



Order of the State Secretary of Foreign Affairs dated November 19 2025, no. BZ2522260, laying down administrative rules and a ceiling for grants awarded under the Ministry of Foreign Affairs Grant Regulations 2006 (Grant Programme: *Focus on Freedom*).

The State Secretary for Foreign Affairs,

Having regard to Articles 6 and 7 of the Ministry of Foreign Affairs Grant Decree;

Having regard to Article 4.2, paragraph 1(g), and Article 4.3, paragraph 1 (g), of the Ministry of Foreign Affairs Grant Regulations 2006;

Orders as follows:

Article 1

For the award of grants pursuant to Article 4.2, paragraph 1(g) and Article 4.3, paragraph 1 (g) of the Ministry of Foreign Affairs Grant Regulations 2006 for activities aimed at capacity strengthening of, service provision by, and dialogue conducted by civil society organisations in or for low- and middle-income countries, on protecting and promoting the human rights and fundamental freedoms of religious minorities and LGBTIQ+ persons, the policy rules annexed to this decision shall apply for the period from the entry into force of this decision up to and including 31 December 2030.

Article 2

1. A ceiling of €84,745,000 applies for the period referred to in Article 1, allocated as follows across the themes:

- a) €34,895,000 for applications relating to the theme of protecting and promoting human rights and fundamental freedoms of religious minorities; and
- b) €49,850,000 for applications relating to the theme of protecting and promoting human rights and fundamental freedoms of LGBTIQ+ persons.

2. Multi-year grants may be granted under the condition, referred to in Article 4:34, paragraph 1, of the General Administrative Law Act, that sufficient funds are made available for this purpose in the relevant budgets.

Article 3

- Applications for grants under the *Focus on Freedom framework* must be submitted between December 15, 2025, at 12:00 CEST and March 9, 2026 at 23:59 CEST, using the model application form as stipulated by the Minister and accompanied by the documents stipulated in that form.¹

¹The application form will be published on <https://www.government.nl/topics/grant-programmes>.

Article 4

1. The allocation of the funds referred to in Article 2, paragraph 1(a) shall be made on the basis of an assessment in accordance with the criteria set out in the annexe to this Order, on the understanding that, out of all applications that satisfy the criteria, the applications that best meet them shall be considered first for grant support.

2. The allocation of the funds referred to in Article 2, paragraph 1(b) shall be made on the basis of an assessment in accordance with the criteria set out in the annexe to this Order, on the understanding that, out of all applications that satisfy the criteria, the applications that best meet them shall be considered first for grant support, within the framework of balanced distribution as referred to in article 8, paragraph 3(d) of the Ministry of Foreign Affairs Grant Decree.

Article 5.

This Order enters into force on the day after the publication date of the Government Gazette in which it appears and lapses with effect from January 1, 2031, with the proviso that it continues to apply to grants awarded prior to that date.

Article 6

This order shall be cited as: *Focus on Freedom Order*.

This Order and its accompanying annexe, excluding the appendices, will be published in the Government Gazette. Appendices to the annexe will be published on the Internet.²

The State Secretary of Foreign Affairs,
on their behalf,
the acting Director-General for International Cooperation,

S. Collet

² <https://www.government.nl/topics/grant-programmes>.

Focus on Freedom
Grant Policy Framework

Table of contents

0.	Definitions	6
1.	Introduction, background and objectives.....	8
1.1	Policy background	8
1.2	Policy principles	9
1.3	Roles and responsibilities of Support Partners and In-Country Partners.....	10
1.3.1	Roles and responsibilities of support partners.....	10
1.3.2	Role and responsibilities of in-country partners	11
1.4	Structure of this grant policy framework and underlying instruments	12
2	Grant activities	13
2.1	Financing activities	13
2.2	Capacity strengthening activities.....	14
2.3	International advocacy at multilateral, international and regional level (by the Support Partner) 14	
2.4	Financial requirements for eligible activities.....	15
2.5	Ineligible activities:	16
2.6	Specific scope of activities by instrument	17
2.7	Monitoring, Evaluation and Learning (MEL)	17
2.8	Inception phase	18
3	Who is eligible for grant funding?.....	19
3.1	Threshold criteria	19
3.2	Financial independence	21
3.3	Organisational capacity and integrity policy	23
3.4	Entities not eligible for grant funding	23
4	Available resources and their allocation	24
5	Eligible costs	24
6	Application procedure.....	25
6.1	Process and timelines	25
6.2	Required documents to be submitted with the application	26
7	Assessment and selection procedure	28
8	Sub-instrument 1: Equal Rights for LGBTIQ+ Persons (LGBTIQ+)	30
8.1	Policy context and objective	30
8.2	Geographical focus	30
8.3	Specific scope of eligible activities	31
8.4	Grant ceiling and application size	33
8.5	Allocation of resources within the instrument.....	33
8.6	Specific quality criteria.....	33
9	Sub-instrument 2: Freedom of Religion and Belief.....	36
9.1	Policy context and objective	36

9.2	Geographical focus	37
9.3	Specific scope of eligible activities	37
9.4	Grant ceiling and application size	39
9.5	Allocation of available resources within the instrument	40
9.6	Specific quality criteria	40
10	Reporting and other grant obligations	43
11	Administrative burden	43
12	Appendices	44

Grant Policy Framework *Focus on Freedom*

0. Definitions

For purposes of this grant policy framework (GPF), the following definitions apply:

Term	Definition
Capacity strengthening activities	Activities aimed at reinforcing the skills and knowledge of local civil society organisations (referred to in this GPF as local CSOs) taking into account their role as service providers and in conducting (critical) dialogue. Capacity strengthening activities may include training, coaching, technical assistance, mentoring, knowledge sharing or the provision of resources to strengthen internal systems and processes.
Coordinating activities	Activities carried out by international or regional civil society organisations that focus on coordinating, connecting and strengthening local civil society organisations in countries where the support partner <u>does not have</u> a local network and the capacity to perform this coordinating role itself.
Dialogue	Purposeful conversations and interaction with governments, informal leaders, religious leaders and/or the private sector at the local, national and regional levels, carried out by local civil society organisations with the aim of raising awareness and promoting policy change.
Service provision	Activities carried out by local civil society organisations that directly aim to improve the welfare or living conditions of individuals, communities and/or community based organisations (referred to in this Grant Policy Framework as ' target communities '). Examples include education, training, psychosocial support, protection or guidance.
Financing activities	The provision of financial resources by the support partner to in-country partners, enabling them to carry out activities that contribute to the objectives of the relevant sub-instrument of this grant policy framework. The activities eligible for funding may include both service provision and dialogue (<i>carried out by local civil society organisations</i>), as well as coordinating and supporting activities (<i>carried out by international or regional civil society organisations</i>).
Gender equality	The equal status and equal treatment of people irrespective of sex, gender identity or sexual orientation, both in society and under the law.
In-country partners	<p>Civil society organisations in low- and middle-income countries (LMICs) as listed by the OECD DAC³ which, with the support of a support partner, carry out activities relevant to the policy objectives within the sub-instruments of this GPF, as well as whose capacities are strengthened by the support partner, or which carry out coordinating and supporting activities.</p> <p>In-country partners include both a) local CSOs and b) international/regional CSOs.</p> <p>Under this GPF, <i>local CSOs</i> and <i>international or regional CSOs</i> are designated separately (see the separate definitions below). The collective term in-country partners is used only when referring to both groups together.</p>

³ <https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/oda-eligibility-and-conditions/DAC-List-of-ODA-Recipients-for-reporting-2024-25-flows.pdf>

Individual applicant	A CSO that independently submits a grant application and is responsible for the full implementation of the programme proposed in the application, within the parameters of this grant policy framework and in compliance with the obligations attached to the grant. In this GPF, it is referred to as support partner.
International advocacy	International advocacy through cooperation with multilateral, international and regional networks, participation in relevant (multilateral) policy fora, and engagement with like-minded organisations and platforms. The aim is to advocate the interests of a specific group, movement, organisation or network in order to address structural causes of poverty, inequality and injustice and to achieve lasting policy improvements. International advocacy activities are only eligible for funding when carried out by a support partner.
International or regional civil society organisation	A CSO that is legally established in, and/or has an operational field office in, a low or middle income country (as defined in the OECD DAC country list), but is part of an international or regional organisational structure with a primarily international or regional mandate and governance. <i>International or regional CSOs may be engaged only in exceptional cases where the support partner has no local network and capacity in the country concerned to perform a coordinating role for local CSOs.</i>
Locally led development	Development in which civil society organisations and communities in low- and middle-income countries (LMICs) as listed by the OECD DAC List themselves set priorities, identify solutions and implement activities.
Local Civil Society Organisation	A CSO that: <ul style="list-style-type: none"> • Is legally established in a low- or middle-income country included on the OECD DAC List, and is thus subject to the applicable (sub-) national laws and regulations; • Operates at (sub-)national or regional level; • And whose actions/activities address (sub-)national issues.
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 was not established by a public authority or has become fully autonomous from the public authority that established it.
Support partner	A CSO that receives a grant to set up and implement its own programme aimed at selecting and carrying out financing and capacity strengthening activities for in-country partners in low- or middle-income countries (LMICs) included on the OECD DAC List, as well as for international advocacy, within the objectives of this grant policy framework.

1. Introduction, background and objectives

This *Focus on Freedom* grant policy framework contains policy rules governing the award of grants under Article 4.2 of the Ministry of Foreign Affairs Grant Regulations 2006 (hereinafter: MFA Grant Regulations 2006)⁴. It is part of the broader Focus policy framework for cooperation with civil society organisations in the field of development cooperation in the period 2026–2030, which encompasses eight instruments in total. One of these instruments is outlined in the Focus on Freedom Grant Policy Framework. A total of €85 million has been made available for implementation, spread over a five-year period. 0.3% of this amount is reserved for a centrally commissioned external evaluation, leaving a maximum of €84,745,000 available for grant awards.

1.1 Policy background

Worldwide, freedom of religion or belief and the equal rights of LGBTIQ+ persons are increasingly under pressure. Religious minorities and LGBTIQ+ persons face discrimination, persecution and violence. Both groups are exposed to risks arising from discriminatory laws, social stigmas and limited access to essential services and legal protection. The absence of effective safeguards undermines not only individual human rights but also democracy and the rule of law in the countries affected. At the same time, international funding for CSOs working to promote and protect human rights is declining.

Focus on Freedom aligns with the broader Dutch policy objectives set out in the *Human Rights, Democracy and International Rule of Law* (MDIR)⁵ policy document and the *Global Multilateralism* policy framework⁶, both of which emphasise the importance of an effective and inclusive multilateral system for the protection of human rights.

The GPF is part of Focus (see Section 1.2) and aims to support CSOs financially and through capacity strengthening so that they are better able to provide the services and engage in the dialogue needed to achieve the thematic policy objectives. In addition, Focus on Freedom allows support partners to receive funding for international advocacy activities. International advocacy is demand driven and carried out in close coordination with local civil society organisations, with the aim of contributing to the objectives of the relevant sub-instrument and promoting policy change at multilateral, international and regional level.

The main objectives of the Focus on Freedom grant framework are:

- 1) **Promoting equal rights for LGBTIQ+ persons:** Ensuring equal access to rights, safety, employment and services is essential to effectively address violence, discrimination and marginalisation.
- 2) **Promoting freedom of religion or belief and protecting religious minorities:** Everyone must be free to choose, change or refrain from any religious or philosophical belief without fear of repression or exclusion.

