



**OCHA**

United Nations Office  
for the Coordination of  
Humanitarian Affairs

# **oPt Humanitarian Fund Operational Manual**

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## Acronyms

AA	Administrative Agent
AB	Advisory Board
AIDA	Association of International Development Agencies
ARA	Access Restricted Areas
CHAP	Common Humanitarian Action Plan
CN	Concept Note
COGAT	The Coordinator of Government Activities in the Territories
GMS	Grant Management System
GVB	Gender-based Violence
HC	Humanitarian Coordinator
HCT	Humanitarian Country Team
HoO	Head of Office (OCHA)
HFU	Humanitarian Financing Unit
HRP	Humanitarian Response Plan
ICCG	Inter-cluster Coordination Group
ICCT	Inter-Cluster Coordination Team
ICRC	International Committee of the Red Cross
IHL	International Humanitarian Law
IHRL	International Human Rights Law
MA	Managing Agent

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M&E	Monitoring and Evaluation
MHPSS	Mental Health and Psychosocial Support
M&R	Monitoring and Reporting
MOU	Memorandum of Understanding
MPTF	Multi-Partner Trust Fund
NCE	No-Cost Extension
NGO	Non-Governmental Organization
OCHA	Office for the Coordination of Humanitarian Affairs
PA	Palestinian Authority
PP	Project Proposal
PNGO	Palestinian Non-Governmental Organizations Network
PUNO	Participating United Nations Organization
RC	Review Committee
SAA	Standard Administrative Arrangement
SRC	Strategic Review Committee
TOR	Terms of Reference
TRC	Technical Review Committee
TSCA	Temporary Shelter Cash Assistance
UNDP	United Nations Development Programme

## 1 Introduction

The purpose of the Operational Manual for the occupied Palestinian territory (oPt) Country-based Pooled Fund (CBPF) is to describe the governance arrangements, allocation modalities and priorities, and accountability mechanisms of the Fund, as well as to detail the roles and responsibilities of the stakeholders involved.

Under the direction of the Humanitarian Coordinator (HC), the oPt Humanitarian Fund (oPt HF) aims to support the timely allocation and disbursement of donor resources to the most critical humanitarian needs as defined by the Strategic Response Plan. In order to meet this goal, this Manual is issued by the HC and endorsed by the Advisory Board to:

- i. provide clarification and instructions for all stakeholders involved in the management of the HF on effective management and governance practices;
- ii. describe the steps and requirements of the allocation processes with the aim of enhancing timely and strategic allocation decisions; and
- iii. provide an overview of the general direction and programmatic focus of the oPt HF.

The goal of this Manual is to guide implementing partners and facilitate the role of OCHA, members of the Review Committees, and sectoral experts.

This Manual should be read in conjunction with the global Operational Handbook for CBPFs. The present document defines the country-specific regulations that govern the oPt HF. It is designed within the framework provided by the Operational Handbook for CBPFs, which describes the global set of rules that apply to all CBPFs worldwide, and adapt specific aspects of the global regulations to the context of humanitarian response.

Adherence to the guidance provided in the two documents is mandatory so as to ensure standard and transparent processes.

## 2 Scope and Objectives of the CBPF

The oPt HF was created in 2007 to provide rapid allocation and disbursement of funds to UN agencies, international and national NGOs, and organizations of the Red Cross/Red Crescent movement, to support humanitarian activities at the sudden onset of emergencies. Following the induction of the new CBPF guidelines in 2015, the fund was further aligned to support the delivery of strategic humanitarian response identified under the Humanitarian Response Plan (HRP) while retaining the flexibility to allocate funds to unforeseen events or special requirements. **The oPt HF will maintain its ability to respond to unforeseen requirements as a strategic tool with the HCT.** The reserve allocation modality will be activated as described in the allocation modality section of this manual.

The Fund will continue to support the highest-priority projects of the best-placed responders, including national NGOs, through an inclusive and transparent process that supports priorities set out in HRPs. **The Fund plans to launch at least two Standard Allocations (SA) per year.** The number and size of the allocations will be determined by the availability of funds. In order to make a significant impact, the oPt HF will work on gradually increasing the scale of funding to reach 15% of the HRP needs<sup>1</sup>. So far, the fund had received over US\$155 million since its inception in 2007, with an average of \$29 million in contributions/allocations over the last 3 years.

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<sup>1</sup> Donors are also identified as risk owner for the funding of the fund (see risk management framework). Donors contribute to advocate for the fund.

The oPt HF's three main objectives are to:

- improve the humanitarian response by increasing the extent to which funding is allocated to priority humanitarian needs through an inclusive and coordinated process at the field level;
- strengthen the leadership of the HC;
- contribute to the delivery of the Humanitarian Response Plan (HRP) within the context of the Humanitarian Program Cycle (HPC).

Further, the oPt HF aims to ensure that humanitarian needs are addressed in a collaborative manner, fostering cooperation and coordination within and between clusters and humanitarian organizations. As such, the oPt HF contributes to improving needs assessments, enhancing the HRP as the strategic planning document for humanitarian action, strengthening coordination mechanisms, in particular the cluster system, and improving accountability through an enhanced monitoring and reporting framework.

A protracted protection crisis facing women, men, boys and girls continues in the occupied Palestinian territory (oPt), leaving many Palestinians struggling to live a life with dignity. It is driven by Israel's military occupation, including the blockade on the Gaza Strip, insufficient respect for international law, continuing internal Palestinian political divisions, and recurrent escalations of hostilities between Israel and Palestinian armed groups. In 2020, the humanitarian situation in the oPt was aggravated by two major developments. The first is the outbreak of COVID19: late in 2020, over 60,000 Palestinians have contracted the virus and nearly 500 have died. The measures imposed to contain the pandemic - including recurrent lockdowns and travel restrictions, school closures, reduction of commercial activities and mandatory quarantines - have severely undermined living conditions across the oPt. The World Bank forecasts that by the end of the year, the Palestinian economy will shrink between 2.6 to 7.6 per cent compared with 2019. Additionally, the state of emergency, and the subsequent lockdown, have exacerbated women and children's vulnerabilities, placing them at increased risk of various forms of violence, including intimate partner violence. Fears about the virus, economic stress and quarantine measures, have increased household tension, compounding domestic violence. The second development in 2020 is the decision by the Palestinian Authority (PA) to halt almost all bilateral contacts with Israel, in response to Israel's plan to formally annex parts of the West Bank. In this context, the PA has stopped accepting the tax clearance revenues that Israel collects on its behalf. This policy undermined Israeli-Palestinian joint efforts to contain the pandemic, which were implemented during the two months following the initial outbreak. Coupled with the economic slowdown due to the pandemic, the PA has lost 80 per cent of its income, reducing its capacity to pay salaries, deliver services and maintain social safety nets. The burden of this worsening situation falls hardest on vulnerable groups including: women headed households, persons with disabilities, refugees, Bedouin and herders in Area C, internally displaced persons, small-scale farmers, herders and fisher-folk in Gaza, people affected by conflict-related violence and people already living below the poverty line. So far in 2020, there has been a significant decline in conflict related violence and casualties, primarily in the Gaza Strip, and to a lesser extent in the West Bank. Between January and September, 25 Palestinians were killed by Israeli forces, compared with 91 and 229 fatalities in the equivalent periods in 2019 and 2018 respectively, while Palestinian injuries have declined by nearly 85 per cent compared with 2019 (approximately 2,000 vs 13,000).<sup>5</sup> While the occasional shooting of projectiles and launching of incendiary balloons from Gaza towards southern Israel, and Israel's subsequent airstrikes in Gaza continued, these did not result in casualties or further escalation. However, concerns about excessive use of force by Israeli soldiers resulting in the killing or

serious injury of Palestinians, as well as lack of accountability for such possible violations of international law, remain.<sup>6</sup> These developments have been compounded by the unprecedented funding crisis affecting UNRWA. This HRP was developed under the assumption that the Agency's large-scale humanitarian operations will continue in 2021; however, as of the time of writing, this scenario remains uncertain.

## Priorities for 2021

Recognizing that the situation in the oPt is effectively a chronic protection crisis, protection concerns continue to be the primary drivers of humanitarian need. Palestinians in the oPt, including Palestinian refugees, face a range of protection threats, including threats to life, liberty and security, destruction or damage to homes and other property, forced displacement, restrictions on freedom of movement and on access to livelihoods, and lack of accountability and effective remedy. Critical problems of concern relate to the protection of civilians and forced displacement, access to essential services, and erosion of resilience with associated humanitarian consequences that translate into needs. 2020 witnessed a significant increase in the severity of humanitarian needs across the oPt, due to the COVID-19 outbreak and measures taken by the Palestinian Authority in response to Israel's threat to annex parts of the West Bank.

In 2021, the Humanitarian Country Team (HCT) estimates that approximately 2.45 million Palestinians across the oPt will require some form of humanitarian assistance. Although this is only slightly more than the estimate for 2020 (2.41 million), due to the new developments detailed in the HRP plan, the number of people suffering from severe need, as opposed to moderate, has increased by 346,000. About 64 per cent of those in need of assistance, or 1.57 million people, live in the Gaza Strip and 36 per cent, 880,000 people, in the West Bank, including East Jerusalem. The nature of humanitarian needs, and the assistance required can be grouped in three categories, according to the critical problems that underlie them: those related to lack of protection and displacement; limited access to essential services; and erosion of resilience and preparedness.

Furthermore, all interventions supported by the oPt HF are to be consistent with basic humanitarian principles of humanity, neutrality, impartiality and independence.

## 3 Governance

### 3.1 Humanitarian Coordinator

The Humanitarian Coordinator decides on the strategy for the use of the fund and ensures that the fund is delivering on its key objectives and is managed in accordance with the Global Guidelines. The HC is supported by an Advisory Board (AB) which advises the HC on the allocation of funds and other strategic issues and by the OCHA Head of Office (HoO) and the OCHA Humanitarian Financing Unit (HFU).

### 3.2 Advisory Board<sup>2</sup>

The Advisory Board (AB) is a governance body with an advisory function that supports the HC to steer the strategy and oversees the performance of the CBPF. The final decision-making authority rests entirely with the HC, who is

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<sup>2</sup> The oPt HF advisory board will be

1. Sent documents to be discussed or endorsed by the AB ample time before the meetings.
2. Any incident that will require formal investigation will be shared at the AB and this will be a standing agenda item for all AB meetings
3. The AB will be informed twice a year on the findings of monitoring field visits and financial spot checks

the chair of the AB. The AB will convene at least four times a year. When a meeting in person is impossible, other means will be explored.

The functions of the AB are defined in detail in the Operational Handbook for CBPFs found on OCHA website.

#### **Composition:**

- **Chair:** The HC chairs and convenes AB meetings.
- **OCHA:** HoO
- **Donors:** four contributing (during the last 12 months) donors.
- **UN Agencies:** two UN agencies.
- **NGOs:** two national and two international NGOs
- **Observers:** Maximum 4, nominated by the HC. Constituencies can recommend entities to the HC for observer status.

**AB Secretariat:** The Humanitarian Financing Unit of the OCHA Country Office serves as the secretariat to the Board.

**Rotation:** AB membership should rotate on a regular basis. The HC and the OCHA HoO are the only permanent members. To ensure continuity, the replacement of AB members is staggered (half of the members rotates every 12 months). Each constituency, donors UN agencies and NGOs will recommend to the HC the replacement of the outgoing member(s) every 12 months.

**Observers:** Nomination of observers is a prerogative of the HC. Different constituencies can recommend observers to the HC. Currently the HC suggested having one representative for each of the following entities: AIDA, PNGO and ECHO. Observers will contribute to the substantive discussions of the AB bringing substantive knowledge of the humanitarian operational context in the oPt and promoting funding complementarity across donors.

