold criterion D.5, for example. The members in that case aren't part of a consortium because they are not contributing as such. A consortium is a partnership between two or more civil society organisations that carry

out a joint project to which each party contributes. In certain cases the members could be considered local implementing organisations, because they are merely forming a partnership to implement the project of certain of its components. In that case the criterion of D.4 should be met.

If the members are in fact a consortium with the overarching organisation being the lead applicant, the requirements of D.3 will have to be met and an agreement will have to be drafted and signed for the course of the project. Also all consortium members need to meet the requirements of D.1.

Please note that the applicant has to make clear whether or not the application is submitted on behalf of a consortium, in order to apply criteria such as criterion D.6. It is the applicant's responsibility to then meet the criteria that are applicable.

Q: Is it possible for a newly founded NGO, comprised of two people, to co-apply for a grant as part of a consortium?

A: For a newly founded NGO it is in principle possible to join a consortium when applying for a grant. Of course all the criteria have to be met. For example criterion D.1 requires all applicants to have legal personality and criterion I.1 requires that the lead party and the co-applicants together (as organisations) demonstrate their experience. Please be referred to the grant policy framework and the application form for details.

Q: Can an organization that operates as an independent NGO, but doesn't have a separate legal entity, apply for the Human Rights Fund?

We operate as an independent NGO, and are based within a University. The University is an exempt charity but our organization itself is not registered as a separate legal entity.

A: No. The lead applicant must meet the requirements of (among others) criterion D.1 and should therefore have legal personality. Universities generally have legal personality. In the case of an organization that legally is a department within the University and has no legal personality itself, it could be possible if the University would be lead applicant. In that case please be sure to fill out all the information with the University as the lead applicant, as all criteria concerning the lead applicant will be applied on the University.

Q: Can a Dutch university be the leading organization in the project proposal?

A: The Grant Policy Framework states at D.1. that "The applicant or, in the case of a consortium, the lead party and all co-applicants must be (a) not-for-profit civil society organisation(s) with legal personality." Universities in the Netherlands have legal personality. Please note that the application should be in name of the University, NOT by a specific department, as a University department as such normally does not have legal personality. Also the University should fall within the scope of the definition of a civil society organisation as mentioned in D.1 and should meet criterion D.2 (a.o.) as well, which can only be assessed after receiving the complete application with the relevant appendices.

Q: Can an organization that makes at the moment a restart apply for the Human Rights Fund?

A: This might be possible, but can only be assessed after receiving the complete project proposal.

Please note that of course all the criteria have to be met. For example criterion D.1 requires all applicants to have legal personality and criterion I.1 requires that the lead party and the

coapplicants together (as organisations) demonstrate their experience. Please be referred to the grant policy framework and the application form for details.

Q: On page 5 under 3.1 of the Grant Policy Framework it is stated that:

“MRF 2019-2021 grants are intended for projects run by independent, not-for-profit civil society organisations with legal personality that work in a result-oriented way to protect and promote human rights. In this framework, a 'civil society organisation' (CSO) is a not-for-profit organisation, neither established by a government body nor linked to a government body either de facto or under its constitution, which is a legal person under civil law.”

Can a membership-based network (umbrella organisation) of national human rights institutions (NHRIs) – which are independent bodies established by governments – qualify as a not-for-profit civil society organisation?

A: A membership-based network (umbrella organisation) of national human rights institutions (NHRIs) is not eligible for a grant under MRF 2019-2021. This, because it is linked to government bodies and does not meet the requirements regarding legal personality.

Q: Concerning the definition of “Civil Society Organisation” under 3.1 in the grant policy framework, do organisations that have a so-called “Mandated Body Status” also fall under this definition, or are these organisations exempt from applying?

A: It is not possible to answer this question in general. To be eligible for a grant, an organisation should meet the criteria D.1 and D.2.

COLLABORATION

Q: Are foreign organisations required to have a Dutch partner organisation?

A: No.

Q: May proposals be submitted that are drawn up by a consortium?

A: Yes.

Q: May a Dutch organisation form a consortium with an international organisation?

A: Yes.

Q: May a knowledge institution be part of a consortium?

A: Yes.

Q: Can a consortium include Dutch NGOs?

A: Yes

Q: Can local departments of UN organisations be part of a consortium?

A: No, also co-applicants have to meet threshold criterion D.1. UN-organisations and their local departments do not do so.

Q: Is it possible to use funds to pay local organisations that will be involved in implementing the programmes being developed? Must these organisations be mentioned in the application?

A: Yes, this is allowed, and yes, these organisations must be mentioned in the application (please refer to D.4).

Q: Do the cases for the track record have to be written for the consortium as a whole, or may they concern individual consortium members?

A: A case for the track record may be supplied either by the applicant/lead party or jointly by the lead party and co-applicants. Its aim is in any case to show that the consortium as a whole has the necessary experience.

Q: May organisations that are part of an international confederation include results in the track record that have been achieved within and by other parts of the confederation, or must the track record be based exclusively on the organisation's own activities?

A: Yes, organisations that are part of an international confederation may base their track record on results that have been achieved within and by other parts of the confederation, *provided* that the organisation itself has demonstrably contributed to those results. This should be made clear in the application.

Q: Do applicants need to provide documents, together with the application, stating that the applicant will collaborate with other NGOs even if they are not forming any consortium for this fund?

A: If several NGOs are working together this is either a consortium with a lead party or an applicant with local implementing organisations. The respective applicable criteria will have to be met in order to qualify for a grant.

Q: In the application form it is stated: "You must enclose the applicant's constitution as proof [of legal personality]." For an International NGO is it necessary to supply a

constitution for each of the country offices relevant to our application or uniquely the constitution of the US entity?

A: The lead party and all co-applicants must meet the criterion of D.1. If all the country offices are to be considered separate co-applicants because they are separate legal entities then it has to be substantiated with their constitutions that they individually meet the criterion. If there is only one legal entity, which happens to have a head office and country offices, there will be one applicant, whose constitution should be submitted and no constitutions of its country offices need to be provided.

Q: Are we required to submit only our HQ annual accounts, or also the annual accounts of the relevant country offices?

A: In case of a consortium, the lead party and all co-applicants must meet the criterion of D.5 together and thus supply, according to the checklist in the application form (under "V"), annual accounts as appendix E. If all the country offices are to be considered separate coapplicants because they are separate legal entities, it has to be substantiated with their two most recent sets of annual accounts and that of the lead applicant that they together meet the criterion. If there is only one legal entity, which happens to have a head office and country offices, there will be one applicant, whose two most recent sets of annual accounts should be submitted and no annual accounts of its country offices need to be provided.