To achieve these aims, the Focus on Freedom framework comprises two sub-instruments, each tailored to one of the main objectives, with its own thematic focus, target communities and geographic scope. These two sub-instruments are:

- Sub-instrument 1: Equal rights for LGBTIQ+ persons
- Sub-instrument 2: Freedom of Religion and Belief

Chapters 1 to 7 of this grant policy framework apply to both sub-instruments. The instrument-specific policy background, objectives, eligible activities, criteria and geographical focus are elaborated in the chapters dedicated to each sub-instrument (Chapters 8 and 9).

⁴ See Foreign Minister's Regulation of 14 July 2025, no. BZ2518248, amending the Ministry of Foreign Affairs Grant Regulations 2006 on subsidising capacity strengthening of civil society organisations in developing countries (Government Gazette. 2025, no. 25027).

⁵ [Human rights - Democracy - International Rule of Law Policy Document](#)

⁶ <https://www.government.nl/documents/publications/2023/06/08/policy-framework-global-multilateralism>

1.2 Policy principles

The Focus on Freedom grant policy framework is part of Focus, the larger policy framework of the Ministry of Foreign Affairs for strengthening CSOs⁷. Within Focus, certain policy principles apply to all instruments, serving as the frame of reference for the assessment and selection of applications, as well as for the design of the activities to be developed and implemented by applicants.

Capacity strengthening

Enhancing the skills and knowledge of local civil society organisations helps improve both the effectiveness and the efficiency of development initiatives and is therefore a key element of this GPF. Capacity strengthening may cover a wide range of areas, such as programme management, financial administration or the protection of vulnerable groups. It may be achieved through training, coaching or knowledge exchange, with existing local capacity serving as the starting point where possible. This approach is essential to fostering local ownership.

Locally led development

A guiding principle of the new Focus framework (which also encompasses Focus on Freedom) is to promote and enhance local ownership within development cooperation. In the OECD DAC understanding, this means that local actors themselves decide on the design and implementation of development initiatives, while international donors and external partners, including Dutch civil society organisations, play a supportive role in addressing the societal challenges faced by local communities. Such support may include financial or substantive capacity strengthening, facilitating knowledge exchange among local CSOs, or providing access to technological innovations and scientific insights.

Gender equality

Through the sub-instruments under this GPF, the Minister aims to contribute to gender equality. This enhances the social and economic resilience of communities and strengthening the effectiveness and relevance of development cooperation.

Climate

Applicants are invited to include a description and analysis of the climate change context in their project proposal, including an assessment of climate risks and vulnerabilities relevant to the programme.

Conflict sensitivity

The Netherlands wants to prevent at all times that activities funded under this GPF contribute to the escalation of conflict. All programmes must therefore take account of the context in which they are implemented. Activities should be designed to 1) avoid or minimise negative impacts and unintended effects and 2) actively seek to positively improve conflict dynamics and foster opportunities for peace, inclusion and social cohesion. Risks relating to conflict dynamics must be identified as part of the contextual analysis.

This requires the ability to: (i) analyse and understand the operational environment in which activities take place; (ii) translate this understanding into practical implications for implementation and interaction with local actors; and (iii) integrate conflict sensitivity throughout the entire activity cycle and make adjustments as circumstances change. Given the importance the Netherlands attaches to mental health and psychosocial support in fragile states and conflict-affected areas, conflict sensitivity also encompasses diligent analysis of mental health and psychosocial dimensions and dynamics of the work.

Do no harm

The do no harm principle is closely linked to conflict sensitivity: activities financed under this GPF must not have adverse effects on local populations, social relations or broader development goals. Grant recipients are therefore required to identify potential risks at an early stage and take appropriate measures to prevent or mitigate any harmful consequences.

⁷ The main elements of this policy framework have been set out in several parliamentary letters, including those of [11 November 2024](#) (Parliamentary Papers II 2024/25, [36 600 XVII, no. 13](#)), [21 January 2025](#) (Parliamentary Papers II 2024/25, [36 600 XVII, no. 55](#)), [20 February 2025](#) (Parliamentary Papers II 2019/2020, [34 952, no. 87](#)) and [27 June 2025](#) (Parliamentary Papers II 2024/25, [36 180, no. 133](#)).

1.3 Roles and responsibilities of Support Partners and In-Country Partners

This grant policy framework operates through an intermediary structure consisting of “support partners” and “in-country partners” (local CSOs and international/regional CSOs). The support partner acts as the **sole** applicant and grant recipient (not as part of a consortium). The selection of in-country partners takes place during the inception phase. The nature of this structure and the respective roles and responsibilities of both types of partner are outlined below.

1.3.1 Roles and responsibilities of support partners

The support partner:

- is a CSO that receives a grant from the Ministry of Foreign Affairs (MFA) under one of the Focus on Freedom sub-instruments;
- must use this grant received from the MFA for financing and capacity strengthening activities benefiting in-country partners;
- must use this grant received from the MFA to carry out international advocacy activities that support the policy objectives of the relevant sub-instrument and help achieve lasting system change at regional and international level.
- serves as an intermediary between the MFA and the in-country partners;
- operates independently, not under any mandate or instruction from the Ministry, and draws on its own expertise;
- bears full responsibility for the lawful and effective implementation of the funded activities;
- is responsible for identifying, selecting, financing and otherwise supporting local CSOs within the thematic scope of the relevant sub-instrument;
- must ensure timely completion so that all reporting obligations can be met when applying for the final determination of the grant.

In practical terms, these responsibilities include:

- **Recruitment, selection and contracting:** The support partner must establish a transparent and objective selection process in line with the policy objectives of the sub-instrument under which it applies for funding from the MFA. Within this process, in-country partners submit project proposals requesting funding from the support partner. In addition, local CSOs may also request support for demand-driven capacity strengthening.

The support partner uses this process to assess and select in-country partners, including an appraisal of each in-country partner’s organisational capacity, which must be of sufficient quality to qualify for support from the support partner. The support partner is responsible for determining whether the organisational capacity of in-country partners seeking support is of sufficient quality to qualify for support.

As part of the selection mechanism, in-country partners are not permitted to create an additional, third financing layer. This means that in-country partners are not permitted to re-grant or onward disburse the funds they receive to other organizations. The financial flow runs exclusively and directly from the support partner to the in-country partner.

- **Financing:** The support partner provides funding to the in-country partners it has selected for the implementation of project proposals developed by those partners. This includes dialogue and service provision (carried out by *local CSOs*) and coordination and support (carried out by *international or regional CSOs*). This financing is provided independently and under the support partner’s own responsibility. Of the grant funds that a support partner intends to allocate to financing activities, 30% must relate to the financing of service provision, in accordance with Section 2.4.
- **Capacity strengthening activities:** The support partner provides capacity strengthening to the local civil society organisations it has selected, for example through direct guidance, the use of external expertise or funding that enables the partner to procure its own

support (see Section 2.2). The approach is tailored to the needs of the local civil society organisations and determined in consultation with them.

- **Monitoring and accountability:** The support partner is responsible for monitoring the progress and results of its financing and capacity strengthening work, fostering mutual accountability, and reporting to the MFA on the implementation of the funded activities, the expenditure of grant funds, and compliance with grant conditions. The support partner bears overall responsibility for the execution of the funded activities and compliance with all grant obligations, including accountability to the Minister for the use of funds and the delivery of results.
- **International advocacy:** This takes place at multilateral, international and regional level, for example through cooperation with international networks, participation in relevant (multilateral) policy fora and maintaining strategic partnerships with like-minded organisations and platforms.

The support partner therefore uses the grant received from the Ministry of Foreign Affairs for **all** of the following activities:

- a) carrying out the financial management of the support provided by the support partner to the in-country partners;
- b) carrying out funding activities for dialogue and service provision, to be implemented exclusively by local CSOs and;
- c) carrying out funding activities for coordination and support, to be implemented exclusively by international or regional CSOs;
- d) capacity strengthening for local CSOs;
- e) international advocacy in support of the thematic objectives.

The three core activities of the support partner are further explained in Chapter 2. Examples of projects that in-country partners may implement with the funding they receive from the support partner are provided in the sub-instrument-specific chapters (8 and 9).

1.3.2 Role and responsibilities of in-country partners

This GPF (see *Definitions*) distinguishes between the following types of in-country partners:

- **Local CSOs;**
- **International/regional CSOs*.**

*International or regional CSOs may be engaged as in-country partners only if the support partner has no local network and capacity in the country concerned to perform a coordinating role for local CSOs. **Their engagement is limited to one country per application.** Where an international or regional CSO serves as an in-country partner, the support partner may use MFA grant solely for financing activities, not for capacity strengthening (see above).

Both types of in country organisations are selected through the support partner's selection mechanism and have relevant thematic and context specific expertise and networks. Their principal roles and responsibilities are as follows:

Local CSOs:

- receive funding from the support partner;
- receive demand-driven capacity strengthening support where needed;
- are primarily responsible for designing, implementing and reporting on activities within the thematic and geographic scope of this grant policy framework;
- manage the resources received from the support partner with due care and contribute to monitoring, learning and accountability processes;
- deliver services and/or dialogue activities aimed at/with their target communities, including capacity strengthening of end beneficiaries (for example through training);

- do not pass on funds to a third tier (to be prevented by the support partner).

International or regional CSOs:

- receive financial support from the support partner solely to facilitate cooperation with local CSOs and to make use of their networks and coordinating role;
- do not receive capacity strengthening support, but may, where relevant, provide capacity strengthening support to local CSOs. In such cases, they act as third parties engaged by the support partner (with the support partner retaining final responsibility);
- carry out coordinating activities and work with, and in support of, local CSOs;
- contribute to monitoring, learning and accountability processes;
- are equal to local CSOs, but may, based on local presence, networks and expertise, perform a coordinating or supporting role (*primus inter pares*); and
- do not pass on funds to a third tier of local CSOs or other organisations. The role of providing financial support to local CSOs rests solely with the support partner.

1.4 Structure of this grant policy framework and underlying instruments

This grant policy framework consists of two parts:

- General section (Chapters 1 to 7, 10, 11 and 12): This section applies to both instruments of the framework and sets out the general principles, obligations and procedures.
- Sub-instrument chapters (Chapters 8 and 9): Each of these chapters elaborates the particular policy objectives, goals, activities, criteria and timelines for the relevant sub-instrument.

2 Grant activities

Under this grant policy framework, three main types of activity are eligible for funding:

1. **Financing activities** (for a more detailed explanation, see Section 2.1);
2. **Capacity strengthening activities** (for a more detailed explanation, see Section 2.2);
3. **International advocacy** (for a more detailed explanation, see Section 2.3).

2.1 Financing activities

Using the grant provided to the support partner under *Focus on Freedom*, the support partner provides financial support to in-country partners for the implementation of activities relevant to the objectives and thematic priorities of the sub-instrument under which the support partner has been granted. These may involve three types of categories carried out by in-country partners:

1. Services (carried out by local CSOs)

Activities that directly aim to improve the welfare or living conditions of individuals or communities in the target countries (referred to in this Grant Policy Framework as 'target communities'). Examples include:

- Education and training;
- Psychosocial support;
- Legal Aid;
- Protection and/or information.
- In restrictive contexts where community based organisations cannot be formally registered due to security risks and risk of persecution, in-country partners can support these community organizations in contributing to service delivery. This support may include technical assistance (e.g., training, mentoring) and financial support (seed funding) to strengthen their role, resilience, and organizational development.

