



European humanitarian NGOs.
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PARTNERS IN HUMANITARIAN ACTION:

Halfway through the EU Humanitarian Partnership 2021 - 2027

BRUSSELS, 2024

BRIEFING PAPER

VOICE (Voluntary Organisations in Cooperation in Emergencies) is the largest network of European non-governmental organisations that implement principled humanitarian projects and programmes in crisis contexts worldwide. VOICE uses its collective voice towards the European Union and its Member States to promote effective and principled humanitarian responses. It advocates for the continued recognition of the key role of NGOs in humanitarian action, and for adequate resources to meet the needs of those living in the most vulnerable contexts and conditions.

Among others, VOICE facilitates the Humanitarian Partnership Watch Group and its Task Force on behalf of all DG ECHO NGO partners.

Since 2004, VOICE has regularly published various versions of the “Partners in Humanitarian Aid” briefings to take stock of the evolving partnership between DG ECHO and its NGO partners. The last briefing before this updated version was published in 2019: [“Partners in humanitarian aid: the development of the ECHO-NGO relationship as governed by the Framework Partnership Agreement”](#).

All opinions collected for this paper through interviews, survey and workshop discussions were given and analysed on the basis of anonymity and confidentiality of the stakeholders, allowing for open and frank dialogue. Interviewees organisations are listed in the references, but findings and conclusions presented in the paper are not attributed to any individual or organisation.

The opinions expressed in this paper do not necessarily reflect the opinions of all interviewees or all VOICE members.

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Introduction

The partnership between the European Commission's Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO) and non-governmental organisations (NGOs) has long been a cornerstone of humanitarian action, rooted in shared commitments to uphold humanitarian principles and efficient and dignified support to crises-affected communities.

Historically framed under the Framework Partnership Agreement (FPA), the collaboration has transitioned into the Humanitarian Partnership (HP) 2021–2027, marking a new era for the DG ECHO-NGO cooperation. This partnership shift aligns with the European Commission's broader "corporate approach" to standardise and streamline processes across its services, aiming for increased coherence and efficiency in its operations.

This report takes stock of the DG ECHO-NGO partnership's evolution under the HP 2021–2027, examining both the institutional transformations and practical experiences of NGOs within this framework. Particular emphasis is placed on the operational, administrative and structural aspects introduced by the Humanitarian Partnership, including the implications of the new Model Grant Agreement (MGA), the ex-ante assessment process, and DG ECHO's increased emphasis on compliance.

The dataset informing this briefing is based on a comprehensive desk review of documentation related to the DG ECHO-NGO partnership, including surveys previously carried out by VOICE as well as reports from Humanitarian Partnership Watch Group (HP Watch Group) and Task Force meetings. It draws from stakeholder perspectives collected through semi-structured interviews with NGOs and DG ECHO, a survey of HP Watch Group members as well as a workshop with the HP Watch Group in October 2024.

DG ECHO and humanitarian NGOs: a partnership spirit to be nurtured

Overview of the partnership space

Effective dialogue between DG ECHO and NGOs is fundamental for fostering a successful partnership to deliver humanitarian action. This collaborative engagement ensures that humanitarian responses are well-coordinated, efficient, and aligned with the needs of affected populations. Dialogue between NGOs and DG ECHO happens regularly on a formal and informal level and is carried out collectively, semi-collectively or at individual NGO level (see Figure 1).

Figure 1: Types of dialogue



Throughout the years, DG ECHO has established platforms to facilitate continuous collective dialogue with its NGO and non-NGO partners. The annual DG ECHO's Partners' Conferences have traditionally been a cornerstone of DG ECHO's engagement with its humanitarian partners, including NGOs, international organisations and UN agencies. These conferences provided a platform for sharing experiences, discussing policy developments, addressing operational challenges, and providing an overview of DG ECHO's upcoming priorities for the year ahead. They fostered a collaborative environment where partners could engage directly with DG ECHO officials and with each other. Due to the COVID-19 pandemic, the annual DG ECHO's Partners' Conference was suspended and then discontinued, with the last event held in 2019. In 2022, VOICE members called for the establishment of another platform for discussion between DG ECHO and its NGO partners, particularly to create a dedicated space:

- For partners to discuss upcoming changes collectively and identify a way forward for the partnership;
- For lessons learned exercises and addressing challenges related to the operationalisation of DG ECHO's policies and guidelines;
- To exchange around DG ECHO's priorities and vision;
- For a privileged moment for in-person and informal networking between DG ECHO and its NGO partners.¹

1. VOICE, Partners' conferences: What is missing?

In 2023, DG ECHO introduced the **Partners' Segment**, a new initiative to enhance direct engagement with its partners. The inaugural Partners' Segment took place in March 2023, immediately following the European Humanitarian Forum. This half-day, in-person event was exclusive to DG ECHO and its partners, providing a space for open discussions to enhance the partnership and ultimately the delivery of principled humanitarian action.

