



HE Minister L. Ploumen
Ministry of Foreign Affairs
The Netherlands
11 January, 2016

Dear Minister

Re: Collective Appeal (Notice of Objection) against FLOW 2 Procedures by unsuccessful qualifying applicants

Further to our letter of 12 December 2015 signed by over 100 women's organisations raising concerns about FLOW 2 outcomes, we hereby lodge a collective appeal against the procedures that led to only two women's organisations and no women's organisation from the south receiving funding. Our appeal follows several attempts to meet with you. We hope that such a meeting might still be possible. In the meanwhile, mindful that 12 January 2016 is the deadline by which appeals on this decision must be made we have also taken the appeal route, guided by the principles outlined in this letter.

Legal basis and qualifications

The appeal is lodged in terms of Section 6.5 of the General Administrative Law that requires that "such an objection be lodged within six weeks of the decision being made; include the name and address of the person submitting it, a description of the decision against which the objection is being lodged, and the grounds on which it is based. Where possible a copy of the contested decision should be enclosed."

The appeal is based on the „Besluit vaststelling FLOW“ (see <https://www.rijksoverheid.nl/binaries/rijksoverheid/documenten/besluiten/2015/06/12/funding-leadership-and-opportunities-for-women-flow-2016-2020/beleidskader-flow-inclusief-wijzigingen-in-geel.pdf>) and article 5.1 „Subsidieregeling Buitenlandse Zaken 2006“

The main reference document is the *Funding Leadership and Opportunities (FLOW 2016-2020) Explanation of the Appraisal Procedure*, received by all applicants, and the related documents referred to in this letter and the analytical *Annexes A- C* that accompany this appeal.

The appeal is being submitted by the Women's Major Group, on behalf of the organisations listed at the end of this letter. The signatories comprise two categories:

- Women's organisations that applied for FLOW 2, including several FLOW 1 and MDG 3 grantees, but were not awarded grants.
- Organisations not directly affected, but who support the principles raised in this appeal, including some of the successful applicants. This demonstrates the broad-based support for the issues raised.

As the appeal had to be prepared over the holiday period, due to the six week deadline for submitting the appeal, *more organisations may be added by the time of the hearing*. At that time, the consortium will also present a detailed analysis of the effects of the FLOW 2 funding decision on their work which has not been possible within this timeframe.

This appeal aims to fight the decisions of rejection of the applications for FLOW2 of the undersigned organisations, dated 1st of December 2015 (received 2nd of December 2015) and with the reference numbers of each of the applicants (see at the bottom of this letter), based on „Besluit vaststellend FLOW“. Please note that this is an initial notice and that more rejected organisations are joining this common appeal.

This joint appeal is complementary to individual appeals being made by our members that provide specific examples of the issues raised. The joint appeal does not in any way supersede these individual appeals, but is put forward in the interest of finding systemic solutions to the short term crisis and the longer term challenges that we as women's organisations face.

Key accompanying documents

The appeal should be read together with

- **Annex A**, a detailed comparison of the FLOW 1& 2 funds, their scope, amounts, number of applicants, assessors and assessment criteria, and the outcomes of these two calls. While the signatories appreciate that FLOW 2 should be assessed against its stated criteria, the comparison is instructive, as FLOW 1 provides a precedent,

especially with regard to the interpretation of Article 8, paragraph 3 (d) of the Ministry of Foreign Affairs Grants Decree.¹

- **Annex B**, a mapping of the FLOW 2 grantees, their origin and the geographical scope of the projects for which they have been awarded grants.
- **Annex C**: An analysis of the FLOW 2 assessment criteria.

Context

Women's rights organisations are grossly under-funded: The context of this appeal is the grim funding environment for women's rights organisations highlighted for many years by AWID, which states in an article entitled *20 years of Shamefully Scarce Funding for Feminists and Women's Rights*: "For decades, the women's rights movement and women's rights organisations have been severely underfunded. AWID research in 2010 revealed that the median budget for 740 women's organizations all over the globe was a miserly US\$20,000. In the same year, as a point of reference, the income for Save the Children International and World Vision International was US\$1.442 billion and US\$2.611 billion respectively."²

Women's rights organisations drive gender justice: AWID goes on to state that: "This is in spite of recent research which proves what feminists and activists have known for a long time—that *women's movements have been the key drivers defending women's human rights and gender justice worldwide.*"

These sentiments are echoed in your and Minister of Foreign Affairs Bert Koenders' letter to the House of Representatives in response to the MDG 3 Fund evaluation in which you stated: "The government will continue to offer targeted support to NGOs fighting for women's rights world- wide. *These organisations – and individual women's rights defenders- play a crucial role in getting women's rights on the agenda, promoting and monitoring them and pursuing any violations.* This empowers women and the organisations that represent them. Empowerment is a precondition for women's participation and leadership in politics, the economy and security... The FLOW fund is at the core of Dutch support for women's rights organisations worldwide."³

¹ This states: "In assessing grant applications, the Minister may also take account of .. an even distribution over target groups, regions, themes, nature of the grant, and form of activity and other factors relevant to the award of grants."

² <http://www.awid.org/news-and-analysis/20-years-shamefully-scarce-funding-feminists-and-womens-rights-movements#sthash.m7CnwqtT.dpuf>

³ Letter of 13 November 2015 from the Minister of Foreign Affairs, Bert Koenders, and the Minister for Foreign Trade and Development Co-operation, Lilianne Ploumen, to the House of Representatives on the "Gender Sense and Sensitivity" 2007-2014 policy review conducted by the Policy and Operations Evaluation department.

Women's rights organisations require sustained support, including institutional capacity building: The evaluation of the MDG 3 fund found that "Women's organisations, large and small, still have a role to play. *They have a good knowledge of local issues and not only play a role in lobbying and advocacy but also fill the gap resulting from lack of government responsiveness in areas like combating violence against women. Yet often these organisations face challenges of long term sustainability and require longer-term assistance. Such support should focus more on building their institutional capacities instead of only conceiving of them as implementing bodies.*"⁴

In your letter to the House of Assembly, you and Minister Koenders responded: "The Netherlands is unusual in earmarking funding for women's rights. *Historically, improvements in the position and rights of women have been the work of the women's movement. Women's rights organisations – which may include men as well as women – are our strategic partners in international and bilateral diplomacy.*"

Avoiding the creation of northern NGO oligarchies in development assistance and supporting women's organisations in the global south: The 2015 Civicus *State of Civil Society* report, in warning against "short term and project focused funding that does not last long enough to achieve impact", notes that "large established CSOs, which are good at speaking donor jargon, have pre-existing relations with donors, and are able to navigate complex application and reporting procedures, do better than smaller, emerging CSOs. *This reinforces power imbalances within civil society, and limits the potential for innovation.*"

The report specifically advocates the strengthening of women's rights organisations in the global south: "The battle for gender and sexual rights is now partly one of denying the notion that there can be two different worlds for rights: one in the global north and another in the global south. *Activists in the global south need to be supported to show that demands for gender and sexual rights emanate from and are legitimate in their countries.*"⁵

The SDGs and the role of the women's movement in embedding gender in the post-2015 agenda: The AWID article notes that: "As the world commemorates the 20th anniversary of the Beijing Conference this year (2015), creates the Sustainable Development Goals (SDGs), and holds the 3rd International Conference on Financing for Development, it is critical to remember that *real systemic impact for women's rights needs significant resources.*" You and Minister Koenders echoed this when you stated in your letter to parliament that: "The policy review comes at a fitting moment, in the year marking the 20th anniversary of the Fourth World Conference on Women and the Beijing Platform for Action

⁴ Gender sense and sensitivity: Policy Evaluation on Women's Rights and Gender Equality 2007-2014

⁵ <http://www.civicus.org/images/SOCS2015ExecutiveSummary.pdf>

and 15 years after the adoption of UN Security Council Resolution 1325 on Women, Peace and Security. The new Sustainable Development Goals, in which the importance of women's rights and gender equality are deeply embedded, were adopted at the recent UN General Assembly."