2. Dialogue (carried out by local CSOs)

Activities aimed at engaging in local and national policy dialogue with governments, religious or informal leaders and/or the private sector in, or focused on, the relevant implementation country in order to raise awareness and encourage policy change that strengthens legal protection for religious minorities, women and girls, young people and LGBTIQ+ persons. In restrictive contexts, local civil society organisations may support community based organisations in contributing to policy dialogue.

Dialogue activities centred on influencing policy within the Netherlands are not funded under the instruments of the Focus policy framework. These activities do not qualify for grant funding, nor may grants awarded under Focus be used to fund such activities.

3. Coordination and support (carried out by international or regional CSOs)

Activities aimed at coordinating, connecting and strengthening local civil society organisations in countries where the support partner does not have a local network and the capacity to perform this coordinating role itself. Support partners may provide funding for this purpose **only to international or regional civil society organizations**, and for no more than one (1) selected country per application.

Examples include:

- Network support and coordination between local organisations;
- Knowledge sharing, technical guidance and collaborative learning.

Support partners must establish selection mechanisms consistent with this framework. These mechanisms should set out clear parameters and directions, while leaving in-country partners sufficient room to make their own choices in line with local context and needs.

Financing activities are carried out by the in-country partner with the active involvement of community members, grassroots movements and other local informal structures, as safeguarded by the selection mechanism used by the support partner.

2.2 Capacity strengthening activities

The support partner provides support, tailored to the needs of the local CSOs, to strengthen their capacity and enhance the effectiveness, autonomy and sustainability of both the organisation and its programme work. This also includes strengthening the capacity of local civil society organisations to support community based organisations in restrictive contexts. Capacity strengthening can take place at three levels:

- **General management:** for example, human resources, financial and operational management;
- **Substantive or technical capacity:** expertise and skills related to the theme and the delivery of services;
- **Dialogue capacity:** the ability of organisations to participate effectively in, or lead, policy dialogue at local and regional levels (as defined in section 2.1).

Such support may be provided:

- **Directly** by the support partner;
- **Indirectly** through third parties engaged by the support partner;
- **Indirectly** through third parties engaged by the local CSO;

Capacity strengthening can take place at several levels:

- **Individual level:** developing the knowledge and skills of staff;
- **Team level:** improving cooperation and internal processes;
- **Organisational level:** strengthening the organisation's structure, leadership, strategy and systems.

2.3 International advocacy at multilateral, international and regional level (by the Support Partner)

The support partner uses the grant received from the Ministry of Foreign Affairs for international advocacy activities that contribute to the policy objectives of the respective sub-instrument. These activities are implemented directly by the support partner and are demand-driven. They take place in close coordination with, and with the active involvement of, local CSOs and complement their local and national efforts. International advocacy contributes to lasting system change and policy impact at regional and international level.

International advocacy includes active participation in policy processes within multilateral, international and regional bodies, such as UN organisations, the African Union/ASEAN or other international platforms and networks in which collaboration takes place to advance the policy objectives of the respective sub-instrument. The aim is to represent the interests of a specific group, movement, organisation or network, address structural causes of poverty, inequality and injustice, and achieve lasting policy improvements. Wherever possible, support partners also represent the interests of local CSOs and target communities, with the aim of strengthening their position in global policy-making. Eligible activities may include, but are not limited to:

- Maintaining and strengthening alliances with international networks, CSOs or relevant private actors;
- Influencing policy by developing position papers, providing thematic contributions to, for example, human rights mandates, reports of UN mandate holders and participating in policy consultations;
- Facilitating the participation of in-country partners in relevant international fora and negotiations, giving local civil society access to international decision-making and influencing processes;
- Identifying and highlighting policy developments, trends and opportunities that support the objectives of this GPF.

These activities are carried out by the support partner, complement the local and national efforts of local CSOs (in the form of dialogue), and contribute to lasting system change and policy impact at international level. Providing information on these activities to the Ministry of Foreign Affairs and to relevant Dutch missions forms an important part of the reporting obligations arising from the grant, as this information enables the Ministry to link its own multilateral and bilateral human rights diplomacy with the programme-level efforts.

International advocacy activities centred on influencing policy within the Netherlands are not funded under the instruments of the Focus policy framework. These activities do not qualify for grant funding, nor may grants awarded under Focus be used to fund such activities.

2.4 Financial requirements for eligible activities

Requirements for support partners:

- **Financial administration costs:** Support partners may allocate no more than 20% of the total (direct and indirect) costs incurred by in-country partners to the financial management of the support they provide.
- **Indirect costs incurred by support partners:** The support partner's own indirect costs may not exceed 15% of its total direct and indirect costs.
- **Mandatory spending ratios for financing activities:**
 - **Service provision** At least 30% of the grant funds that a support partner designates for financing in-country partner activities must be used to support service provision activities implemented by local CSOs.
 - **Coordination and supports:** No more than 10% of the grant funds intended for financing in-country partner activities may be used for coordination or support activities carried out by international or regional organisations. This is limited to one country per (sub)application.
- **International advocacy costs:** The costs that support partners may claim for international advocacy activities at the multilateral, international and regional levels shall amount to a minimum of 12% and a maximum of 20% of the grant funds.
- **Financial independence of support partners:** The requirement regarding the financial independence of support partners is explained in section 3.2.

Requirements for in-country partners:

- **Indirect costs incurred by in-country partners:** Indirect costs incurred by in-country partners (both local CSOs and international or regional organisations) may not exceed 15% of the total of their direct and indirect costs.

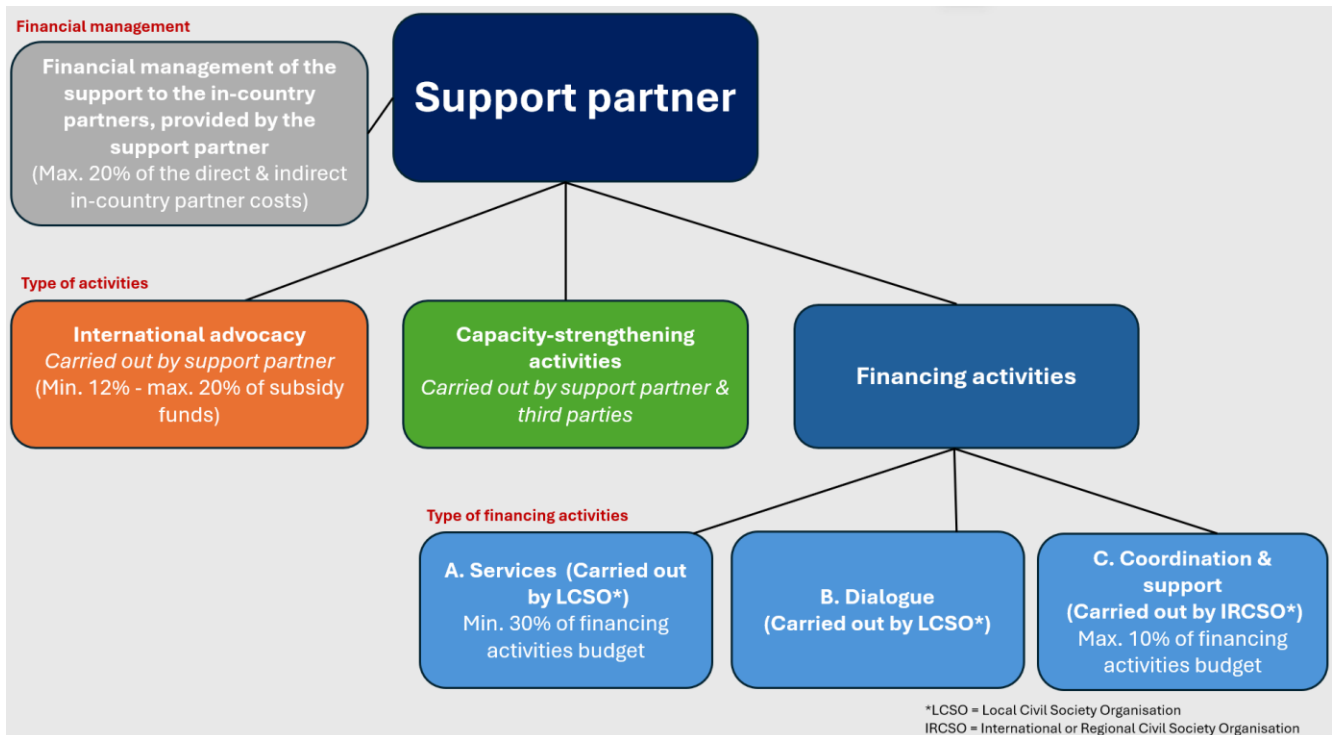


Figure 1: Distribution of activities and funding between support partners and in-country partners

All of the above requirements are further detailed in Appendix 4.1 "Budget Model Manual".

2.5 Ineligible activities:

The following activities are not eligible for a grant under this framework:

- Proselytism;
- Activities that involve racism, stigmatising expressions, antisemitism, or any other form of religious persecution or discrimination that is punishable and/or prohibited under Dutch or European law;
- Commercial activities;
- Activities that already receive funding or a contribution from the budget of the Ministry of Foreign Affairs either directly or indirectly, or from the budget for Foreign Trade and Development Cooperation, to avoid double financing of identical activities.
- Activities aimed at influencing policy within the Netherlands;
- Activities that support or facilitate any of the above.

2.6 Specific scope of activities by instrument

The instrument Chapters 8 and 9 set out the particular requirements for each sub-instrument, including examples of service and dialogue activities for which support partners may provide financial assistance using grant funds and capacity strengthening activities that may be eligible for grant funding.

Grant applications must meet both the general requirements described in chapters 1 through 7 and the sub-instrument-specific requirements (chapters 8 and 9).

2.7 Monitoring, Evaluation and Learning (MEL)

Within the instruments of the Focus policy framework, the aim of Monitoring, Evaluation and Learning (MEL) is to systematically track the progress, quality and results of the funded activities. This enables continuous learning, strategic programme adjustment where necessary, and transparent reporting on the outcomes achieved.

For *Focus on Freedom*, the Ministry of Foreign Affairs (MFA) is responsible for commissioning an external, overarching baseline study and a Mid-Term Evaluation (MTE). The support partner is responsible for output-level monitoring and learning for the entire duration of the grant period. To avoid any misunderstandings: throughout implementation, support partners must meet the reporting requirements that will be laid down in the grant award decisions.

Applicants must submit an initial outline of their MEL system as part of the grant application, as well as explaining how this outline will be further developed during the inception phase in collaboration with in-country partners. During this phase, the MFA will facilitate coordination among the various support partners working under the same instrument, in order to create synergies and, where possible, harmonise indicators.

This system must meet the following criteria (which will be included as an obligation in the grant award decisions):

- The system must be consistent with both the overarching Focus policy framework and the specific instrument concerned.
- Results must be clearly formulated at both the output and outcome level, including the underlying assumptions. Wherever possible, these assumptions should be substantiated with scientific evidence and/or practical experience. Assumptions that lack solid substantiation are actively monitored and examined closely during the programme.
- Appropriate indicators must be defined for the intended results at both the output and outcome level. These must in any case include the following overarching Focus indicators:
 - The number of local CSOs reached through capacity strengthening activities;
 - The total amount of MFA funding (in EUR) provided through a maximum of one intermediary layer (the support partner) to in-country partners;
 - Qualitative: the extent to which the target communities have been involved in developing the programme, reviewing progress and planning activities;
 - Qualitative: the extent to which gender considerations were incorporated in the design, implementation and monitoring of the programme.

