

FemFocus Q&A – as of 28 November 2025

This document contains the sixth batch of answers, complementing the earlier published questions and answers (also included here). **Additions to the previous version of the Q&A are marked in yellow.**

Questions have been anonymised and combined where possible.

IMPORTANT NOTICE: A few amendments will be made to the grant policy framework in relation to paragraph 3.2

- 1) The Ministry may consult external references regarding the submitted track records in order to conduct additional verification where necessary
- 2) In the grant policy framework is currently stated in paragraph 3.2:
 - i. under b: *applicants will be required to submit an auditors statement confirming that the information in Table 1 of Annex 2 is correct.*

Amendment 28 November 2025: This auditors statement will *not* be required.

- ii. under “Customized approach”: *applicants are required to demonstrate by audited statement that at least 80% of the organization’s annual programme funding in 2020, 2021, 2022, 2023 and 2024 was spent on activities or interventions related to this core theme.*

Amendment 28 November 2025: This requirement concerning an auditors statement for 80% of the organization’s annual programme funding will be *replaced* by a requirement concerning an auditors *Agreed-Upon Procedures Report* of the total programme funding over the mentioned years.

- 3) The changes above result in:
 - i. Amendment of Annex 2 to the Grant Policy Framework. The updated Annex 2 is published today with the announcement of the changes above.
 - ii. Publication of a formal amendment decision to revise the grant policy framework on the forementioned items. Estimated publication date: second week of December 2025.
 - iii. Publication of a protocol for the accountant’s work regarding the applicant’s specification of its annual core theme expenditure. Estimated publication date: second week of December 2025.

Several questions request confirmation of information that is already explicitly described in the FemFocus Grant Policy Framework. To keep this Q&A concise and focused, we do not repeat full text from the SBK. As a guiding principle: if a requirement is not stated in the SBK, it is not part of the assessment.

This applies in particular to:

- cross-cutting themes: if they are not required in the SBK, they will not be assessed;
- minimum or maximum thresholds (e.g. max number of countries to include in a proposal or min or max number of in-country partners to work with: if no range or limit is specified, none applies, and applicants may propose what they consider appropriate;
- roles and responsibilities: support partners are expected to fulfil the roles described in the SBK, and not take on an implementing or any other role that is not described.
- the country list provided in Annex 6; no deviations are allowed. Countries included in the proposals should be on the list.

Applicants are therefore encouraged to rely on the SBK as the definitive source. If something is not included there, it is not required.

General questions

1. Will there be only one submission round?

Yes, for *FemFocus* there is one submission round (submission of full proposals).

2. I am assuming that with “this framework” the Minister implies the “*FemFocus* grant policy framework”, rather than the wider Focus policy framework, which will include several other subsidy instruments?

Correct. The reference is to the grant policy framework *FemFocus*, which forms part of the broader policy framework *Focus*.

3. Will the other instruments under the Focus Framework have similar rules (specially for example on support partners and in-country partners)? Will all be centred around building grant programmes for in-country organisations?

All Focus instruments follow the same policy principles set out in Chapter 1 of the framework. Questions are currently answered only for instruments under the grant policy framework *FemFocus*, not for other instruments.

4. Can an organisation submit an application under FemFocus and also apply to other subsidy frameworks issued under the broader Focus policy? And if so, is the maximum

subsidy limit (5 × average annual non-MFA income 2022–2024) applied per instrument, or across all Focus instruments combined?

Organisations may submit one application under FemFocus and may also apply to other subsidy frameworks under the wider Focus policy. The subsidy cap applies to the overall Focus Framework. The total subsidy granted across all awards may not exceed five times your average annual non-MFA income for 2022–2024 (reflecting the five-year grant period).

This limitation does not apply to specialist organisations or small southern organisations as described in Section 3.2 of the FemFocus framework.

5. Can an organization submit multiple applications within FemFocus, either per instrument or for two different instruments (e.g., one under “Encouraging women’s entrepreneurship” and one under “Women, peace and security”)?

Within FemFocus, an organisation may submit only one application. If multiple applications are submitted by the same organisation, only the first application received will be considered and all later applications will be rejected.

6. Could you clarify whether applications submitted by more than one organisation — for example in the form of a consortium or alliance with a lead applicant and co-applicants — are admissible? And do local CSOs need an INGO to apply?

Applications by consortia or alliances are not allowed. Each application must be submitted by a single civil society organisation (CSO) acting independently as a support partner and meeting all threshold criteria in Chapter 3 of the framework. Local CSOs do not need an international NGO to apply.

7. Questions related to countries that can be included in the proposal:

The MFA does not allow deviations from the published country lists. The list is aligned with the Foreign trade and development aid policy.

For each instrument, only activities in the countries mentioned in Annex 6 of the grant policy framework *FemFocus* may be included. The required minimum number of countries per instrument is set out in paragraphs 8.2, 9.2 and 10.2. This requirement applies to all applicants. There is no maximum, but countries included must be well-justified and logically follow from the context/problem analysis.

The geographic focus states that applications must relate to the countries listed. The term “relate” means that activities must take place in, and be directly relevant to, one or more of the eligible countries listed in Annex 6.

8. Questions about eligibility of a specific organisation

It is difficult to confirm eligibility of an organisation at this stage without full information to assess the threshold criteria for support partners. In this stage it is up to an organisation to consider whether to apply. If your organisation does not qualify as a support partner, you might be a suitable in-country partner to be selected by the support partner.

9. May an organisation that is legally one entity but has multiple thematic departments (e.g. livelihoods, peace, gender) submit one integrated proposal combining themes, or must it choose one instrument only?

An organisation should focus its proposal on one of the three instruments under this grant policy framework. The three themes/instruments may not be combined.

10. Can international or Dutch organisations, including UN agencies, be contracted on a fee-for-service basis to provide technical or capacity-strengthening support under the grant, and would such costs be considered eligible as long as they do not involve re-granting of funds?

Yes, such service contracts are eligible expenditures if they deliver specific outputs and do not involve re-granting of funds.

11. Is a university eligible to apply?

Universities are not eligible to apply, unless they have established a separate legal entity that meets the CSO eligibility requirements and that legal entity applies

12. Does the required five years of experience in capacity strengthening and financing in-country partners need to be demonstrated specifically in the proposed countries, or can it be shown at the organisational level based on broader global or regional experience?