We, representatives of the global women's movement, wish to place on record that *it is a result of our efforts, working night and day with limited resources, that women's rights and gender equality are now on the global agenda*, and that our work needs to be sustained.

Guiding principles

Appreciation: In lodging this appeal, we wish to underscore our appreciation for the support received to date, and for the open and democratic processes that enable us to make such an appeal. The signatories appreciate the political commitment by the Netherlands to women's rights reflected in support for three successive funds for this purpose (MDG 3, FLOW 1 and FLOW 2). These funds are among the very few such funds dedicated to promoting women's rights.

Rigour and accountability: We acknowledge that FLOW 2 introduced several new parameters to increase rigour and accountability, and accept that FLOW 1 grantees needed to submit themselves to the same rigorous tests as all other applicants. We congratulate the successful applicants on their success.

Sound developmental and organisational principles: However, we question the premises and processes that have led to the steep drop from 45 grantees for MDG 3, to 34 grantees in FLOW 1, to just 9 grantees in FLOW 2, only two of which are women's organisations, and none of which are women's organisations based in developing countries. *The signatories submit that the procedures have been progressively changed to the disadvantage of the very organisations that they are meant to serve, many of whom face a bleak future as a result of the decisions taken. We submit that it is not organisationally sound to help organisations to grow and then fail to ensure their sustainability. As you stated in your letter to parliament: "The IOB is right to note that support for women's organisations, large or small, local or international, must be long-lasting and focused on strengthening capacity. The recently launched FLOW 2016-2020 is based on this principle."*

Value for money: We agree that the key principle guiding the award of grants should be value for money – in other words that funds that make the most difference. We will demonstrate why sidelining the very organisations that create the enabling environment for women's rights does not represent the best VFM.

Win-win solutions: We have followed the legal route open to us, in the hope that the appeal will provide the opportunity for the organisations that have signed this appeal to be heard and to present their case, and for some interim and longer term relief to be found.

The decision being objected to

The signatories object to the procedures and interpretations of rules in respect of the Order of the Minister for Trade and Development Co-operation 3 June, 2015 122-15 that led to:

- ***The drastic reduction in the number of grantees in Flow 2:*** Only nine out of 265 FLOW 2 applicants (3%) received funding compared to 34 out of 238 or 14.2% of total applicants in the case of FLOW 1.
- ***The lack of a level playing field that led to a dearth of women's rights NGOs, especially from the global south among the grantees:*** Not a single one of the organisations awarded a grant under FLOW 2 is a woman's rights organisation based in a developing country, compared to 34.4% in the case of FLOW 1. Only two of the nine (22%) are women's organisations based in developed countries (compared to 29% under FLOW 1). Two thirds (ie 66%) of the FLOW 2 grantees are INGOs, compared to 22% under FLOW 1, which used the "other factors relevant to the award of grants" to make a case for weighting grants in favour of women's organisations, especially those from the south, as will be further elaborated.
- ***The high proportion of funding going to Dutch NGOs:*** Unlike the FLOW 1 process, the Flow 2 fund was open to Dutch NGOs who already receive Dutch funding through different programmes such as "Dialogue and Disent". Out of the 9 lead applicants and their co-applicants who obtained FLOW 2 funding, approximately fifty percent are Dutch NGOs.⁶ As *Saskia Brand, a consultant at MDF Training & Consultancy writes:* "The funding is going to large Dutch, North-West European and American organisations, few of which have the fight for women's rights as their *core business*. The organisations from the Global South that, sometimes at risk of their own lives, have to operate at the margins of the space allowed by often unfriendly governments, and have few funding channels available to them, all missed out. This can never have been the intent of this policy framework. How could the Ministry get it so wrong?"⁷
- ***The almost complete lack of any link between FLOW 1 and 2:*** Despite virtually every FLOW 1 grantee applying to upscale their work, only two FLOW 1 grantees (Action Aid and International Women's Development Agency) received further funding.

⁶ Information provided in a meeting with the Ministry of Foreign Affairs.

⁷ BLOG – Saskia Brand (MDF) evaluates the Funding Leadership and Opportunities for Women (FLOW) call for proposals and finds that too large of an investment is asked of organisations, with almost no one benefitting.

- ***The size of awards***, from 34 organisations receiving an average of Euro 2.4 million under FLOW 1 to nine organisations receiving average grants of Euro 10.8 million.

Grounds for the objection

- 1) ***The outcome is contrary to the objectives of FLOW 2:*** The FLOW 2 call clearly spelt out the link between MDG 3 and FLOW 1 when it stated: "Thanks to the MDG 3 and FLOW funds, civil society organisations for women's rights have been able *to reach broad networks* of grassroots organisations, develop capacity for lobbying and advocacy, and *grow as organisations.. it builds on the results achieved by the earlier funds and ties in with the ongoing debate on women's rights.*"

Furthermore, the two funds had three, very similar themes (VAW, economic and political empowerment) with slight variations in emphasis (e.g. FLOW 1 specified food security, employment and property rights, and access to safe drinking water) as part of economic self-reliance. This is another argument in favour of linkages, synergy and continuity, rather than starting from a clean slate. We should be building on lessons and strengths.

The question that arises is why FLOW 2, with such similar themes, and seeking to build on the results of FLOW 1, did not deliberately seek to strengthen the existing, performing grantees while broadening the scope to include new and promising women's organisations? Contrary to the clear intention to make a link between FLOW 2 and its predecessors, the FLOW 2 funds are being dispersed to a totally new, small group of largely generalist, northern-based INGOs. This, as stated earlier, runs contrary to sound developmental and organisational principles, and to your assertion, quoted earlier, that "*support for women's organisations, large or small, local or international, must be long-lasting and focused on strengthening capacity*".

We further submit that in narrowing the scope of this fund to just nine organisations, the Ministry plays into the creation of INGO oligarchies that the CIVICUS report warns about (see context). This also runs contrary to the Paris Declaration for making aid more effective, especially the core principle of ownership, which states that "Developing countries set their own strategies for poverty reduction, improve their institutions and tackle corruption." The second principle, alignment, states that "Donor countries align behind these objectives and use local systems."

None of the principal recipients of FLOW 2 are from a developing country. In the scenario we now confront, those women's NGOs fortunate enough to benefit from re-granting will need to adapt to the funding modalities of the selected INGOs.

Projects could potentially be more reflective of a few grantees interests rather than the priorities of many CSOs represented by more grantees. An example of how smaller organisations will be affected institutionally when their interests have to be mediated through INGOs is that while FLOW 2 allows core funding, HIVOS grants are roughly \$50,000 per year. This limits core funding to women's NGOs, the possibility of implementing projects that will help their sustainability, the launch of innovative approaches or long-term results and partnerships.

- 2) ***The organisations best placed to deliver impact for this call:*** FLOW 2 places a strong emphasis on creating an enabling environment for gender equality and women's rights. Its stated aim is: "To promote an *enabling environment* for equal opportunities, rights and safety for women and girls in all low and lower middle income countries.. by improving opportunities for women and girls and creating a climate in which women's rights are better protected, the fund contributes *at local and national level* to sustainable inclusive development and to the fight against poverty and lack of rights. The aim of a strategic partnership of this kind is to create the right conditions (enabling environment) for the *permanent transformation of institutions, laws and standards* in order to bring about gender equality and women's rights."

This emphasis on transformation and enabling environment has been cited lobby as one justification for funds going to a few large northern based IGOs in meetings with the Ministry by members of our group.

Officials have argued that INGOs are the best placed to deliver transformative change. This is a contentious point when applied to women's rights, to which most progressive organisations pay lip service, but whose mainstreaming in reality is often superficial. Are large mainstream CSOs better placed to deliver an enabling environment for women's rights than women's rights organisations based in developing countries, working at the grassroots level, especially given the FLOW 2 emphasis on delivering results at *local and national level*?

We submit that organisations specialising in women's rights, and especially those based in the countries they serve, are best placed to do this. The context section provides ample evidence, including from your letter to parliament, of how it is women rights organisations that have driven the transformative agenda for gender justice, all the way up to the SDGs.