Q: Should two independently registered organisations, however in practice operating together and under the same name, apply as one applicant or as a consortium?

A: If these are two legal entities they will have to form a consortium. One of them has to act as lead applicant.

Q: Can we keep some of our partners and countries anonymous in the application for confidential purposes?

A: When working with local partners you are requested to provide the information as stated in criterion D.4. The same applies to countries with regard to criterion D.11. However, your application will be dealt with confidentially. If your application has been granted you can request this information not be made public.

HOW

Q: May a proposal be submitted in a language other than Dutch or English?

A: No.

Q. All appendix and attachments documents are in another language than Dutch of English. Is it obligatory to translate it or do we have a possibility to submit these documents in those languages?

A: As set out in paragraph 5.6 of the Grant Policy Framework all appendices have to be translated in either English or Dutch. Please note that this does not have to be a certified translation.

Q: Are the application form and the logframe really mandatory?

A: Yes, you must use the published application form and logframe in order for your application to be processed. The fixed format ensures the uniformity of applications and of their assessment, thus guaranteeing a level playing field for all applicants.

Q: Is there a budget template that we should use for the budget (appendix H) and if so, where can we find it?

A: No, there is not an obliged budget template.

Q: What is the final deadline for submitting proposals?

A: The deadline is 1 October 2020, 23:59 uur CET. Nevertheless, as proposals are assessed in the order in which they are received, the funds available for the MRF – divided over the specific themes – may already be exhausted before this deadline. Once funds are exhausted, applications will no longer be processed, but will be rejected.

Q: What appendices must be sent with the application?

A: The documents that must be included with the application as appendices are listed at the very end of the application form.

Q: May an organisation submit more than one proposal?

A: Yes, but they must be genuinely different proposals.

Q: If an application cannot be processed or is rejected, may I resubmit it?

A: Yes, you may. The date on which your amended proposal is received will be taken as the date of receipt of your application. Submitting a second application on a different project is also possible.

Q: Do the threshold criteria have to be filled out again if the organisation has been selected for another grant award before, for example as a strategic partner or for a different project?

A: Yes.

Q: Is it possible to submit more than one proposal within the same thematic issue (in different countries)?

A: Yes, this is possible within the same thematic issue, as long as they are truly two projects and have a different focus.

Q: Is it possible to submit a proposal aimed at a country where also other activities are being implemented in the context of the strategic partnerships with the MFA. If yes, can these activities be implemented with the same partner organisation or should it involve different partner organisations?

A: Yes, it is possible to submit a proposal focusing on a country where already other activities are being implemented (whether or not in the context of the strategic partnership with the MFA). However, the proposed project(s) should be genuinely different from the already existing project in that country and these activities should clearly be taken into account. Of course also the requirements of criterion D.12 have to be met, concerning financing by the MFA. If these requirements are met it is allowed to work together with the same local implementing organisation.

Q: Does the applicant have to list all local partners even though it is not objectively possible to know in advance (for a long term project) who all these local partners will be?

A: If the local organisations for later years cannot be known in advance, details cannot be provided. In that case applicant can provide information on why it is not yet known. Of course, when asked how the local implementing organisations will be involved and will have influence etc., the applicant can still provide the information on how this will be the case when the local partners are selected.

Q: Can the Ministry of Foreign Affairs say anything about how many grant applications have already been submitted?

A: This anonymized information will be published every week (at the same time as the Q&A's) on the website of the Human Rights Fund. However, no rights can be derived from this text.

Q: Is it necessary that all required documents that are part of a certain appendix be merged into one document?

A: No, this is not necessary as long as the different documents of the same appendix are logically and clearly numbered.

Q: Will the Ministry of Foreign Affairs publish an announcement once the budget for a particular lot has been depleted or diminished?

A: Information about the (provisional) exhaustion of funds will be published once available. Until then a weekly anonymized overview of the submitted applications will be published. However, no rights can be derived from this text.

Q: Is the application form also available in English?

A: Yes, everything is available in English. Please be referred to the government's English website: <https://www.government.nl/topics/human-rights/human-rights-fund>

Q: What is the word count / character limit / page limit for the application form?

A: There is no word count, character limit or page limit for the application form.

Q: Is there a template for the liquidity forecast (appendix J) referenced in section I.9?

A: No, there is no template for the liquidity forecast.

Q: How can an organisation avoid drawing up and submitting an application but being rejected because funding has already been exhausted?

A: You will have an indication of the grants that have been applied for through the weekly updated overview on the site. Of course it will take several weeks before it is known whether or not the previously submitted applications have been granted. If funding for a theme is provisionally exhausted this will be published too. No rights can be derived from these overviews. You can make an estimated guess whether or not it is worthwhile to submit an application, but guarantees cannot be given. As would of course be the case if applications would not be processed in the order that they are received but through a tender procedure.

Q: What is the average percentage of applications being accepted?

A: The MRF 2019-2021 applications will be assessed in the order of receipt, following a “first come, first serve”-principle. The applications overview provided weekly on the website is meant to give you an indication of the grants that have been applied for. Of course it will take several weeks before it is known whether or not the previously submitted applications have been granted. If funding for a theme is provisionally exhausted this will be published too. No rights can be derived from these overviews.

You can make an estimated guess whether or not it is worthwhile to submit an application, but guarantees cannot be given. As would of course be the case if applications would not be processed in the order that they are received but through a tender procedure.

Q: Does the Ministry want to see impacts on the individual, state, international, or multiple levels?

A: It is required that activities, outputs and outcomes are described in your application and logframe (for which the prescribed logframe format, appendix III to the grant policy framework, should be used), impact level is not required. For definitions thereof please be referred to www.oecd.org/dac/evaluation/2754804.pdf. The level on which the outcomes are to be realized depends on the nature of the project, but will most often be on state, international and/or multiple levels.

Q: Concerning the logical framework, how should it be completed with regards to worldwide projects, given that it is not yet possible to link specific outcomes to specific countries?

A: Where applicable you can mention ‘worldwide’ in the logical framework. At criterion D11 in the application form you can explain why the project outcomes cannot be related to specific countries.

Q: The application form is a mix of explanatory and guiding information and several tables. Could you clarify which parts have to be filled in by the applicants?