While the introduction of the Partners' Segment reflects DG ECHO's commitment to continue fostering an interactive and responsive dialogue with its partners, NGOs consulted reported room for improvement regarding its effectiveness.² In particular, stakeholders highlighted the short length of the Partners' Segment (half a day),³ which limits opportunities for interactive elements such as breakout sessions, and suggested that expanding it to a full-day or two-day event would enable more in-depth discussions and meaningful exchanges.⁴ Nevertheless, if comparing the two Partners' Segment events carried out so far, NGOs positively noted improvements in the second event, particularly in the selection of topics and overall structure of the event.

On the semi-collective level, the **Humanitarian Partnership Watch Group (HP Watch Group)** continues the tradition of facilitating constructive dialogue between DG ECHO and its NGO partners, building on its original format as the FPA Watch Group. Established in 1999 as a "Dialogue group," the Watch Group's role has evolved from simply monitoring the FPA to encompassing broader consultative responsibilities. With the transition from the FPA to the Humanitarian Partnership (HP) in 2021, the group was renamed accordingly. As for its previous mandates, the HP Watch Group is tasked with representing the interests of all DG ECHO-certified NGO partners. Led by the VOICE Secretariat, it acts as a collaborative body, aiming to maintain an effective, efficient, and quality EU Humanitarian Partnership for DG ECHO and its partners. The Watch Group's commitments include analysing challenges posed by the HP, structuring collective inputs on the HP's potential improvements, and communicating relevant issues back to DG ECHO. Additionally, the Watch Group plays a crucial role as the focal point for DG ECHO whenever discussions on potential changes to the HP or other policies arise, ensuring that partners' perspectives are included. The Watch Group is composed of approximately 40 NGOs, each represented by a designated individual chosen by their organisation to contribute to ongoing discussions and debates.

Meetings of the HP Watch Group are a core element of its work. Regular sessions, which may either include DG ECHO representatives or be internal to the group, offer an organised platform for discussing priority issues. Each year, an annual calendar is established for these meetings, and minutes are recorded and made available for all VOICE members by the Secretariat, fostering transparency and information sharing. A further element of the Watch Group's structure involves the formation of ad hoc sub-groups when specialised expertise is needed to tackle particular issues. Through consultation, analysis, and reporting mechanisms (e.g. surveys, written inputs, etc.), the Watch Group collects feedback from NGOs about the implementation of the Humanitarian Partnership and reports evidence-based information to DG ECHO. Watch Group members regularly provide direct input to enhance the quality, efficiency and effectiveness of the Humanitarian Partnership, particularly through participating in surveys and data collection efforts, reviewing notes, assessing documents, guidelines and policies as well as sharing their experiences and perspectives, both in writing and during meetings, to inform discussions and decisions.

The large majority of stakeholders consulted reported that the HP Watch Group provides a high contribution to the partnership spirit between DG ECHO and NGOs,⁵ and positively rated the quality of dialogue with DG ECHO interlocutors in the context of Watch Group meetings.⁶ **The Watch Group is considered as a critical platform that enables continuous dialogue on practical issues**, ensuring that DG ECHO's initiatives are implemented within a collaborative environment with its partners. In particular, the HP Watch Group played an important role in conveying NGOs' input on DG ECHO's key policies and allowed dialogue on important matters. Examples include the operationalisation of DG ECHO's equitable partnerships guidance, environmental requirements, the new budget template and the annual report on sexual exploitation, abuse and harassment (SEAH).⁷ **The creation of sub-working groups within the Watch Group** focusing on specific issues such as audits and equitable partnerships, was particularly appreciated by three stakeholders. This approach allows partners to engage deeply on topics of particular interest, fostering a more focused and practical dialogue. NGOs also called for more consistent follow-ups on issues discussed during consultations, with some respondents noting that, while discussions take place, actionable outcomes and follow-ups are sometimes lacking, ultimately risking reducing the effectiveness of these engagements.⁸

2. Online survey (16 out of 26 responses)

3. Online survey (11 open responses), Interviews with NGOs (4 out of 5)

4. Online survey (9 open responses)

5. Online survey (18 out of 26 responses, 6 open responses), Interviews with NGOs (5 out of 5), Interviews with DG ECHO (4 out of 4)

6. Online survey (22 out of 27 responses)

7. Online survey (7 open responses), Interviews with NGOs (5 out of 5), Interviews with DG ECHO (1 out of 4)

8. Online survey (5 open responses)

The HP Watch Group is supported by a smaller **Task Force**, which is composed of seven representatives elected from the HP Watch Group who regularly liaise with DG ECHO on emerging issues, aiming to establish a common foundation for discussion. Formed initially as part of the Framework Partnership Agreement (FPA) in 1999, the Task Force emerged as a mean of consolidating feedback from Watch Group members, liaising directly with DG ECHO to represent the HP Watch Group in a smaller setting, and overseeing the implementation of the Group’s work plan. In alignment with the transition from the FPA to the Humanitarian Partnership (HP) in 2021, the Task Force was renamed, with its mission adapted to reflect the evolving needs of DG ECHO’s NGO partners. As for the HP Watch Group, the mandate of the current **Humanitarian Partnership (HP) Task Force** also covers the period 2022-2027.