The five years of demonstrable experience under criterion D3.a refers to the organisation's overall, global experience, not specifically its experience in the countries included in the proposed project. However, under criterion D3.b, the organisation must demonstrate at least five years of relevant experience in the policy themes and objectives of the specific instrument for which it is applying, within all countries covered by its project proposal. Additional details, see Q3 under 'Track record related questions' in this Q&A.

13. Have the eligibility criteria and timeline for the upcoming call for in-country partners been published, and where will this information be made available?

After the selection of the support partners, each will develop its own partner-selection process during the inception phase. Details on how, where, and when in-country partners can apply or be considered will therefore be published or communicated directly by the selected support partners, in line with their transparent and competitive selection procedures.

Informal or unregistered groups cannot be funded as in-country partners but are considered part of the target communities.

14. Do in-country organisations need to be formal members of a consortium at application stage, or can they be sub-grantees selected after award?

Applications by consortia are not allowed. The applicant must be a civil society organization submitting a grant application independently. The applicant may select sub-grantees after the grant has been awarded. In-country partners will be contracted by the support partner, after award.

15. Must in-country partners remain in the programme for the full five years, or can new partners be added in for example year 2 or 3?

This depends on the instrument.

- Encouraging Women’s Entrepreneurship: all in-country partners must be selected at the start of the grant period and are expected to be involved for the full five-year duration.
- Combating Violence against Women and Women, Peace and Security: these instruments allow for a more flexible programme design. New in-country partners may be added later in the programme (e.g. in year 2 or 3), as the programme may consist of multiple components with varying durations, adapted to the specific country context and objectives of the instrument.

16. Could you please confirm whether organizations established outside the Netherlands or a low- or middle-income country on the OECD-DAC list are not eligible to apply under Instruments 1 and 3?

That is correct. For the instruments Encouraging Women’s Entrepreneurship and Women, Peace and Security the applicant must be legally established in the Netherlands or in a low- or middle-income country on the OECD-DAC list.

Country offices of international NGOs may apply, provided they are legally established in the LMIC themselves and meet all Chapter 3 threshold criteria.

17. For Instrument 2: Combating Violence against Women & Supporting Women's Rights & Women Human Rights Defenders (CVAW-WHRDs), is there any specific requirement for where the applicant needs to be legally established?

For this instrument (Combating violence against women and supporting women human rights defenders) there is no specific requirement for where the applicant needs to be legally established.

Country offices of international NGOs may apply, provided they are legally established in the LMIC themselves (see Definitions) and meet all Chapter 3 threshold criteria.

18. Came across the *FemFocus* 2026-2030 call for proposals and I wish to know if organizations such as the UN (United Nations Development Programme) located in these countries could apply.

Under FemFocus, the applicant must be a civil society organisation (CSO) (see Definitions). Intergovernmental organisations, such as UN entities, do not qualify as eligible applicants

19. Related to instrument 2, paragraph 9.5: If each proposal must request at least 33.3% of the instrument budget per region, how can there be “remaining funds” to re-allocate?

If, in a given region, no application meets the minimum score, no grant will be awarded in that region. In that case, the funds initially allocated to that region may be reallocated to other regions.

20. Our organisation believes it meets the criteria for a specialist organisation. However, if the Ministry does not agree with this assessment, would our proposal be excluded from consideration altogether, or would it be possible to adjust the requested funding amount to align with the threshold applicable to a non-specialist organisation (as we also meet those criteria)?

No, it would not be possible to adjust the requested funding amount after submission. If you choose to submit as a specialist organisation and the assessment by the MFA does not support this, your application will be rejected and will not be qualitatively assessed.

21. In sensitive contexts, can country names or partner details be kept confidential in the proposal or during implementation?

Country names must be listed in the proposal. Partner names do not need to be included yet. Track record entries may not be anonymised, but this information will be treated as highly confidential. Confidential treatment during implementation is possible where disclosure would create safety risks.

22. Can our organisation's regional offices be considered as in-country partners?

A country or regional office can only count as an in-country partner if it is a separate legal entity, legally established in an LMIC, with its own financial and operational responsibility. If it is not legally independent (i.e. it is a branch of the parent organisation), it is considered part of the applicant and cannot be counted as a separate in-country partner. Legally independent country offices also can act as in-country partners for another support partner/NGO under *FemFocus*.

23. Can we involve diaspora organisations (including those based in Europe/US) in our programme, for example to provide technical support, and can they sub-grant to local organisations?

Diaspora organisations may be contracted as third-party technical providers (e.g. for capacity strengthening) and there is no geographic restriction on where such third parties are based. However, they may not transfer funds onwards to in-country partners. This would create a “third layer”, which is not allowed under the framework.

24. Can the programme be shorter than 60 months, and when may activities start?

Proposed programs may not exceed 60 months in duration and may not start before the day after submission and not before 1 January 2026. The intention of “no more than 60 months” is to clarify that a programme may in any case not be longer than 60 months. Preferably programs do not have a shorter duration than 60 months.

25. How will support partners select in-country partners? Can they pre-identify partners? And is there a limit to the number of in-country partners?

There is no minimum or maximum number of in-country partners. Support partners must have a transparent and objective partner-selection mechanism addressing financial, governance and integrity risks. They may indicate preferred partners in the application, but this is not required and is not assessed. New and existing partners can be in-country partners. Whenever relevant, support partners jointly coordinate during the inception phase to avoid overlap.

26. How much influence does the support partner have on day-to-day decisions of in-country partners

The support partner ensures strategic and financial oversight but not day-to-day management, in line with the framework’s emphasis on local ownership and locally led implementation.

27. May applicants involve international technical actors (e.g. specialist INGOs, UN agencies) as “third parties” for capacity-strengthening? And may applicants already name such actors in the proposal?

Third parties may be contracted to carry out capacity-strengthening activities (e.g. financial management, specialist thematic expertise). This may include UN agencies. Applicants may indicate preferred third parties in the proposal, but this is not a joint proposal, and these actors are not co-applicants.

28. Are there geographic limits or numeric limits on the number of third-party technical providers a support partner may involve?

There are no geographic restrictions and there is no fixed limit on the number of third parties. The support partner should engage third parties only as needed, ensuring coherence, value for money, independence, and appropriate oversight and conflict-of-interest management.