### **3.3 Review Committees**

The Review Committee(s) are responsible for the strategic and technical review of the concept notes and project proposals received by the CBPF.

The functions and composition of the Review Committee(s) are defined in detail below, in line with the Operational Handbook for CBPFs.

#### **Strategic review committee:**

A strategic review committee (SRC) will be established for each cluster with the membership of NGOs (one national and one international), one UN agency, the cluster coordinator and OCHA represented by the fund manager. The members of the committee will use the standard score card to review the proposals. Each SRC will include members with diversified neutral (cross cutting group) who are equipped with the relevant competencies to the ongoing allocation and the specific session. Proposals will be shared with cross cutting group and the relevant scores will be sent to the fund manager before the sessions

The committee members other than the Fund Manager and cluster coordinators will be recommended by the cluster coordinator and approved by OCHA in consultation with AIDA and PNGO when appropriate. Members of the committees are preferred to be rotated each allocation and not to be applicants of the ongoing allocation.

#### **Technical review committee**



The review committees are comprised of groups of technical experts, per sector/cluster, that review project proposals according to their technical merit and the appropriateness of budget provisions. Enough time and effort will be dedicated to ensuring that substandard projects are improved or rejected.

The technical review of the recommended proposals will be done by the HFU, CBPF finance section, the specialized focal point as needed (such as gender, protection, disability) and cluster coordinators using the GMS. It is recommended that the cluster coordinators form a technical review committee from expertise in the cluster with the participation of national NGOs, international NGOs and UN agencies.

## 4 Allocation modalities

### 4.1 Allocation criteria:

The review and approval of project proposals is made in accordance with the programmatic framework and focus described above and on the basis of the following criteria:

- i. Partner eligibility and capacity: verified through a due diligence and capacity assessment process
- ii. Access: accessibility and/or physical presence to areas of operation; the location of the project is clearly identified
- iii. Strategic relevance: clear linkage to the Humanitarian Response Plan's strategic and sectoral objectives, compliance with the terms of the allocation strategy as described in the allocation paper, and alignment of activities with areas of special focus of the Fund
- iv. Needs-based: the proposal includes a recent (up to 12 months) needs assessment and, the needs are well explained and documented and beneficiaries are clearly described
- v. Appropriateness: the activities respond to the identified needs adequately, the objectives are relevant to the recently assessed needs, the desired outcomes are socially, economically, and environmentally appropriate, the strategies will assist in achieving the objectives and the desired outcomes
- vi. Technical soundness and cost effectiveness: the proposal meets technical requirements to implement the planned activities; and the budget is fair, proportionate in relation to the context, and adequate to achieve the stated objectives in the most effective way.
- vii. Risk management: assumptions and risks are comprehensively and clearly spelled out, along with risk management strategies
- viii. Monitoring: a realistic monitoring and reporting strategy is developed in the proposal. Project Proposal indicators are SMART with clear targets and sufficient Means of Verification to monitor progress and achievements. Monitoring and Reporting (M&R) plan is coherent and achievable/realistic and includes (where relevant): Baseline and end line, Research and documentation, Ongoing data collection, analysis and reporting (other than GMS reports), Project review and lessons learning sharing events and documentation, and Review & evaluation
- ix. Time criticality: In accordance with the cluster/sector strategies, the allocations will priorities time sensitive activities, i.e. activities that are most urgent in nature and require immediate response that cannot be postponed.
- x. Complementarity with other sources of funding: A proposal recommending activities that have received funding from other sources should be weighed more favourably than activities with no other sources of funding, unless justified by the cluster/sector with a solid needs analysis. Cluster/sector partners will be requested to provide most up-to-date funding sources on FTS.

- xi. Gender mainstreaming: Projects with gender with age marker (GAM) of 4 will be weighed more favourably in the vetting process.
- xii. Value for Money (Cost effectiveness): Projects that can demonstrate the most 'value for money' (e.g. maximum outcome and beneficiary reach for each dollar invested and effectiveness of the intervention) relative to the project budget, should be prioritized. In case of partnership, proposed partners should participate directly in program delivery (including clear segregation of duties between main applicant and implementing partner i.e. main applicant may delegate responsibility/ delivery, but not accountability/ quality)

## 4.2 Grant Duration

Implementation of projects funded by the oPt CBPF should not exceed twelve (12) months from the project start date as indicated in the final approved project documents, the HC can approve longer duration is necessary to meet programmatic requirements. Cost eligibility can start as early as the date of the projects' budget clearance as long as it matches the date mentioned in the agreement

If necessary, implementing partners can request project revisions and/or no-cost extension or cost extension to re-program and/or extend the duration of the grant (see section 5.3 of the CBPFS global guidelines).

## 4.3 Allocation Types

### 4.3.1 Standard Allocation

The HC uses the standard allocation process to support targeted priorities within the HRP. The process is informed by the AB and is conducted in close consultation with humanitarian partners to ensure the best possible use of resources. The process is transparent which is essential for the Fund to function properly. Transparency should be interpreted as the degree to which all relevant information is communicated to key stakeholders in a timely manner and whether allocation decisions can be documented and rationalized.

The process of the standard allocation is executed through a number of steps which are outlined below. The standard allocation begins with an allocation paper. Projects funded through standard allocations should be implemented within a maximum period of 12 months. Exceptions can be made by the HC when a longer duration is necessary to meet programmatic requirements. The grant ceilings are defined based on the partner risk level and project duration, as outlined in the Operational Modalities (page 17). The recommended minimum limit for standard allocation projects is \$200,000, with exceptions to be determined by the HC.

In-depth description of the allocation workflow, roles and responsibilities is contained in the Operational Handbook for CBPFs. Steps of the standard allocation process include:

1. Allocation strategy development
2. Submission of project proposals
3. Strategic review
4. Preliminary approval by HC
5. Technical and financial review
6. Final approval by HC
7. Disbursement

Standard Allocation Workflow	
<b>Step 1: Allocation strategy development</b>	
1.1	<b>OCHA</b> prepares an Allocation Strategy Paper (strategic priorities, criteria, process and timeline) Supervised by the HoO, the HFU prepares the Allocation Strategy Paper in consultation with the OCHA's <b>Inter-Cluster Coordinator (ICC)</b> who may request inputs from the ICCG.
1.2	OCHA HQ/FSCS review the Allocation Strategy Paper
1.3	<b>HC</b> reviews and AB endorses the strategy
1.4	<b>HFU</b> launches allocation on behalf of <b>HC</b>
<b>Step 2: Submission of project proposals</b>	
2.1	Eligible <b>partners</b> submit proposals through the GMS
2.2	Proposal(s) are vetted by <b>HFU</b> (eligibility of partner, template/criteria compliance, duplication of proposals, etc.)
<b>Step 3: Strategic review</b>	
3.1	<b>Cluster</b> Strategic Review Committees (SRCs) use GMS-based unified allocation scorecard for projects in their respective clusters/sectors
<b>Step 4: Preliminary approval by HC</b>	
4.1	<b>HFU</b> prepares SRC recommendations for <b>AB</b> review remotely or via an <b>AB</b> meeting
4.2	Recommended projects are submitted to HC for pre-approval. AB may feedback to HC/HFU at meeting or via email (at the discretion of the HC)
<b>Step 5: Technical and financial review</b>	
5.1	<b>Cluster</b> Technical Review Committees (TRCs), <b>OCHA HQ/FCS</b> , <b>HFU</b> and <b>gender/protection advisor(s)</b> conduct technical and financial review of pre-approved projects
5.2	<b>HFU</b> shares consolidated budget and technical feedback shared with the <b>partner</b>
5.3	Proposal revised - if the project does not meet quality standards thereafter, it is rejected (maximum of 3 rounds of revisions recommended)
<b>Step 6: Final approval by HC</b>	
6.1	<b>HFU</b> prepares a Grant Agreement for finalized projects and sets start date and reporting timeline in consultation with partner
6.2	<b>HC</b> approves project and signs a Grant Agreement
6.3	<b>Partner</b> counter-signs a Grant Agreement
6.4	<b>OCHA HQ/EO</b> signs a Grant Agreement which is uploaded as final in the GMS
<b>Step 7: Disbursement</b>	
7.1	<b>OCHA HQ/FCS</b> actions disbursement

### 4.3.2 Reserve Allocation

The reserve allocation is intended for rapid and flexible allocation of funds in response to unforeseen circumstances, emergencies, or contextually relevant needs. The reserve allocation process is significantly quicker and lighter than the standard allocation process.

The Fund is active and open to project proposals based on discussions between the HFU and eligible partners. Reserve allocations require a strategy/case for funding which may be limited in scope and criteria when compared to Standard Allocations in order to ensure a rapid and flexible disbursement schedule. When reserve allocations expect to receive more than one proposal, or when the HC has called for a limited competitive process, the reserve allocation proposals will undergo a competitive prioritization process through the use of scorecards in the GMS.

The reserve allocation can be triggered/activated at any time and upon humanitarian demand to respond to emergency and/or unforeseen needs. The HC will maintain a minimum of 10% of available funding for the reserve until October each year. The decision to accept project proposals from the reserve rests with the HC. If addressing emergency needs, the AB will be consulted and decision of the HC will be made with 48 hours. The HC, under exceptional circumstances, can approve reserve allocations and notify the AB post factum.

The process of the reserve allocation will be executed through a number of steps which are outlined below. Projects funded through reserve allocations should be implemented within a maximum of 12 months. Exceptions to this

timeframe can be made by the HC based on prevailing circumstances. The grant ceilings are defined based on the partner risk level and project duration, as outlined by the Operational Modalities (see Operational Modalities table). The recommended minimum limit for reserve projects is \$200,000, with exceptions to be determined by the HC.

Steps of the reserve allocation process:

1. Allocation strategy development (*reserve allocations may choose to use email communication may be used in lieu of a full Allocation Strategy Paper*)
2. Submission of a project proposal
3. Strategic review
4. Technical and financial review (may be combined with step 3)
5. Final approval by HC
6. Disbursement

Reserve Allocation Workflow	
<b>Step 1: Allocation strategy development</b>	
1.1	OCHA prepares an Allocation Strategy (strategic priorities, criteria, process and timeline) in consultation with OCHA's <b>Inter-Cluster Coordinator (ICC)</b> who gets inputs from the ICCG. Reserve Allocations may choose to use email communication may be used in lieu of a full Allocation Strategy Paper.
1.2	An Allocation Strategy Paper review by <b>OCHA HQ/FCS</b> if time allows vis-à-vis needs on the ground
1.3	<b>HC</b> review and <b>AB</b> endorsement (possibly remote in case of time issues) of strategy
1.4	HFU launches the strategy on behalf of HC (Allocation Strategy Paper or email notification)
<b>Step 2: Project submission</b>	
2.1	Eligible <b>partners</b> submit proposals
2.2	Proposal(s) are vetted by <b>HFU</b> (eligibility of partner, template/criteria compliance, duplication of proposals, etc.)
<b>Step 3: Strategic review</b>	
3.1	<b>HFU</b> and <b>SRC</b> review projects for strategic relevance using GMS-based simplified scorecard <sup>3</sup>
3.2	<b>HFU</b> submits projects for technical review
<b>Step 4: Technical and financial review</b>	
4.1	<b>TRC, OCHA HQ/FCS, HFU and gender/protection</b> advisor(s) conduct technical and financial review
4.2	Consolidated feedback shared with partner
4.3	Proposal revised - if the project does not meet quality standards thereafter, it is rejected (maximum of 3 rounds of revisions recommended)
<b>Step 5: HC approval</b>	
5.1	HC approves projects
5.2	HFU notifies AB of HC-approved project portfolio and comments/concerns are relayed back to HC
5.3	HFU prepares the Grant Agreement for finalized projects and sets start date and reporting timeline in consultation with partner
5.4	HC signs the Grant Agreement
5.5	Partner counter-signs the Grant Agreement
5.6	OCHA HQ/EO signs the Grant Agreement which is uploaded as final in Grant Management System
<b>Step 6: Disbursement</b>	
6.1	OCHA HQ/FCS actions disbursement

<sup>3</sup> This step may be combined with step 1.3 (strategic review)

## 5 Accountability

Accountability of the oPt HF is articulated on two levels: firstly, the ability of the Fund to achieve its objectives as a humanitarian financing mechanism. The HC is responsible for establishing a process which produces high quality allocation strategies, selects appropriate and qualified implementing partners, monitors implementation and verifies that reported-results are genuine and match those of approved project agreements. This is captured in a logical framework of the application template that enables the HC to assess the results of the oPt HF in the short, medium and long term.