Indeed, in making the case for prioritising women's organisations in developing countries in the final allocation of funds (see below), FLOW 1 argued that these organisations are "*closest to the goals of FLOW.. in supporting them, the grants go*

directly to organisations in the countries that were targeted in the first place.”⁸
FLOW 1 further argued that organisations based in the south “offer large opportunities for direct influence without the intervention of a northern partner.” We submit that the same argument applies to FLOW 2, which aims to “contribute at local and national level to sustainable inclusive development.”

3) Outsourcing and administrative overheads: INGOs replacing private firms?

In the MDG 3 evaluation, the IOB found that outsourcing the management of the fund “was not conducive to productive interaction between policy and implementation.” You responded in your letter to parliament that “the new FLOW will be managed in-house to improve interaction between policy and implementation, learn as much as possible from experience and make results more visible.”⁹

Yet the argument put forward by the Ministry in favour of dispersing large amounts to a few organisations is that this will reduce the costs of administering the funds, outsourced in MDG 3 and FLOW 1 to PWC. This consideration appears to have played an important role in the revising and interpretation of the rules of FLOW 2 to deliberately reduce the number of grantees.

At a political level, this move is an example of the trend highlighted in the CIVICUS *State of Civil Society 2015* report quoted earlier of falling aid levels at a global level (reduced number of countries receiving aid and a much reduced number of NGOs funded). This leads to big projects and consortia being favoured at the expense of small scale actions at grassroots level. It further breeds unhealthy competition between INGOs and local NGOS, now compelled to review strategies and cut costs.

At a finance and VFM level, the question that needs to be answered is what proportion of funds going to INGOs (as opposed to organisations based in-country) goes to *their* administrative overheads. We request that this cost computation be done, as it forms part of the justification for side lining direct dealings with women’s organisations. This needs to be weighed against the long term cost of failing to develop the independent capacity of these organisations, that runs counter to the finding of the MDG 3 evaluation, accepted by the ministry that “*support for women’s organisations, large or small, local or international, must be long-lasting and focused on strengthening capacity.*”

4) Lack of an inclusive approach in the making and interpretation of rules:

Despite the commitment in the FLOW 2 call to “an inclusive approach to

⁸ FLOW 1 – Explanation of the Appraisal Procedure.

⁹ Letter of 13 November 2015 to the House of Representatives

development”, FLOW 2 procedures operated at every turn in a way that disadvantaged smaller and emerging women’s organisations. For example:

- The floors and ceilings for FLOW 2 (minimum of Euro 5 million and maximum of Euro 15 million) meant there could only be a maximum of 15 and minimum of six grantees compared to a minimum of 12 and maximum of 70 in FLOW 1 (minimum of Euro 1 million and maximum of Euro 6 million). The dye had been cast against small organisations from the outset, as Dutch women’s organisations warned in the letter sent by Wo=men (Brief BZ Waarschuwing FLOW 2, see enclosed). The letter warned well ahead of time of the negative impact on women’s rights organisations, particularly for those from the global South and mid-sized organisations, and proposed to earmark part of the FLOW 2 funds for these organisations to ensure balance. Unfortunately these proposals were ignored. Furthermore, the final decision in FLOW 2 (nine grantees) *tilted more towards the minimum number of six than maximum number of 15 grantees*, due to the other change in rule, that funds would be granted to the top scoring applicants until they ran out, rather than based on performance as in FLOW 1.
- 60% of applicants failed to meet the threshold criteria in FLOW 2 compared to 26% in FLOW 1. Among the factors contributing to this was the increase in the requirement for contribution by other donors from 25% to 40%. Even women’s organisations who met this criterion were told that their proposals were too dependent on Dutch funding. This was said to be “just a comment that did not count in the weighting.”¹⁰ However, such comments reflect a clear bias against smaller organisations. The call also required applicants to tackle underlying structural causes of inequality and to “think big” which meant partnering with various groups, such as media organisations, universities and large INGOs. But then threshold criteria, such as the cap on *all* salaries in the collaborating consortium, regardless of whether or not they participated directly in the programme, led to some women’s organisations being disqualified at this stage.
- Only 13% of applicants went on to the final process in FLOW 2, compared to 19% of FLOW 1 applicants, due to this being compressed into two as opposed to three stages (see Annex A for details).
- At this final round, FLOW 1 made use of a complex ranking system to give priority to women’s and southern based NGOs, based on the nature of the call. FLOW 2 on the other hand stated: .. “in the final allocation of resources, grants will be allocated to the highest ranking applications until the available resources are exhausted.”¹¹ This is what finally accounted for only nine organisations receiving funds, despite 35 having achieved a score of 70% or more, as elaborated in the next point.

¹⁰ Phone conversation, Gender Links and Ministry officials, 10 December, 2015.

¹¹ Funding Leadership Opportunities for Women (FLOW 2016-2020) – Explanation of the appraisal procedure.

- 5) ***The failure to apply the Ministerial Grants Decree in favour of women's organisations:*** Both FLOW 1&2 referred to Article 8 para 3 (d) of the Grants Decree for guidance in the final allocation of funds. This states: "In assessing grant applications, the Minister may also take account of .. an even distribution over target groups, regions, themes, nature of the grant, and form of activity and *other factors relevant to the award of grants.*" The two funds however interpreted this provision in different ways, with dire consequences in the case of FLOW 2 for the very women's organisations they are designed to serve.

In the case of FLOW 1, the decree was used to classify the top scoring organisations according to north/south, and those specialising in women's rights compared to generalist organisations; with top priority being given to women's organisations in the south; then women's organisations based in the north; then to generalist NGOs based in the south, and lastly to INGOs. No such distinction was made in the case of FLOW 2 – the decision was based on scores only, with no regard for the origin of the organisations.

The question that must be asked is how and why the same decree can be interpreted so differently, with the result that two thirds of FLOW 2 funds went to the very organisations that FLOW 1 weighted lowest as it preferred funds to go directly to women's organisations, especially in the south, in keeping with the objectives of FLOW.

Furthermore, when there were insufficient funds to go around in FLOW 1 (Euro 132 million requested by the qualifying organisations, compared to the available Euro 70 million), FLOW 1 used the grants decree clause to weight amounts awarded according to the objectives of the call. Women's organisations in the south and re-granters received 70% of what they requested; women's organisations in the north, 65% and general NGOs in the south, 55%. INGOs received just 40% of what they requested. In contrast, it would appear that in the case of FLOW 2 all applicants received the amount they asked for, regardless of their background. This played a key role in a small number of organisations, mostly INGOs, receiving large sums of money to the exclusion of women's NGOs, and total exclusion of women's NGOs based in the south.

- 6) ***The under valuing of track record and weighting of key criteria:*** Both FLOW 1 and 2 had three major criteria, threshold, track record, and programme. The weighting of these scores is not stated in the call; it was a discretionary matter

decided on after the call. In the case of FLOW 1, these three areas carried equal weight. Thus organisations that failed to demonstrate a strong track record were eliminated at round two. 27% failed to achieve a score of 65% or higher at this level, and did not go on to the programme check. In contrast, FLOW 2 compressed this into a two stage process, giving equal weight to track record, Theory of Change (new) and programme. The weighting is illustrated in the table below:

CRITERIA	WEIGHT	
	FLOW ONE	FLOW TWO
1. Threshold criteria – are criteria which all applicants must meet	100%	100%
2. Criteria relating to the quality of the track record in the areas of gender equality and women’s rights (quality of the applying organisation or the lead party – organisational check in FLOW One)	100%	33%
3. Criteria relating to the quality of the programme proposal for the first year and the Theory of Change (comprehensive programme proposal in FLOW One)	100%	
Theory of Change		33%
Programme		33%

The change in the weighting affected women’s organisations for two reasons:

- Women’s organisations might reasonably be expected to score highest on track record for a fund emphasising *"the effectiveness of gender equality and women’s rights activities implemented by the organisation/ consortium, including the use of relevant national and international networks to enhance the intervention effectiveness, the challenges this entailed, and response."* The signatories submit that the dilution of this score from a determining factor for proceeding to the next stage, to 33% of the score, is disadvantageous to women’s rights organisations. This is clearly where specialist organisations with experience on the ground would have scored, as evidenced in FLOW 1.
- The fact that the Theory of Change is given equal weight to the other two factors in FLOW 2 also weighed against smaller and emerging women’s organisations. While developing a Theory of Change is an established practise for larger and well-resourced INGOS, this is a relatively new area for women’s organisations. *In general, the relative weight given to theory over practise is a concern.* FLOW 2 received a large number of applications from known FLOW 1 grantees, with reports and evaluations funded by the Dutch

government, yet these were not consulted in the assessment: another example of failing to make meaningful links between the two funds.