29. Will having a Partos 9001 certificate (ISO certification), or submitting an ORIA, be used as a threshold criterion?

Yes. Both the Partos certificate and the ORIA are ways to show that the criteria concerning organizational capacity and integrity policies are met, which is necessary in order to be eligible for a grant. MFA has separated the ORIA-assessment from the rest of the threshold assessment. This means that only organisations that meet all threshold criteria will be invited to submit the ORIA (or Partos certificate). Applicants that have met the threshold criteria will have four weeks to submit it.

30. For working with subcontracting (in-country partners), is it required that they be registered in the local countries, or can they instead be registered in the Netherlands with operating entities in those countries?

Under the FemFocus Grant Policy Framework, an in-country partner is defined as a local civil society organisation, which means it must be formally registered in a low- or middle-income country (LMIC). Country offices of international NGOs may apply, provided they are legally established in the LMIC themselves and meet all Chapter 3 threshold criteria.

31. In the event of disagreements between the Support partner and in-country partner in implementing the project on any issue, is there a redress mechanism that can be followed should there be difficulty in resolving the situation between both parties?

It is up to the support partner to handle this through sound agreements with in-country partners.

Track record related questions

1. Must the track record reflect only the applying legal entity's own experience, or can experience of the wider network (HQ, country offices, federation) also be used?

The track record must reflect the applying legal entity's own experience. Results from the wider network may be included only if the applicant's own direct role and contribution can be clearly evidenced (this also applies to consortium examples).

2. Must the 5 years of required experience under D3 come from one single 5-year project?

No. The applicant must demonstrate at least 5 years of experience gained in the last 10 years before 1 October 2025. This does not have to be one single 5-year project.

3. Must the track record be from the same countries/region as the proposed intervention?

For threshold criterion D3.a (5 years of experience in financing and capacity strengthening), country overlap with the proposal is not required. For D3.b (thematic experience relevant to the instrument), the experience must be relevant to the theme and countries included in the proposal.

The required 5 year track record in D3.b has to be demonstrated for all countries included in the proposal. If you are applying to two regions (for the instruments CVW-WHRD and WPS), the information provided in Annex 5 must cover both regions and D3b should relate to all countries in the region(s). Annex 5 needs to be submitted only once. You may copy and paste the table if additional project references are needed.

4. Can an organization apply that has the required experience but is newly registered under new name?

Just a name change does not affect eligibility as long as the organization can demonstrate the required years of relevant experience.

MEL related questions

1. Who conducts baseline / mid-term / endline evaluations, and may applicants do additional baselines/evaluations themselves?

MFA will arrange an external baseline and external mid-term evaluation for the instruments under the grant policy framework *FemFocus*. There is no endline evaluation foreseen by the MFA. The applicant is free to organise additional baseline, mid-term and end evaluations, but this is not an obligation.

2. Is there a standard FemFocus result framework and which indicators apply?

The MFA has not developed a FemFocus Result Framework. Appropriate indicators must be defined for the intended results at both the output and outcome level. These must in any case include the overarching Focus indicators defined in paragraph 2.5.

3. Do we have to report only on output level or on output + outcome?

The MFA requires output-level monitoring. However the result framework should include both output and outcome level indicators as the central baseline and mid-term evaluation will measure outcomes.

4. When will the MFA baseline start?

Once the intervention logic and activities are clearly defined, the baseline will start, either during the inception phase or shortly after.

5. May we include cross-country / cross-regional peer learning?

The applicant is responsible for monitoring and learning for the duration of the grant. This can include cross-regional sharing and learning.

6. What level of MEL detail is required at proposal stage vs. inception phase?

At proposal stage: provide a clear outline of your MEL system and describe how you will further develop it with in-country partners.

During inception: you will co-design the full MEL system (including output and outcome indicators) with in-country partners.

7. Are additional programme-specific baselines / evaluations eligible cost items?

The MFA will conduct an external baseline and mid-term evaluation. Costs related to programme specific research and evaluation can be included in the MEL budget of the programme.

8. Will there be a final end-evaluation?

There is no endline or final evaluation planned, nor requested from partners.

9. What does 'fostering mutual accountability' mean?

The applicant is expected to implement the monitoring of the programme's progress and results in close collaboration with in-country partners and end-beneficiaries/right holders, fostering as much as possible shared ownership over and accountability for results.

Finance related questions

1. Is the Annex 8 salary cap per year or for the full programme, and does it apply to all staff or only management?

The salary cap in Annex 8 applies per annum, not for the entire programme period. It concerns the annual gross remuneration of individuals in the applicant's management and governing bodies only, not all staff working on the project.

2. Do activities such as business capacity strengthening and training, technical skills development, knowledge sharing/peer learning networks and apprenticeships count towards the minimum 30% service provision requirement?

Yes, provided they directly benefit the end-beneficiaries/rightsholders and contribute to the objectives of the relevant FemFocus-instrument.

3. Is there any cost-share or co-funding requirement?

There are no cost-sharing or co-funding requirements.

4. Could you clarify the minimum and maximum budget amounts that can be requested per instrument?

Only the instrument Encouraging Women's Entrepreneurship applies a minimum and maximum budget range. The other two instruments use a fixed budget amount per region.

1. Encouraging Women's Entrepreneurship

Applicants must request between 33.33% and 50% of the total instrument budget.

This corresponds to a grant request between €18,260,055 and €27,417,500.

2. Combating violence against women and supporting women human rights defenders

Applicants may apply for one or two regions. An application for two regions counts as one application with two sub-applications.

Per region: 33.3% of the total instrument budget of €114,655,000 (€38,180,115 per region)

Two regions: 66.66% of the total instrument budget (€76,360,230 total)

3. Women, Peace and Security (WPS)

Applicants may apply for one or two regions. Two regions count as one application with two sub-applications.

Per region: 33.3% of the total instrument budget of €39,880,000 (€13,280,040 per region)

Two regions: 66.66% of the total instrument budget (€26,560,080 total)

5. Selection of country partners will happen during the inception phase, but the budget guidelines specify that indirect costs for them need to be based on their ledger accounts. Does it mean that we will need to select some partners at the proposal stage?

No. The formal selection and contracting of in-country partners will take place during the inception phase. Indirect costs may be estimated initially. After partners are selected during the inception phase, an updated budget based on actual figures must be submitted.

6. In multi-country programmes, may support partners allocate different proportions of the budget per country based on partner capacity and context, or must the distribution be broadly balanced?