A: All dropdown menus, all tables, all open text areas – in short every part of the form that allows you to fill something out - are to be filled out by the applicant.

Q: We expect to submit our application around the end of May. Do you think it is fine or the risk is too high given the fact that applications are processed in the order in which they are received?

A: Please be referred to the application overview. This is all the information we can provide. We cannot advise you on the risk of waiting, however, since applications are processed in the order they are received you may want to consider being as quick as possible.

Q: Could we send you a letter of inquiry briefly explaining our project in order to verify if it complies with your expectations, ensuring your interest when we apply the full proposal, if it's the case.

A: No, only a full and complete application will be processed and assessed.

WHAT

Q: What are the minimum and maximum project duration?

A: Projects must have a duration of between two and four years. Projects must start between 1 April 2019 and 1 October 2020 and end no later than 1 October 2024.

Q: If my proposal serves objectives under multiple themes, may I submit it for consideration under more than one theme?

A: You may not submit a proposal for consideration under more than one theme. You should choose one theme, taking account of the requirement laid down in sections 3.2 and D.8.

Q: In D.8 it states that at least 80% of the funds needed to implement the project must be intended for activities aimed at outputs and outcomes relating to one or more of the specific objectives under one of the themes. How is this to be calculated?

A: In appendix III to the grant policy framework you will find the format for a logframe. This excel document contains four sheets to be filled out by the applicant. The first sheet should give an overview of the resources that are allocated to activities which activities, in turn, are aimed at outputs and then at outcomes. The outcomes and the underlying outputs that contribute directly to one or more of the specific objectives under one of the themes can be identified and elaborated on in the third and the fourth sheet. Combining those sheets will enable you to estimate the percentage of resources that are directly aimed at one or more specific objectives. First check which resources contribute to outputs and outcomes that are aimed at one or more specific objectives. Then calculate the sum of those resources as the percentage of the total budget. This should be at least 80%.

Q: Can the track record include projects that are currently still under implementation, or should these only be finalised projects?

A: To establish the applicant's experience it is necessary that you can indicate to what extent outputs and outcomes have been realized or have not been realized and what lessons have been learned from that. To that end a project will need to be finalized or at least furthered to a stage in which the applicant can provide that information.

Q: We understand that the required 1-year experience within the selected countries does not necessarily have to be linked to the thematic field we are applying for. Is this correct?

A: Yes, this is correct.

Q: Do local implementing organisations have to be located within one of the proposed countries of operation, or can they be based in another country/region?

A: Local implementing partners can be based in countries other than the proposed countries of operation. However, criterion D.4 must be met.

Q: Are local implementing organisations required to have legal personality?

A: Yes, legal personality is required (see criterion D.4).

Q: Is it allowed to provide some track record from the applicants member organisations even though it is not a form of consortium (in the context of a new organisation)?

A: No, this is not allowed.

Q: Are future activities eligible when they are a in fact following up to activities that are currently being implemented?

A: Yes, new activities financed through MRF 2019-2021 can be follow up activities that are currently being implemented. Through the MFA activities will not be eligible for funding twice nor will they be eligible if they have already been started. New activities can be similar to or a follow-up to activities that have been funded or started in earlier projects, but they have to be genuinely new activities in order to be eligible for funding through the MRF 2019-2021.

Q: Are secondment and/or expert deployment to other organisations eligible as capacity building activities?

A: That depends on the nature of their activities and the nature of the project. The activities should be fully aimed at capacity building of the organization the person is deployed to.

Q: Does the Ministry have any preference with regards to the duration of the projects, or is this not relevant as long as it is within the already set frame?

A: No, this is not relevant. The projects must have a duration of at least two years but no more than four years. The activities must start no earlier than 1 April 2019 and no later than 1 October 2020, and end no later than 1 October 2024 (D.10). Activities that have already been started at the time that the application is submitted are not eligible for a grant, as stipulated in D.10.

Q: Criterion 1.6 is about the PME system: is it referring to a specific system made by your Ministry or is it any PME system? For instance, as an applicant, could we propose and use our own PME system? If not, where could we get more information about the relevant PME system?

A: There is no specific PME system prescribed or designed by the Ministry. You can use your own PME system, the quality of which will be assessed according to 1.6.

Q: We would like to ask funding for different activities, which all fall under the same human rights theme. Can the Ministry fund such a variety of activities or does the Ministry need one project with a limited type of activities?

A: The Ministry of Foreign Affairs does not apply a minimum or maximum number of activities to be performed as long as the activities contribute (for at least 80%) one or more of the specific objectives of the theme chosen. NB the activities should form a coherent project. Please refer to 1.2 and 1.3.

Q: What is the specific difference between the details that need to be filled in under the “context and actor analysis and clear problem definition” under 1.2 Re A, and “the human rights situation in these countries” under 1.3?

A: The context and actor analysis under 1.2 should aim to clarify the thematic relevance of the project and how it will contribute to the overall and specific objectives for the theme in question. A clear problem definition should follow logically from this analysis. This differs from describing the human rights situation under 1.3, where clarification is required on country and/or region relevance. The selected countries and regions should be relevant to the theme and the project, and should form a logical combination. While 1.2 and 1.3 are two distinct criteria, it is possible that a slight overlap between the responses to these may occur. Please refer to the application form for more details on these criteria.

ORIA (previously called COCA)

Q: One of the threshold criteria for grant applications of €1 million or more is that the organization must have a PARTOS-9001 certification or a positive Checklist for Organizational Capacity Assessment (COCA)/Organizational Risk and Integrity Assessment (ORIA). If an organisation is fully ISO certified but not PARTOS ISO certified, is the regular ISO certification sufficient? What about certification from the Central Office for Fundraising Organisations (CBF)?

A: No, ISO 9001 certification and/or CBF certification are not sufficient. If the organisation cannot demonstrate that it has a valid, positive COCA/ORIA or PARTOS ISO-9001 certification, a COCA/ORIA should be filled out and submitted after the organisation has been notified that it has met the threshold and substantive criteria.

Q: Does an organisation have to demonstrate that it has a valid, positive COCA/ORIA or PARTOS-9001 certification even if it is already a selected partner (e.g. for Dialogue and Dissent)? Does an organisation also have to demonstrate this if the Ministry has awarded it a grant before (from the Human Rights Fund)?