The MFA will provide methodological guidance on these indicators after the grant has been awarded, prior to or during the inception phase.

- The MEL system must also set out clearly how in-country partners and target communities are actively involved in the MEL process, while recognising that the MFA will commission the baseline study and the mid-term review externally.
- The MEL approach fosters a learning and adaptive mindset, with regular reflection on progress achieved and the systematic identification of lessons learned for further implementation.

2.8 Inception phase

Once a grant has been awarded, each selected support partner starts with an inception phase. This phase starts on the date specified in the grant award decision as the beginning of the grant period. Support partners are required to submit an inception report on this phase no later than six months after the completion of the inception phase.

Purpose of the inception phase

During this period, the support partner begins applying the proposed selection mechanism proposed to identify in-country partners for the full duration of the activity. New partners may be engaged at a later stage if circumstances require. The support partner also works with the selected in-country partners to develop the programme of activities, in line with the policy objectives and thematic scope of the relevant instrument. The support partner plays a facilitating role in this process, with the nature and form of support defined in consultation with the in-country partners.

Identifying the capacity strengthening needs of local CSOs is a key part of the inception phase, and based on this assessment, the most suitable form of support is jointly determined. This could be direct assistance by the support partner, indirect assistance through external expertise, or by providing funding that allows the in-country partner to procure its own support.

During this phase, the MEL system (Monitoring, Evaluation and Learning) and risk allocation method are also refined and finalised. Where relevant, the Ministry of Foreign Affairs facilitates coordination among support partners operating under the same instrument, with the aim of creating synergy and harmonising indicators.

Outcome of the inception phase

The inception phase concludes with an inception report, setting out the detailed programme design, the preliminary selection of in-country partners and the MEL system. The Ministry will provide a standard format for this report. The inception report shall be submitted no later than six months after the start date. This approval forms the basis for the subsequent implementation of the programme.

Once the inception phase has been completed, the inception report shall be submitted to the Ministry no later than six months after the start of the grant period as specified in the grant award decision. When the grant is awarded, the Ministry will provide further guidance on the inception phase, the applicant's reporting obligations and the associated timeline.

3 Who is eligible for grant funding?

Grant applications are first assessed against the threshold criteria set out in this chapter. Only applications that pass this first assessment proceed to the assessment described in Chapter 7.

3.1 Threshold criteria

An application will be considered for funding only if all of the following threshold criteria are met. Applications that fail to satisfy one or more of the threshold criteria will be rejected and will not be assessed (on quality) any further.

Threshold criteria relating to the applicant organisation (support partner):

D.1 Type of organisation

1) The applicant (support partner) must be a civil society organization (CSO) submitting a grant application independently.

D.2 Financial independence

In the 2022 – 2024 period, an average of at least 25% of the applicant's total annual income came from sources other than the Dutch Ministry of Foreign Affairs. This criterion does not apply to specialist organisations and small southern organisations as referred to in section 3.2. (See section 3.2 for a detailed explanation of criterion D.2).

D.3 Applicant's track record

a) The applicant has at least 10 years of demonstrable experience in providing financial- and capacity strengthening support to local CSOs in low- and middle-income countries (LMICs). This experience must have been acquired within the past 15 years, reference date 1 October 2025.

b) The applicant must have at least 5 years of demonstrable experience⁸ in:

- all policy objectives and themes of the sub instrument to which the grant application relate;
- for applications under the **LGBTIQ+ sub-instrument**: the region(s) targeted by the application; or
- for applications under the **ForB sub-instrument**: the geographic cluster(s) targeted by the application.

This experience must have been gained within the past 10 years, reference date 1 October 2025.

D.4 System for selection, monitoring and risk management of in-country partners

The applicant has an established policy and system in place (applied in the five years preceding 1 October 2025) for selecting and monitoring the in-country partners it supports. This system must include procedures for managing risks relating to finance, governance and integrity in connection with the implementation of activities and the (financial) support provided to those partners.

D.5 Maximum remuneration

As of the start of the grant period, the gross remuneration of each individual member of the applicant's management and governing bodies must not exceed the following annual maxima:

⁸ NB: For no more than one (1) selected country per application, an international/regional civil society organization may be engaged to support cooperation between local civil society organizations and to fulfil a coordinating role. This is only permitted when the applicant does not have local operational capacity and an established network in that country. If such a country is included in the application, threshold criterion D.3(b) does not apply to that country. For further clarification, see the sub-instrument-specific chapters 8.2 and 9.2.

a) Applicants legally established in the Netherlands or other EU Member States

A maximum of EUR 226,000 (gross) per calendar year.

For EU Member States outside the euro area, conversion to euros will be based on the current corporate exchange rates (see Appendix 7) as set by the Ministry of Foreign Affairs.

b) Applicants legally established in the United Kingdom, Norway, Switzerland, Japan, the United States or Canada

Maximum annual gross remuneration per country:

- United Kingdom: GBP 245,536
- Norway: NOK 3,323,529
- Switzerland: CHF 371,194
- Japan: JPY 37,569,305
- United States / Canada: USD 348,469

c) Applicants established in other countries

The maximum annual gross remuneration is the amount determined for the relevant country of establishment, as set out in Appendix 8 of this grant policy framework.

Threshold criteria pertaining to the activities:

D.6 Thematic focus

The proposed activities must align with:

- a) the overarching aim of Focus on Freedom: to provide financial and capacity support to local CSOs so that they can deliver services and engage in dialogue in order to make a direct contribution to the objectives of the instrument concerned (see b), and;
- b) the policy objectives and themes of the sub-instrument to which the application relates, as specified in the sub-instrument-specific chapters (see sections 8.1 and 9.1), and;
- c) international advocacy at multilateral, international and regional level.

D.7 Geographical focus and number of countries

The activities for which funding is requested relate exclusively to the number of countries and the geographical focus as specified in the sub-instrument-specific sections 8.2 and 9.2.

D.8 Duration of activities

The activities for which the subsidy is requested have a duration of 60 months, calculated from the moment the grant is awarded. These activities will commence at the start of the grant period as indicated in the grant award decision.

D.9 Grant amount

- a) The total grant amount requested must fall within the minimum and maximum amounts specified in the relevant sub-instrument-specific chapters (see sections 8.4 or 9.4).
- b) The annual grant amount requested must not exceed the applicant's average annual non-MFA income during 2022–2024, and the total grant amount requested must not exceed five times this average. This criterion does not apply to specialist organisations and small southern organisations as referred to in section 3.2, where a more detailed explanation of this criterion can be found.

- c) At least 30% of the total grant funds that the applicant (support partner) intends to allocate to financing activities shall be used for service provision activities undertaken by local CSOs.
- d) No more than 10% of the total grant funds that the applicant (support partner) intends to allocate to financing activities shall be used for coordinating/supporting activities.
- e) A minimum of 12% and a maximum of 20% of the requested grant amount must be allocated to international advocacy activities carried out by the support partner at the multilateral, international and regional level.
- f) No more than 20% of the total direct and indirect costs incurred by in-country partners shall be used for the financial management of the support provided by the support partner.

D.10 Number of applications per applicant

Individual applicants are eligible for a maximum of one grant under this GPF. If multiple applications are submitted, only the first application received will be considered; all subsequent applications will be rejected.

D.11 Ineligible activities

The application must not include:

- a) Activities that involve or contribute to proselytism;
- b) Activities that involve racism, stigmatising expressions, antisemitism, or any other form of religious persecution or discrimination that is punishable and/or prohibited under Dutch or European law;
- c) Commercial activities;
- d) Activities that, either directly or indirectly, already receive funding or a contribution from the budget of the Ministry of Foreign Affairs either directly or indirectly, or from the budget for Foreign Trade and Development Cooperation;
- e) Activities aimed at influencing policy within the Netherlands;
- f) Activities that support or facilitate any of the above.

In addition to these threshold criteria, applicants must also meet the requirements concerning organisational capacity and integrity policy. These requirements, as well as further explanation of criteria D.2 (financial independence) and D.9b (grant size), are set out in the following sections.

3.2 Financial independence

Threshold criterion D.2 requires that each applicant must demonstrate that, on average at least 25% of its total annual income during the period 2022–2024 was derived from sources **other** than the Dutch Ministry of Foreign Affairs (MFA) to qualify for grant funding under Focus Policy Framework.

'Income from the Ministry of Foreign Affairs' includes:

- a) All direct grants and/or contributions⁹ received from the budget of the Ministry of Foreign Affairs or from the budget for Foreign Trade and Development Cooperation, including funds obtained via organisations mandated by the Ministry such as the Netherlands Enterprise Agency (RVO) or Nuffic (Dutch Organisation for Internationalisation in Education).

Note: Organisations acting as the lead organisation of an alliance or consortium that have received a grant or contribution on behalf of that alliance or consortium may deduct from their MFA income the portion of those MFA funds that was passed¹⁰ directly to other organisations within the alliance or consortium.

⁹ This does not include income from commissioned work.

¹⁰ 'Passing on' funds means transferring funds so that they are deposited in an alliance partner's bank account.

- b) All funds received by an organisation as a member of an alliance or consortium from the lead organisation that received a grant or contribution from the Ministry of Foreign Affairs or the budget for Foreign Trade and Development Cooperation, for activities financed from that grant or contribution.

Applicants that meet this minimum percentage of 25% 'non-MFA income' may receive, per year, a grant or contribution not exceeding the average annual amount of 'non-MFA income' received in 2022, 2023 and 2024. Over the total programme period, this amounts to five times that figure, since grants are awarded for five years. Naturally, no grants will be awarded that exceed the ceiling available for the instrument under which the grant is requested.

To demonstrate compliance with the financial independence requirement, applicants must submit audited annual accounts for 2022, 2023 and 2024. Where this is not possible, the applicant must provide a justification for the absence of audited accounts.

Note: Further information on the documentation required for this criterion can be found in Annex 2.

Applicants that **do not** meet the minimum threshold of 25% 'non-MFA income' (i.e. those that derive more than 75% of their income from MFA grants and contributions) are *not* eligible for a grant under the sub-instruments of this framework. Only organisations eligible for the customised approach (see below) are exempt from this requirement. These organisations may also be eligible for a grant exceeding five times their average 'non-MFA income' in 2022, 2023 and 2024.

Customised approach

Regarding the financial independence requirements described above exceptions are made for specialist organisations and for small southern organisations. For both categories, the requirement that at least 25% of their total income in 2022, 2023 and 2024 must have come from sources other than the Ministry of Foreign Affairs or the budget for Foreign Trade and Development Cooperation does not apply. Moreover, they may be eligible to receive a grant that on an annual basis exceeds the average of their non-MFA income over the past three years.