- 7) ***The adequacy of the assessment team:*** We understand from the documentation and subsequent meetings that the assessment team comprised three individuals, two from the ministry and a consultant. FLOW 1 fund managers played no part at all in FLOW 2 process. The need for impartiality is accepted. At the same time we question why a fund designed to build on the successes of its predecessor made no reference at all to the existing in-house evidence and expertise on this track record and made no effort to verify whether results claimed on paper exist in reality.

Assessors seemed more focused on technicalities like whether complex interventions happened within the last three years, as required in the application, than whether they actually had a transformative impact. In addition to this joint appeal, we anticipate a large number of individual appeals on matters of detail that call into question the credentials and adequacy of the assessment team for a task of this import. We request that this be reviewed as part of the response to this joint appeal.

8) Disproportionate weighting, especially with regard to budget and VFM

	No of criteria	No of indicators	No of criteria covered in 3000 words	No of indicators in 3000 words	Score	Adjustment factor	Final score	Qualifying score
TRACK RECORD	8	21			48		48	33
THEORY OF CHANGE	9	34	9	34	54	0.9	48	33
PROGRAMME	15	49	7	23	90	0.53	48	33
TOTAL	32	104	16	57	192		144	99 (70%)

Annex C provides an overview of the scoring criteria, indicators and scores. The table above summarises the salient facts. In total, there were 32 criteria in FLOW 2, evaluated against 106 indicators. *The latter were not stated in the call, and in several cases the indicators do not match or went beyond what is asked for in the call.* Programme, with 50% of all criteria and indicators, accounted for only 30% of the score.

Of particular concern, given the very large size of the grants made, is the absence of a stand-alone section on budget. This formed one of the 15 programme criteria, accounting for just 3% of the overall score. We do not believe that this represents a sufficient weighting for such a crucial factor in the awarding of such large grants, and is one of many reasons why we question the VFM premises and justification in the decisions made. This runs against the very principles of transparency emphasised at every turn in the call.

- 9) ***A confusing and disempowering set of guidelines:*** The call for proposals contained many inconsistencies and in many places was vague and unclear. It led to numerous questions and a stream of responses which sometimes changed significantly the original, and which smaller, under-resourced organisations struggled to make sense of. The call offered no guidance on the format of key annexes, such as the one year work plan, but created indicators after the fact to assess this.

The Theory of Change and a significant portion of the programme description – 16 criteria, and 55 indicators in all had to be described in 3000 words in the text. This meant an absurd average of 187 words per criteria and 55 words per indicator that militated against complex multi-theme, multi-country interventions.

We note that the awards made tended to be for projects in a limited number of countries and to focus on one of the three themes rather than all of them. These would be easier to explain in a tight word count. *Nothing in the scoring system rewarded an applicant for a regional or sub-regional approach, or a multi-prong thematic approach, of the kind that we believe would answer best to the FLOW 2 call, and represent the greatest value for money.*

- 10) ***Equity with regard to target groups, regions, themes:*** We acknowledge that not every country can be covered through the one call. However, based on the information available on the website, we note a number of concerning geographical deficiencies. With reference to Annex 2:
- Out of the 96 countries targeted, only 32 (one third) are covered through FLOW 2 grants.
 - The FLOW 2 grantees cover two to seven countries each (see Annex B). *None of the organisations awarded FLOW 2 grants works within an entire region or sub-region, as many of the FLOW 1 grantees based in the global south do, creating significant multiplier effects through their work.*
 - Certain countries overlap, in other words are covered more than once in the grants awarded. These include India, Pakistan, Ghana and Rwanda.
 - Latin America (one country) and the Middle East (three countries) are poorly represented in the programming for which grants have been awarded.

The assessment team has argued in conversations following the announcement that the nine grantees will, through their re-granting, reach a wider group than FLOW 1. We do not have the full information regarding the re-granting. But we do not believe that nine organisations can have the same reach as 34. As noted in the FLOW 2 call, through MDG 3 and FLOW 1: “Women’s rights organisations(?) have been able *to reach broad networks* of grassroots organisations, develop capacity for lobbying and advocacy, and *grow as organisations*.” While final figures for FLOW 1 are yet to be compiled, the FLOW 1 mid-term report figures demonstrate this reach, even in the start-up years, and indicate a substantial increase between 2012 and 2013.

FLOW 1 MID-TERM BENEFICIARY ANALYSIS		
	2012	2013
1. Women whose leadership has been enhanced	44,619	64,398
2. Women’s organisations strengthened	1,115	3,159
3. Women who increased income/reduced costs	23,748	550,831
4. New leaders in food security	5,962	13,187
5. Women who gained property rights	4,060	6,998
6. Women who gained access to safe drinking water	1,600	5,485
7. (new) Women leaders demanding Labour rights	8,087	18,000
8. Women who joined trade unions	2,211	38,496
9. Women public office candidates	533	3,568
10. Women who assumed decision-making positions	394	882
11. Recommendations of women or organisations included in policies	769	1,708

Figures from FLOW CI Report 2012-2013

We request, as part of the response to this appeal, that the claim that nine organisations will have a broader reach through their re-granting then be substantiated, in line with the Ministers Grant Decree requirement that equity be achieved with regard to target groups, regions and themes.

- 11) ***The insensitivity of the process to small organisations with limited resources and capacity:*** The FLOW application process is one of the most onerous of all funding application processes. Unlike most funders who have a two or even three stage process (concept, full proposal, due diligence) FLOW is all or nothing. The application and 14 annexes take days if not weeks of the most senior management time to prepare. The UNWOMEN Fund for Gender Equality, a comparable example, has a three stage process, with technical support offered to women’s organisations that pass the concept stage. Even those who do not make it feel they have gained something in the process. FLOW applications have cost under-resourced and stretched women’s organisations dearly in precious time and resources, with no return either in funds received or capacity building.

The example below from Saskia Brand's blog is illustrative of what all of us experienced in this process:

"I was able to closely observe the application process of one of the applicants. The staff of this North-African organisation started off with positive energy this past summer. They had spent the whole year working on their theory of change, as a network for women and peace. They had been very successful during the first FLOW grant and knew exactly what they wanted to do with FLOW 2. *Minister Ploumen wrote on her Facebook page that this was an organisation that deserved Dutch support.* Key staff of the organisation spent two full months on the application. My estimate is that it cost them about 150 days. A major investment that cost the organisation almost a hundred thousand euro! When it was announced that 265 applications had been submitted, the full scale of this dawned on me. Suppose that the average applicant had spent not 150, but 100 days on this process. This totals about 26,500 days or 120 years of someone's life: with costs between twelve and twenty million euros! These numbers already raised serious questions when the applicants still had high hopes. It was clear that an excessive amount of work had been done here for nothing."¹²

Brandt estimates that the total amount of wasted time on these applications to be 26,500 days or 120 years: a figure that we can verify is not far-fetched. Ironically, as you put it in your letter to parliament, the various funds have been designed to *"empower women and the organisations that represent them. Empowerment is a precondition for women's participation and leadership in politics, the economy and security."* The process is at odds with the objective of the fund.