A: Yes, even a previously selected partner or grant recipient must demonstrate on request that it has a valid, positive COCA/ORIA or certification as mentioned in the application form. However, keep in mind that a valid positively assessed COCA means that it should not be older than 3 years. So it is possible that an applicant in its application for another grant referred to a COCA that was still valid then but isn't anymore now. And even if a positively assessed COCA is still valid, you might have to fill out the new mandatory additional ORIA Integrity Update Form. It remains the responsibility of the applicant to show its organizational capacity and integrity. This information will only be asked for if and after the application has passed the threshold and substantive checks

Q: Can the Ministry of Foreign Affairs provide information about whether or not an organization has previously submitted a COCA/ORIA and if this COCA/ORIA was assessed positively?

A: No, it is the responsibility of the applicant to show its organizational capacity and integrity.

Q: What is "PARTOS-9001"?

A: It is a certification that can be obtained by NGOs. With that certification it is assumed that an organization meets the Organisational Capacity as required by the MFA. Please be referred to:

- www.partos.nl/fileadmin/files/Documents/Partos_9001-2015_EN.pdf.
- www.partos.nl/en/about-us/

Or contact the organisation at info@partos.nl.

Q: Are all the required documents necessary to obtain a positive COCA/ORIA?

A: To be eligible for a grant, the applicant has to pass the Checklist for Organisational Capacity/Organisational Risk and Integrity Assessment or provide a PARTOS-9001 certification. The organisational capacity will only be assessed when the application has passed the threshold check and scored sufficiently on the substantive criteria. In order to pass the assessment on these first two tests, all required documentation as mentioned in the application form is needed.

Only after the threshold and substantive checks are passed will the applicant be invited to demonstrate its organizational capacity. The documentation and information needed for that

check is listed under “Organisational Capacity” in the application form and differs depending on the applicant’s situation.

Q: Which kind of documents can be attached and submitted with the ORIA form in order to show or prove the Details on work force (quantity and quality)? More specifically, which kind or type of measurement is expected in terms of proving the quality of the Organization's work force?

A: These documents should refer to staff working for the organization and their qualifications in relation to the grant proposal submitted.

Q: An organization can hand in the COCA/ORIA-form at a later stage. Is this also the case with the following documents: (f) Procurement policy, (g) Code of conduct or code of ethics, (h.) Anti-fraud and anti-corruption policy.

A: The Organisational Capacity and integrity of an applicant will only be assessed after the threshold and substantive checks have both been passed. If that is the case the applicant will be notified thereof. In that case you will have to provide the information required to assess the Organisational Capacity and integrity. This information depends on your situation, for example whether or not you have a valid COCA/ORIA or PARTOS certification. Please carefully read the instructions in the application form, under “Organisational Capacity”.

Q: Having passed the threshold criteria check for another MFA-fund, namely the ARC-fund, can we assume that we have “previously drawn up a COCA which was assessed positively by the Ministry of Foreign Affairs”?

A: The threshold check with ARC entailed an assessment of an applicant’s organisational capacity. Therefore, if you have been received confirmation that you passed the threshold check you normally should have a valid COCA, in which case you can refer to the activity number and fund when requested to provide the information. *However*, keep in mind that a valid positively assessed COCA means that it should not be older than 3 years. So it is possible that an applicant in its application for the ARC Fund referred to a COCA that was still valid then but isn’t anymore now. And even if the positively assessed COCA is still valid, you might have to fill out the new mandatory additional ORIA Integrity Update Form. It remains the responsibility of the applicant to show its organizational capacity and integrity. Again, this information will only be asked for if and after the application has passed the threshold and substantive checks.

Q: Are you able to provide an editable version of the ORIA form? (e.g. Word format) Or should we formulate our responses in a new document?

A: Yes, we can provide you with a word-version. However, we will do so only if and after your application has passed the threshold and substantive check. Only then will an assessment of your organisation’s organizational capacity and integrity become relevant.

THEMES

Q: Do the specific objectives represent priority issues for the Ministry? Will the score of the assessment be influenced by inclusion of the specific objectives of the Ministry in a proposal? And if so, would it be possible to explain how it influences the score?

A: Yes, they are priority issues and yes, they will influence the score. As stated in chapter 4 of the Grant Policy Framework “the extent to which a proposed project also contributes to the specific objectives is assessed under criterion I.2”. The score will of course be positively influenced if the project clearly aims to contribute to the specific objectives. This cannot be explained in more detail.

Q: One of the themes is the promotion of the international legal order/the fight against impunity. The specific objectives of this theme focus solely on international crimes and international legal order. Would a proposed project which focuses on strengthening national rule of law and reducing the global justice gap also be eligible? For example, projects targeting the 1.5 billion people which cannot resolve their justice problems.

A: The Grant Policy Framework is leading and states that project proposals that focus on the overall objective and specific objectives of a theme are eligible for a grant. Please refer to threshold criterion D.8 and chapter 4 of the Grant Policy Framework for more information on the specific objectives within the themes.

Q: Can I submit a proposal in the field of civil and political rights or economic, social and cultural rights?

A: As mentioned in paragraph 2.2 of the Grant Policy Framework, applications must be related to one of the six themes mentioned in the Framework. Please refer to the Framework for more information on the themes.

WHERE

Q: Activities must take place in at least two countries. Do the activities have to be the same in all countries, or may they be different?

A: While activities need not be the same in all countries, there needs to be sufficient cohesion between them so that it is clear that they are part of a single project. In addition, a minimum percentage of the total project budget must be used to achieve the intended outcomes in each of the selected countries. (NB The question here is not how much money is actually spent in a given country, as in the distinction between ODA and non-ODA, but how much is spent on achieving the intended outcomes in a given country.) Please refer to D.11, I.2 and I.3.

Q: In which countries may projects be implemented? Is there an overview or list of these countries?

A: There is no list of countries that can be referred to. Of course, projects must be implemented in countries where interventions in defence of human rights are necessary and meet the requirements as set out under I.3, and D.11 should also be met.

Q: Does it make a difference whether projects are implemented in ODA-eligible or non-ODA eligible countries?

A: The application form includes a question on whether the activities will chiefly take place in ODA-eligible or non-ODA-eligible countries. However, your answer makes no difference to the possible award of funds. The information is related to administrative requirements for the Ministry.

Q: D.11 gives a formula on the percentage of the budget to be spent on outcomes in each selected country. How should this percentage of the budget be calculated?

A: In appendix III to the grant policy framework you will find the format for a logframe. This excel document contains four sheets to be filled out by the applicant.