Secondly, accountability relates to the ability of individual implementing partners to achieve expected project outputs and outcomes. Implementing partners are ultimately responsible for project activities, project outputs and reporting accurately on results. Implementing partners should ensure targeted beneficiaries' engagement and participation in the entire project cycle management, and proper communication and information sharing to targeted communities and relevant stakeholders.

The Accountability Framework aims to provide an overview of the four pillars of accountability under the oPt HF; including risk management, capacity and performance assessment of implementing partners, monitoring and reporting, and project auditing. The Framework defines how and when partners will be assessed and selected as oPt HF partners, what will be monitored and reported on, how and when audits will be carried out, who is responsible for each pillar of accountability, what key actions will be taken, and what resources are necessary for ensuring overall accountability.

To this end, OCHA prepares an Accountability Framework consisting of four pillars that enables the HC to ensure that implementing partners are delivering intended programmatic results; the oPt HF is managed responsibly and according to established guidelines; and ultimately to ensure that the oPt HF is achieving its main objectives. The pillars include:

- i. Risk management
- ii. Partner capacity and performance assessment and partner risk rating
- iii. Reporting (financial and programmatic)
- iv. Project monitoring and financial spot-checks
- v. Audits (project level)
- vi. Evaluation of CBPFs

Accountability is the foundation for effective CBPF management. It is exercised through a set of different components that enable the HC, mandated by the ERC, to ensure that: (i) implementing partners are delivering intended programmatic results; (ii) the CBPF is managed responsibly and according to established guidelines; and ultimately (iii) the CBPF is achieving its main objectives.

### 5.1 Risk Management

### 5.2 Eligibility

Donor contributions to the oPt CBPF will be utilized to fund projects carried out by:

- i. UN organizations (UNOs)

- ii. National and international Non-Governmental Organizations (NGOs) and organizations of the Red Cross/Red Crescent movement

UN eligibility:

In order to become eligible for funding from the oPt HF, United Nations agencies must fill out the Registration Form on the Grants Management System of the Fund (<http://gms.unocha.org/>). UN agencies are required to provide the name and contact information for the focal point(s) and the legal representative of the organization, address of the main office, and bank information.

Once the registration and the duly-filled-out due diligence form have been submitted, OCHA will proceed with its review and approval. The eligibility of the UN agency is determined after OCHA approves the registration form

NGO eligibility:

OCHA, as the Managing Agent, will carry out a due diligence process and an assessment of the capacity of potential NGO implementing partners. The outcomes of the due diligence and capacity assessment processes will determine the partner's eligibility, and the risk level of the partner considered eligible. The risk rating will in turn influence the assurance requirements (Operational Modalities see below) that apply to the management of the partner's grants, as described in the Operational Handbook for CBPFs.

The process for due diligence is described in detail in the Operational Handbook for CBPFs. The procedures that will be utilized to assess the capacity of implementing partners in the context of the oPt CBPF are described below.

At the partner level, the oPt HF has devised a context-appropriate approach to assess the capacity of each NGO partner that wants to be eligible for funding. The assessment aims at determining whether the NGO has a sufficient level of capacity in terms of institutional, managerial, financial and technical expertise. The HC, in consultation with the AB, has determined to use an Internal Capacity Assessment (ICA). Eligible NGOs are categorized according to a specific risk rating which determines the minimum standard of operational modalities applicable to the partner. The principle is that the higher the risk, the more stringent assurance mechanisms will apply. The system encourages improvements in capacity as partners can migrate to lower risk levels through good performance and by addressing capacity weaknesses. The score bands of each risk level (high, medium, low) are determined by the HC in consultation with the AB. More details about the approach the steps to be taken by the IP is in the global guidelines (page 30).

## Operational Modalities 2021

Risk level	Project duration (months)	Project value (thousand US\$)	Maximum amount per allocation (thousand US\$)	Disbursements (in % of total)	Financial reporting			Narrative reporting		Monitoring		Audit
					For disbursements	31-Jan	Final	Progress	Final	Project monitoring	Financial spot-check	
<b>NGOs</b>												
High	< 6	< 250	-	60-40	Yes	Yes	Yes	1 mid	Yes	1	1	As per plan
		> 250	500	50-50	Yes	Yes	Yes	1 mid	Yes	1	1	
	6 - 12	< 250	-	40-40-20	Yes	Yes	Yes	2	Yes	1	1	
		> 250	800	40-30-30	Yes	Yes	Yes	2 - 3*	Yes	1-2**	1	
Medium	< 6	< 250	-	100	-	Yes	Yes	1 mid	Yes	1	-	
		> 250	700	80-20	Yes	Yes	Yes	1 mid	Yes	1	-	
	6 - 12	< 250	-	80-20	Yes	Yes	Yes	1 mid	Yes	1	-	
		> 250	800	60-40	Yes	Yes	Yes	1 mid	Yes	1	-	
		> 400	1,200	60-40	Yes	Yes	Yes	1 mid	Yes	1**	1 / partner	
	>800	1,200	60-40	Yes	Yes	Yes	1 mid	Yes	1**	1		
Low	<6	< 400	-	100	-	Yes	Yes	-	Yes	1	-	
		> 400	-	80-20	Yes	Yes	Yes	-	Yes	1	-	
	6 - 12	< 400	-	100	-	Yes	Yes	1 mid	Yes	1	-	
		> 400	-	80-20	Yes	Yes	Yes	1 mid	Yes	1	1/partner	
<b>UN Agencies</b>												
N/A	< 6	-	-	100	-	Yes	Yes	-	Yes	1***	-	No
	6 - 12	-	-	100	-	Yes	Yes	1 mid	Yes	1***	-	
<p>* Three progress reports are only required for projects of 10 months or more.</p> <p>** Additional field visits are only required for projects of 10 months or more.</p> <p>***Monitoring of UN agency projects is mandatory and should be based on a sampling methodology considering country-specific factors as required (see 4.5 Monitoring).</p>												

The process of determining partner eligibility is comprised of steps for eligibility and risk rating of NGO partners.

The partnership between OCHA and NGOs is governed by CBPF accountability frameworks which include the following steps:

Step 1: Registration

Step 2: Due diligence

Step 3: Capacity assessment

Step 4: Risk Rating

More details about each step is available in the global guidelines (page 28-32).

At the Fund level, an analysis of the risks that might prevent the oPt HF from achieving its objectives has been carried out, in consultation with key stakeholders. Identified risks have been analysed and categorized in terms of severity according to relative likelihood and potential impact on fund objectives. Mitigation strategies have been designed, and assigned to specific stakeholders. This analysis represents a management tool which enables the HC, supported by the AB, to ensure strategic decision making and guarantee that that the oPt HF remains relevant in the context in which it is operating. The framework consolidates all activities and functions that mitigate key risks under one umbrella, and spells out the residual risks to enable informed decision-making based on an understanding of potential consequences. Identified risks and associated mitigation strategies will be regularly reviewed and monitored by the HC in consultation with the AB.



## Risk analysis and mitigation matrix

*Risk evaluation analysis and mitigation matrix and treatment*

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
<b>Risk 10:</b> Inadequate humanitarian space: local authorities impose additional restrictions on implementing partners, which negatively impact the implementation of activities and may undermine the ability to satisfy humanitarian imperative.	4	3	12	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- HFU will work with international community, including AB, donors, AIDA, and PNGO to collectively address these restrictions through most appropriate channels should the situation arise.</li> <li>- HFU will ensure working through implementing partners with established good reputation in communities.</li> <li>- HFU will ensure that implementing partners have well established financial systems and programming mechanisms that are transparent, accountable and accepted by local authorities</li> </ul>	Ongoing	HFU, OCHA, HoO, HC
<b>Risk 37:</b> The increasing trend of Arab Countries tendency to normalize relations with Israel, may increase pressure on the PA.	4	3	12	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Increase advocacy with Arab and international community showing the negative impact of increasing pressure on PA the delivery of humanitarian assistance.</li> <li>- Remind the Arab countries and international community of their obligations under</li> </ul>	Ongoing	HFU, OCHA, HoO, HC, OCHA communication

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
				international law to facilitate the delivery of aid.		
<b>Risk 45:</b> The divide between the two main Palestinian factions (Fatah and Hamas) widens further.	4	3	12	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- HFU will ensure security plan maintained and updated including a number of possible scenarios.</li> <li>- HFU staff and implementing partners keep low visibility profile.</li> <li>- HFU keeps contact only with technical level employees with the local authorities to ensure delivering project activities.</li> <li>- HFU coordinates and shares Information with HCT, AIDA, PNGO, and AB.</li> </ul>	Ongoing	HFU, OCHA, HoO, HC
<b>Risk 49:</b> Worsening of the political and security situation in oPt following the recent unrest in Gaza, West Bank, and Jerusalem, lead to more humanitarian needs.	4	3	12	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- HFU will continuously monitors the security situation in the Gaza Strip. The decision on mitigation measures to be taken is based on the risks faced and the magnitude.</li> <li>- Contingency plans are therefore in place, but decisions are taken on a case by case basis.</li> </ul>	Ongoing	HFU, OCHA, HoO, HC

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
				<ul style="list-style-type: none"> <li>- Temporary suspension of activities in certain security situation may happen depending on the nature of the security incident.</li> <li>- Tighten the security procedures as needed with increased coordination and with UNDSS.</li> <li>- Monitoring and follow up of the security incidents with the various bodies (Focal points, UNDSS, AIDA, local media and authorities).</li> </ul>		
<b>Risk 50: Israel could impose complete internal and external closure following May escalation of hostilities</b>	4	3	12	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- HFU will keep its contingency plans updated, in accordance with implementing partners and clusters.</li> <li>- HFU will collaborate with key allies, including EU members states, civil society organisations, HCT, AIDA, and ACU.</li> <li>- HFU will work with international community, including AB, donors, AIDA, and PNGO to collectively address these restrictions through most appropriate channels should the situation arise.</li> </ul>	Immediately	HFU, OCHA, HoO, HC

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
<b>Risk 57:</b> Due to shifting donor priorities toward COVID-19 response in donors countries and other places, funding may decrease to oPt.	4	3	12	<b>Accept Risk</b> <ul style="list-style-type: none"> <li>- HFU to mobilize resources from allies donors by more influencing and communication tactics.</li> <li>- HFU &amp; OCHA to brief donors on the criticality of people’s lives in OPt due to multi-layers vulnerabilities due to COVID 19 within a protracted crisis.</li> </ul>	Immediately	HFU, HC, OCHA HoO, Communication
<b>Risk 58:</b> COVID-19 mitigation measures will further deteriorate the vulnerability and poverty situation in oPt by creating new vulnerable and poor groups.	4	3	12	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- HFU to encourage partners to focus more on utilizing cash based modalities in their interventions.</li> <li>- HFU, partners, and relevant stakeholders to define the new vulnerabilities and poverty criteria.</li> <li>- HFU and partners to enhance their inclusiveness for the new vulnerable, poor groups.</li> </ul>	Ongoing	HFU, Partners
<b>Risk 31:</b> Aid diversion from implementing partners, which will lead to tensions in oPt. with different stakeholders, complicating partner	5	2	10	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Discussions with partners and stakeholders with clear explanation on compliance and control guidelines.</li> </ul>	Ongoing	HFU