12) The effects of the decision on women's organisations

The most important reason for this appeal is the dire straits that dozens of women's organisations find themselves in as a result of the FLOW 2 decisions. A full analysis is being prepared and will be shared at the hearing. Here we share three illustrative examples of the effects of the FLOW 2 decision on women's organisations:

As the only women rights- based network in West Africa, **WiLDAF** works in 10 countries of the region. Thanks to MDG 3 and FLOW 1, WiLDAF has successfully lobbied for the integration of women's rights and gender perspectives in the new generation of ECOWAS (Economic Community of West African States) agricultural policy that will benefit over 90 million women living in rural areas in the region. On the ground, WiLDAF works with 300 traditional leaders to change 18 major harmful and unequal socio-cultural and traditional practices that hinder women from enjoying their rights. WiLDAF also lobbies for 5000 women to get access to productive resources including lands in 208 communities in 6 countries. FLOW 1 has supported

¹² BLOG – Saskia Brand (MDF) evaluates the Funding Leadership and Opportunities for Women (FLOW) call for proposals and finds that too large of an investment is asked of organisations, with almost no one benefitting.

the activities of more than 150 women farmers. In 3 of the 6 countries, 94 women's cooperatives have built the capacity of 2,600 women.

Without follow up funding through FLOW 2, the progress which needs to be consolidated and amplified will experience an uncertain evolution, even a regression. There will be a gap in the sub-region concerning women's rights since the very existence of the network is threatened by the lack of funding to pay staff salaries at regional level as well as in the countries. Available funding from other donors is for projects; not institutional support.

Gender Links is a regional NGO working in the fifteen countries of the Southern African Development Community where it has championed the SADC Protocol on Gender and Development, a unique sub-regional instrument that brings together all existing global commitments to gender equality and enhances these through targets and timeframes. The Protocol is an example of creating an enabling environment for women's rights as advocated by FLOW 2.

Apart from leading the alliance of over 40 NGOs formed around this Protocol now demanding that it be updated in line with the Sustainable Development Goals, GL has worked to achieve its targets on the ground in three areas aligned to FLOW priority areas – political decision-making, VAW, and economic empowerment. With support from MDG 3 and FLOW 1, GL has pioneered an innovative, integrated model for mainstreaming gender in 400 local councils covering 25% of the population of the region. This involves an enabling environment for political participation by women; a ten-stage process for achieving gender-responsive governance by localising the SADC Protocol, involving women and men; local action plans for ending VAW, and support by councils for economic empowerment of survivors of gender violence as part of a holistic approach to ending violence. This cutting edge work, presently being assessed as part of the FLOW 1 close out, is now in limbo, with limited project funding and no institutional funding to support and upscale it.

Women in Informal Employment: Globalizing and Organizing (WIEGO) is a global network focused on securing livelihoods for the working poor, especially women in the informal economy. Through MDG3 and FLOW grants, WIEGO has been able to support networks of women informal workers' organisations in accessing improved economic rights and political participation in developing countries. In 2013, after years of joint work, WIEGO promoted and supported the creation of the International Domestic Workers Federation (IDWF). The IDWF is the first global union federation to be led by women. It has sustainable processes in place with 58 affiliates in 46 countries representing over 400,000 domestic worker members. With the Ministry's support through MDG3/FLOW1, the IDWF, WIEGO and partners successfully campaigned for a domestic workers' convention at the International Labour Organization. With continued support, the IDWF has achieved improvements to labour legislation at local and national levels, proving its record of effective

campaigns in organizing and advocacy. The resulting legal frameworks enshrine improved rights and protections for domestic workers, the majority of whom are women. These achievements are a direct result, and could only be possible, with the Ministry's support.

Under FLOW1, the WIEGO network also promoted greater economic rights and political participation of home-based workers. During project implementation, home-based workers made great strides in organizing internationally and gaining recognition, especially in 2015 when ILO's Recommendation 204 on transitioning from the informal to the formal economy was adopted through a long process of inclusive negotiations. Without follow-up and further funds, the momentum created by a network of over .5 million home-based workers is at risk. The women working at the bottom of global value chains will continue to face risks and rights deficits at work, remaining almost entirely unrecognized, valued, or taken into account in urban planning and local economic development processes. Twelve (12) local project partners will have fewer opportunities to build their advocacy and negotiating capacity and will have greater difficulty to increase their participation in economic development processes, in leveraging support from governments and other key stakeholders, and in gaining economic rights and public services.

What these three examples illustrate is the long term nature of the kind of transformative change envisaged in FLOW 2, as well as the local know how and ability to work through networks that create multiplier effects that is a particular strength of women's organisations. The IOB review quoted earlier, and endorsed in your letter to parliament, advocates prioritising organisations which understand the local situation, focusing on strengthening their institutional capacity rather than implementing short term projects. The MDG 3 evaluation states unequivocally that, *"independent funding is still necessary for organisations working to achieve equal rights and opportunities for women and girls."*

The IOB and MDG3 reports furthermore give some crucial conclusions, which have been ignored in the design of the FLOW 2 procedures, namely, they emphasise the crucial role of women's rights organisations for transformative change for women's rights.

They state that women's organisations, small and large, continue to play a crucial role because of their good knowledge of local problems and situations, and their important role in policy advocacy, thus filling gaps where government action is lacking, e.g. in violence against women.

They state that these women's organisations merit and need long-term sustainable support, supporting their institutional strengthening, and less their role as implementing organisation

The results of the MDG3 fund – with a maximum period of 3 years – concentrated more on the output than outcome level. The MDG 3 fund design lacked a clear framework to measure impact and longer term results. The IOB report notes that even though this was not specifically requested in the MDG 3 framework, there are ample examples of transformational results achieved by MDG 3 grantees, including changes in legislation and better enforcement, and some steps towards changes of norms and behaviour. The IOB states that these important results cannot become sustainable if the women's organisations are not enabled to continue their work in this area. Since the FLOW 1 recipients will no longer obtain funding from FLOW 2, the sustainability of these results achieved is being undermined.

Remedies sought

We understand that FLOW 2 decisions have been made and communicated and contracts signed. However, we urge that:

Short term

- 1) Supplementary funding be made available for deserving proposals that failed to receive funding for the many reasons cited in this appeal that disadvantaged women's organisations, on terms that help to redress some of the systemic issues raised. We note that FLOW 1 began as Euro 70 million; the final amount disbursed was Euro 85 million (20% more). There is a precedent for supplementary funds being availed; we believe that there is compelling evidence for this to be done.
- 2) A Women's Rights Organizing Fund to be managed out of the Dutch Embassies around the world be created. This fund would give direct access to national and local women's rights groups in all of those countries, so as to support their organizational capacity and to advance key issues affecting women's rights that are contextually relevant and locally owned. This Fund could function in a similar way to the existing Accountability Fund. It requires a commitment of some Euro 10-15 million euros a year, for the next 5 years.
- 3) Bridge financing be made available to FLOW 1 grantees who failed to get further funding through FLOW 2 to enable them to reposition, fund raise, and to ensure that the gains of FLOW 1 are consolidated, in keeping with the stated aims of FLOW 2. Presently there is no close out plan for FLOW 1, not even a learning session, despite the Community of Practise developed that will now have to be re-engineered.
- 4) Final payments for FLOW 1 be made expeditiously, consistent with reporting and audit requirements, to assist with liquidity.
- 5) The Ministry arrange a round table meeting of FLOW 1 and FLOW 2 grantees to develop synergies and for possible re-granting. This idea has already been enthusiastically welcomed by some FLOW 2 grantees.

- 6) A portion of the coming Human Rights fund be earmarked for women's rights.
- 7) The Netherlands Government convene a round table with UNWOMEN and other donors interested in funding women's rights (who may have contributed to FLOW), possibly at the CSW; sharing the unsuccessful but promising FLOW proposals with them and urging for them to be funded.

Long term

- 1) Women's organisations be consulted in the design of funds intended for their work.
- 2) A thorough assessment of FLOW and other Dutch grant-making processes be undertaken to bring them in line with current trends that are rigorous but considerate of the time of smaller organisations, and offer them the support they need to grow and develop. In particular, we urge the changing of the application process to a two or three stage process, rather than a one- step all-or-nothing approach, with requisite technical support for smaller organisations.
- 3) Prioritisation of grantees in accordance with the grant call. For example, a call targeted at women's rights should have a certain percentage set aside for women's rights organisations.
- 4) Capacity building and empowerment as key targets and end-result, whether or not women's organisations receive funding.