Yes. The budget does not need to be evenly distributed across countries. Support partners may allocate different proportions based on the specific context, needs and capacity in each country.

Please note that the assessment will explicitly consider whether the requested resources - and their allocation - are justified and proportionate to the context, stakeholder and problem analysis, the proposed activities, and the intended results.

7. The framework (Section 2.3 and D.11) says activities that “directly or indirectly” already receive MFA funding are ineligible. Could you clarify what “indirectly” means? Does this only refer to activities funded through other MFA instruments (e.g. FLOW / Power of Voices / RVO), or also to activities implemented by in-country partners that already receive MFA funds through other programmes? And are activities still eligible if they have distinct objectives, separate funding, and only build on lessons learned without duplicating funding?

‘Indirectly received funding’ refers to funding currently being received for the same activities executed at the same location as those included in the application. “Indirectly” means that the funding is not received directly from the Ministry of Foreign Affairs (MFA), but from another party that receives MFA funding for this purpose—for example, a consortium partner in an existing MFA-financed project or through the Netherlands Enterprise Agency (RVO). Activities carried out by in-country partners that themselves already receive MFA-funding through another programme or instrument also cannot be included in the application. The rationale for this exclusion is to prevent double funding of the same or overlapping activities.

8. How will MFA assess and document potential “indirect overlap”? Will there be a self-declaration by applicants or a formal screening at threshold stage?

Appraisal of 'indirect overlap' is an integral part of the assessment. In cases where indirect overlap seems to exist, applicants are kindly invited to explicitly elaborate on this matter in their application (as a part of the program proposal).

9. What is the expected funding range for multi-country regional consortia?

Applications from consortia are not allowed.

10. How should the minimum 30% service delivery spending requirement be demonstrated within the budget template?

The Model Budget includes a budget line for expenditure related to service delivery. These costs are presented under B.I.1 Financing of project activities via service delivery (under programme costs of in-country partners). In the financial requirement dashboard (first sheet) it will be visible whether it fulfils the minimum of 30% of direct programme costs of in-country partners.

11. Will the financial independence threshold criterion be applied across the Focus instruments?

Yes. All Focus-instruments will be subject to the financial independence threshold criterion.

12. Is there a recommended budget range we should consider when applying, or should the requested amount only be determined by roles, planned activities, and actual needs and expenses (as described in Annex 4.1)?

Budget requirements differ for the three instruments. They are stipulated in chapters 8, 9 and 10 of the Grant Policy Framework.

13. Can part of the budget be allocated to strengthen the applicant's institutional capacity in financial management, digital safety, and monitoring, as part of the “demand-driven capacity strengthening” component?

No. The “capacity strengthening” budget is for strengthening the capacity of in-country partners, not for strengthening the applicant/support partner itself. Themes such as financial management, digital safety and monitoring can be funded only when they are directed at (and delivered to) in-country partners.

14. For applicants legally based in an LMIC where international bank transfers are restricted: can they route transfers through an intermediary in a third country (e.g. an EU country)? And if direct transfers are not possible, may alternative transfer modalities be used with prior MFA approval?

If these alternative modalities are also subject to risk-analysis, internal control and an audit this is allowed.

15. To what extent can the Support Partner's "recruitment, selection and contracting" role (1.3.1. of the grant policy framework) be carried out by a third party? Such as affiliated entities within the same international group? Referring also to how this is written down for the "capacity strengthening" role.

This is a core responsibility of the support partner and cannot be outsourced. The framework only foresees the use of third parties in the context of capacity-strengthening activities. Recruitment, selection and contracting of in-country partners (Section 1.3.1) must be carried out directly by the support partner itself.

16. Referring to the provision on page 22 of the English Grant Policy Framework, if an application is submitted shortly before the holiday break (such as 19 December) will the Minister still have sufficient time, considering the holiday period, to make use of the discretionary power to request a supplement should the application not fully meet the formal requirements?

The shorter the period between handing in the application and the submission deadline, the smaller the chance that MFA can make use of the discretionary power to request for supplements.

17. Applicants legally established in the United Kingdom can have a maximum annual gross remuneration of GBP 245,536. Our income is around €900,000 annually, does this mean we cannot apply?

The annual gross remuneration refers to the maximum amount board and management members of the applicant organisation may earn. In terms of requirements, there is no direct relationship between the maximum remuneration set by MFA and the organisation's annual income. However, as stipulated in the Grant Policy Framework (paragraph 3.2) the requirement concerning the maximum amount requested for the project does relate to the annual non-MFA income of the organisation.

18. Would the maximum remuneration apply to the director of an organisation and its senior management staff or to the President, Provosts and Trustees of the University (or both)?

The requirements on maximum remuneration apply to financial compensation the applicant organization provides to all board and management members of the applicant organisation.

19. Could you please clarify the difference between the grant amount and the maximum remuneration for a UK Applicant?

The maximum remuneration refers to the maximum remuneration board members and management may receive in order for the applicant to be eligible. This does not relate to the total grant amount an organisation can receive for activities.

20. Approximately how many grants do you plan to award under this call?

There is no predetermined number of grants to be awarded under this call. Each instrument has a defined total budget ceiling and specifies either a fixed amount or a range for individual grant applications. For further details, please refer to the relevant policy instrument chapters.

21. As grant holders, are we required to establish a mechanism/process to select local organizations? Are there any specific regulations we need to consider for this process apart from the ones mentioned in the call?

Yes. Support partners must have a transparent and objective mechanism (in place) for selecting in-country partners. The support partners existing mechanism can be used if it meets the requirements described in sections 1.3.1 and 2.1 of the Grant Policy Framework. The process must ensure objectivity, inclusivity and an assessment of partner capacity. No additional regulations apply beyond those specified in the framework.

22. In cases where organisations apply an internal funds transfer (sub-granting) rate to partners, would the Ministry consider this eligible and acceptable under the applicable financial provisions?

No. Applicant organisations should follow the approach laid down in the Grant Policy Framework. For the financial management of the support provided to in-country partners, under *FemFocus* support partners may claim a maximum of 20% of the total direct and indirect costs claimed by in-country partners.

23. We don't fully understand the intention of the 'Administrative costs' (point 12, p. 30 in the Staatscourant) and the wording "costs associated with information obligations in connection with submitting the application and, if the subsidy is granted, complying with the associated accountability obligations." Is this intended for applicants, or grantees, or for the MFA's own administrative costs?