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
relations and projects implementation				<ul style="list-style-type: none"> <li>- All requirements to be shared before contracts are signed</li> <li>- Closer monitoring and control on more frequent durations.</li> </ul>		
<b>Risk 15:</b> Israel continues restricting movement in West Bank, especially in Area C with impending risks of further land annexation	3	3	9	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- HFU will collaborate with key allies, including EU members states, civil society organisations, HCT, AIDA, and ACU.</li> <li>- HFU will develop with OCHA a policy framework to improve engagement between HCT and Israeli authorities to facilitate rapid, unimpeded and impartial humanitarian assistance.</li> <li>- HFU will utilize International advocacy to pressure Gol to end its annexation, confiscation, and demolition policies; influencing PA to be more involved in Area C; coordinated actions with donors and humanitarian organizations if incidents take place; legal advice (from Israeli Lawyer/and/or Israeli HR organizations); reactive media lines and proactive plans are prepared.</li> </ul>	Immediately	HFU, HC, OCHA HoO, Communication

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
<b>Risk 19:</b> The imposed dual use list continues preventing entry of urgently needed materials to Gaza Strip, and further deteriorate humanitarian conditions.	3	3	9	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- HFU will utilize International advocacy to pressure GoI to ease dual use list policies.</li> <li>- HFU and OCHA will influence PA to be more involved in dialogue regarding entry of materials to Gaza.</li> <li>- HFU and OCHA will have coordinated actions with donors and humanitarian organizations if dual use list extended i.e. reactive media lines.</li> </ul>	Immediately	HFU, HC, OCHA HoO, Communication
<b>Risk 48:</b> Violence between the Israeli army and militants in and around the Gaza Strip.	3	3	9	<b>Accept Risk</b> <ul style="list-style-type: none"> <li>- OCHA office in the Gaza Strip to lead rapid needs assessment efforts.</li> <li>- If access is granted, clusters lead to work with NGOs and UN agencies to update the needs and redirect the assistance to the most urgent needs.</li> <li>- More flexible working and/or remote working modalities will be activated</li> </ul>	Immediately	OCHA filed coordination office ·Cluster Coordinators IPS
<b>Risk 65:</b> DFA in Gaza does not share timely accurate information regarding COVID19 cases, isolation centres, stockpiles, and	3	3	9	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- HFU will utilize internal advocacy to pressure DFA to end its restrictive policies.</li> <li>- HFU and OCHA will influence DFA to ease the</li> </ul>	Immediately	HFU, HC, OCHA HoO, Communication

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
tracking utilization of support items.				time consuming measures restricting implementing partners responses in Gaza.		
<b>Risk 29:</b> Politicization of funds' visibility of the projects/partner level.	4	2	8	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- HFU to share the Fund's visibility guidelines at the beginning of each project.</li> <li>- All publications and visibility related to the Fund to be cleared beforehand by the HF Manager.</li> </ul> <p>HFU to conduct periodic visits to the projects sites.</p>	Ongoing	HFU
<b>Risk 2:</b> Unpredictability, amount of resources available for the HF in a timely manner.	4	2	8	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- Continue to advocate for the HRP funding.</li> <li>- Maintain resource mobilization documents with commitment from the fund's donors.</li> <li>- Advocate for multi-year commitments.</li> </ul>	Ongoing	HC, AB, OCHA
<b>Risk 4:</b> Funds received by a partner with a political agenda.	4	2	8	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- Remind the partner of the humanitarian principles (Humanity, Neutrality, Impartiality, Independence).</li> <li>- Clarify and emphasize humanitarian principles in the contractual agreements and termination articles.</li> </ul>	Immediately	HFU, HC, AB

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
				<ul style="list-style-type: none"> <li>- Establish if the partner has already breached any of the principles.</li> <li>- Discuss with the HC if freezing the project activities is advised.</li> <li>- Terminate the project if needed.</li> </ul>		
<b>Risk 7:</b> Sanction on the UN from the hosting country/global power.		2	8	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- Increase advocacy with host country showing the negative impact of restricting the delivery of humanitarian assistance.</li> <li>- Remind the host country to their obligations under international law to facilitate the delivery of aid.</li> <li>- Explore common working areas (DRR, civil military coordination...etc.).</li> </ul>	Ongoing	HF,AB, OCHA
<b>Risk 11 :</b> Unclarity regarding the reconciliation process between Palestinian Political affiliates	4	2	8	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- Adopting Do-No Harm principle at each step of the working modality</li> <li>- Ensure the required level of contact at the technical level</li> <li>- Intensify policy and influencing tactics illustrating impact of political division on humanitarian situation in OPT.</li> </ul>	Ongoing	HFU, HC, OCHA



Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
<b>Risk 12:</b> The political processes around Gaza might result in odd scenario i.e. Gaza might be declared a rebel state	4	2	8	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Follow political developments closely, consider potential policy response,</li> <li>- Develop program implementation scenarios and communicate with donors and international policy makers.</li> <li>- Discuss and recommend tailored remote/ flexible working modalities</li> </ul>	Ongoing	HFU, HC, OCHA
<b>Risk 16:</b> Increase in damages to infrastructures, equipment, stop working orders from Israeli authorities in targeted locations following the unrest in West Bank and Jerusalem.	4	2	8	<b>Accept Risk</b> As part of the HCT Policy and Operational Framework for Addressing Impediments to Humanitarian Action the following will be implemented: <ol style="list-style-type: none"> <li>a. Monitoring and reporting</li> <li>b. Coordination with Israeli authorities (military and civilian)</li> <li>c. Public and private advocacy</li> <li>d. Material response</li> <li>e. Legal aid</li> <li>f. Alternative programming modalities (use of high OR low visibility and other strategies, in close consultation with communities. Such measures should be considered temporary mitigation measures, rather a sustainable longer-term strategy).</li> </ol>	Ongoing	OCHA, ACU, HC, HF Donors, Ips, HCT, LTF
<b>Risk 17:</b> Regional escalation including Gulf Countries, Iran and Israel; lead to extreme	4	2	8	<b>Reduce Risk</b>	When needed	HF, AB, OCHA, HC, OCHA Communication

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
deteriorations for the humanitarian situation.				<ul style="list-style-type: none"> <li>- Increase advocacy with host country on the negative impact of restricting the delivery of humanitarian assistance.</li> <li>- Remind the host country of their obligations under international law to facilitate the delivery of aid.</li> <li>- Explore common working areas (DRR, civil military coordination...etc.).</li> <li>- Channel funds through (approved and capable) partners with access.</li> </ul>		
Risk 18: The expected Palestinian elections may result in unpreferable situation for international community, thus; additional sanctions on oPt in general of areas within it.	4	2	8	<ul style="list-style-type: none"> <li>- The following influencing tactics will be implemented:               <ul style="list-style-type: none"> <li>a. Monitoring and reporting</li> <li>b. Coordination with Israeli authorities (military and civilian)</li> <li>c. Public and private advocacy</li> <li>d. Material response</li> <li>e. Legal aid</li> </ul> </li> </ul>	When needed	HF, AB, OCHA, HC, OCHA Communication
<b>Risk 26:</b> Poor financial and programmatic management capacity of Implementing Partners, including deficiency/gaps in internal control systems.	4	2	8	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- Implement the full range of financial monitoring mechanisms including financial spot checks, review of financial reports and audits.</li> <li>- Reflect finding to the partner's capacity and risk levels.</li> </ul>	Ongoing	HFU, CBPF section

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
				<ul style="list-style-type: none"> <li>- More frequent monitoring visits, including pre-arranged and ad-hoc visits.</li> <li>- HFU ensures conducting capacity assessment including organisational risk assessment that focuses on identifying associated risks of engagement with a partner organization.</li> <li>- HFU will provide regular capacity building sessions (financial, procurement, antifraud) to implementing partners, through training sessions, and regular visits.</li> </ul>		
<b>Risk 32:</b> Staff and/or partners might be involved in fraud, corruption and nepotism	4	2	8	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- Discussions with partners and stakeholders with clear explanation on compliance and control guidelines.</li> <li>- All requirements to be shared before contracts are signed</li> <li>- Closer monitoring, financial spot checks, audits more frequently.</li> <li>- Remind staff and partners by consequences of fraud and the penalties.</li> <li>- HFU has reporting mechanisms in place to report these behaviours.</li> <li>- Ethical Risks related to any kind of abuse (sexual, power, etc) are mitigated by clear</li> </ul>	Ongoing	HFU

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
				contractual agreement, and providing compulsory briefing to each implementing partner i.e. OCHA Policy for Protection from Sexual Exploitation and Abuse (PSEA).		
<b>Risk 36:</b> The consequences of the American demonstration Peace Plan may impact the performance of the PA system in oPt, which will have consequences on funds to oPt.	4	2	8	<b>Accept Risk</b> <ul style="list-style-type: none"> <li>- Being alert, agile and flexible in the approach to review the operations and program implementation and re-assess the situation.</li> <li>- More close coordination and collaboration with donors, and partners.</li> </ul>	Ongoing	HFU, HC, OCHA
<b>Risk 60:</b> Restricted movement of goods may affect the availability/ affordability for basic materials/ productive inputs in the local market, prices of COVID 19 related items increasing globally as well.	4	2	8	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Encourage partners and stakeholder to conduct emergency market mapping prior to their responses.</li> <li>- Continue analysing the impact of COVID 19 on humanitarian situation in OPT</li> <li>- Continue assess the effects of COVID 19 on private sector and both micro and macro-economics.</li> <li>- Discuss and decide adapted working modalities to the situation</li> </ul>	Ongoing	HFU, HC, OCHA

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
<b>Risk 62:</b> Further increase of severe economic pressures attributed to COVID 19, leading to family disputes, religious extremism, and criminal incidents	4	2	8	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- HFU to encourage partners to focus more on utilizing cash based modalities in their interventions.</li> <li>- HFU will encourage implementing partners to have flexible measures and adaptive management to ensure targeting most vulnerable communities by multi-sectoral interventions implementation of the project.</li> <li>- HFU, partners, and relevant stakeholders to define the new vulnerabilities and poverty criteria.</li> <li>- HFU and partners to enhance their inclusiveness for the new vulnerable, poor groups.</li> <li>- HFU will coordinate and share Information with all actors and stakeholders including AIDA, PNGO, and PNA.</li> </ul>	Ongoing	HFU, HC, OCHA HoO, Communication
<b>Risk 63:</b> The uncontrolled pandemic rapid spread, may reach to a point where the health system collapses in oPt.	4	2	8	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Encourage partners and clusters to work on further strengthening the social relationships.</li> <li>- Encourage partners and stakeholders to arrange sensitization and awareness campaigns.</li> </ul>	When Needed	HFU, Clusters, Partners