Respectfully submitted



Sascha Gabizon
Women's Major Group

On behalf of the following organisations for which endorsements had been received by 12 January, 2016, with possibly more to follow by the time of the hearing:

1. ACORD, Agency for Cooperation and Research in Development (FLOW 2, 062)
2. Fundación Puntos de Encuentro para la Transformación de la Vida Cotidiana (FLOW 2, 152).

3. Gender Links (FLOW 2, 028)
4. Huairou Commission (Co-applicant with Plan Netherland (Lead organization)
FLOW 2, 135)
5. Nobel Women's Initiative (FLOW 2, 051)
6. Pesticide Action Network Asia and the Pacific (Lead applicant); PAN Africa;
GABRIELA Philippines - (FLOW 2, 199)
7. Réseau des Organisations Féminines d'Afrique Francophone (ROFAF) and
Genre en Action: will sign the joint appeal (FLOW 2, 211)
8. Shirkat Gah - Women's Resource Centre, Pakistan, Institute for Women's
Empowerment and Women Living Under Muslim Laws (FLOW 2, 252)
9. WECF International and WEP (FLOW 2, 202)
10. WILDAF (Lead applicant; partner ROPPA (FLOW 2, 064)
11. WIEGO Women in Informal Employment: Globalizing and Organizing (FLOW
2, 105)
12. Women Peacemakers Program (WPP) and WILPF (FLOW, 231)
13. CREA India
14. Global Fund for Women

Category 2 Supporting Organisations (some of which might join category 1):

Semillas, Sociedad Mexicana Pro Derechos de la Mujer, AC.
 Ecumenical Women's Initiative
 Fund for Global Human Rights
 Mama Cash
 Karama
 Femnet
 JASS (Just Associates)

ANNEX A: COMPARATIVE ANALYSIS OF FLOW 1 AND 2

PARAMETER	FLOW ONE	FLOW 2	COMMENT
Legal Provisions	Order of the Minister for European Affairs and International Co-operation, 10 May 2011 no DJZ/BR-0457/11	Order of the Minister for Trade and Development Co-operation 3 June, 2015 122-15	Same provisions
Size of fund	Euro 70 million – later increased to Euro 85 million	Euro 93 million	FLOW 2 is a bigger fund yet it went to even fewer grantees. Important to note that FLOW One was topped up; this shows that supplementary funds can be accessed for funds of this kind.
Other donors	"Scope will be created for other donors wishing to contribute to FLOW in 2012-2015."	"The amount is likely to be increased with additional contributions from other donors."	Both FLOWS mentioned other donors – is there a possibility of bringing them into this discussion?
Maximum and minimum	D4 Minimum grant application is Euro 1 million and maximum is Euro 6 million; duration 4 years.	Minimum is Euro 5 million and maximum is Euro 15 million; duration 5 years.	The floors and ceilings for FLOW 2 meant there could only be a maximum of 15 and minimum of six grantees compared to a minimum of 12 and maximum of 70 in FLOW One. The final decision in FLOW 2(9) tilted more towards the minimum than maximum.
Proportion of FLOW to other resources	D3 Grants awarded by FLOW must not exceed 75% of the total annual income of the applicant organisation.	D3 FLOW will not exceed 60% of the total annual income of the organisation	The increase in the proportion required from other donors in FLOW 2 disadvantaged smaller NGOs.
Eligibility	Must be based in or operate in developing countries.	FLOW 2016-2020 are intended for Dutch and international civil society organisations with promising proposals and a proven track record in the areas of gender equality and women's rights.	In both cases the funds were designed for Dutch and international NGOs, operating in developing countries (low and lower middle income countries). However, FLOW 2 specifies a "proven track record on gender equality and women's rights", and activities run by local civil society organisations. This potentially shows that <i>priority should have been given to</i> women's
	Programmes set up by independent, not for profit civil society organisations with legal personality, both Dutch and international, that contribute in a result-oriented way to structural poverty	Flow 2016-2020 supports activities run by local civil society organisations.. medium term financial support to gender equality and women's rights programmes implemented in low-and lower middle	

PARAMETER	FLOW ONE	FLOW 2	COMMENT
	reduction.	income countries by Dutch and international civil society organisations.	organisations, and especially those in the global south, in terms of the call.
	Can submit independently or in a consortium	Run independently or jointly with institutional partners.	Both calls made provision for consortia or independent organisations.
	Dutch civil society to be informed and consulted.	(No mention of this).	FLOW 1 specifically mentioned consultation with Dutch civil society, missing in FLOW 2.
Background	Built on MDG 3 – Euro 70 million; 454 proposals, 45 received funding – inheritance and property rights, paid employment, politics and public administration, VAW. The fund “had a significant catalytic effect on strengthening the position of women.”	The FLOW 2 call states: “Thanks to the MDG 3 and FLOW funds civil society organisations for women’s rights have been able <i>to reach broad networks</i> of grassroots organisations, develop capacity for lobbying and advocacy, and <i>grow as organisations.. it builds on the results achieved by the earlier funds and ties in with the ongoing debate on women’s rights</i> ”.. Beijing Plus Twenty, the post 2015 Agenda, SDG 5.	The number of grantees has reduced with each successive call from 45 (MDG 3) to 34 (FLOW 1) to 9 (FLOW 2). Both funds stated that the one built on the last one. It is significant that the FLOW 2 call explicitly states that it builds on the results of FLOW 1. It further explicitly states that through FLOW 2 civil society organisations for women’s rights have been able to reach broad networks, and grow as organisations. Yet only one previous FLOW One grantee, an INGO that does not specifically focus on women’s rights, received further funding.
Aim	To contribute to structural poverty reduction by improving gender equality and empowerment of women.	To promote an <i>enabling environment</i> for equal opportunities, rights and safety for women and girls in all low and lower middle income countries.. by improving opportunities for women and girls and creating a climate in which women’s rights are better protected, the fund contributes <i>at local and national level</i> to sustainable inclusive development and to the fight against poverty and lack of rights. The aim of a strategic partnership	FLOW 2 places a stronger emphasis on creating an enabling environment for gender equality and women’s rights. This has been used in meetings with FLOW One grantees as one justification for funds going to a few large northern based INGOs. This raises a fundamental question about whether such organisations are better placed to deliver an enabling environment on women’s rights than women’s rights organisations

PARAMETER	FLOW ONE	FLOW 2	COMMENT
		of this kind is to create the right conditions (enabling environment) for the <i>permanent transformation of institutions, laws and standards</i> in order to bring about gender equality and women's rights.	based on the ground. This is a contentious and highly debatable point, especially given the FLOW 2 emphasis on delivering results at local and national level.
Areas of focus	1) Combating violence, peace, security, reconstruction	1) Combating violence against women.	The two funds have three, very similar themes, with slight variations in emphasis (e.g. FLOW 2 specified food security, employment and property rights, and access to safe drinking water) as part of economic self-reliance. The fact that the themes of the two funds remains fundamentally the same is a strong argument in favour of continuity: the question is why would FLOW 2, with such similar themes, and seeking to build on the results of FLOW 1, not have deliberately sought to strengthen the existing, performing grantees?
	2) Economic self-reliance, through giving women a say in food security, employment and property rights, and access to safe drinking water.	2) Women's economic participation and self-reliance.	
	3) Participation and representation of women in politics and public administration	3) Participation by women in politics and public administration.	
Assessors	Assessment committee, two members of staff of the Ministry of Foreign Affairs and possibly an external consultant.	A committee of independent experts from within and beyond the ministry to assess the applications. Appraisal committee, prepared by assessment teams, monitored by consistency teams.	Similar parameters, with the addition of assessment teams and consistency teams in the case of FLOW 2. However, given the importance of the prior track record, why were managers of FLOW 1 not involved in any way in verifying track record? Who were the assessors? How well qualified were they to assess impact on the ground, beyond what is recorded in the application and case studies?
No of applicants	238	265	Even larger no of applicants for FLOW 2– 11% more