This section in the Grant Policy Framework is for informational purposes only. It aims to clarify the administrative costs associated with an application. Under this programme the costs are estimated at EUR 75,000. These costs will not be reimbursed. Neither in case the grant is awarded, nor when the application is rejected.

24. How many project audits are mandatory – one per year it seems?

Normally indeed yearly audits are obliged accompanying the (financial) reports agreed upon.

25. When calculating the maximum budget that can be requested, should the budget for the in-country partner be taken into account? For example: the subsidy instrument for female entrepreneurs requires an application of 18 million euros. 20% is for the support partner (3.6 million euros). Does the support partner (the applicant) then need to have at least 72,000 euros of its own funds (3.6/5), or 3.6 million euros (18/5)?

The maximum budget that can be requested relates to the total grant amount applied for, not only on the portion (20%) of the support partner. So 3.6 million ((18/5) is correct.

26. Financial management costs may not exceed 20% of the total direct and indirect costs. Indirect costs may not exceed 15% of the total direct and indirect costs. Does this mean that the support partner can allocate max 35% of the total direct and indirect costs for financial management and indirect costs?

No. These two percentages cannot be added together. The 20% ceiling for financial management costs already includes both direct and indirect costs related to financial management.

27. Paragraph 1.3.2 states that in-country partners may not onward finance. What if they want to hire expertise outside of the support partner's services?

That is allowed. The restriction in paragraph 1.3.2 concerns providing further financing to another layer to implement the activities. In-country partners may contract third-party expertise for capacity strengthening, as long as this supports the implementation of their own approved activities and aligns with the objectives of the grant.

28. Throughout the programme's runtime, local partners may submit applications to the support partner. Will it be allowed to make multiple successive grants to the same local partner? For example, would providing 2 successive grants of 2 years each to the same local partner be permitted?

Yes, provided double financing of the same activities is avoided. Note: this scenario (successive shorter grants to the same in-country partner) only applies to the two instruments where shorter project grants are possible: CVAW-WHRD and WPS. Under Encouraging women's entrepreneurship all in-country partners are selected at the start of the inception phase and are foreseen to stay on board for the full 5-year duration.

29. Are there any additional guidelines or examples available to help us develop the financial model beyond what is included in the annexes?

The guidelines in annex 4.1 give a detailed description. Annex 4.2 provides a standard and mandatory Excel format to use when developing the financial model.

30. If submitting one application covering two regions (e.g. West Africa + MENA) under this instrument, can you confirm the budget applied for would be €76,360,230 total (i.e. €38,180,115 per region), and not €38,180,115 shared across both regions?

Correct; see the answer on question 4 of the finance-related questions.

31. Page 10: “funds received from the Ministry of Foreign Affairs must be used exclusively for financing and capacity strengthening activities benefiting in-country partners.” Does this mean that “recruitment, selection and monitoring”, as well as “monitoring and accountability” activities are not eligible costs?

Costs for recruitment, selection and monitoring, as well as monitoring and accountability activities would fall under the 20% "fund management" costs. Please refer to the Model Budget guidelines in Annex 4.1 section A.I.1.

32. Are there eligibility criteria regarding the applicants’ financial capacity, in particular about a minimum annual income?

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 the instruments of this grant policy framework. Further details on this criterion (including exempts from this requirement) may be found in section 3.2 in the grant policy framework, as well as in Annex 2.

33. Our organisation has an annual staff budget 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 financial report. Could this annual staff budget be average over the last few years? Does this “Staff budget” include all employees, or only local salaried employees (i.e. no expatriate)?

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 Annex 2 in support of this claim.

The ceiling of an annual staff budget of EUR 500,000 refers to the most recent financial year, not to an average over several years. The staff budget should include all personnel costs of the organisation, both local and, if applicable, expatriate or international staff, as reported in the most recent audited financial statements. The amount represents the organisation’s total annual expenditure on staff, including salaries, social security contributions, insurance, and other employment-related costs, irrespective of the employee’s nationality or contract type. The purpose of this criterion is to ensure that the organisation’s overall size and administrative capacity correspond to the definition of a small southern organisation.

34. Should the proposed budget include allocations for activities to be implemented in other countries participating in the program? If so, is there specific guidance on the percentage or proportion of funds to be allocated per country?

Each instrument has a required minimum number of countries to be included in the proposal (please refer to chapter 8, 9 or 10 within the grant policy framework). In the mandatory Model Budget format in Excel (Annex 4.2), costs should be allocated to each country where activities are planned to be carried out. Costs should logically be derived from the context- analysis and proposed activities.

35. Is the following assumption correct: MFA income is defined as income directly coming from MFA, but also indirectly (for instance through a consortium lead for instance, or in case we are technical partner)?

Correct. Refer to the definition in the Grant Policy Framework, section 3.2.

36. Criterion 11 budget: Can the narrative justification be included in the 3.2 annex or should it be presented as an additional annex (free format)?

The narrative justification can be presented as an additional appendix (free format).

37. Do we need to submit 1 budget per region under Instrument ‘Countering violence against women and supporting women's rights and WHRD’?

No. Only one budget should be submitted per application.

38. Is there a maximum number of words per cell for Column O ‘Budgetary Notes’?

No. However, a narrative justification of the budget can also be submitted as a separate appendix (free format).

39. There's a discrepancy between the results included in the budget template (3) and the sub objectives/result areas mentioned under 9.1 of the Grant Policy Framework (p.31) (4). You seem to have copied the policy objectives and not the result areas. Please clarify.

There is no discrepancy between the results presented in budget sheet (3) and the objectives mentioned in section 9.1 of the Grant Policy Framework. When you select an instrument in budget template sheet (2), it will automatically appear in sheet (3). The three objectives listed in paragraph 9.1 are: 1. combating violence against women and girls, including sexual and gender-based violence. 2. Providing treatment and support to women and girls who are victims of such violence. 3. Supporting women's-rights defenders and women human-rights defenders.

40. Sheet 1 – there are conflicting instructions to provide PxQ costs to the level of staff members and staff categories – which should we follow?

This question is unclear, we don't see any conflicting instructions.

41. Is there a list of Auditors that the MFA has accredited for use by all applicants in the post-'Threshold Assessment' phase? Or are applicants at liberty to use their Auditors as long as they have fulfilled certain criteria stipulated by the MFA?