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
<b>Risk 1:</b> Programmatic inertia (funding used to solve structural problems – energy in Gaza, lack of funding for big agencies).	2	3	6	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Encourage IPs to develop a robust exit strategy for each funded project with the help of cluster coordinators.</li> <li>- Prioritise projects with a sound exit strategy. Engage with authorities/donors.</li> </ul>	Immediately	IPS, Cluster coordinators, HC
<b>Risk 5:</b> Inability to work with the government/de facto due to failing of functioning government/authority (internal fighting, civil unrest, strikes).	3	2	6	<b>Accept Risk</b> <ul style="list-style-type: none"> <li>- Work at the technical level with actors on the ground.</li> <li>- Work with IPs and CBOs to activate the coordination structures.</li> <li>- Depend on OCHA field coordination units and ICCG to establish coordination structures if needed.</li> <li>- Keep the civil military coordinators abreast of the work in the field.</li> </ul>	When needed	OCHA, HFU, IP, ICCG
<b>Risk 13:</b> The UN might be perceived as being too vocal by and/or too risk averse, which may expose the UN & oPt HF to unwelcomed media attention affecting its reputation.	3	2	6	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Keep close coordination and communication with all relevant stakeholders and policy makers in both Israeli and Palestinian sides.</li> </ul>	Ongoing	HoO, OCHA communication, HC

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
				<ul style="list-style-type: none"> <li>- Prepare media and communication plan including counter campaigns for the different scenarios.</li> <li>- Constant close monitoring, working with partners and other allies.</li> <li>- Seek support and understanding from donors.</li> </ul>		
<b>Risk 14:</b> Working with both Israeli and Palestinian Civil Society Organizations as partners may results in criticism from some Palestinian political groups	3	2	6	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- Prepare media and communication plan including counter campaigns for the different scenarios.</li> <li>- Keep close coordination and communication with all relevant stakeholders and policy makers in both Israeli and Palestinian sides.</li> <li>- Being transparent, demonstrate OCHA &amp; OPt HF effectiveness in working with partners, communicate with donors and others our faith in our partners and their processes and approaches.</li> </ul>	Ongoing	HFU, HoO, OCHA communication, HC
<b>Risk 23:</b> Projects are implemented by a limited number of eligible partners (monopoly on funding)	2	3	6	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- HFU to increase the number of trainings for current and new partners on GMS.</li> <li>- HFU to increase out-reach activities to new partners via NGO networks.</li> </ul>	Immediately	HFU, Cluster coordinators, HC

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
				<ul style="list-style-type: none"> <li>- Cluster coordinators to disseminate information about the Fund among new partners.</li> <li>- HFU to further diversify the members and observers of the strategic review committees.</li> <li>- HFU to ensure frequently reviewing the scoring criteria and SRC members (i.e. new criteria and SRC members per each allocation).</li> <li>- HC to suggest a ceiling on the amount of funding per partner in a calendar year (notwithstanding funding the best placed partners).</li> </ul>		
<b>Risk 24:</b> Funds are perceived to favour a political aim of a particular party.	3	2	6	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- Remind the partner of the humanitarian principles (Humanity, Neutrality, Impartiality, Independence)</li> <li>- Establish if the partner has already breached any of the principles.</li> <li>- Discuss with the HC if freezing the project activities is advised.</li> <li>- Terminate the project if needed.</li> </ul>	Immediately	HFU, HC, AB
<b>Risk 30:</b> Pressure on the Humanitarian Fund's	2	3	6	<p><b>Reduce Risk</b></p>	When needed	HC, HFU, ICCG



Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
limited resources to fill programmatic gaps.				<ul style="list-style-type: none"> <li>- Make sure that all projects should be responding to needs-based assessments and supporting lifesaving and life supporting interventions.</li> <li>- Reduce the gap filling projects to the lifesaving components.</li> </ul>		
<b>Risk 35:</b> Projects effects are marginal due to the size of the needs.	2	3	6	<p><b>Accept Risk</b></p> <ul style="list-style-type: none"> <li>- Work with the ICCG to make sure that all funds are channelled according to the highest priority needs.</li> <li>- Fund the most efficient projects with the maximum impact.</li> <li>- Work with partners to have solid projects exit strategies.</li> <li>- Mobilize more resources utilizing diversified influencing and fund raising tactics.</li> </ul>	Ongoing	HFU, ICCG, OCHA
<b>Risk 38:</b> Difficult working relationship with hosting country/de facto authorities/PA.	3	2	6	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- Increase advocacy with host country as to highlight the negative impact of restricting the delivery of humanitarian assistance.</li> <li>- Remind the host country of their obligations under international law to facilitate the delivery of aid.</li> </ul>	Ongoing	HF, AB, OCHA

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
				- Explore common working areas (DRR, civil military coordination...etc.).		
<b>Risk 43:</b> The confiscation/ destruction/seizure of assistance	2	3	6	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- Establish appropriate risk management mechanisms to reduce the likelihood and impact on achieving oPt HF objectives.</li> <li>- Implementing Partners and suppliers coordinate to arrange a delivery time when risk of obstructed movement or harassment at its lowest.</li> <li>- <i>HC/RC to call on duty-bearers and Members States to jointly address IHL/IHRL violations (e.g. demarches in case of destruction/seizure of assistance; deny access to assistance; etc.).</i></li> <li>- HFU will utilize International advocacy to pressure Gol to end its annexation, confiscation, and demolition policies; influencing PA to be more involved in Area C; coordinated actions with donors and humanitarian organizations if incidents take place; legal advice (from Israeli Lawyer/and/or Israeli HR organizations); reactive media lines and proactive plans are prepared.</li> </ul>	Ongoing	HC, HFU, IPS, OCHA HoO, Communication

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
<b>Risk 52:</b> winter storm, snow, floods, drought, and earthquake	2	3	6	<b>Accept Risk</b> <ul style="list-style-type: none"> <li>- Clusters lead to work with NGOs, and implementing partners to update the needs and redirect the assistance to the most urgent needs.</li> <li>- HFU will encourage implementing partners to adapt an environmental friendly approaches</li> </ul>	Immediately	Cluster coordinators, NGOs
<b>Risk 53:</b> Severe market disruption caused by external shocks (conflict, natural disaster).	3	2	6	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- HFU will encourage partners to adopt flexible approaches to have the ability to switch to other types of assistance if needed in the case of prolonged market disruption.</li> </ul>	Immediately	HFU, implementing partners
<b>Risk 64:</b> education modality under COVID-19 may require inaccessible means for vulnerable/ poor groups.	3	2	6	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Encourage partners and education cluster to further assess the impact of COVID 19 on education in OPT.</li> <li>- To prioritize relevant education modalities interventions within education projects in the different allocations.</li> <li>- To enhance communication with education cluster and sub working groups.</li> </ul>	Ongoing	HFU, Education Cluster

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
<b>Risk 6:</b> Inability to work with the government due to boycott of the UN/Fund.	4	1	4	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Increase advocacy with host country as to highlight the negative impact of restricting the delivery of humanitarian assistance.</li> <li>- Remind the host country of their obligations under international law to facilitate the delivery of aid.</li> <li>- Explore common working areas (DRR, civil military coordination...etc.)</li> </ul>	Ongoing	HF, AB, OCHA
<b>Risk 9:</b> Inability to implement projects due to restrictions on partners/UN.	4	1	4	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Increase advocacy with host country on the negative impact of restricting the delivery of humanitarian assistance.</li> <li>- Remind the host country of their obligations under international law to facilitate the delivery of aid.</li> <li>- Explore common working areas (DRR, civil military coordination...etc.).</li> <li>- Channel funds through (approved and capable) partners with access.</li> </ul>	Ongoing	HF, AB, OCHA
<b>Risk 21:</b> Donors/UN/NGO-driven AB	2	2	4	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Each of the stakeholder's type (NGOs, UN Agencies and donors) has equal representation at the AB.</li> </ul>	Each AB rotation period	HC, HFU, AB

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
				- Increase the number of observes on the board.		
<b>Risk 25:</b> Over coordination/ engagement with specific individuals representing sectors/ organization, may result in falls power.	2	2	4	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Each of the stakeholder’s type (NGOs, UN Agencies and donors) has equal representation at the AB and SRC’s.</li> <li>- Increase the number of observers on the board and SRCs.</li> <li>- Ensure having new members per each SRC.</li> </ul>	Ongoing	HFU
<b>Risk 27:</b> Fraud, corruption or misuse of funds i.e. aid workers may try to charge for their services.	4	1	4	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Compliance with the Operational Manual oversight requirements, in line with agreed operational modalities.</li> <li>- Compliance with the Global Incident/ Fraud reporting guideline/ SoP.</li> <li>- Ensure partners stablish beneficiary complaint mechanisms/monitor the system and feedback for each project.</li> <li>- Increased awareness and capacities of implementing partners to identify, prevent and address fraud.</li> <li>- Increase the HFU capacity in monitoring and reporting.</li> </ul>	Ongoing	HFU

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
<b>Risk 28:</b> Poor tracking of received funds.	4	1	4	<b>Accept Risk</b> <ul style="list-style-type: none"> <li>- Conduct financial spot check for partners.</li> <li>- If the data is still not up to the standard, conduct a special audit for the IP.</li> <li>- If misuse is confirmed activate the SoP for the case.</li> </ul>	Immediately	HFU
<b>Risk 33:</b> Inability of donors to participate in the Fund due to the partner's agenda, stands, opinion.	2	2	4	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Outreach to potential donors at all level (in country and at HQ) to explain the funds risk management framework.</li> <li>- Receive feedback from the potential donors about the exact obstacle preventing participating.</li> <li>- Work with HQ to enhance the risk management framework to address the concerns (if these concerns are within the Fund's mandate).</li> </ul>	When needed	HC, HFU, HQ, Donors
<b>Risk 39:</b> Lack of engagement and lack of commitment by clusters and duplication of coordination mechanisms.	2	2	4	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Strengthen the cluster coordinators' role with more engagement in the allocation process.</li> <li>- Engage cluster coordinators in project monitoring and evaluation.</li> </ul>	When needed	Ips, AB Donors, HFU, ICCG, OCHA field coordination units.

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
				- Enhance the reporting and communication between the HFU and the coordination at the cluster level.		
<b>Risk 40:</b> Difficulties in money transfer and money wires to the Gaza Strip.	4	1	4	<b>Accept Risk</b> - Work with partners to transfer funds to other accents in West Bank or IP HQ accounts. - Work with the Central Bank/monetary authority to clear transfers to humanitarian projects.	When needed	HFU, HC
<b>Risk 51:</b> Unforeseen emergencies/shifting of humanitarian needs.	2	2	4	<b>Accept Risk</b> - Continue implementing a flexible response approach to project management. - Advocate for funding emerging needs. - Align funding cycle to seasonality issues. - Advocate for increased contingency planning.	Ad-hoc	HC, AB
<b>Risk 54:</b> Households are unable to access markets because of security issues.	4	1	4	<b>Reduce Risk</b> - HFU will encourage implementing partners to adapt flexible implementation approaches to be able to respond with other assistance modalities such in-kind assistance, door-to-door modality until markets are accessible.	Immediately	HFU, Implementing Partners
<b>Risk 56:</b> Collapse of the banking system in oPt, mainly Gaza.	4	1	4	<b>Reduce Risk</b>	Immediately	HFU, Implementing Partners, OCHA

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
				<ul style="list-style-type: none"> <li>- HFU will work with clusters and implementing partners to have the flexibility to utilize temporary provision of in-kind assistance until alternate solutions are worked out such as the importation of cash.</li> </ul>		
<b>Risk 59:</b> COVID-19 may be used as an excuse to further tighten the mobility restrictions imposed on oPt and specially the Gaza Strip.	2	2	4	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- Prepare influencing and media and communication plans to respond to any new imposed restrictions.</li> <li>- Keep close coordination and communication with all relevant stakeholders and policy makers in both Israeli and Palestinian sides.</li> <li>- HFU management structure allows for considerable remote management and good communication.</li> <li>- The unit has physical presence in Ramallah, East Jerusalem and Gaza Strip.</li> <li>- Work with OCHA oPt field offices to cover any access gap.</li> </ul>	Immediately	HFU
<b>Risk 3:</b> Access restrictions and lack of mobility within the oPt (Gaza Strip, Area C, East Jerusalem, areas near the settlements, areas behind the barrier).	3	1	3	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- HFU management structure allows for considerable remote management and good communication. technology to link up.</li> </ul>	Ongoing	HFU, AB, OCHA Field Units,



Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
				<ul style="list-style-type: none"> <li>- The unit has physical presence in Ramallah, East Jerusalem and Gaza Strip.</li> <li>- Work with OCHA oPt field offices to cover any access gap.</li> </ul>		
<b>Risk 8:</b> Insufficient monitoring of projects due to access and movement restrictions following May escalation and the unrest in Jerusalem and West Bank..	3	1	3	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Enhance the HFU capacity in the field.</li> <li>- Delegate monitoring to OCHA field units and cluster Coordinators.</li> <li>- Remote monitoring.</li> <li>- Third-party monitoring.</li> </ul>	Continue from previous years	HFU, Field Coordination Unit, cluster Coordinators, IPS,
<b>Risk 20:</b> Weak participation/engagement of advisory board members	3	1	3	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Ensure continued engagement with the AB members - organize meetings at least four times a year as per the guidance of the operational manual.</li> <li>- Have bilateral meetings with the members to address any issue.</li> </ul>	Ongoing	HFU, HoO, HC
<b>Risk 22:</b> Lack of engagement with coordination structures	3	1	3	<b>Reduce Risk</b> <ul style="list-style-type: none"> <li>- Hold meetings with the partners to explain the importance of coordination and overcome the encountered problems.</li> </ul>	When needed	IPS, HF, ICCG

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
				<ul style="list-style-type: none"> <li>- Establishing trustful relations with partners and diversify activities with different partners.</li> <li>- Strengthen the cluster coordinators' role.</li> </ul>		
<b>Risk 34:</b> Labelling the Fund by its individual donor's political stands.	3	1	3	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- Reassure stakeholders of the Fund's commitment to the humanitarian principles (Humanity, Neutrality, Impartiality, Independence).</li> <li>- Humanitarian principles govern humanitarian actors' conduct.</li> <li>- Humanitarian actors must engage in dialogue with all parties in the conflict for strictly humanitarian purposes.</li> <li>- Maintaining principled humanitarian action in the face of pressures is an essential task for the Fund and its stakeholders.</li> </ul>	Ongoing	HFU, HC, AB
<b>Risk 42:</b> Complete freezing for coordination between DFA in Gaza, and PA in West Bank from one side; and between PA and Gol from the other side.	4	2	8	<p><b>Reduce Risk:</b></p> <ul style="list-style-type: none"> <li>- HFU will ensure coordination with AB, HCT, Clusters, implementing partners, international institutions, humanitarian actors (AIDA, PNGO) and local authority.</li> <li>- HFU will conduct Ad hoc training for key players and community members and on time</li> </ul>	Ongoing	HFU, OCHA, OCHA Communication, implementing partners

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
				<p>coordination meetings with key players to re-plan ,evaluate, learn, and adjust regularly.</p> <ul style="list-style-type: none"> <li>- HFU and OCHA will ensure coordination with all relevant key stakeholders to identify suitable operational solutions.</li> </ul>		
<b>Risk 44:</b> Israeli settler violence hindering projects implementation	1	3	3	<p><b>Accept Risk</b></p> <p>As part of the HCT Policy and Operational Framework for Addressing Impediments to Humanitarian Action in Area C the following will be implemented:</p> <ol style="list-style-type: none"> <li>Monitoring and reporting</li> <li>Coordination with Israeli authorities (military and civilian)</li> <li>Public and private advocacy</li> <li>Material response</li> <li>Legal aid</li> <li>Alternative programming modalities (use of high OR low visibility and other strategies, in close consultation with communities. Such measures should be considered temporary mitigation measures, rather a sustainable longer-term strategy).</li> </ol>	Ongoing	OCHA, ACU, HC, HF Donors, Ips, HCT, LTF
<b>Risk 46:</b> Civil unrest.	3	1	3	<p><b>Accept Risk</b></p> <ul style="list-style-type: none"> <li>- OCHA office to lead rapid needs assessment efforts.</li> </ul>	Immediately	OCHA filed coordination units , Cluster Coordinators, IPs

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
				- If access is granted, clusters lead to work with NGOs and UN agencies to update the needs and redirect the assistance to the most urgent needs.		
<b>Risk 47:</b> Arrest of humanitarian workers while delivering relief items.	3	1	3	<p><b>Accept Risk</b></p> <ul style="list-style-type: none"> <li>- As part of the HCT Policy and Operational Framework for Addressing Impediments to Humanitarian Action in Area C the following will be implemented:               <ol style="list-style-type: none"> <li>a. Monitoring and reporting</li> <li>b. Coordination with Israeli authorities (military and civilian)</li> <li>c. Public and private advocacy</li> <li>d. Material response</li> <li>e. Legal aid</li> <li>f. Alternative programming modalities (use of high OR low visibility and other strategies, in close consultation with communities. Such measures should be considered temporary mitigation measures, rather a sustainable longer-term strategy)</li> </ol> </li> </ul>	Ongoing	OCHA, ACU, HC, HF Donors, Ips, HCT, LTF
<b>Risk 55:</b> Currency exchange rate fluctuations might reduce the available budget for delivering the different activities, or reaching the proposed	3	1	3	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- HFU will encourage implementing partners to prioritize national procurement that considers</li> </ul>	When Needed	HFU, Implementing Partners

Risk	Impact (A)	Likelihood (B)	Score (A*B)	Mitigation strategy	Timeframe	Risk owners
number of beneficiaries under funded projects.				<p>local material from the local market to avoid importing material at high costs as possible.</p> <ul style="list-style-type: none"> <li>- HFU will adapt flexible procedures to ensure prompt revisions for actions according to changes in the economic and financial conditions.</li> </ul>		
<b>Risk 61:</b> The fear/ anxiety of uncontrolled pandemic rapid spread, may affect the social fabric of oPt communities.	3	1	3	<p><b>Reduce Risk</b></p> <ul style="list-style-type: none"> <li>- Encourage partners and clusters to work on further strengthening the social relationships.</li> <li>- Encourage partners and stakeholders to arrange sensitization and awareness campaigns.</li> </ul>	When Needed	HFU, Clusters, Partners
<b>Risk 41:</b> Conflicting agenda with local authorities in identifying needed humanitarian interventions and priorities.	2	1	2	<p><b>Accept Risk</b></p> <ul style="list-style-type: none"> <li>- Make sure that HF funding is based on the HRP.</li> <li>- Make sure that HNO and HRP are based on OCHA's needs assessment tools and analysis.</li> <li>- Remind the authorities of the humanitarian principles (Humanity, Neutrality, Impartiality, Independence).</li> <li>- Further engage relevant stakeholders in the entire PCM phases from identification to evaluation.</li> </ul>	Ongoing	HC, ICCG, HCT, HFU



## 5.3 Risk-based grant management

A partner risk analysis is carried out by analyzing the partner's capacity to determine eligibility. Eligible partners are rated according to risk based on assessed capacity. The risk level is translated into minimum control mechanisms (see operational modalities table) applicable to the grants issued to the partner. Over time, as partners receive funding and implements projects, risk ratings will increasingly be determined by partners' performance.

Risk-based grant management serves two main functions. Firstly, it aims at improving the management of CBPF projects by matching grant management and oversight requirements with the assessed risk. Low-risk partners are subject to fewer controls. Secondly, risk-based management helps partners identify areas for improvement and provides tangible incentives for capacity building, in turn allowing for a wider range of partners, especially national NGOs, to access funds more easily.

The partner-based risk analysis only applies to NGO partners. These entities are not part of the UN system and do not have the legal standing of UN agencies. UN agencies are intergovernmental organizations that are accountable to UN Member States. Each UN agency has its own governance and control framework which applies also to their management of CBPF grants

The assessment is aimed at determining whether the NGO has sufficient capacity in terms of institutional, managerial, financial and technical expertise. This analysis determines eligibility for CBPF funding.

Every NGO is assessed at the national level. Capacity assessments take place before an application for funding is submitted. Ineligible partners can re-apply for a capacity assessment six months after being unsuccessful, provided that they demonstrate that the elements that caused the rejection have been addressed.

### **5.2.1 Performance index (PI)**

The PI tool is a key part of the accountability framework, and will allow OCHA to have an up-to-date rating of the partners' performance. The rating of the performance of partners in the implementation of projects will be used alongside the original capacity assessment to determine and adjust as necessary the partners' risk levels.

The PI tool supports the HFU to score the performance of partners on CBPF-supported projects from submission to closeout. During project implementation, the following categories of partner performance are tracked and scored:

- i) quality and timeliness of submissions of project documents (proposals, budget and concept notes);
- ii) quality and timeliness of implementation against approved targets;
- iii) quality and timeliness of reporting;
- iv) frequency, timeliness and justification of project revision requests;
- v) quality of financial management;
- vi) audit findings.

The scores assigned to each project on the above categories will be summarized in a PI. The PI score is captured in the GMS and is used along with the original capacity assessment score to determine the performance score and risk level. In order to reward sound project implementation, the score from the PI will progressively be given more weight and the capacity assessment score will become less significant as partners implement more projects. The partners' scores on the most recent projects will be considered the most important and given the most weight in calculating the overall risk rating score. The calculation and relative weighing of project scores and the original capacity assessment is explained in Annex 10.4, Performance Index Tool, tab 2 - PPI and Capacity Assessment. The scoring and the weighing are standardized across funds and the GMS will make the calculations.

If the overall risk score of a partner reaches a threshold at which the risk level of the partner should be adjusted, the Fund Manager will notify the partner about the adjustment and adjust the risk level. If a partner performs poorly in a consistent manner and its risk rating score moves from high risk to the threshold of ineligibility, it will be rendered ineligible on the basis of poor performance. Agency projects must also be scored for performance in all areas with the exception of the audit. The PI score can be used to assess future funding decisions and the frequency of monitoring. The monitoring mechanism can be tailored to the type of project such as stakeholder satisfaction survey for pipeline projects.

Through the aforementioned accountability mechanisms, the HC will aim to safeguard programmatic and financial management of CBPFs. Compliance measures enables the HC to address non-compliance with the legal terms agreed between the fund and the recipient organization, especially related to the following types of situations:

- i. Financial or narrative reports that are overdue.
- ii. Non-refund of unspent funds.
- iii. Critical (high risk) audit findings/qualified audit opinion (especially on lack of critical internal controls, serious weaknesses in internal controls, lack of bank reconciliation; lack of double-entry accounting system; lack of supporting documents, lack of authentic receipts).
- iv. Critical findings from monitoring and financial spot checks.
- v. Violation of humanitarian principles and code of conduct.
- vi. Indication of possible fraud, corruption or misuse of funds.

When a partner does not comply with the requirements described in the global guidelines and reflected in the contractual agreement or violates any other obligations stemming from the contractual agreement, OCHA will progressively take corrective actions commonly referred to as compliance measures, as described in section 4.9 of the global guidelines and outlines in annex 15.

## 5.4 Monitoring

Monitoring is defined as the systematic and regular process of collecting, verifying and triangulating information to assess progress made against project outputs and activities; bearing in mind accountability to affected populations and donors. Information gathered is used to make informed decisions and strengthen partnership and coordination.

### Monitoring objectives

The main purpose of monitoring is to assess progress made towards set targets and to verify the accuracy of reporting submitted by partners. Building on the principles, CBPF monitoring and reporting has the following key objectives:

- i. Verify the partner's progress in delivering project outputs and activities (as per log frame and work plan), the beneficiary targeting process, the use of resources (as per budget) and internal monitoring and reporting systems.
- ii. Triangulate information collected through other means, identify gaps and trends in humanitarian operations and reflect on best practices and lessons-learned using findings and recommendations for results management, risk mitigation and public information.
- iii. Strengthen partnership and coordination between OCHA, the partner and the local authorities, and to engage and seek feedback from affected communities.