PARAMETER	FLOW ONE	FLOW 2	COMMENT
Total amount applied for		Euro 1.1 billion – ten times more than available.	
Assessment criteria one-threshold	1) Threshold criteria – no points; applicants must satisfy these criteria	1) Threshold – all must meet	Similar requirements, but some key differences. On a positive note, FLOW 2 responded to complaints during FLOW One on prescriptive approach to salaries, making this more context-specific. However, the increase in the size of grants and proportion of Dutch funding clearly militated against smaller NGOs.
No who failed to meet the threshold test	63 (26%)	161 (60%)	A much higher proportion of applicants failed to meet the threshold criteria in FLOW 2(60% compared to 26%). Conversely a much higher proportion (74%) went on to Stage Two in FLOW 1 than in FLOW 2(40%).
No who went forward to Stage 2	175 (74%)	104 (40%)	
Assessment criteria two – organisational performance (Flow One); track record, Theory of Change and Programme check (Flow Two).	2) Organisational check – if quality and efficiency of the organisation is deficient – rejected.	2) Quality of track record in the areas of gender equality and women's rights	FLOW 1 gave equal weight to the three programme criteria – threshold, organisational check (track record) and programme. Organisations had to score at least 65% on track record to go on to the next phase. FLOW 2 lists almost exactly the same set of three criteria, adding a fair bit of detail with regard to what is meant by the quality of track record in relation to women's rights and gender equality. In keeping with trends in international aid, FLOW 2 was also far more detailed in its requirements concerning results, Monitoring and Evaluation, financial and administrative management, for example including IATI
	<ul style="list-style-type: none"> Track record over the past three years 	Expertise and effectiveness; flexibility and learning capacity; knowledge of, and value added in country contexts; inclusive approach	
		The effectiveness of gender equality and women's rights activities implemented by the organisation/ consortium, including the use of relevant national and international networks to enhance the intervention effectiveness, the challenges this entailed, and response.	
	PME system	Structural embedding of results	
		A Monitoring and Evaluation framework,	

PARAMETER	FLOW ONE	FLOW 2	COMMENT
		including a description of the technical assistance needed to strengthen this for local organisations.	for the first time. Transparency is also emphasised far more. However, track record, a critical factor for women's rights organisations, was not weighted on its own in FLOW Two, despite being cited in the call as one of the three main criteria. This is a critical factor in the appeal. The weight of prior experience was substantially diluted in FLOW 2 because this was combined with programme check, and theory of change, each given equal weight, rather than being a factor on its own (see Annex Two).
		The extent to which the organisation/ consortium has the capacity to absorb, adapt in response to PME.	
	Financial and administrative management	Accountability to be ensured through IATI; budget allocation for technical assistance on M&E	
		Transparency, accountability and public support	
		Transparency – donors and partner organisations	
	3) Programme check – If quality of the programme is deficient – no further consideration	3) Quality of the programme in the first year and the Theory of Change	The programme check criteria for FLOW One and Two were similar, however in keeping with international development trends, FLOW 2 introduced a Theory of Change. This was welcomed by women's organisations, many of whom have been developing Theory of Changes for all their work.
		ToC	
		Short and medium terms objectives with accompanying vision	
	Policy	Chosen strategy – premises underlying these points	
	Relevance to development		
	Relevance to the objective of this call	Relevance to the objective of this grant	However, it is not evident why equal weight should have been given in the scoring to quality of the lead party (a factor on its own) and Theory of Change and Programme proposal (the third criteria is comprehensive programme proposal). This further disadvantaged small women's organisations, as large INGOs have substantially more resources
	Contribution to Dutch development objectives	Extent to which in keeping with Dutch International gender policy	
	Countries in which the activities will be carried out	Geographical areas of operation – added value	
	Complementarity	Complementarity and cohesion	
	Innovation – thematic or efficiency gains	Innovation- thematically or due to improvements in the intervention strategy	

PARAMETER	FLOW ONE	FLOW 2	COMMENT
	Contextual analysis	Context, actor and gender analysis – extent to which the programme proposal reflects a valid contextual analysis	<p>to develop theories on paper than small women's organisations, whose main strength is delivery on the ground, the power and quality of the relations they develop.</p> <p><i>The weighting of the different factors is not spelt out in the call, only in the subsequent explanation of the appraisal procedure, ie this was discretionary. This is a critical factor in the appeal, as it calls into question the underlying biases, and extent of the transparency of the process.</i></p>
	Contribution to building capacity	Contribution to institutional capacity building	
	Outcomes, outputs, activities, funds	Measurable process and impact indicators; clear links	
	Risks, monitoring and corrective action	Risk analysis	
	Sustainability	Sustainability	
		Added value on gender equality – government authorities, other NGOs, multilateral organisations and business community	
		A budget for the entire duration of the programme	
No turned down at stage 2	65 = 27% (did not meet a score of 65% or higher for organisational check).	69 = 26% (did not meet score of 70%, being an equal weighting of track record, Theory of Change, and first year programme).	As noted, FLOW 1 took a three stage approach, whereas FLOW 2 took a two stage approach. It should also be noted that FLOW 2 raised the score for further consideration to 70% as compared to 65%. If the score of 65% had been maintained (96/148) 39 organisations would have gone on to the third stage using the two stage process and weighting of FLOW Two, which in any case is open to contestation.
No who went on to stage 3	110 (46%)	35 (13.2%)	
Assessment criteria three - Programme	In the case of FLOW One, the programme check was divided into policy (60%) and technical (40%). Applicants	Track record, Theory of Change and Programme equally weighted in stage two	

PARAMETER	FLOW ONE	FLOW 2	COMMENT
criteria	had to score at least 65% on policy and 55% on programme		
No who went to final round	47 or 19% (these had requested Euro 193,970, 763 – 2.7 times more than available in the fund).	35 or 13.2% - the explanation does not state how much these asked for relative to the fund.	After the three round process, the proportion of FLOW 1 who went forward to the final round was still six percentage points higher in FLOW 1 than in FLOW 2.
Allocation of funds – per the call	"If insufficient funds, applications will be ranked according to the programme check; the size of grants received will depend on how well they meet the criteria."	"If insufficient resources are available for all satisfactory applications to receive the full grant requested, funds will be allocated to them according to their ranking on the basis of the criteria specified in the rules .. in the final allocation of resources, grants will be allocated to the highest ranking applications until the available resources are exhausted."	In both cases the final allocation was determined by Article 8 para 3 (d) of the Grants Decree, but interpreted very differently. In the case of FLOW 1, the decree was used to classify the top scoring organisations according to north/south, and those specialising in women's rights compared to generalist organisations; with top priority being given to the first two categories, then to organisations based in the south, and lastly to INGOs. No such distinction was made in the case of FLOW 2– the decision was based on scores only.
		"The funds will be allocated with due regard for an even distribution over the FLOW 2016-2020 priorities, in accordance with Article 8, paragraph 3 (d) of the Ministry of Foreign Affairs Grants Decree."	
Principles considered in final selection – per explanations of appraisal procedure	1) Those with two had the second one removed = 44 organisations, asking for Euro 188mn. Looked at distribution of themes and regions – this found to be adequate	1) Only those receiving 70% or more	
	2) In accordance with Article 8, para 3, applications divided into 1. Womens org hq in north or west	2) Those applications that met the criteria best would be given priority, in the case of insufficient resources for all	<i>Of crucial importance is that these final selection criteria were decided on after the call; they do not form part of the rules of FLOW. They are part of an interpretation of the same Decree. The question that must be asked is how and why the same decree can be interpreted so differently. The import of this is given</i>

PARAMETER	FLOW ONE	FLOW 2	COMMENT
	2. INGOS 3. Women's org hq in developing countries 4. General NGOs. = four lists with the best categories in each	qualifying, grants would be awarded to the highest ranking applications until the resources were exhausted.	<i>in the figures below.</i>
	3) In accordance with Article 4 of order on FLOW – of the applications that meet the criteria, those that meet them best will be given priority, with due regard to an even spread. = top applications in the four categories. Some categories valued higher than others. 3 (women's organisations headquartered in developing countries) were valued highest – “this category embraced women's organisations based in the South and therefore closest to the goals of FLOW.. in supporting them, the grants go directly to organisations in the countries that were targeted in the first place.” Category 1 (women's org hq in north) = second, deal with women's issues; Category 4 (general NGOs in the south) = third, based in the south “offers large opportunities for direct influence without the intervention of a northern partner.” Category 2 = INGOS = lowest- “large	3) Even distribution according to the factors as mentioned in Article 8, paragraph 3 (d) of the Ministry of Foreign Affairs Grants Decree (but not elaborated). Concludes: “in accordance with the scores awarded, the Appraisal committee, acting for the Minister for Foreign Trade and Development Co-operation, has assessed the applications according to these criteria. Those that comply the best are ranked at the top, being expected to contribute most to FLOW themes. In total 9 grants were finally awarded to the applications with a total score of 129 or more.”	