The first sheet should give an overview of the resources that are allocated to activities which activities, in turn, are aimed at outcomes. It should be indicated in which country the outcome will be achieved.

First check which resources contribute to outcomes in each country. Then calculate the sum of those resources as the percentage of the total budget. (This percentage should be at least the total budget, divided by twice the number of countries in the application. The application form gives an example of that last formula.)

Q: Can a certain percentage of a project, which also includes focus countries, be considered 'worldwide'?

A: Yes it can provided the project effectively seeks to achieve outcomes with such a global reach. The percentage of the focus countries will still need to meet the minimum requirement of D.11.

Q: How does the possibility for 'worldwide' projects combine with the 'at least two countries' criterion?

A: When a project has a worldwide focus the 'at least two countries' criterion is met. However, applications must elaborate on the activities and outcomes in at least two countries. And it has to be accounted for that the project indeed aims to achieve outcomes with a worldwide span.

Q: Do projects that have a global reach or that focus on Dutch MFA priority countries receive a higher score ?

A: No, they do not. Projects can aim at outcomes anywhere provided the requirements of criteria D.11 and I.3 are met.

Q: Is the Human Rights Fund 2019-2021 open for applications that focus on the Kingdom of the Netherlands, for example on Curacao and Aruba?

A: No. The MRF 2019-2021 is an instrument of the Dutch *foreign* policy on human rights. Therefore outcomes aimed to be realised within the Kingdom of the Netherlands are excluded from funding.

Q: Do applicants with worldwide projects need to list all possible countries in case a criterion requires explanatory information about specific countries?

A: No, in this case applicants can respond to that criterion from their worldwide perspective. Thus, not all countries covered by the project need to be listed separately. Obviously, the applicant would still need to meet all criteria (entirely or partially) with regard to the selected countries. For applications with a worldwide focus, this criterion applies to the method that will be used at the start of the project to select countries or regions.

Q: Can you confirm which countries can be deemed 'priority' countries for each theme?

A: As stated in the Grant Policy Framework (paragraph 2.6) there are no priority countries. Of course the criteria under D.11 and I.3 have to be met.

Q: Under D.11 it is stated that: "the project budget must result in outcomes relating to promoting and improving the human rights situation worldwide or in at least two different countries". Can a project have a regional focus as well, for example, can a project be targeting the Middle East and North Africa region without specifying countries?

A: The answer is embedded in the description of I.3: "the countries selected for implementation of the proposed project are a logical combination. Moreover, the human rights situation and the quality of the rule of law in these countries justify the project activities, and the project has added value there. For applications with a worldwide focus, this criterion applies to the method that will be used at the start of the project to select countries or regions." For that reason, the countries located in a specific region – or all the countries in a region as a whole if the focus lies on the whole region – must fulfill this criterion's requirement. This must be clear from the project proposal.

Q: Is it an advantage to have a worldwide project or to include specific countries that the Dutch MFA focuses on?

A: No, it is not. Projects can be aimed to realise outcomes anywhere where the requirements of criteria D.11 and I.3 are met.

Q: Regarding 1.3, does the call require that we demonstrate the pre-existence (i.e. prior to the implementation of the project) of geographical/regional, social or political ties or links between the selected countries where the project would take place?

A: Yes. The countries selected (in which the outcomes will be realised) should form a logical combination.

Q: Is it possible to combine Sudan, Egypt and Pakistan in one application?

A: Yes, one project can aim to realise outcomes in three countries, as long as the criteria of D.11 and I.3 are met.

Q: Is the fund also eligible for minority groups in diaspora?

A: This depends on the application. Minority groups in diaspora are certainly not excluded per se, but the application will have to meet all the criteria, such as realising outcomes in at least two countries and focusing on the themes that are eligible for the Human Rights Fund.

Q: If the project outcomes focus on a specific context but activities are implemented in another country, which country will be considered as the country of intervention?

A: Please be referred to the explanatory notes to D.11 in the application form. The criterion aims at the country in which the outcomes will be realised, not necessarily where the activities themselves are carried out or where the money is spent. Funding allocated to outcomes that are to be realised in a given country can be considered when making the calculation for that country, regardless of where the money will in fact be spent. (This differs from the distinction between ODA and non-ODA, which concerns how much funding is spent in a given country.)

Q: Should we select contexts in which the human rights situation is very similar or can we identify different contexts (from a geographical, historical and political point of view) as long as the situation legitimizes an intervention responding to one of the selected themes?

A: The selected countries have to form a logical combination regarding the context of your project, as will be assessed under criterion I.3. The aim is to assure that it is in fact one project in (at least) two countries and that they are not randomly selected countries. So normally the human rights situation and/or the context in which your operating should be similar in the selected countries. The connection does not need to be geographical per se, but can also be cultural, political, historical, etc. and it has to be quite clear. This connection will in turn most likely influence the interplay between the countries within the project.

Q: We would like to submit a project with a worldwide impact. The activities would be implemented in more than 10 countries, selected at the beginning of the project in countries where we have a local presence through our membership. The countries (and members) would be selected according to the needs deriving from the human rights situation, the identified opportunities during the course of the project and the potential impact of the activities in that context. For these reasons, we cannot specify in the application form the countries where the activities will be implemented. Is this allowed and will our application still be eligible?

A: When the project is worldwide applicants can fill out criteria from their worldwide perspective. Thus, not all countries covered by the project need to be listed separately. Obviously, the applicant would still need to meet all criteria (entirely or partially) with regard to the selected countries. The countries selected for implementation of the proposed project are a logical combination. Moreover, the human rights situation and the quality of the rule of law in these countries justify the project activities, and the project has added value there. For applications with a worldwide focus, this criterion applies to the method that will be used at the start of the project to select countries or regions.

Q: Is there any guidance you can provide on how much detail we should include about each country that is part of our application, specifically with regards to I.3?

A: Please provide for enough detail to allow the Ministry to assess the criterion, with due focus on the questions set out in the application form. The Ministry will of course check this

information, but if it is not included in the application it will in any case be considered insufficient. There is no page limit, so please do not feel restricted.

Q: Most of the planned activities would take place in country A, but none in country B or country C per se. The project, however, would directly impact the two latter countries. Is this eligible?

A: This would probably meet the requirement of D.11, but this can only be assessed based on the details of the application as a whole. This criterion is assessed based on where the outcomes are to be realised, not where the activities are in fact carried out. Even though generally this is the same country, it does not have to be.