The applicants are free to use their auditors as long as they are certified auditors and fulfil certain criteria stipulated by Dutch MFA.

42. Could you confirm whether “audited annual accounts for 2022, 2023 and 2024” refers to calendar-year accounts (1 January - 31 December) or to audited fiscal years (1 July – 30 June, e.g., FY2021/22, FY2022/23, FY2023/24)?

This refers to calendar years.

43. Annex 4.2 model budget: Where do we budget direct staff costs and other direct project costs for the in-country partners under B.1? Can they be included in lines B.I.1 and B.I.2? By direct project costs we mean for example: direct office costs, travels related to implementation, equipment, MEAL, local audits, etc.

Yes, they can be included in line B.I.1 and B.I.2.

44. Annex 4.2 model budget: Sheet 2 and 3, why are some cells black? Does that mean we should not fill them in?

The black cells may not be filled.

45. Annex 4.2 model budget: At the bottom of the model budget, there is a table with different income sources. Is this a requirement?

Yes, filling in the different income sources is a requirement.

46. We seek clarity on how the 20% maximum restriction is to be calculated. Our understanding is that the total Support Partner costs (so both sections A.I.1 and A.I.2 combined) would be limited to 20% of the total In-Country Partner costs. Is this correct?

No, 20% maximum restriction for the fund management costs (A.I.1) are calculated on (sum) B.I and B.II. A.II.2 costs are other direct costs for Support Partners that are not included in fund management costs.

47. For organisations with mixed funding from MFA and other Dutch government agencies (e.g. RVO, Nuffic), how should those be counted in the 25% non-MFA income requirement? Can in-kind contributions or unrestricted private donations count toward the 25% “non-MFA income”?

Funding received from other Dutch government agencies, such as RVO, Nuffic, or other implementing agencies originating from the Ministry of Foreign Affairs, must be counted as MFA-income. Only income from non-MFA sources, such as: other governments, multilateral organisations, private foundations, private sector partners, membership fees, and unrestricted private donations can count towards the required 25%. In-kind contributions may be included only if their value is verifiable (based on accounting standards) and recorded in the organisation’s audited financial statements.

48. Are indirect cost ceilings (15% for support partner; 15% for in-country partners) calculated on total or eligible direct costs?

Both the support partner and the in-country partners have an indirect cost cap of 15%. It is calculated as follows: (indirect costs) divided by (the sum of indirect and eligible direct costs for this partner*). *Either support or in-country partners.

49. Could you please confirm that if an organisation likes to apply for 2 proposals (1 per region) for 1 Instrument, it will need to submit (next to 2 proposals for the Instruments) also 2 different Budgets (Annex 4.2)? Due to different prices, context and circumstances, budgets will need to be able to be formulated differently per region.

No, this is not correct. If an organisation wishes to apply for two regions under the same instrument (only possible for the instrument WHRDs or WPS), this counts as two sub-proposals within one overall application. The financials of the two sub-proposals must be combined in one overall budget (Annex 4.2). In Sheet 3, the different countries and regions where activities are planned are to be selected.

50. On page 12 of the Grant Policy Framework, in section 2.1 on Minimum Expenditure Requirements, it reads: "At least 30% of the total grant funds requested for financing projects of in-country partners must be used to service delivery provided by in-country partners. This requirement does not apply to grant funds used for capacity building." If we understand correctly, not every in-country partner has to do service delivery, as long as 30% of the total grant-amount is for service delivery. Is this correct?

Yes, this is correct.

51. What does the auditor's statement on Table 1 and/or Table 2 of Annex 2 contain? Paragraph 3.1 states that applicants must submit this after a positive assessment of the threshold test.

Amendment 28 November 2025: This auditors statement will not be required. Please refer to the important notice at the top of this document for more information.

52. If our organisation is not qualified due to the lack of audited financial statements in each of the selected countries, would we be able to structure a relationship with another locally registered civil society organisations and apply jointly as a 'support organisation'?

Applications by consortia or alliances are not allowed. Each application must be submitted by a single civil society organisation (CSO) acting independently as a support partner and meeting all threshold criteria in Chapter 3 of the framework.

53. Regarding the eligibility criteria for the first instrument of stimulating women's entrepreneurship: do organizations in the 'small southern organization' category also require 5 years of active program management and 5 years of financial statements?

Yes.

54. Criteria of financial independence. As our organisation has not received any funds from the Dutch government in the previous 4 years, does the limit on the budget amount apply to us?

The criterion of financial independence applies to all applicants.

55. On page 5 of "Annex 4.1 Guide to the Model Budget" it is said on page 5 that "The total costs under A.I.1 may not exceed 20% of the total costs of in-country partners (row 14 in Table I of this document)". The line A.I.1 refers to Direct costs of the applicant explicitly related to Fund Management (and represents salaries and consultancies). But in the document Grant policy framework, page 10, it is stated that "The costs incurred by support partners for the financial management of the support provided may not exceed 20% of the total direct and indirect costs incurred by in-country partners". Is financial management the same as fund management, meaning that the 20% is only applied to salary costs declared under the A.I.1 chapter?

Correct

56. Concerning Annex 4.2 model budget: under section B of the budget there is a distinction between "B.I.1 Financing of project activities via Service delivery" and "B.I.2 Financing of project activities via non- Service delivery". Do those 2 categories

correspond with “Service Provision” and “Dialogue” under section 2.1 of the Grant Policy Framework guidelines? If not, what else is included in non-Service Delivery, apart from Dialogue?

Correct, these correspond.

Threshold criteria related questions

1. Must a specialist organisation meet both criterion 1a (active in the theme of this instrument for at least the past 15 years) and criterion 1b (specialised in the thematic focus area, with at least 80% of its funding spent on it)? Or is it sufficient to meet only one of the two criteria?

A specialist organisation must meet both criteria.

2. If a specialist organisation meets the 25% non-MFA income threshold, can it still fall under the customised approach for specialist organisations — and therefore request a total grant amount exceeding five times its average non-MFA income in 2022–2024?

Yes, that is correct. As outlined in the introduction to the customised approach in paragraph 3.2, an organisation that qualifies as either a specialist organisation or a small southern organisation may request a grant that exceeds five times its average annual non-MFA income from the past three years. However, the grant amounts that can be applied for, as specified in paragraphs 8.4, 9.4, 10.4, and in Q4 of the Finance related questions in this Q&A, do still apply.