- 1) In the context of this grant policy framework, a specialist organisation is defined as a civil society organisation that, compared to other organisations working in the same policy area, distinguishes itself in terms of the focus, nature, and scope of its expertise and experience. In order to qualify as a specialist organisations an applicant must meet the following two requirements:
 - a. The organisation has been active for at least 15 consecutive years (reference date 1 October 2025), working on the core theme of the sub-instrument under which it is applying for a grant; and
 - b. The organisation has specialised in that core theme. This must be substantiated through the performance of agreed-upon procedures by the auditor in accordance with the audit protocol (Annex 9), resulting in a report of factual findings under Standard 4400.

Appendix 2 provides instructions for demonstrating compliance with the requirements in (a) and (b).

- 2) Within the context of this grant policy framework, a small southern organisation is defined as an organisation that (i) has been established and is legally registered in a country included on the OECD-DAC list of low- and middle-income countries, and (ii) has an annual staff budget¹¹ not exceeding EUR 500,000. This must be substantiated by the organisation's deed of incorporation or articles of association, and by its most recent audited annual report.

Applicants claiming eligibility for the customised approach on the basis of being either a specialist organisation or a small southern organisation must submit the information specified in Appendix 2 in support of this claim.

¹¹ Expenditure on salaried employees.

Applicants claiming a customised approach as a specialised organisation (see paragraph 3.2) will be required to have the auditor perform the procedures set out in the audit protocol (Annex 9), resulting in a report of agreed-upon specific procedures (Standard 4400). This report does not need to be submitted with the application, but only at a later stage (see paragraph 6.1).

Note: the approval of the threshold assessment, based on the information submitted at that stage, is provisional. If it is subsequently established that the requirements for being recognised as a specialised organisation have not been met, the application will be rejected and will not proceed to further assessment.

3.3 Organisational capacity and integrity policy

To be eligible for a grant under the sub-instruments of this grant policy framework, applicants that have passed the threshold test must also meet the following two requirements, which form part of the subsequent assessment:

1. The applicant is in a position to ensure adequate financial management and can guarantee the effective and efficient implementation of the activities through experience and expertise in relation to activities of the kind for which grant funding is sought.
2. The applicant must demonstrate that it has adopted an integrity policy and has introduced procedures to give effect to that policy. This integrity policy should include pre-employment screening and the necessary procedures to apply the policy. This integrity policy and the corresponding procedures must be designed to prevent, as far as possible, serious forms of inappropriate conduct, including sexual misconduct and racism, towards staff members and others involved in carrying out the proposed activities, whether by the applicant or by other parties engaged in their implementation. In cases where such conduct does occur, the procedures must ensure that it is promptly investigated, that appropriate measures are taken to bring it to an end as quickly as possible, and that the consequences are mitigated. The procedures must be designed to ensure the timely reporting of incidents to the Minister for Foreign Trade and Development.

These two requirements operate in the same way as the criteria of the threshold test: applicants that fail to meet them are not eligible for a grant.

For this purpose, the Ministry of Foreign Affairs uses the Organisational Risk and Integrity Assessment (ORIA) or Partos certificate. Only applicants that have received a positive assessment of the above threshold criteria (see Section 3.1) will be invited separately by the Ministry to submit an ORIA or Partos certificate. The ORIA **therefore does not need to be included with the initial grant application.**

Applicants must submit a fully completed ORIA (including attachments) and a positive assessment of its mandatory components in order to qualify for a grant. Organisations that already hold a valid, positively assessed ORIA or a valid Partos certificate must submit this document instead.

3.4 Entities not eligible for grant funding

Ineligible entities:

- For-profit organisations;
- Government bodies and organisations in which the government is the sole or majority shareholder;
- Intergovernmental organisations;
- Organisations submitting an application as or on behalf of a partnership (alliance or consortium).

4 Available resources and their allocation

For the award of grants under the sub-instruments of this grant policy framework, the Minister of Foreign Affairs has made available a total amount of **EUR 84,745,000**¹² from 1 January 2026 up to and including 31 December 2030, for a grant period of five years (60 months).¹³

The total amount available for grant funding over this five-year period is distributed across the sub-instruments of this framework as follows:

Grant instrument	Total grant ceiling per instrument €	Detailed in
LGBTIQ+	€ 49,850,000	Chapter 8
Freedom of Religion and Belief	€ 34,895,000	Chapter 9

The available resources are allocated per sub-instrument through a grant tender procedure. Applications are ranked according to the results of their qualitative assessment, based on the criteria set out in this grant policy framework (see sections 8.6 and 9.6). Only complete applications that are submitted on time and that satisfy the threshold criteria will undergo this qualitative assessment. The assessment will be based solely on the information received before the closing date and time for submission.

Chapter 7 sets out the general provisions on assessment and selection. The specific allocation mechanism for the available resources under each sub-instrument is presented in sections 8.5 and 9.5, respectively.

5 Eligible costs

Only costs that are necessary for carrying out the activities for which a grant is requested, and which cannot reasonably be covered from the applicant's own resources or from other sources, are eligible for funding.¹⁴

Activities that have already started before the date on which the application was submitted are not eligible for funding, and the costs associated with such activities are therefore also ineligible.¹⁵ Eligible costs are listed and explained in the mandatory budget template to be submitted with the application (see Appendix 4.2 to this grant policy framework).

¹² A total of €85 million has been made available for implementation, spread over a five-year period. 0.3% of this amount is reserved for a centrally commissioned external evaluation, leaving a maximum of €84,745,000 available for grant awards.

¹³ For information: the subsidy period during which the subsidised activities must be implemented starts and ends later than the period to which the subsidy ceiling applies, in view of the established dates for the application and decision-making procedure associated with this grant policy framework.

¹⁴ Article 14 (1), Ministry of Foreign Affairs Grants Decree.

¹⁵ Article 9 Ministry of Foreign Affairs Grant Decree.

6 Application procedure

6.1 Process and timelines

- Applications may be submitted during the application period: **December 15, 2025 – March, 9, 2026**, closing at **23:59 CEST**
 - Applications submitted after the date and time stated above will be rejected. The time at which the application is *received* at the Ministry will be considered the time of submission. The applicant bears full responsibility for ensuring that the application is complete and submitted on time.
- A decision on the threshold assessment will be issued by **April 20, 2026** at the latest.
- Applicants that pass the threshold test will be requested to submit:
 1. ORIA documents; or a valid Partos certificate.
 2. **For specialised organisations applying for a customised approach: the auditor must perform the procedures set out in the audit protocol (Annex 9), resulting in a report of agreed-upon specific procedures (Standard 4400) to be submitted to the Ministry.**

Applicants will have **4 weeks** from the date of this request for information to submit the required documents. Both documents will be assessed concurrently with the substantive evaluation of the application.

Please note: If the assessment of the documents mentioned under 1) and 2) is negative, the applicant will receive a rejection decision.

The decision on whether or not a grant will be awarded will follow by **July 6, 2026** at the latest.

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 because of 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, which may lead to a lower ranking or even rejection.

Applications must be submitted in full and without reservation, legally signed by the person authorised to do so on behalf of the applicant organisation, stating their name and position. Applicants may not submit preliminary applications.

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. Any annexes prepared in another language must be accompanied by an English translation. Additional materials (such as USB sticks) will not be taken into account in the assessment.

*Applications should preferably be submitted by email in .pdf format, with the **budget in Excel format**. Please send email applications to: DMM-focus@minbuza.nl , stating **Focus on Freedom [+ sub-instrument name] grant policy framework**.*

The time that the email is received on the servers of the Ministry of Foreign Affairs will be considered the time of submission. Please note that the email server will reject files larger than 14MB. Emails exceeding this size must be divided into smaller parts. 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 each sent separately by email, the emails must be

numbered, with both the email number and the total number of emails clearly indicated in the subject line.¹⁶

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

Submitting applications by post is discouraged. Applicants who nonetheless choose to submit applications by post or courier or in person should contact the Ministry in good time via the following email address: DMM-focus@minbuza.nl, stating **Focus on Freedom [+ sub-instrument name] grant policy framework**. Please bear in mind post processing times, given that the date of receipt is determined by the time of registration and that MFA does not register post in the evenings and on Saturdays and Sundays.

For the Focus on Freedom grant policy framework, a Q&A document has already been prepared, based on the Q&As for the FemFocus grant policy framework, and will be made publicly available.

A digital information session will be held on 17 December from 11:00 to 12:30 CET, during which the Focus on Freedom instrument will be presented. For access to the information session, please use the following link: [Information session Focus on Freedom](#).

Following this session, written questions may be submitted until 9 January. The aim is to answer the submitted questions no later than 23 January. For more information on the Q&A and the information session, please refer to: [Grant programmes | Government.nl](#).

6.2 Required documents to be submitted with the application

Applications must be submitted using the prescribed formats. An overview of these mandatory documents and formats is provided below.

I Mandatory documents and annexes

To submit a grant application, the following documents and appendices must be provided:

- A. A fully completed **application form**, using the mandatory format in Appendix 1.
- B. The applicant's **articles of association**, demonstrating that it is a civil society organisation, and clearly stating the date and place of establishment as well as the registered office.
- C. A fully **completed Table 1 in Appendix 2**, demonstrating compliance with the threshold criterion on financial independence (see Appendix 2, section 2.A).
- D. **Audited financial statements** for the financial years 2022, 2023 and 2024. For each financial statement, applicants must indicate the page number and section where the information relevant to the financial independence requirement can be found. Where audited financial statements cannot be submitted, the applicant must provide a complete justification explaining why they have not been audited.
- E. The organisation's **track record***, using the mandatory format in Appendix 5.
- F. **Project proposal, including policy principles***, prepared in accordance with the mandatory format (see Annex 3.1 for Equal Rights for LGBTIQ+ Persons or Annex 3.2 for Freedom of Religion or Belief). For the Freedom of Religion or Belief instrument, a separate project proposal must be submitted for each sub-application.
- G. **A budget in Excel**, prepared in the prescribed format (Appendix 4.2). The Excel budget must include:
 - i) a detailed budget for the first twelve months, along with a multi-annual projection for the remainder of the project period;

¹⁶ For example: email 1 of 5, email of 2 of 5, etc.

- ii) a narrative explanation of how the budget figures were calculated (no fixed format);
- iii) all underlying P×Q calculations (no fixed format).

H. A description of the applicant's selection and monitoring process for in-country partners, including:

- (i) Procedures and formats (no more than 1 or 2 examples)
- (ii) Proof of application: Anonymised example of a risk analysis or due diligence investigation of an in-country partner.

*For both the track record submitted for the threshold assessment (Annex 5) and the track record submitted as part of the proposal (Annex 3.1), the Ministry may consult external references regarding the submitted track records in order to carry out additional verifications if necessary

II. Mandatory annexes for applicants claiming eligibility for customised approach in relation to threshold criterion D.2

The following annexes must be submitted only by applicants who claim eligibility for customised approach in relation to threshold criterion D.2 (financial independence), as explained in section 3.2. Such applicants must include the following information with their application (see also the form to be completed in Annexe 2). The Ministry may consult external references related to the submitted track records:

For specialist organisations:

- I. In addition to the track record mentioned under item E above (to be completed in Appendix 5), the applicant must submit an **additional track record** of at least five and no more than ten projects or programmes that focused on the core theme of the sub-instrument for which the organisation is applying for a grant. At least one project must date back more than ten years. This must be completed in Appendix 2, which also provides further explanation on this point.
- J. **Audited financial statements** for the financial years 2020, 2021, 2022, 2023 and 2024. Where audited financial statements cannot be submitted, the applicant must provide a written justification explaining why they have not been audited. The applicant must clearly indicate on which page and in which section of the financial statements the requested information can be found.
- K. **Table 2 in Appendix 2**, duly completed, must demonstrate that at least 80% of the organisation's annual programme expenditures during these five years was spent on activities and interventions related to this core theme. Applicants are required to have the auditor perform the procedures set out in the audit protocol (Annex 9), resulting in a report of agreed-upon specific procedures (Standard 4400). This report will be requested only after the threshold assessment, together with the ORIA or Partos documentation. Applicants will be informed accordingly and given four weeks to submit the required materials. This statement therefore does not need to be included with the initial application.