Q: The application requires a minimum of two countries where the activities are planned. Our project activities are taking place in several countries. However, since our focus is collecting evidence on war crimes committed in one of those countries, the outcome of our activities is more related to that country than other countries. Would outcomes of the activities planned in multiple countries require outcomes for each country? And if so, does the outcomes of all countries have to be equal?

A: In the application form (D.11) it is clearly stated that the project budget must result in outcomes (not activities) relating to promoting and improving the human rights situation in at least two different countries. In each country, the share of the total budget to be spend on the intended outcomes is at least: the total budget, divided by twice the number of countries in the application ($100\% / (\text{number of countries} \times 2)$).

This means that for a minimum of two countries outcomes should be achieved. The outcomes don't need to be equal in either country, but the share of the total budget spend on the intended outcomes should (for each country where outcomes are planned) reach a minimum percentage as calculated in D.11. If the outcomes in this question/proposal only relate to one country, this would not be allowed.

Q: The application form mentioned that in each country, the share of the total budget to be spent on the intended outcomes is at least: the total budget, divided by twice the number of countries in the application. Is there any flexibility in these percentages and can our organization spend a bit below the required percentage in some of the countries?

A: No, that is not possible. If the proposal does not meet the minimum requirements, it will be rejected.

Q: On the grant website, it is stated that the grant award amount can vary from 1 million Euros to 3 million Euros. If an application is submitted for a single country grant, what is the maximum amount that can be applied for?

A: The Grant Policy Framework states that the project budget must result in outcomes relating to promoting and improving the human rights situation worldwide or in at least two countries. It is therefore not possible to submit an application for a single country grant.

PROCESSING

Q: Why has the MFA decided to apply the principle of 'first come first serve' to this call under the MRF?

A: The principle of 'first come first serve' allows for much shorter waiting periods for applicants after they have submitted their proposal. Within 13 weeks after the application has been submitted an applicant will know whether or not their request for a grant is approved. In addition less capacity is needed from both the ministry as well as civil society in relation to the awarded grants than would be the case with a regular call for proposals. Less proposals will have to be submitted and considered before the funding will be allocated. Of course this means that applicants need to be quicker and some proposals will be rejected, merely for being too late. However, we intend to maintain a high standard with a high threshold. Therefore the quickest applications might not necessarily be approved if speediness stood in the way of quality. With this principle we are aiming for a strong balance between efficiency and quality.

Q: How soon will a decision be reached on my application?

A: You can expect a decision on your application within 13 weeks.

Q: In what order are applications processed?

A: Funds are allocated in the order that applications are received, on the understanding that the total available funds have already been divided over the MRF 2019-2021 themes and that the order of receipt is determined separately for each theme.

Q: May the Ministry of Foreign Affairs ask additional questions even if the application form is complete?

A: Supplementary information will be requested if a proposal cannot be assessed without it. In this case, the date on which the supplementary information is received will be taken as the date of receipt of the application. You should therefore ensure that your application is complete and that you have fulfilled all the requirements as best you can when submitting it. This is entirely the applicant's responsibility.

Q: How are the available funds divided over the different themes?

A: The allocation of funds to each of the themes is set out in paragraph 2.2 of the grant policy framework and in article 2, section 2, of the Order.

Q: Will proposals be considered that focus on themes other than those set out?

A: No. Applications containing proposals focused on other themes will neither be processed nor forwarded to any other unit or ministry, but will be rejected.

Q: If an earlier application applied for most of the available funding under a certain theme, will the available funding be divided between that application and a later application?

A: No, this is not the case. Applications are assessed in the order in which they are received and the available means will be divided accordingly if the applications meet the requirements for a Human Rights Fund 2019-2021 grant. As stated in par. 2.5 of the Grant Policy Framework following the approval of one or more applications for a particular theme, funds amounting to less than €1,000,000 (the minimum amount that can be applied for) may be left over. As the minimum grant amount is €1,000,000, no additional projects can be approved for that theme.

Q: Will the Ministry inform us on the results of the assessment of the proposal in different stages of the process? For example, will we be informed when we have passed the assessment of the threshold criteria?

A: Applicants will be notified if the application

- is considered incomplete;
- fails the threshold check;
- fails or passes the substantive check;
- fails or passes the check on organizational capacity
- is awarded a grant for.

Q: When turning down an application will the Ministry share its assessment with the applicants so it is clear which specific parts or elements should be improved?

A: Yes. When turning down an application the decision will provide information on the (main) reason(s) for doing so. Improvement of the application on those points is necessary in order to enlarge the chances for a possible new application.

REPORTING, PLANNING, MONITORING, EVALUATION

Q: What form of monitoring and evaluation is expected?

A: The requirements in the area of monitoring and evaluation are set out in criterion I.6.

Q: Where can I find the reporting requirements for grants > 1.000.000?

A: The specific reporting requirements will be laid down in the grant decision.

FINANCIAL

Q: What is the relationship between the Human Rights Fund 2019-2021 grant policy framework and other financing modalities offered by the Ministry of Foreign Affairs? Are organisations that are already receiving grant funding on the basis of a different grant round or core funding also eligible for funding from the Human Rights Fund 2019-2021, either directly (as a lead party) or indirectly (as a coapplicant)?

A: Organisations that are receiving funding on the basis of another grant framework may also be eligible for funding from the Human Rights Fund 2019-2021, provided that the application concerns different activities. However, the organisation must meet requirements for financial independence, and in assessing its independence, other income received from the Ministry of Foreign Affairs is taken into account.

Activities of an organisation that is receiving core funding are not eligible for a grant from the Human Rights Fund 2019-2021.

Q: What are the rules for overhead costs?

A: Appendix I to the grant policy framework specifies the costs that must be counted as overhead/indirect costs. The costs indicated for reporting on the project are considered part of the overhead costs if overhead is part of the requested grant. If funding of overhead costs is not requested by the applicant the costs indicated for reporting on the project may still be listed separately in the budget to be covered by the grant.

Q: What is the difference between direct and indirect funding?

A: Direct funding is based on a grant decision of the Dutch Ministry of Foreign Affairs (embassy, MFA department, etc) to the requesting organisation or a contract between the requesting organisation and the Dutch Ministry of Foreign Affairs (embassy, MFA department, etc.). Indirect funding refers to funds received or channeled through an organisation that has a contract with or a grant decision of the Ministry of Foreign Affairs.