The main principle for monitoring is that all recipient organizations, UN agencies and NGOs, are subject to monitoring by the Fund. While requirements will not be identical, it should be recognized that the HC needs



reassurance of project performance, regardless of the implementing entity.

Since mid-March 2020, the oPt HF has reviewed and adapted its methodologies for project monitoring and spot checks (programmatic and financial) by using remote methodologies, desk reviews of scanned copies, remote calls, online surveys or videoconferences when required and in complement to existing monitoring modalities.

Implementing partners are expected to:

- keep original documents for five years as per the UN Secretariat Financial rules and regulations;
- in line with their grant agreement, collect and share beneficiaries contact details while ensuring enough and adequate data protection measures are in place.

The partners should ask the beneficiaries for their consent to pass their data to the oPt HF for monitoring purposes by the fund. When using this data, the oPt HF will ensure a confidential management of the information collected from the beneficiaries; Project monitoring will continue to follow the implementation in the field to the furthest extent possible. Remote monitoring will be conducted through direct contact with beneficiaries and key informants. In some occasions, when contacting the beneficiaries directly could pose a protection risk, the partner will be expected to play the role of liaison between oPt HF monitoring officers and the beneficiaries. This means that the partners may be asked to disseminate beneficiary questionnaires on behalf of oPt HF. On-site monitoring will be organized based on the risk mitigation measures of HCT

### Roles and Responsibilities

The HC is responsible for ensuring that a representative sample of CBPF-funded projects is effectively monitored through appropriate monitoring modalities. The OCHA HFU is further responsible for coordinating monitoring efforts and ensuring that monitoring of projects is carried out.

The HFU coordinates and participates in field monitoring visits and will work closely with clusters in devising procedures related to monitoring. An approximate monitoring date will be set by the HFU for each project at the time allocation decisions have been made. The monitoring date may be adjusted depending on changes in the operational context and information gathered through reporting.

Minimum monitoring arrangements for projects implemented by NGOs will be determined based on the risk level assigned to the partner, the duration of project activities and the size of the project budget as articulated in the operational modalities (page 17) of CBPF.

Monitoring of UN agency projects is mandatory, at least one monitoring visit will be conducted during the project implementation.

### Process and Monitoring Tools

**Field site monitoring** - Field site monitoring, implemented by OCHA and supported by clusters, is a critical component of the overall framework in order to verify that CBPF-funded projects are delivering against targeted outputs, and to allow the HC and clusters to assess the qualitative aspects of programme implementation. As there are limitations to what can be observed through site visits, additional information will still need to be collected through other means. While field monitoring will not attempt to make evaluative assessments of projects, it will be essential to select an approach that covers issues beyond the delivery of project outputs.

Field monitoring visits will, at a minimum, collect information that: (i) makes an assessment of the timeliness of the overall project implementation, (ii) verifies reported results, and (iii) assesses progress on key project activities.

If it is not feasible to conduct physical project visits, virtual meetings will be organized with the implementing partners, sub-implementing in the presence of the cluster coordinators and OCHA field officer if available. This will be complemented by phone calls to sample beneficiaries and relevant stakeholders (if applicable).

## Remote Call Monitoring

Remote call monitoring can be a cost-effective means of collecting statistics and recording observations from key informants and beneficiaries on progress made on project outputs and satisfaction. The method can provide real-time progress information on projects monitored. Remote monitoring occurs in instances when it is not feasible to conduct physical project visits. This is not uncommon as CBPFs tend to operate in insecure and highly volatile environments with restricted access. Remote monitoring will be used in cases where there are no other options, the principle is to use enough sources of information to allow for meaningful monitoring. For those situations where it is not possible to undertake any form of monitoring (physical or remote), funding projects should be considered in light of the urgency of the needs they address.

**Financial Spot Check (fiscal or online)** - Financial spot checks will be conducted to assess the soundness of the internal controls and the accuracy of the financial records of the partner. A financial spot check will be conducted based on the risk level of the partner and the operational modality of the Fund. On-site financial spot checks by HFU staff and special audits by audit firms may be conducted on the basis of Operational Modality, or when warranted due to concerns about the functioning of the partner's internal controls.

Financial spot check will be conducted for all High-risk partners, and case by case for Medium and Low-risk partners based on the amount of grant, project duration, and any concern related to the implementation of the project (Annex 12, Financial Spot checks.)

## 5.5 Budget Preparation Guide for oPt HF funded Projects

### 1. THE ROLE OF THE OPT HF-IP IS TO:

- **Address all recommendations** from the partner capacity assessment, financial spot-check, and the audits of previous oPt HF projects, (if these risk-management procedures have been conducted for the IP) and **clear any pending issues** related to previous or ongoing oPt HF projects (revisions, final financial report and refunds) prior to submission of new proposals.
- Provide a correct and fair budget of no less than **\$200,000** a clear breakdown of the planned costs that are necessary to implement the activities and achieve the objectives of the project.
- Provide an **accurate budget narrative** (as an essential component of the budget) that clearly explains the components (quantity, unit cost, occurrence and percentage charged to oPt HF) and the rationale of each budget line. For example, shared costs, large/expensive assets, and costs/equipment required to support the regular operations of the oPt HF- IP are clear cases where the provision of details will be necessary in the budget narrative.

### 2. ELIGIBLE COSTS MUST:

- Be necessary and reasonable for the delivery of the objectives of the project.
- Comply with the principles of sound financial management, in particular the principles of economy, efficiency, effectiveness, transparency and accountability.
- Be identifiable in the accounting records of the Partner and backed by original supporting evidence.

#### A. ELIGIBLE COSTS MAY INCLUDE:

- A. Costs of staff based in country (including salaries, social security contributions, medical insurance, and hazard pay for high-risk locations) involved in the management and implementation of the project.
- B. Salaries and costs may not exceed the costs normally borne by the oPt HF-IP in other projects.
- C. Costs for consultancies involved in the implementation of the project.
- D. Support staff costs at country level (not Headquarter) directly related to the project may be included.

- E. Travel and subsistence costs directly linked to the project for project staff, consultants and other personnel that may also be eligible, provided the costs do not exceed those normally borne by the oPt HF-IP.
- F. A contribution to the oPt HF-IP's Country Office costs, such as shared costs charged on the basis of a well- explained calculation and a reasonable allocation system.
- G. Costs related to non-expendable items (assets) such as equipment, information and technology (IT) equipment for registration and relevant field activities, medical equipment, water pumps, generators, etc.
- H. Costs incurred by the oPt HF-IP's sub-implementing partners, directly attributable to project implementation.
- I. Other costs deriving directly from the requirements of the grant agreement such as monitoring, reporting, evaluation, dissemination of information, translation, insurance etc., including financial service costs (in particular bank fees for transfers).

### 3. THERE ARE TWO CATEGORIES OF ELIGIBLE EXPENDITURES: DIRECT AND INDIRECT COSTS:

#### B. DIRECT COSTS:

- C. These costs have to be clearly linked to the project activities described in the project proposal and the logical framework.
- D. They are defined as actual costs **directly related to the implementation of the project** to cover the costs of goods and services delivered to beneficiaries, and the costs related to the **support activities** (even partial, such as a security guard or a logistician partially working for the project), required for the delivery of services and the achievement of the project objectives.
- E. These costs include:
  - Staff and related personnel costs, including consultants and other personnel.
  - Supplies, commodities, materials.
  - Equipment.
  - Contractual services.
  - Travel costs, including transportation, fuel, and daily subsistence allowances for staff, consultants and other personnel linked to the project.
  - Transfers and grants to counterparts/sub-implementing partners.
  - General operating and other direct costs including security expenses, office stationary, and utilities such as telecommunications, internet, office rental and other direct costs, including expenses for monitoring, evaluation and reporting, related to the implementation of the project.

#### F. INDIRECT COSTS / PROGRAMME SUPPORT COSTS / ADMINISTRATIVE COSTS

- A. Indirect costs are referred to as Programme Support Costs (PSC). PSC are all costs that are incurred by the oPt HF-IP regardless of the scope and level of its activities and which cannot be traced unequivocally to specific activities, projects or programs. These costs typically include **corporate costs** (i.e. headquarters and statutory bodies, legal and organizational audit services, general procurement, recruitment, premises related costs, etc.). PSC is a maximum 7 % of the approved direct expenditures incurred by the oPt HF-IP.
- B. In the event the Implementing Partner sub-contracts any project components or activities to a sub-contractor, the Implementing Partner shall ensure that any Project support costs are fairly distributed between the Implementing Partner and the sub-contractor proportionate to the Project Budget and activities being undertaken by either.
- C. PSC of sub-IPs associated to the implementation of a specific project are covered by the overall maximum 7% of the actual project expenditures, and may not be duplicated in the sub-IPs' budget.
- D. Indirect costs do not have to be itemized in the project budget.

#### 4. SHARED COSTS:

Sharing costs between different donors and projects under a Country programme of the oPt HF-IP is an acceptable practice for CBPFs. The oPt HF-IP may share certain Country office costs to different uses and projects, for example staff, office rent, utilities and rented vehicles. However:

- A. All shared costs must be directly linked to the project implementation.
- B. All shared costs shall be itemized in the budget, following standard accounting practice and based on a well-justified, reasonable and fair allocation system, to be clearly explained in the budget narrative of each relevant budget line to be assessed and approved by OCHA's HFU.
- C. The opt HF-IP should at any time be able to demonstrate how the costs were derived and explain in the budget narrative how the calculation has been made (e.g. pro-rata, averages).
- D. For staff-related costs, if a position is cost-shared, the percentage of the monthly cost corresponding to the time that the person will dedicate to the project shall be budgeted. It is not acceptable to have portions of a unit for staff costs, only percentages are acceptable.
- E. Non-staff shared costs should be shared on the basis of an equitable cost allocation system based on IP policy.
- F. Accordingly, the percentages in the budget are to be assessed and approved by OCHA's HFU Finance.

#### 5. THE ITEMIZATION OF BUDGET LINES:

Each budget line requires the cost breakdown and narrative, as follows:

- A. Itemize each national and international staff, consultants and other personnel by function and provide unit quantity and unit cost by monthly or daily rates for each staff position.
- B. Provide quantity (e.g., 10 kits, 1000 metric tons) and unit cost for commodities, supplies and materials to be purchased. The budget narrative should be used to account properly for specifying the applicable unit of reference (length, volume, weight, area, etc.).
- C. Provide cluster standard / technical specifications for items whose unit cost is greater than US\$ 10,000.
- D. Provide list of items and estimated cost per item for kits when the cumulative budget line value exceeds \$10,000.
- E. Provide the list of items included in kits whose value is equal to or less than US\$ 10,000.
- F. Provide the list of items for globally standard / cluster standard kits.
- G. Provide cluster standard / technical specifications for those items whose unit costs can greatly vary, based on those same specifications (e.g., for generators, a reference to the possible range of power would be sufficient to properly evaluate the accuracy of the estimated cost).
- H. Itemize general operating costs (e.g. office rent, telecommunications, internet, utilities) for project implementation providing quantity and unit cost. A lump sum for operating costs is not acceptable.
- I. Estimates can be accepted in travel, as long as the calculation modality of the estimate is described reasonably in the budget narrative (e.g., providing estimates on the number of trips and average duration in days, daily subsistence allowance (DSA) rates, etc.).
- J. In the case of construction works whose individual value is greater than US\$ 10,000, only the labor costs and known essential materials shall be budgeted and itemized, providing unit/quantity and unit cost. The budget narrative should explain how construction costs have been estimated on the basis of a cluster standard prototype of building (latrine, health post, shelter), type of materials (wood, prefabricated, brick/cement/concrete) and formula or rationale used to estimate construction costs (e.g. per square foot or meter, previous experiences, etc.).