For small, southern organisations:

- L. The organisation's **articles of association** (see section B above) must show that it is established and legally registered in a country listed as a low- or middle-income country according to the OECD DAC list. If the articles of association do not provide sufficient evidence, a deed of incorporation may be attached to the application as supplementary evidence.
- M. The applicant must also submit its **most recent annual financial statement**, demonstrating that its total staff expenditure for salaried employees of the organisation does not exceed EUR 500,000.

7 Assessment and selection procedure

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.

Assessment of threshold criteria

Applications received on time are processed according to the following assessment and selection procedure. The applicant and the activities for which a grant is requested must first satisfy all the threshold criteria listed in section 3.1 of this grant policy framework. Applications that fail to satisfy one or more of the threshold criteria will be rejected and will not be assessed any further. Applicants will be notified accordingly.

ORIA assessment and customised approach

Applicants whose submission meets the threshold criteria will be notified of this by the Ministry. This notification will always be provisional, given the provisions of paragraph 3.3 regarding the additional documents to be submitted for the Organisational Risk and Integrity Assessment (ORIA), or a valid Partos certificate, for the purpose of assessing the criteria on organisational capacity and integrity policies.

Applicants claiming a customised approach as a specialised organisation (see paragraph 3.2) are required to have the auditor perform the procedures set out in the audit protocol (Annex 9), resulting in a report of agreed-upon specific procedures (Standard 4400). This report does not need to be submitted with the application, but only at a later stage (see paragraph 6.1).

Please note that approval of the threshold assessment, based on the information submitted at that stage, is provisional. If it is subsequently established that the requirements for being recognised as a specialised organisation have not been met, the application will be rejected and will not proceed to further assessment.

Substantive assessment

For the substantive assessment, the MFA uses qualitative assessment criteria, which are set out in the sub-instrument chapters (sections 8.6 and 9.6). These criteria concern the track record, the project proposal (including budget), and the policy principles. The scoring system is as follows:

Component	Maximum score	Minimum score per component
Track record	40	25
Project proposal including budget	60	35
Policy principles	10	6
Total	110	-

To be eligible for a grant, the overall quality of the application must be assessed as more than satisfactory, meaning a minimum total score of **77 points out of 110**. Each individual component must also be assessed as more than satisfactory, meeting the minimum scores listed above. (Note: Merely achieving the minimum score on each component will not necessarily result in a total score of 77 points.) Applications that do not meet these minimum quality standards will be rejected.

The allocation method for each sub-instrument is further elaborated in sections 8.5 and 9.5 respectively.

The decision-making will take place with an eye to account Article 10 of the Grant Decree of the Ministry of Foreign Affairs.¹⁷ The minister may refuse to award a grant if awarding the grant would be incompatible with his policy on foreign relations and development aid; this must concern publicly accessible policy, for example from the explanatory memorandum to the Ministry's

budget, from parliamentary documents, or from policy rules pursuant to Article 6, first paragraph, of the Grant Decree of the Ministry of Foreign Affairs.

8 Sub-instrument 1: Equal Rights for LGBTIQ+ Persons (LGBTIQ+)

8.1 Policy context and objective

Across the world, the human rights and safety of LGBTIQ+ persons are under growing pressure, with this group facing increased discrimination, violence and restricted access to essential services in many countries. This grant sub-instrument supports improved access to equal rights, helps strengthen the position of LGBTIQ+ persons by supporting local CSOs and other actors working on their behalf, improves access to protection mechanisms and services that enhance physical safety, and promotes substantive dialogue with local and national authorities as well as religious and other actors.

The sub-instrument Equal Rights for LGBTIQ+ Persons (hereinafter: LGBTIQ+) aligns with the broader Dutch policy objectives set out in the MDIR policy¹⁷ document and in the Global Multilateralism Policy Framework¹⁸.

The main objectives of this sub-instrument are:

1. Strengthening local CSOs and community based organisations that work to promote the rights, protection and inclusion of LGBTIQ+ persons;
2. Improving access to legal and psychosocial support, a safe environment and protection for LGBTIQ+ persons;
3. Promoting economic and social participation by LGBTIQ+ persons;
4. Fostering inclusive dialogue with relevant actors to improve legislation and reduce social stigma;
5. Supporting advocacy efforts to combat discrimination and advance equal rights for LGBTIQ+ persons.

In doing so, the sub-instrument contributes to the sustainable strengthening of local initiatives that improve the position of LGBTIQ+ persons in both the short and long term. The objectives of this sub-instrument align with the goals of Dutch foreign human rights policy on LGBTIQ+, namely: 1) the decriminalisation of homosexuality and/or diverse gender identities and expressions; 2) the prevention of violence and discrimination against LGBTIQ+ persons; and 3) the promotion of social acceptance of LGBTIQ+ persons. These are also areas in which the Netherlands has built extensive expertise and networks over several decades, and in which Dutch bilateral and multilateral missions have dedicated diplomatic capacity.

For other general policy principles, such as capacity strengthening of civil society organisations and locally led development, reference is made to section 1.2.

8.2 Geographical focus

The Ministry of Foreign Affairs has established a country list for the sub-instrument Equal Rights for LGBTIQ+ Persons, in which countries are grouped per region. Due to the sensitivity of the theme and related security considerations, further information on the country list is made available only upon request from the Ministry of Foreign Affairs (DMM-focus@minbuza.nl) Requests must include the organisation's most recent annual report and articles of association.

To qualify for a grant under the sub-instrument Equal Rights for LGBTIQ+ Persons, an application must cover **at least three and no more than twenty countries. At least 50%** of the selected

¹⁷ [MDIR policy document, 2023](#)

¹⁸ [Global Multilateralism Policy Framework, 2023](#)

countries must be drawn from the country list referred to above¹⁹. Other countries may be freely selected, with the exception of Rwanda, provided that they are in line with the policy objectives described in paragraph 8.1.

Promoting equal rights for LGBTIQ+ persons benefits from regional and cross regional cooperation. Applications covering **six or more** countries must span **at least two regions** as defined in the country list. Applications targeting fewer than six countries shall focus on one region or two regions.

Role of international or regional CSOs

A support partner may engage an *international or regional CSO* in no more than one selected country, and only to support cooperation among local civil society organisations where the support partner lacks its own local network and cannot perform a coordinating role. In all other selected countries, the support partner must have its own local operational capacity and/or an established network and must work exclusively with local civil society organisations.

8.3 Specific scope of eligible activities

Applicants are expected to develop financing and capacity strengthening activities and to undertake international advocacy (see sections 2.1, 2.2 and 2.3). These activities must contribute to the objectives of the sub-instrument as set out in section 8.1.

Financing activities

The support partner provides financial support to in-country partners for the implementation of activities that contribute to the policy objectives of this instrument (see section 2.1). The in-country partners are responsible for developing and implementing these activities, facilitated by the support partner through a transparent application and selection process for financing and supervision of the in-country partners.

Under this instrument, support partners may provide financial support to in-country partners for activities including but not limited to:

- Establishing safe spaces, such as shelters for LGBTIQ+ persons experiencing domestic or intimate partner violence or other forms of violence and persecution linked to their human rights work;
- Providing psychosocial support and legal assistance to victims of persecution, violence or discrimination;
- Facilitating emergency assistance and temporary relocation for LGBTIQ+ human rights defenders;
- Running awareness campaigns and educational programmes that counter stigma and misinformation and increase visibility;
- Conducting dialogue with governments and religious actors to improve policy and legislation and ensure protection.

Note:

Financing activities may cover service provision, dialogue and/or coordination and support by international or regional organisations (see Chapter 2).

At least 30% of the budget requested for funding activities must be allocated to financial support for service provision.

¹⁹ If, due to demonstrable security considerations or risks within the country itself, this proves not to be feasible within the parameters of this sub-instrument, the applicant must, to the extent possible, align as closely as possible with the country list. The applicant must provide a robust justification and analysis of these security considerations in a separate document (maximum 350 words).

Capacity strengthening activities

The support partner assists local CSOs in strengthening their capacity, in line with the general principles described in section 2.2. This support is aimed at increasing the effectiveness, autonomy and sustainability of local CSOs and is not directly targeted at the target communities.

International or regional organisations may, under the conditions set out in section 1.3, be engaged by the support partner or local CSOs as third parties to assist with capacity strengthening for local civil society organisations.

The form of support is tailored to the needs of the local CSOs and is in principle agreed during the inception phase. Specific examples of capacity strengthening within this instrument include but are not limited to:

- Training and capacity strengthening in areas such as governance, financial management, HR, integrity (including SEAH and the prevention of fraud and corruption), MEL and communication;
- Support for organisational development and strategic cooperation;
- Knowledge sharing and facilitating collaboration and networking;
- Training and guidance for allies (such as local policymakers, judges, lawyers and religious actors) to help integrate LGBTIQ+ rights into policy and practice.

International advocacy

The support partner carries out international advocacy activities that contribute to the policy objectives outlined in sections 2.3 and 8.1. These activities take place at the multilateral, international, and regional levels. The budget available for this component is between 12 and 20% of the total grant requested (see section 2.4). In addition to the general guidance in section 2.3, examples include:

- Contributing to monitoring compliance with, and violations of, human rights relating to sexual orientation, gender identity, expression and sex characteristics;
- Organising and contributing to learning activities within and across networks to share and strengthen knowledge and capacities on international advocacy;
- Amplifying the visibility and voices of local partners, activists and target communities in multilateral policy processes, with the aim of strengthening their position in global policy-making;
- Structurally engaging in dialogue with multilateral organisations (such as the UN, EU, AU, etc.) and providing substantive input to shared policy agendas;
- Participating in, and contributing to, national or international campaigns, legal initiatives, events or joint statements aimed at, among other things, countering anti-LGBTIQ+ legislation;
- Sharing knowledge and conducting joint analyses with multilateral and international partners to inform policy development and strengthen the evidence base for LGBTIQ+ interventions;
- Cross-regional cooperation and exchange between in-country partners to strengthen national and international advocacy.

Note:

Applicants must distinguish clearly between financing, capacity strengthening and international advocacy activities carried out by the support partner in their budget.

Please note that when preparing the project budget (see also section 6.2, part G), the respective costs for the three activities listed in this section must be presented separately.

8.4 Grant ceiling and application size

The grant ceiling for this sub-instrument (Equal Rights for LGBTIQ+ Persons) is €49,850,000 for a period starting from 1 January 2026 up to and including 31 December 2030, for a grant period of five years (60 months).²⁰

The size of an application must be at least 33.3% and no more than 50% of the total budget available for this sub-instrument, meaning that a single application must amount to a minimum of EUR 16,616,000 and a maximum of EUR 24,925,000. No more than 3 grants will be awarded under sub-instrument 1: Equal Rights for LGBTIQ+ Persons (LGBTIQ+).