Q: Can the ministry give an example calculation for threshold criterion D.5?

A:

Example 1

The requesting organisation's annual report shows that in the most recent fiscal year, the organisation received €1,250,000 of its total revenue from the MFA:

- one €250,000 grant via the embassy in Cotonou (Benin);
- one €900,000 grant via the Multilateral Organisations and Human Rights Department (DMM);
- €100,000 in funding for certain activities through a network organisation that has a contract with the MFA.

The organisation's total revenue in the most recent fiscal year was €1,560,000.

Of this, the MFA therefore provided 80% ($1,250,000 / 1,560,000$). In this case, the requesting organisation will not be eligible for funding through the Human Rights Fund 2019-2021. This is because the percentage of its revenue that it receives from sources other than the MFA is 20%, whereas the minimum required is 25%.

If the organisation receives 20% of its revenue from other sources in year one and 30% in year two, the average of the two years can be used. However, the average must be at least

25%. This calculation is made by dividing the amount of revenue from other sources by the total revenue given in the two most recent annual reports.

Example 2

The requesting organisation forms a consortium with another NGO, which receives a small amount of funding from the MFA (€50,000) and has €150,000 in revenue from other sources. In that case, the consortium will have a total revenue of €1,760,000 (1,560,000 + 50,000 + 150,000), of which €1,300,000 comes from the MFA and €460,000 from other sources. Other resources therefore represent 26.14% (460,000/1,760,000) of the total revenue. Given that the minimum percentage required is 25%, the consortium will be eligible for funding (if approved) through the Human Rights Fund 2019-2021.

If the organisation receives 20% of its revenue from other sources in year one and 30% in year two, the average of the two years can be used. However, the average must be at least 25%. This calculation is made by dividing the amount of revenue from other sources by the total revenue given in the two most recent annual reports.

Q: With reference to threshold criterion D.5 on the application form, can the MFA provide an instance where an organisation would be asked to provide proof of its capacity to manage Human Rights Fund funding?

A: If the requested funding (on an annual basis) is more than twice the organisation's average own income, the organisation must show it can manage Human Rights Fund funding.

An organisation requests a €2,000,000 grant to run for four years. The average amount per year is €500,000. According to its two most recent annual reports, the organisation didn't receive any funding from the MFA. However, the organisation did receive €200,000 on average from other sources. In this case, the organisation is eligible to apply for Human Rights Fund funding, but will also have to show its capacity to manage that funding because the funding is 2.5 times higher than the average funding it managed over the past two years.

Q: Is there a list with "eligible costs" available for activities concerning MRF 2019-2021 applications? If not, is a real estate acquisition considered to be an eligible cost?

A: There is no list with "eligible costs" available. Costs in light of MRF 2019-2021 are divided into direct and indirect costs. Whether a real estate acquisition is considered to be an eligible cost, depends on whether it can qualify as either a direct or an indirect cost. For a definition of what kind of costs could be included under direct and indirect costs, we would like to refer you to this previously published Q&A:

- Q: Could the Ministry of Foreign Affairs please specify the definition of direct and indirect costs of the applicant as meant under I.9 of the application form? What costs could be included under indirect costs that are other than overhead as defined by Appendix I?
- A: Direct costs are cost that can be related directly to specific outputs. For example salary costs from staff directly working for an activity, or ICT costs for setting up a website if this website is indeed an output of the project. Indirect costs are made by the organisation to support activities but are not clearly assignable to specific outputs. For example auditors cost, office expenses, managerial cost, organisation website maintenance. Indirect costs can be seen as overhead.

Q: Could the Ministry of Foreign Affairs please specify the definition of direct and indirect costs of the applicant as meant under I.9 of the application form? What costs could be included under indirect costs that are other than overhead as defined by Appendix I?

A: Direct costs are cost that can be related directly to specific outputs. For example salary costs from staff directly working for an activity, or ICT costs for setting up a website if this website is indeed an output of the project.

Indirect costs are made by the organisation to support activities but are not clearly assignable to specific outputs. For example auditors cost, office expenses, managerial cost, organisation website maintenance. Indirect costs can be seen as overhead.

Q: If it is necessary that staff of the applicant works alongside local partners in order to achieve outputs and outcomes, is it acceptable to count this as direct costs?

A: Yes.

Q: With regards to the additional funding, is it possible to use funding originating from other MFA-funded projects as additional funding to this Human Rights Fund?

A: No, this is not allowed.

Q: Can an applicant send its cost categorization ahead of the application and ask the MFA to approve of that beforehand?

A: No, the general guidelines should help with categorizing the costs. The cost categorization is part of the assessment of the application.

Q: The documentation regarding the Human Rights Fund says the project can start April 1, 2019. Does that mean funding, if approved, can be applied to expenditures already made before the funding is released?

A: Before the date of submission of the grant application, no expenses can be funded from this grant. Any project expenses made between the application and the decision being made will only be funded in case of a positive decision. In case of a negative decision, these costs will not be reimbursed. This follows from art. 9 of the Ministry of Foreign Affairs' Grants Decree, as referred to in chapter 5, par. 1.12 ? of the grant policy framework.

Q: Could the Ministry of Foreign Affairs please list exactly what is included in the remuneration calculation under the eligibility criterion (D.6). Should we count non-taxable health/dental, pension, and other benefits?

A: The mentioned maximum remunerations include:

- * all periodically paid salary, bonus shares and participations,
- * taxable expense allowances (fixed or variable),
- * vacation allowances, end-of-year allowances (13th month salary), pension contributions paid by the employer.

Of course whether or not an expense allowance is taxable depends on your own legal system. You can refer to the three categories from the criterion (salary components, taxable expense allowances and other payments at set times of the year) to sustain your calculations.

Q: Regarding criterion D.6: our organisation is independently managed and funded and we control our own budgets and staffing. However, we are housed in a much larger civil society organisation that is the legal entity under whose authority all of our project's legally binding contracts and agreements are signed. The CEO of this civil society, and our representative legal entity, earns a salary that is higher than the remuneration limit stipulated by D.6. Our proposal would be submitted by this civil society on behalf of us. Would our proposal be in compliance with the threshold criteria?

A: No. For criterion D.6 (remuneration limit) the Ministry takes into account the organisation/legal entity which submits the application and which, in case the application is awarded a grant, will be the grant recipient.

Q: Concerning D.6 Remuneration in the application form, do point a., b. and c. under Re D only relate to senior management staff or to the entire organisation?