PARAMETER	FLOW ONE	FLOW 2	COMMENT
	generic organisations based in OCED countries."		
No and % of total selected	30 (4 later – after appeals= 34) = 14.2% of total applicants	9 = 3% of total applicants	FLOW 2 awarded grants to less than one third the no of grantees as FLOW 1; 3% of all applicants compared to 14.2% in FLOW 1. Furthermore, whereas the largest proportion of funds in FLOW One (34.4%) went directly to women's organisations based in the south followed by 29.1% to women's organisations in the north/west = 63% to women's NGOs, in the case of FLOW 2, 67% went to INGOs; 22% to women's organisations based in the north and none directly to women's organisations based in the south. <i>This runs contrary to FLOW 2 declared intentions to strengthen women's organisations where it matters most – on the ground.</i>
% women's organisations HQ developing countries	34.4%	0%	
% women's organisations HQ in north/ west	29.1%	22%	
% general NGOs HQ developing countries	14.7%	11%	
% INGOs	21.8%	67%	
Amount awarded	In all cases the Minister decided that a lower amount than applied for would be awarded as the 30 had together applied for Euro 131,649,910. All regranters= 70%; women's organisations in the west = 65%; INGOs= 40%; women's organisations in south = 70%; general NGOs in the south = 55%.	No weightings in the amounts awarded – based on the applications .." in the final allocation of resources, grants will be allocated to the highest ranking applications until the available resources are exhausted."	Whereas in the case of FLOW 1 the amounts received were weighted according to priority with women's organisations and re-granters receiving the highest proportion of 65% to 70%, and INGOs the lowest (40%) in FLOW 2 applicants received what they asked for, with the lions share going to INGOs!
Average size of grant	Euro 2.4 million	Euro 10.3 million	

ANNEX B – ANALYSIS OF FLOW 2 GRANTEES

ORGANISATION	HQ	Category	TO DO WORK IN				TOTAL
			Asia – Pacific	Africa	Latin America	Middle East	
1) Women for women International	UK	Women's org in developed country	Afghanistan,	DRC, Nigeria			3
2) SNV	Netherlands	INGO	Vietnam	Kenya			2
3) IBIS, Impunity Watch	Denmark	INGO		Liberia, Burundi	Guatemala		3
4) International Women's Development Agency	Australia	Women's org based in developed country	Myanmar, Thailand, Cambodia, Papua New Guinea, Solomon Islands and Timor-Leste				6
5) Action Aid	SA (UK)	INGO	Pakistan, Bangladesh	Ghana, Rwanda			4
6) Rutgers, Pro Mundo, Sonke Gender Justice	Netherlands, Brazil, SA	INGO	India, Pakistan	Uganda, Rwanda, Egypt, Morocco		Lebanon	7
7) Simavi, Solidaridad, Healthy Entrepreneurs Foundation	Netherlands	INGO		Tanzania, Ghana			2
8) Hivos	Netherlands	INGO		Malawi, Zambia, Zimbabwe		Iran, Jordan	5
9) Panos West Africa	Senegal (UK)	INGO		Senegal, Mali, Niger, Ivory Coast			4
TOTAL			10	18	1	3	32

ANNEX C: SUMMARY OF SCORES

Note: Assessment factors in the same colour are very similar ie get double the weight.

Budget (in bold) gets only 4% of the programme score and only 3% of the score overall.

Assessment factors	No of criteria	No of indicators	Score
TRACK RECORD			
T1. expertise in the areas of gender equality and women's rights, particularly FLOW 2016-2020 themes	1	2	6
T2. Effectiveness including its use of relevant national and international networks challenges and response	1	4	6
T3. Innovative intervention strategies and ways of raising efficiency as it carries out its programmes.	1	2	6
T4. Transparency & accountability to target group partner organizations, local stakeholders, donors and public	1	3	6
T5. Inclusiveness: participation of local partners, gender mainstreaming, and increasing opportunities and access to basic services for vulnerable and marginalized groups.	1	3	6
T6. Structurally embedded its results.	1	3	6
T7. Added value government, civil society organizations, multilateral organizations business community.	1	3	6
T8. Capacity to absorb, and adapt in response to the lessons learned through (PME).	1	2	6
<i>Sub-total</i>	8	21	48
THEORY OF CHANGE			
P1. Adequate contextual, actor and gender analyses of the theme of the planned intervention	1	8	6
P2 Vision and explanation of how strategic short- and medium-term goals are logically derived from the context, actor and gender analyses.	1	3	6
P3. Choice of intervention strategies in the programme.	1	7	6
P4. In the case of applications made by a consortium, the extent to which the theory of change gives an adequate account of the roles of its members and its added value.	1	3	6
P5. Adequate system with indicators for monitoring outputs, outcomes and impact.	1	4	6
P6. Adequate risk analysis that describes the steps taken to limit risks as far as possible.	1	2	6
P7 Countries and or regions of added value and opportunities to achieve results.	1	3	6
P8. Makes explicit the premises and choices underlying the chosen approach.	1	1	6
P9. In keeping with the FLOW 2016-2020 priorities and the strategic objectives of these priority areas.	1	1	6
<i>Sub-total</i>	9	32	54
PROGRAMME			
A. Policy relevance and complementarity of the programme (P10 a-c)			
P10a. Activities contribute to equal rights and create opportunities for W&G in specified countries and themes.	1	4	6

Assessment factors	No of criteria	No of indicators	Score
P10b in keeping with Dutch international gender policy Beijing Platform for Action and SDG Goal 5	1	1	6
P.10c: Complementarity and coherence: activities aligned with target countries and development concerned.	1	3	6
<i>Sub total</i>			
B. Sustainability and capacity development (P11-P14)			
P 11. Programme proposal, especially problem and objective, reflects valid contextual analysis.	1	2	6
P 12. Contribution to institutional capacity building of the partners and the extent to which the target group can effectively influence the programme.	1	5	6
P13. Satisfactory risk management analysis and monitoring and corrective action. Funding necessary in addition to the requested grant, is guaranteed.	1	3	6
P14. Activities produce a lasting effect for the ultimate target group and contribute to the institutional sustainability of partners and the applicant	1	5	6
C. The position of the lead party and co-applicants in the programme (P15)			
P15. Collaboration with co-applicants has additional value illustrated in signed collaboration agreement.	1	6	6
<i>Sub-total</i>			
D. Outcomes, outputs, activities and resources (P16a-P16f)			
P16. Detailed description of outcomes, outputs, activities and resources, clear link between outputs and resources; outcomes, outputs and resources are Specific, Measurable, Acceptable, Realistic and Time-related			
P.16 a: Outcomes concrete; fall within the programme's span of influence; follow logically from the problem as defined in the contextual analysis.	1	2	6
P.16 b: Progress in achieving the formulated outcomes can be determined objectively.	1	4	6
P.16 c: Outputs are concrete and fall within the programme's span of control; they follow logically from the outcomes described in 16.a.	1	3	6
P.16 d: Progress on outputs determined objectively.	1	4	6
P.16 e: Logical connection activities and outputs.	1	2	6
P.16 f: Resources required for outputs.	1	4	6
<i>Sub-total</i>			
E. Innovation (P17)			
P17. Innovative thematically or due to improvements in the intervention strategy or efficiency gains	1	5	6
<i>Sub-total</i>			
<i>Sub- total programmes</i>	15	53	90
TOTAL	32	106	192