8.5 Allocation of resources within the instrument

In addition to Chapters 4 and 7, the following applies:

Funds are allocated through a grant tender, i.e. on the basis of quality, as described in Chapter 4. The quality of applications is assessed using the qualitative criteria set out in section 8.6. The results of this assessment produce a quality ranking of applications. Applications that do not meet the minimum qualitative standard (i.e. 'more than satisfactory', see chapter 7) are not included in the ranking.

The Minister awards grants in accordance with this quality-based ranking until the grant ceiling is reached. Applications that best meet the qualitative criteria will be awarded first, provided that they meet the minimum quality standard.

If the remaining budget is insufficient to fully fund the next application in the ranking, that application will be partially awarded, using the remainder of the budget. In doing so, account is taken of a balanced distribution of resources across the countries for which applications have been received.

Each applicant will receive a formal decision indicating whether the grant has been fully awarded, partially awarded/partially rejected, or fully rejected. A partial award may be provided if the funds available for this instrument are insufficient to fund all qualifying applications, and/or in order to ensure a balanced distribution of the available resources across the countries concerned. Applications that do not meet the minimum quality standard may be rejected.

8.6 Specific quality criteria

Following a positive outcome of the threshold assessment (see section 3.1), each application is assessed on the basis of the following qualitative criteria.

Part I: Track Record (maximum 40 points)

1. Track record in capacity strengthening (maximum 10 points)

a) The extent to which the applicant has demonstrably experience in strengthening the capacity of local CSOs working to advance equal rights for LHBTIQ+ persons, tailored to the specific needs of these organizations.

b) The extent to which the capacity strengthening measures implemented by the applicant have led to lasting positive change among local CSOs, and the extent to which lessons have been learned from these experiences.

2. Track record in financing mechanisms (maximum 10 points)

The extent to which the applicant has experience in designing and managing systems for the disbursement and accountability of funds to in-country partners, in a manner that allows for transparency, mutual trust and an appropriate degree of ownership and responsibility by these partners.

²⁰ For information: the grant period during which the subsidised activities must be implemented starts and ends later than the period to which the grant ceiling applies, in view of the established dates for the application and decision-making procedure associated with this grant policy framework.

3. Access to a relevant and diverse network (maximum 10 points)

a) The extent to which the applicant has a relevant and diverse network of local CSOs in the selected countries suited to the policy objectives (see section 8.1), demonstrating strong embeddedness in the local context.

b) In the case where the applicant does not have a relevant network of local CSOs in one (1) of the countries covered by the application: the extent to which the applicant is able to identify a suitable international or regional CSO that can, in cooperation with local CSOs, act as an in-country partner in a coordinating and supporting capacity.

4. Track record in advocacy (maximum 10 points)

The extent to which the applicant has experience in advocacy for equal rights for LGBTIQ+ persons within regional, international and multilateral bodies, and has represented the demand-driven interests of local CSOs and strengthened their position in these processes.

Part II: Proposal (maximum 60 points)

5. Context, stakeholder and problem analysis, and proposal including country selection (maximum 20 points)

a) The extent to which the application presents a sound and relevant analysis of the context, stakeholders and problems with due attention to intersectionality and the different target communities.

b) The extent to which the proposed activities logically follow from, and respond to the context, stakeholders and problem analysis.

c) The extent to which the choice of (a combination of) specific countries follow logically from the context, stakeholder and problem analysis and are well substantiated.

d) The extent to which the proposal convincingly explains how the intervention contributes to lasting outcomes.

6. Vision on localisation (maximum 5 points)

The extent to which the applicant presents a clear vision and approach for fostering local ownership, with a transparent division of roles between the applicant and in-country partners (local CSOs and international or regional organisations where applicable) in the design and implementation of the programme.

7. Selection and assessment process of in-country partners (maximum 5 points)

The extent to which the process for selecting in-country partners is thorough, objective and inclusive. It is important that clear procedures are in place for selecting new partners and for reassessing existing partners whose organisational capacity has previously been deemed sufficient to qualify for support.

8. Capacity strengthening for local CSOs (maximum 10 points)

a) The extent to which the proposed approach to capacity strengthening is demand-driven, taking account of the local context and the (to be further defined) capacity needs from local civil society organisations.

b) The extent to which the proposed approach is based on a clear and coherent vision on capacity strengthening.

9. International advocacy (5 points)

The extent to which the advocacy activities to be carried out by the applicant follow logically from the context, stakeholder and problem analysis, and contribute to strengthening cross-regional cooperation and the network of local civil society organisations in an adaptive, evidence-based and demand-driven manner, with the involvement of relevant LGBTIQ+ representatives.

10. MEL system (maximum 5 points)

- a) The extent to which the proposed MEL approach and the associated division of responsibilities for MEL are developed in cooperation with in-country partners.
- b) The extent to which the MEL system is designed to track programme progress, enable transparent reporting, and serve as a basis for timely adaptation of activities within the requirements of this grant policy framework.

11. Risk management (maximum 5 points)

The extent to which the risks for the proposed programme and for all stakeholders have been clearly identified and accompanied by appropriate mitigating measures.

12. Budget (5 points)

The extent to which the requested resources, and their allocation in the budget submitted with the application, are proportionate to the context, stakeholder and problem analysis, the proposed activities and the intended results.

Part III: Policy principles (maximum 10 points)

13. Gender (maximum 5 points):

- a) The extent to which the proposal proactively takes gender relations into account in the relevant context.
- b) The extent to which the proposal promotes gender equality through its proposed implementation, in a way that is appropriate to the local context and target communities.

14. Conflict sensitivity (maximum 5 points):

- a) The extent to which the proposal demonstrates understanding of conflict dynamics in the context of the countries concerned and translates this understanding into a conflict-sensitive programme design and implementation.
- b) The measures taken to ensure that implementation adheres to the Do No Harm principle.

9 *Sub-instrument 2: Freedom of Religion and Belief*

9.1 Policy context and objective

Worldwide, freedom of religion or belief is under increasing pressure. More than three quarters of the global population live in countries where this freedom is restricted. Religious minorities often face discrimination, violence, social exclusion and stigmatisation, and legislation such as blasphemy laws, along with limited access to essential services, further undermines their position in society. Human rights defenders working on freedom of religion or belief are also increasingly at risk.

In many contexts, however, local CSOs and religious actors lack the capacity and resources needed to protect and advance these rights. Interreligious dialogue remains underutilised, despite being crucial in religiously diverse and fragile societies for preventing tensions, polarisation and violent extremism. In many religious communities, women, young people and LGBTIQ+ persons have limited opportunities to participate and are often left out of local decision-making and protection mechanisms.

The global order is shifting, with geopolitical tensions, authoritarian tendencies and conflicts placing growing pressure on human rights, including freedom of religion or belief. In this context, religion is becoming an increasingly important social and political factor. Religious leaders and communities hold authority and possess networks that reach deep into society, enabling them to help rebuild trust, prevent radicalisation and foster social cohesion. At the same time, traditional and religious norms can clash with universal human rights, including gender equality and sexual and reproductive rights. This calls for careful dialogue with religious actors, focused on inclusion and justice.

The main objectives of this sub-instrument are:

1. Strengthening local CSOs and community based organisations that work to advance freedom of religion or belief and protect religious minorities;
2. Promoting inter-, intra- and extra-religious dialogue and cooperation;
3. Reducing tensions, polarisation and the risk of violent extremism in fragile and religiously diverse societies;
4. Enhancing the inclusion of vulnerable groups, including women, young people and LGBTIQ+ persons, within religious communities;
5. Supporting dialogue and international advocacy towards governments to reduce discrimination against religious minorities and strengthen their position.

The sub-instrument Freedom of Religion and Belief (hereinafter: FoRB) aligns with broader Dutch efforts to protect human rights, as enshrined in the MDIR policy²¹ document and in the Global Multilateralism Policy Framework²². Structural cooperation with religious actors is a cornerstone of building lasting and effective Dutch foreign policy.

For other general policy principles, such as capacity strengthening of civil society organisations and locally led development, reference is made to section 1.2.

²¹ [MDIR document](#)

²² [Global Multilateralism Policy Framework, 2023](#)

9.2 Geographical focus

In general, the activities must take place in countries where the needs of religious minorities are substantial and where experience with FoRB programming is already established. To be eligible for a grant under the FoRB sub-instrument, an application must pertain to activities in one or two of the following geographical clusters:

1. Sub-Saharan Africa and North Africa²³
2. the Middle East and Asia²⁴

Applications spanning both geographical clusters listed here must be submitted as two sub-applications.

For each cluster, the (sub)application must cover **at least three and no more than six countries**. Applications consisting of two sub-applications (one for each geographical cluster) shall therefore focus on at least six and no more than twelve countries.

For the FoRB sub-instrument, the Ministry of Foreign Affairs has established a country list for each geographical cluster with priority countries drawn from the broader list included in the footnote. Due to the sensitivity of the theme, further information on the country list is available only on request from the Ministry of Foreign Affairs (DMM-focus@minbuza.nl) Requests must include the organisation's most recent annual report and articles of association.

Each application or sub-application must cover **three** countries from the aforementioned priority country lists, along with up to three optional extra countries per (sub)application. Applicants may select these additional countries at their own discretion provided they belong to the same geographical cluster (as per the footnote) for which the application is submitted.

Role of international or regional CSOs

A support partner may engage an *international or regional CSO* in no more than one selected country per sub-application, and only to support cooperation among local CSOs where the support partner lacks its own local network and cannot perform a coordinating role. In all other selected countries, the support partner must have its own local operational capacity and/or an established network and must work exclusively with local civil society organisations.

9.3 Specific scope of eligible activities

Applicants are expected to develop financing and capacity strengthening activities (see sections 2.1, 2.2 and 2.3) and to undertake international advocacy. These activities must contribute to the objectives of the instrument as set out in section 9.1.

Financing activities

The support partner provides financial support to in-country partners for the implementation of activities that contribute to the policy objectives of this instrument (see section 2.1). The in-country partners are responsible for developing and implementing these activities, facilitated by the support partner through a transparent application and selection process for financing and supervision of the in-country partners.

²³This geographical cluster includes LMICs in sub-Saharan Africa: Angola, Benin, Burkina Faso, Burundi, Djibouti, Ethiopia, Gambia, Ghana, Guinea Bissau, Côte d'Ivoire, Cameroon, Kenya, Liberia, Madagascar, Malawi, Mali, Mauritania, Mozambique, Niger, Nigeria, Uganda, Senegal, Sierra Leone, Somalia, Sudan, South Sudan, Tanzania and Zambia, and in North Africa: Algeria, Egypt, Morocco and Tunisia.

²⁴This geographical cluster focuses on LMICs in Asia: Afghanistan, Bangladesh, Bhutan, Cambodia, India, Indonesia, Laos, Mongolia, Myanmar, Nepal, Pakistan, Philippines, Sri Lanka, Thailand and Vietnam, and in the Middle East: Iran, Iraq, Jordan, Lebanon, Syria and Yemen.

Under this instrument, support partners may provide financial support to in-country partners for activities including but not limited to:

- Promoting interfaith dialogue and cooperation at local and national level to foster mutual understanding, respect and peaceful coexistence;
- Developing and implementing community outreach projects that actively support tolerance, inclusion and mutual respect;
- Establishing media guidance and public campaigns to strengthen a positive social climate around religious diversity and tolerance;
- Encouraging constructive dialogue with governments and religious leaders aimed at improvements in policy and legislation for the protection of religious minorities;
- Contributing to national and international human rights procedures and policy dialogues that advance freedom of religion and belief;
- Providing legal support and psychosocial assistance to human rights defenders and members of religious minorities who are threatened, prosecuted or marginalised.