A: All these points relate to the individual management and board members of the applicant/lead partner and any co-applicants.

Q: Is there any additional budgetary guidance available to applicants? For example, we would like to know whether there are any particular set thresholds which we should apply under main budget headings, such as Human Resources, Travel, etc.

A: No. The proportion between the budget items on the one side and activities and outputs/outcomes on the other should be balanced, necessary and effective. Exceptions should be explained clearly.

Q: Can an applicant compensate the shortfall to comply with the 25%-requirement (D.5) in the first year with a surplus in the second year?

A: Yes. It is allowed to use the average percentage of both years.

Criterion D.5 states: over the last two years for which auditor-approved annual accounts are available, at least 25% of the applicant organisation's total annual income must have come from sources other than derived directly or indirectly from the budget of the Ministry of Foreign Affairs contributions. Grants awarded under MRF 2019-2021 will not on an average annual basis exceed 75% of the applicant organisation's average annual income (based on the last two auditor-approved annual accounts).

Q: How is 'own income' defined in section D.5?

A: "Own income" within the context of D.5 is defined as all income from other sources than derived directly or indirectly from the budget of the Ministry of Foreign Affairs.

Q: Can an application be submitted for 100% of the project budget?

A: An application can be submitted for 100% of the project budget, as long as the requested subsidy has a minimum of €1.000.000 and does not exceed €3.000.000 and of course the other financial criteria should be met.

Q: If additional financial contributions are required but not yet confirmed in writing, can an application still be submitted?

A: Yes. If contributions are not yet secured an application can still be submitted. In that case it is required that the applicant describes sufficiently how the project's continuity will be guaranteed if these contributions are not secured. This will be assessed with criterion I.8.

Q: Would two annual reports signed and approved by a bookkeeper satisfy the requirement established at paragraph D.5 of the application form?

A: No, an independent certified auditor should approve the annual accounts.

Q: Criterion D.1 states that the lead party of a consortium must be a not-for-profit organisation and there are also financial threshold criteria. Is it possible for a notfor-profit organisation that does not meet the financial threshold criteria to be financially underwritten by a for-profit consortium member that does meet the criteria?

A: No. The threshold criteria are applicable to the legal entities of both the lead applicant and all individual co-applicants.

Q: Section D.5 requires that auditor approved financial statements are required. If the lead entity is exempt from audit according to national legislation - in this case the UK by virtue of size - is it acceptable to provide the unaudited accounts as submitted to the UK Companies House? If not, are there any further options such as a letter from the organisation's accountancy firm confirming they have been prepared according to UK law?

A: Audited financial statements are required under D5, as they can be better relied upon compared to unaudited statements. In case in 2019 the financial statements of 2018 are not available, or available but not audited, the applicant must provide the 2016 and 2017 audited financial statements. However, if audited financial statements are not available for the reason as described in the question, unaudited financial statements could be provided. But with the risk that during the assessment of the grant application, questions on the content of the unaudited financial statements might arise. These questions could lead to delay in the assessment process and/or even to rejection of the grant application.

Q: While the application form states that applying organizations are required to have two year audit reports, we as a coalition have not yet been audited by an external party. However, we have collectively managed over 10 million dollars in funding from key partners like the USG, EU, and French Government. Would recommendations from these donors that verify our financial independence be suffice to replace the audit requirement?

A: It is not entirely clear whether the coalition you mean is one within the meaning of criterion D.3. However, in that case audit reports from the lead applicant and all the co-applicants are required.

Q: D.5 of the application form states: "If the requested grant amount (per year) is more than twice the applicant's average own income, you must satisfactorily establish that the applicant is capable to manage the grant from the Human Rights fund". In case of consortium does "applicant's average own income" mean the average income of all partners of the consortium or the average income of the leading party only?"

A: This means the average income of all partners of the consortium for the total requested grant.

Q: How many details are needed for the budget of year 2 and 3? It is difficult to predict the level of inflation because the countries are fluctuating in vulnerability and are volatile at times. Would it be acceptable if we budget in an increase of 10% for all projects as to cover the inflation?

A: This could be acceptable as long as this increase for inflation is well explained and documented per country.

Q: Do we need to specify in the budget the separate expenses for each country office? And for each region? Or could we all combine the similar line items in one figure within the budget? The country offices are submitting separate budgets which will be combined in one overview for the lead applicant to monitor on. Should we add that overview as an appendix?

A: Yes, these separate expenses for each country office and region should be specified.

Q: With regards to the liquidity forecast, is that for all consortium partners and what period should it cover?

A: The liquidity forecast should cover the period of the project duration. It concerns the project budget expenditure and therefore all income and expenditure related to the activities involved by all consortium partners should be taken into account.

Q: What are the corporate rates for (appendix II)? How and when should they be used as part of the application?

A: These corporate rates are to be used only if you need to convert amounts in any other currency to Euro's. For example in criterion D.5 if your annual accounts are drawn up in USD you will need to use the corporate USD rate to convert the amount to Euro's. Using another conversion rate is not allowed.

Q: In the guidelines it is stated that at least 80% of the total project budget must be intended for the implementation of activities aimed at the overall objective, and the remaining part must also be intended for human rights activities but these do not need to focus exclusively on the overall objective.

Does this mean that you cannot fund any of the running (operating) costs of the organization applying, including the salaries of the employees working on the project?

A: The Ministry of Foreign Affairs can fund those running costs that are required explicitly for the project. For example: the salary cost of a program manager can be included in the budget as direct project costs for the specific percentage of time the program manager is working on this project. Other running (indirect) costs of the organization have to be in a reasonably and healthy proportion to the direct programme costs of the activity.

Q: On page 4 under 2.2 of the Grant Policy Framework it is stated that:

“Under the theme of internet freedom, the aim will be to award at least one grant, provided an eligible application along these lines is received, for activities with the specific objective of enhancing the digital security of human rights defenders from around the world by offering financial support in emergencies and offering organisations guidance in recovering from a digital emergency.”

Does “offering financial support” means the same as “subgranting”, “regranting”, or in other words the “transfer of funds”? Is there also guidance as to how much or what percentage of the funds needs to be “offering financial support in emergencies”?

A: Yes, 'offering financial support' can mean the same as 'subgranting', 'regranting' or 'transfer of funds'. There is no guidance as to how much or what percentage of the funds needs to be 'offering financial support in emergencies'.