3. As stated in the FemFocus, civil society organizations can apply for the grants. Can you elaborate on eligible entities that can apply? Is small CBO or a for-profit firm eligible if they charge no fees?

Only non-profit civil society organisations (CSOs) are eligible. Private companies or other for-profit entities cannot qualify for a grant, even if they propose to carry out the project without making a profit. Please refer to the threshold criteria in chapter 3 of the grant policy framework.

Any civil society organisation (see Definitions), including a smaller CBO, may apply only if it independently meets all threshold criteria in Chapter 3 of the framework.

Consortium/partnership applications are not allowed.

4. Could you please specify what is considered BZ income over the last 3 years? For example, if a contract signed in early 2025 but with a disbursement in late 2026, would the entire grant amount be considered already as “BZ income” or would only the amount received be counted under this requirement?

A definition of MFA-income is included in the Grant Policy Framework (paragraph 3.2). Concerning the example in the question: to calculate the MFA-income, MFA adds up its disbursements (amounts received in a certain period) and NOT grant amounts included in a grant decision.

Practical application questions

1. How to apply?

Applications should preferably be submitted by email in .pdf format, with the budget in Excel format. Applications should be sent to DSO-MM@minbuza.nl, stating “application *FemFocus* (+name of instrument)”. For further information please refer to chapter 6 of the grant policy framework.

2. Are there specific MEL and conflict-sensitivity templates required for submission?

MEL and conflict-sensitivity must be addressed, but there are no mandatory templates for submission.

3. As the timeline for submissions is open until January 7, are proposals submitted earlier more likely to be considered for funding / is this a first come, first served basis?

No, there is no first come first served basis. All applications submitted during the application period (October 16 2025 – January 7 2026 closing at 23.59 hour CEST) will be considered.

4. Referring to the provision on page 22 of the English Grant Policy Framework, if an application is submitted shortly before the holiday break will the Minister still have sufficient time, considering the holiday period, to make use of the discretionary power to request a supplement should the application not fully meet the formal requirements?

The Minister may request supplements where time permits, but we cannot guarantee at this stage whether applications submitted shortly before the holiday period will allow sufficient time for this. This will depend on the number of applications received and the time available before the deadline.

5. If a proposal includes two regions, is it necessary to submit two applications?

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

6. What is the difference between mandatory Annex H and the required description in Annex 3.1 Criterion 7? Is there a format available and/or a maximum number of words we may use for mandatory Annex H?

Criterion 7 requires a narrative explanation of how your organisation’s selection and assessment mechanism works. This refers to the description of the process — the steps involved, who is responsible, and how risk and due diligence aspects are considered in decision-making. Annex H, on the other hand, is meant to illustrate this process in practice.

Here we would like to see one or two (anonymized) examples of the actual procedures and formats used internally — for instance, a template or form applied in partner selection — as well as proof of application, such as an anonymized example of a completed risk analysis or due diligence of an in-country partner. There is no fixed format and no word limit for Annex H. The content can be based on your organization’s existing internal documentation.

7. The extent to which the applicant presents a clear vision and approach for promoting local ownership, with insight into the division of roles between the applicant and in-country partners in making programmatic choices. Are there specific requirements regarding how this should be demonstrated?

You need to submit what is requested in Annex 3.1, criterion 6. No additional requirements apply.

8. Is it possible for us to submit our project in French?

We only accept proposals in English.

9. Are hyperlinks or footnotes allowed?

Only information that is requested and submitted in the requested annexes will be considered for the assessment of applications. Sources outside of this, such as external websites or reports, will not be taken into account.

10. Annex 1 The boxes are a fixed size, but it is possible to write more text than will fit in them – the form still works. It won’t work when printed but text outside of the box limits will be visible if the form is read in excel. Are there word limits?

The text boxes are meant for brief answers and can be used to refer to the relevant appendix where detailed information can be found. For example: where necessary refer to the model budget or the project proposals (annex 3.1 / 3.2 / 3.3).

11. Annex 1 Is the use of space for “Explanation by applicant” under each criterion mandatory or optional?

The use of space here is mandatory. It may be used to simply refer to the relevant appendix you have submitted with the necessary information.

12. Under 'h' you ask whether the organisations have received any grants. And if so, for what activities have they been granted (activity number)? Does this mean that the formal activity number is sufficient, or do we need to list the activities per project too? And is the amount the grant amount, so the overall budget?

Please include the list of activities and total grant amounts.

13. Under criterion D7: If an organisation wants to apply for 2 regions, for each region a separate project proposal format will need to be submitted. What about Threshold Criteria in Annex 1 that are or can be region specific, such as D7, D8 and D9? Does this mean that Annex 1 also needs to be submitted separately per region?

All annexes must be submitted once, except for the project proposal formats for the instruments CVAW–WHRDs (chapter 9) and WPS (chapter 10). These instruments have a regional approach, meaning that the qualitative assessment will take place separately for each region. For this reason, the project proposal formats in Annex 3.2 (for CVAW–WHRDs) and Annex 3.3 (for WPS) must be completed separately for each regional proposal. All other annexes should be submitted once at the level of the overall application. This includes the application form (Annex 1), the track record (Annex 5), and the budget (annex 4.2). Applicants preparing a proposal for two regions under CVAW–WHRDs or WPS should ensure that the track record includes examples of relevant experience from both regional proposals, and that the budget clearly indicates the relevant countries and regions within the overall financial overview.

14. Is the track record part in the proposal format (annex 3.2, criterion 1 and 2) related to Annex 5? Do we need to mention the same projects in both documents, and can they/do they need to be different? (See also Annex 5)

The track record section in the project proposal format (Annex 3.2 / 3.3, criteria 1 and 2) and Annex 5 are related but serve different purposes. Annex 5 is used to verify compliance with the threshold criteria on experience. It provides a factual overview of relevant projects and activities. In the project proposal format, the same experience is assessed qualitatively under criteria 1 and 2. Applicants may refer to the same projects listed in Annex 5 and are not required to provide different examples.

15. Is there a word or page limit for the track records? Is there any guidance available on how to complete Part C in the track record format?

The track record in annex 5 should be a brief overview provided in the table format. In the project proposal format, a clear word limit is indicated for each question

16. In the proposal submission, you indicated that the email title should be indicated as: “application *FemFocus* (+name of instrument)”. Where should the name of the applicant be placed? Should it be a prefix or a suffix?