Note:

Financing activities may cover service provision, dialogue and/or coordination and support by international or regional organisations (see Chapter 2).

At least 30% of the budget requested for funding activities must be allocated to financial support for service provision.

Capacity strengthening activities

The support partner assists local CSOs in strengthening their capacity, in line with the general principles described in section 2.2. This support is aimed at increasing the effectiveness, autonomy and sustainability of Local CSOs and is not directly targeted at the target communities.

International or regional organisations may, under the conditions set out in section 1.3, be engaged by the support partner or by the local CSOs as third parties to assist with capacity strengthening for local civil society organisations.

The form of support is tailored to the needs of the local CSOs and is in principle agreed during the inception phase. Specific examples of capacity strengthening within this instrument include but are not limited to:

- Organising training and sustained capacity strengthening for local CSOs and religious leaders in areas such as good governance, financial management, human resources management, integrity, monitoring and evaluation, and strategic communication;
- Encouraging knowledge exchange and facilitating cooperation and network formation between local CSOs and relevant partners;
- Providing technical support to local CSOs in developing strategies for advocacy and policy engagement;
- Supporting the establishment and strengthening of lasting partnerships and networks, enabling local CSOs to engage in dialogue independently and effect policy change.

International advocacy

The support partner carries out international advocacy activities that contribute to the policy objectives outlined in sections 2.3 and 9.1. These activities take place at the multilateral, international, and regional levels. The budget available for this component is between 12 and 20% of the total grant amount requested. In addition to the general guidance in section 2.3, examples include:

- maintaining and strengthening alliances with international networks, CSOs or relevant private actors;

- influencing policy by developing position papers, providing thematic contributions to, for example, UN mandate holders and participating in policy consultations;
- facilitating the participation of in-country partners in relevant international fora and negotiations, giving local civil society access to decision-making and influencing processes;
- identifying and highlighting policy developments, trends and opportunities that support the objectives of this GPF;
- amplifying the visibility and voices of local partners and target communities in multilateral policy processes, with the aim of strengthening their position in global policy-making;
- structurally engaging in dialogue with multilateral organisations (such as UN organisations, the AU and ASEAN) and providing substantive input to their policy agendas;
- participating in international campaigns or joint declarations that contribute to lasting system change in the domain of Freedom of Religion and Belief;
- sharing knowledge and conducting joint analyses with multilateral and international partners to inform policy development and strengthen the evidence base for FoRB interventions and policy.

Note:

Applicants must distinguish clearly between financing, capacity strengthening and international advocacy activities carried out by the support partner in their budget.

Please note when preparing the project budget (see also section 6.2, part G), the respective costs for the three activities listed in this section must be presented separately.

9.4 Grant ceiling and application size

The grant ceiling for this sub-instrument is €34,895,000 for a period starting from 1 January 2026 up to and including 31 December 2030, for a grant period of five years (60 months).²⁵

Each application within this instrument may cover one or two geographic clusters, with applications relating to two geographical clusters being considered as a single application consisting of two sub-applications.

The geographical clusters are as follows:

1. Sub-Saharan Africa and North Africa
2. the Middle East and Asia

Participants requesting grant funding for activities in both geographical clusters must submit two sub-applications.

The size of an application or sub-application for a geographical cluster is set at 50% of the budget available for this instrument (Freedom of Religion and Belief, FoRB), which amounts to €34.895.000. A single application/sub-application must therefore amount to EUR €17,447,500.

Applications spanning both geographical clusters (Sub-Saharan Africa and North Africa as well as the Middle East and Asia) shall be treated as a single application consisting of two sub-applications. In this case, the total application size will be 100% of the available budget (€34,895,000).

²⁵ For information: the grant period during which the subsidised activities must be implemented starts and ends later than the period to which the grant ceiling applies, in view of the established dates for the application and decision-making procedure associated with this grant policy framework.

9.5 Allocation of available resources within the instrument

In addition to Chapters 4 and 7, the following applies:

Funds are allocated through a grant tender, i.e. on the basis of quality, as described in Chapter 4. The quality of applications is assessed using the qualitative criteria set out in section 9.6.

The qualitative assessment of applications takes place on a cluster by cluster basis (see section 9.2). For each (sub)application for a geographical cluster, a single final score is given on the basis of the established assessment criteria. In applications covering two geographic clusters, each sub-application is given a separate final score. All (sub)applications are then ranked per geographical cluster according to quality. Applications that do not meet the minimum qualitative standard (i.e. 'more than satisfactory') are not included in the ranking.

The Minister awards grants per geographical cluster in accordance with this quality-based ranking, granting the highest-scoring (sub)application per geographical cluster, provided it meets the minimum quality standard of "more than satisfactory" (see chapter 7).

If no applications/sub-applications of more than satisfactory quality are received for a given geographical cluster, no grant will be awarded for activities in that geographical cluster. In such cases, the available funds for that region may instead be used for awarding grants for activities in other geographical cluster. Each applicant will receive a formal decision indicating whether the grant has been fully awarded, partially awarded/partially rejected, or fully rejected.

Applications will be rejected partially or fully if:

- the quality of an application does not meet the minimum quality standard and/or
- in the case of an application spanning two 'geographical clusters, the sub-application for only one region is approved, and/or
- the funds available under this instrument are insufficient to award all qualifying applications/sub-applications.

9.6 Specific quality criteria

Following a positive outcome of the threshold assessment (see section 3.1), each application is assessed on the basis of the following qualitative criteria (in the case of sub-applications: per sub-application).

Part I: Track Record (maximum 40 points)

1. Track record in capacity- strengthening(maximum 10 points)

a) The extent to which the applicant has demonstrably experience in strengthening the capacity of local CSOs in LMICs working to advance freedom of religion and belief, tailored to the specific needs of these organizations.

b) The extent to which the capacity strengthening measures implemented by the applicant have led to positive change among local CSOs, and the extent to which lessons have been learned from these experiences.

2. Track record in financing mechanisms (maximum 10 points)

The extent to which the applicant has experience in designing and managing systems for the disbursement and accountability of funds to in-country partners, in a manner that allows for transparency, mutual trust and an appropriate degree of ownership and responsibility by these partners.

3. Access to a relevant local network (maximum 10 points)

a) The extent to which the applicant has a relevant and diverse network of local CSOs in the selected countries suited to the policy objectives (see section 9.1), demonstrating strong embeddedness in the local context.

b) In the case where the applicant does not have a relevant network of local CSOs in one (1) of the countries covered by the application: the extent to which the applicant is able to

identify a suitable international or regional CSO that can, in cooperation with local CSOs, act as an in-country partner in a coordinating and supporting capacity.

4. Track record in advocacy (maximum 10 points)

The extent to which the applicant has experience in advocacy for freedom of religion and belief within regional, international and multilateral bodies, and has represented the demand-driven interests of local CSOs and strengthened their position in these processes.

Part II: Proposal (maximum 60 points)

5. Context, stakeholder and problem analysis and country selection (maximum 20 points)

a) The extent to which the application presents a sound and relevant analysis of the context, stakeholders and problems, with due attention to intersectionality and the different target communities.

b) The extent to which the proposed activities logically follow from, and respond to, the context, stakeholder and problem analysis.

c) The extent to which the choice of (a combination of) specific selected countries follow logically from the context, stakeholder and problem analysis and are well substantiated.

d) The extent to which the proposal convincingly explains how the intervention contributes to lasting outcomes.

6. Vision on localisation (maximum 5 points)

The extent to which the applicant presents a clear vision and approach for fostering local ownership, with a transparent division of roles between the applicant and in-country partners (local CSOs, and international or regional organisations where applicable) in the design and implementation of the programme.

7. Selection and assessment process of in-country partners (maximum 5 points)

The extent to which the process for selecting in-country partners is thorough, objective and inclusive. It is important that clear procedures are in place for selecting new partners and for reassessing existing partners whose organisational capacity has previously been deemed sufficient to qualify for support.

8. Capacity strengthening local CSOs (maximum 10 points)

a) The extent to which the proposed approach to capacity strengthening is demand-driven, taking account of the local context and the capacity needs of local CSOs.

b) The extent to which the proposed approach is based on a clear and coherent methodological vision on capacity strengthening.

9. International advocacy (maximum 5 points)

The extent to which the advocacy activities to be carried out by the applicant follow logically from the context, stakeholder and problem analysis, and contribute to strengthening cross-regional cooperation and the network of local CSOs in an adaptive, evidence-based and demand-driven manner, with the involvement of relevant religious actors and stakeholders.

10. MEL system (maximum 5 points)

a) The extent to which the proposed MEL approach and the associated division of responsibilities for MEL are developed in cooperation with in-country partners.

b) The extent to which the MEL system is designed to track programme progress, enable transparent reporting, and serve as a basis for timely adaptation of activities within the requirements of this grant policy framework.

11. Risk management (maximum 5 points)

The extent to which the risks for the proposed programme and for all stakeholders have been clearly identified and accompanied by appropriate mitigating measures.

12. Budget (maximum 5 points)

The extent to which the requested resources and their allocation, in the budget submitted with the application, are proportionate to the context, stakeholder and problem analysis, the proposed activities and the intended results.

Part III: Policy principles (maximum 10 points)

13. Gender (maximum 5 points):

a) The extent to which the proposal proactively takes gender relations into account in the relevant context.

b) The extent to which the proposal promotes gender equality through its proposed implementation, in a way that is appropriate to the local context and target communities.

14. Conflict sensitivity (maximum 5 points):

a) The extent to which the proposal demonstrates understanding of conflict dynamics in the context of the countries concerned and translates this understanding into a conflict-sensitive programme design and implementation.

b) The measures taken to ensure that implementation adheres to the Do No Harm principle.

10 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 inability to implement the activities for which a grant is awarded in time or in full, or to fulfil its reporting obligations, including the submission of interim and final narrative and financial reports.

Any funds remaining after the grant award notice has come to an end shall be returned to the Ministry of Foreign Affairs, unless the grant period is extended. An obligation to this effect will be included in the grant award decision.

11 Administrative burden

The administrative burden of implementing this grant policy framework is €75,000 for the total 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. Based on the estimate that a maximum of 60 organisations will submit an application eligible for funding, the total is $60 \times \text{EUR } 75,000$, which represents approximately 5.3% of the total grant budget.

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. In this way, the Ministry aims to keep the administrative burden for applicants to an absolute minimum.

12 Appendices

Appendices published with the GPF²⁶:

Appendix 1: Application form (mandatory format)

Appendix 2: Explanatory notes and form demonstrating compliance with the threshold criterion on financial independence (including customised approach)

Appendix 3.1: Project proposal incl. LGBTIQ+ policy principles

Appendix 3.2: Project proposal incl. ForB policy principles

Appendix 4.1: Budget model manual

Appendix 4.2: Budget model format Excel

Appendix 5: Track record

Appendix 6: Country list

Appendix 7: Corporate rates

Appendix 8: Max. remuneration amounts

Appendix 9: Protocol for accountants

²⁶ [Grant programmes | Government.nl](#)