#### 6. INELIGIBLE COSTS THAT REMAIN THE SOLE RESPONSIBILITY OF THE OPT HF-IP:

1. Costs incurred outside the approved implementation period defined by the project start date to project end date (taking into consideration duly approved no-cost extensions).
2. Costs not included in the approved budget (taking into consideration duly approved budget revisions).
3. Debts and provisions for possible future losses or debts.
4. Interest owed by the oPt HF-IP to any third party.
5. Items already financed from other sources.

6. Purchases of land or buildings.
7. Currency exchange losses.
8. Cessions and rebates by the oPt HF-IP, contractors or staff of the oPt HF-IP as part of declared project costs.
9. Government staff salaries.
10. Hospitality expenses, provision of food/refreshments for project staff (not including water and hospitality for trainings, events and meeting directly related to project implementation).
11. Incentives, mark-ups, gifts to staff.
12. Fringe benefits such as cars provided by the organization to staff, individual full housing allowance, etc.
13. Fines and penalties.
14. Duties, charges, taxes (including VAT) recoverable by the oPt HF-IP.
15. Global and country level evaluation of programmes.
16. Audit fees/system audit fees – these costs are paid directly by the oPt HF.

## 7. OTHER TYPES OF COSTS:

On a case-by-case basis and depending on the approved allocation strategy, OCHA's HFU retains the flexibility to consider the following costs as eligible:

- A. Government staff training as a component of a project activity that contributes to the achievement of the overall project objectives.
- B. Visibility material of the oPt HF-IP directly related to projects funded by the oPt HF. Any visibility should be cleared in writing by the HFU beforehand.
- C. International travel costs when directly linked to the delivery of the project objectives. When international travel costs are requested to support additional activities outside those of the project, such costs can only be considered if they are well justified and in the proportion attributable to the project.
- D. Vehicles.
- E. Depreciation costs for non-expendable/durable equipment used for the project for which the cost is not funded in the current budget or prior CBPF funding.
- F. Equipment for the regular operations of the oPt HF-IP.

## 8. Cost Extension

The oPt HF will allow projects' cost extensions of ongoing projects to include critical activities responding to ongoing emergency. Partners' performance and capacity will determine if the extension will be considered, high risk partners will not be eligible for cost extension. Cost extensions must be requested one month before the project end date with a very strong justification. Cost extensions should be recommended by the cluster(s) and the HFU and approved by the HC. Progress reports (narrative and financial reports) of the current project are required as part of the justification. In addition, regular revision procedures apply, and assurance activities may be increased according to the operational modalities. Each cost extension request will be reviewed on a case by case basis. Submitted requests that are unclear or not clearly justified will not be reviewed nor accepted. Only cost extensions that are limited in scope and scale, ready to be implemented and contributing to the ongoing emergency response will be approved. The proportion between direct and indirect support costs will be taken into consideration.

## 9. Adding budget lines

The oPt HF will allow the creation of new budget lines within the 15 percent flexibility parameter further to receiving oPt HF approval by email to procure specific items for staff, or to support the response,

provided they are directly related to ongoing emergency response. Any variation exceeding 15 percent will require an amendment to the grant agreement.

#### 10. Contingency budget line

For new allocations, implementing partners can include a contingency budget line of up to 4 % of total project budget under the “General Operating and Other Direct Costs” category. This approach will ensure a speedy response as this budget can be easily re-programmed and used to address needs related to an ongoing emergency, if the situation deteriorates quickly. The contingency is meant to rapidly respond to unforeseen urgent humanitarian needs that may be outside of the original location/sector but not for routine overspending or expansion of ongoing project/s. Activation of such budget will be an email communication with the oPt HF Fund Manager. Approval will be in writing and within 24 hours of request. If not utilized during the project implementation timeframe, the amount budgeted will be refunded. This budget line can be used outside of the proposal Partners will provide a breakdown of the utilization of the contingency budget line during the submission of the financial report.

## 5.6 Reporting

CBPFs require reporting so as to ensure that activities carried out are on track to reach proposed project objectives. To the extent possible, UN agencies and NGOs are treated equally in relation to their reporting requirements.

Narrative and financial reporting requirements for NGOs are determined according to the Operational Modalities (see allocation modalities table).

UN agencies will submit an interim financial statement to reflect expenditure incurred for project activities up to 31 December of each year by 31 January of the following year. Interim financial statements will be submitted every calendar year until the submission of the final financial statement. Upon completion of the project, a final financial statement covering the period between inception and completion of the project will be due no later than 30 June of the following year. Financial statements for UN agencies and NGOs are collected through the GMS according to the templates available in the global guidelines.

UN agencies will submit a final narrative report within two months of completion of the project. If the duration of the project is between 7-12 months, UN agencies will also submit a progress narrative report to reflect achievements at midpoint of the project implementation. Narrative reports for UN agencies and NGOs will be submitted through the Grant Management System (GMS) and will follow the templates available in the global guidelines.

## 5.7 Audit

UN agencies are subject to internal oversight audit systems and other mechanisms established by their respective governing bodies. All NGOs partners receiving funds from oPt HF are subject to an external audit by the fund. The external audit is an oversight mechanism and an essential component of the accountability framework. It enhances the transparency and sound financial management of resources allocated through CBPFs. External audits allow the HC to obtain evidence-based assurances on the use of funds transferred to NGOs. In particular, external audits help to mitigate financial risks; including misuse of resources and fraud; identify weaknesses in financial and operational management and recommend critical improvements; identify ineligible expenditures. External audit findings provide essential feedback to the partner and the system, promoting continuous improvement of NGO financial and operational management and performance, and enabling the HC to make better informed funding decisions. OCHA will develop a risk-based approach to audits. The risk-based approach will set the criteria to prioritize which partners will be audited on the basis of partner risk level and financial volumes transferred to NGOs.

In line with the global guidance and if deemed necessary, the oPt HF may put in place offsite and remote audits, i.e. desk reviews of scanned copies. A mix methodology may apply as well and will be communicated to partners. Implementing partners are expected to keep original documents for five years as per the financial rules and regulations of the UN Secretariat. The oPt HF will consider postponing some of the audits, rather than conducting remote audits. This decision will be taken on a case by case basis.

## 5.8 Appeals Process and Arbitration

Stakeholders with insufficiently-addressed concerns or complaints regarding the oPt CBPF processes or decisions can at any point in time contact the OCHA Head of Office with these concerns at [muscroft@un.org](mailto:muscroft@un.org).

Complaints will be compiled, reviewed and raised with the Humanitarian Coordinator, who will then take a decision on necessary action(s). The Humanitarian Coordinator will share with the Advisory Board as appropriate any such concerns or complaints and actions taken thereof.

## 5.9 Complaint mechanisms

The following email address [HFoptcomplaint@ochaopt.org](mailto:HFoptcomplaint@ochaopt.org) is available to receive feedback from stakeholders who believe they have been treated incorrectly or unfairly during any of the CBPF processes. OCHA will compile, review address and –if necessary- raise the issues with the HC, who will then take a decision on necessary action.

## 6 Cross-cutting issues

### 6.1 Gender

The humanitarian assistance must meet the distinct needs of women, girls, boys, and men in order to ensure equal opportunities and access to assistance. In order for humanitarian action to effectively promote gender equality, focused action and deliberate attention are needed by all actors of the humanitarian community at the local, national and international level. Integration of gender considerations and actions to prevent and respond to Gender-Based Violence (GBV) into projects will generate positive and sustainable outcomes.

Partners of the oPt HF should ensure that projects are designed, implemented, monitored and evaluated considering the specific needs and constraints faced by women, girls, boys, and men. In order to do so, the oPt HF encourages the use of existing tools that are available at the systemic level to promote sound gender analysis and gender integration in projects. In this regard, partners should ensure routine collection, collation, and utilization of sex and age-disaggregated data and information in the whole project cycle.

The IASC Gender Marker is utilized by the oPt HF throughout the programme cycle: prospective partners are required to indicate the Gender Marker code as part of the project proposal, and to report on how gender and GBV were addressed during implementation. Beneficiary numbers should be broken down by sex, age, and other diversifying factors whenever possible. If there are challenges and obstacles to collecting disaggregated data and information, mechanisms should be put in place to address the gap during implementation. At the reporting stage, partners are required to describe how projects have contributed to promoting gender equality, including the prevention of and response to Gender-Based Violence.

The oPt HF Review Committees should benefit of a Gender Advisor's support or available gender expertise, to ensure that gender analysis forms the core of the need's identification and that the Gender Marker is accurately assessed. Partners are ultimately responsible for ensuring that gender considerations are operationalized in project activities and that there is adequate capacity to address gender issues during the life of the project and that the implementation of the Gender Marker is accurately reported on.

## 6.2 Accountability to Affected Populations (AAP)

The oPt HF is committed to ensuring that funded projects adhere to the highest possible quality standards. As part of this effort, partners are encouraged to incorporate the various existing Accountability to Affected Populations (AAP) modalities into the design, implementation, management, and monitoring of projects. At the project proposal stage, partners are asked to describe how affected populations and specific beneficiaries have been and will be involved throughout the project cycle. The oPt HF reporting and monitoring procedures are seeking to verify how this has been applied throughout project implementation. This includes, for the projects that will be monitored, making an assessment of the level of participation and access to information by project beneficiaries.

Partners are encouraged to seek guidance from existing resources on AAP. In particular, the following documents are important: (i) the five IASC Commitments to Accountability to Affected Populations (CAAP), (ii) the IASC Operational Framework on Accountability to Affected Populations, and (iii) the IASC Tools to assist in implementing the IASC AAP Commitments.

## 6.3 Protection mainstreaming

Protection mainstreaming is the process of incorporating protection principles and promoting meaningful access, safety and dignity in humanitarian aid. The following elements must be taken into account in all humanitarian activities funded by the oPt HF<sup>4</sup>:

1. Prioritize safety & dignity and avoid causing harm: Prevent and minimize as much as possible any unintended negative effects of your intervention which can increase people's vulnerability to both physical and psychosocial risks.
2. Meaningful Access: Arrange for people's access to assistance and services – in proportion to need and without any barriers (e.g. discrimination). Pay special attention to individuals and groups who may be particularly vulnerable or have difficulty accessing assistance and services.
3. Accountability: Set-up appropriate mechanisms through which affected populations can measure the adequacy of interventions, and address concerns and complaints.
4. Participation and empowerment: Support the development of self-protection capacities and assist people to claim their rights, including – not exclusively – the rights to shelter, food, water and sanitation, health, and education.

The oPt HF Review Committees should benefit of a protection mainstreaming support.

## 7 Administration of CBPFs

Basic definitions and guidance on the project budget preparation process provides partners with a common framework to facilitate appropriate preparation of project budgets. It focuses on defining eligible and ineligible costs, direct and indirect costs (e.g. Programme Support Costs – PSC), shared costs, budget categories and the adequate breakdown of budget lines. This guidance applies to all partners. Details about that are in the global guidelines pages 39-47.

## 8 Additional information

- 2021 Humanitarian Response Strategy (HRP)

[https://www.ochaopt.org/sites/default/files/hrp\\_2021.pdf](https://www.ochaopt.org/sites/default/files/hrp_2021.pdf)

<sup>4</sup> <http://www.globalprotectioncluster.org/themes/protection-mainstreaming/>



- 2021 Humanitarian Needs Overview (HNO)

<https://www.ochaopt.org/content/humanitarian-needs-overview-and-humanitarian-response-plan-2021-dashboard>

## 9 Contact information

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## 10 Review date

This manual will be reviewed and presented to the Advisory Board by December 2021.