Please put the name of the applicant organisation first.

17. Annex 5: Are there 3 examples needed of experience in both "Capacity Strengthening" and "Financing of In-Country Partners", or do we have to provide three examples of each?

The examples could be a combination of both activities, and/or examples of either one of those. You may copy and paste the table if additional project references are needed to demonstrate the required 5 year track record in all countries that you include in your proposal.

18. Are there any limits regarding the number of pages or words of our application?

The project proposal formats have a word limit per question, as indicated in annex 3.1, 3.2 and 3.3

19. Can the application be submitted via an institutional secure file transfer link if the file exceeds 14 MB, or must it be split into multiple emails?

If necessary, multiple emails may be used. Please make sure to indicate this in the subject title and email body (e.g. email 1 out of 3). Kindly note that all applications including all necessary emails and with all required attachments should be submitted before the deadline.

20. Can we show the date and place of establishment through our KvK registration (Netherlands Chamber of Commerce), instead of the organisations' articles of association/ statutes? As articles of association vary, this information is not always documented within organisations' articles of association/ statutes.

No, KvK-registration is not sufficient.

21. As we recently moved to a new address: Can we show the date and place of establishment through our KvK registration (Netherlands Chamber of Commerce), instead of the organisations' articles of association/ statutes? As articles of association vary, this information is not always documented within organisations' articles of association/ statutes.

If the move was within the same country, please submit articles of association, the KvK-registration and an explanatory note that your organisation is currently moving to a new address.

22. Annex 1 doesn't open. How can I complete the form.

Begin by completing the introductory section of the form and ticking the boxes that apply to your organisation. For Question 1, this means ticking all boxes indicating you are an NGO. If your answers suggest that your organisation does not meet the eligibility criteria, a pop-up warning will appear and the rest of the form will stay hidden. If your organisation does meet the threshold criteria, the remainder of the form will automatically open.

23. On the last page of the checklist of appendices, it is asked to upload the following document at number 9: *“Proof of application: an anonymised example of a risk*

analysis or due diligence of an in-country partner.”. What exactly is required under this appendix?

Applicants are required to demonstrate that they have an established system for selecting and monitoring the in-country partners they support (threshold criterium D4 and as part of the qualitative assessment criteria). This system must include procedures for managing risks related to finance, governance, and integrity in connection with the implementation of activities and the use of (financial) support.

The requested document should therefore illustrate how your due diligence or risk assessment system has been applied in practice within the five years preceding 1 October 2025. For example, you may provide a completed risk analysis or due diligence form used in a previous case. The document may be anonymised, especially if it contains sensitive information, but anonymisation is not mandatory.

Instrument specific questions

Encouraging women’s entrepreneurship

1. Could the Ministry clarify how broadly “women’s entrepreneurship” is interpreted within the instrument? For instance, does it include social and cooperative enterprises, micro-entrepreneurship and informal businesses, or is the focus primarily on formal MSME development and access to finance?

This instrument focuses on the initial phase of the entrepreneur, strengthening women entrepreneurs on the individual level and their immediate environment. Depending on the context this means women in the informal sector or MSMEs. As noted in chapter 8.1 this instrument aims to a) strengthen women's entrepreneurship at individual level and b) remove socio-cultural and institutional barriers at societal level that limit their ability to flourish. Each applicant may independently propose its implementation strategies to attain these objectives.

2. Does the entrepreneurship instrument allow activities such as skills training, incubation and vocational pathways when these directly enable women to start or scale a business, or must the emphasis be strictly on enterprise growth and access to markets?

The policy objectives of instrument 1 are stated in paragraph 8.1: strengthen women's entrepreneurship at the individual level and remove socio-cultural and institutional barriers at the societal level. Each applicant may independently propose its implementation strategies to attain these objectives.

- 3. May a single application focus on different types of entrepreneurship models in two countries (e.g. agricultural cooperatives in Benin and service-sector enterprises in Ethiopia), or should the value proposition and sectors be coherent across countries?**

The policy objectives of instrument 1 are stated in paragraph 8.1: strengthen women's entrepreneurship at the individual level and remove socio-cultural and institutional barriers at the societal level. Each applicant may independently propose its implementation strategies to attain these objectives.

- 4. May applicants invest in capacity-strengthening at two levels — (i) the direct target group of women entrepreneurs, and (ii) the intermediary partner organisations in the countries (e.g. women's associations, cooperatives, training centres)?**

No. Support partners do not work directly with the target group. Support partners provide assistance to in-country partners in strengthening their capacity as a service provider and critical dialogue partner, in close consultation with them and in line with their specific needs. For detailed examples see paragraph 2.2.

Combatting violence against women

- 1. To what extent does the proposal need to include women human rights defenders?**

Supporting WHRD's is a core element of this instrument. The balance between combatting VAWG/SGBV and supporting WRDH's is context dependent. It is up to the applicant organization to demonstrate that the balance/approach they have chosen is appropriate.

- 2. On page 32 of the Grant Policy Framework, under paragraph 9.4, it says "Each application within this instrument may cover one or two regions, with applications relating to two countries being considered as a single application consisting of two sub-applications". We assume that this is a typo, and that where you write "two countries", you mean "two regions". Can you confirm?**

This should indeed be two regions.

Women Peace and Security

- 1. As we focus on one region, can we support cross country lessons sharing and learning with women's Peacebuilding organizations in other regions? In our experience the cross-regional peer to peer exchanges are very fruitful and essential to movement building and enhancing capacities especially for women's**

participation in peace and security decision making, conflict prevention and response to CRSV.

Cross-country exchanges can be supported as part of capacity-strengthening, provided they demonstrably serve women's peacebuilding organisations and target groups in the focus countries. Proposals should clearly justify how such exchanges contribute to the objectives of the Women, Peace and Security instrument.

2. Regarding the geographic focus under instrument 3 (WPS): what if - in the 5-year period - a situation arises (for instance violent conflict) that makes work more needed / relevant in a country that was not included in our application previously? Can we then add that country?

The selected countries must remain the implementation countries for the full duration of the grant. If it is no longer possible for an in-country partner to implement activities in a particular country for security reasons, implementation from a neighbouring country may be permitted, provided that this is properly substantiated and remains consistent with the requirements of this grant policy framework. In such a case, the grant recipient would need to submit a request for modification, and if approved, the Ministry of Foreign Affairs would issue a corresponding amendment decision.