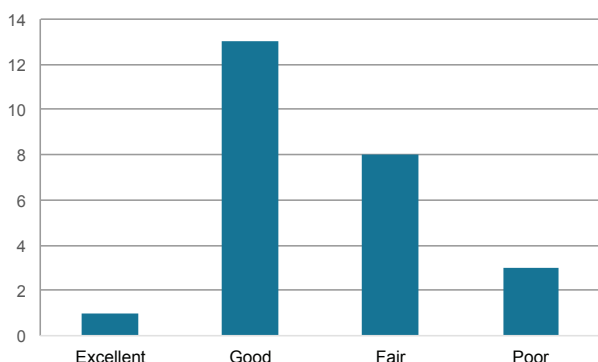
Meetings are integral to the Task Force’s functions, with members gathering approximately once or twice a month. Document analysis and development also form a significant part of the Task Force’s mandate. Members examine and provide feedback on documents, addressing points of concern and proposing necessary actions. When needed, and with the support of the VOICE Secretariat, the Task Force drafts working notes or other documents to communicate suggestions directly to DG ECHO, ensuring the interests and perspectives of the HP Watch Group are reflected in official exchanges.

Overall, the **Task Force representing the HP Watch Group and led by the VOICE Secretariat was acknowledged as a valuable mechanism within the DG ECHO-NGO partnership structure**, serving as a bridge for NGO feedback and fostering a responsive operational framework.

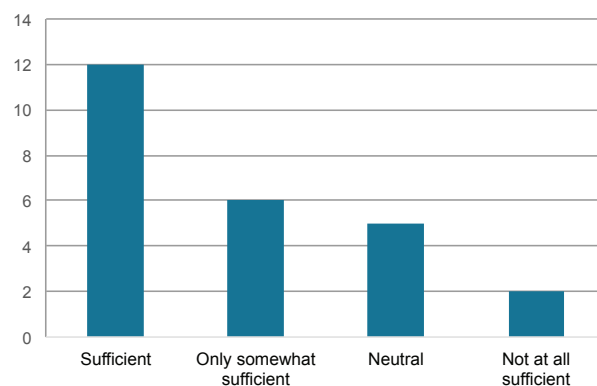
With regard to the individual level, as shown in Figure 2, most of the NGOs consulted reported that the **current channels for direct dialogue with DG ECHO are sufficient to address their needs**,⁹ and positively rated the overall quality of the dialogue with DG ECHO.¹⁰

Figure 2: Quality of direct dialogue

How would you rate the quality of the direct dialogue between your organisation and DG ECHO at HQ level? (n: 25)



Are the current channels for direct dialogue with DG ECHO sufficient to address your needs? (n: 25)



Some respondents highlighted that **DG ECHO’s openness and accessibility are a significant strength which facilitates direct dialogue**, and that **DG ECHO representatives, particularly in countries of operations, are generally approachable and responsive**, providing clear channels for communication and demonstrating a willingness to address urgent issues when needed.¹¹ This accessibility is especially valued as it enables NGOs to engage promptly on pressing matters, contributing to a sense of reliable partnership. In addition, the technical expertise of DG ECHO representatives was highly regarded by NGO partners, who emphasised that DG ECHO’s staff bring a substantial level of knowledge of humanitarian principles, funding mechanisms, and EU policies, which enhances the quality of dialogue and ensures discussions are grounded in operational realities.¹² This expertise allows for well-informed exchanges that benefit collaborative planning and decision-making processes.

9. Online survey (12 out of 25 responses)

10. Online survey (22 out of 25 responses)

11. Online survey (6 open responses), Interviews with NGOs (3 out of 5)

12. Online survey (5 open responses)

Nevertheless, NGOs reported that **some improvements are needed to further harmonise country-level HIP consultations**, which allow country-based NGO staff to directly engage with DG ECHO's operational priorities, and to align activities with DG ECHO's strategic objectives. A few organisations highlighted that some HIP presentations are conducted through formal meetings, while others occur in more informal or even one-on-one discussions. This inconsistency makes it challenging for NGOs to adequately prepare for and engage in these consultations, as they are often unaware of when and how the HIP presentations will be conducted. Furthermore, a minority of NGOs also reported the need to include local and national actors in DG ECHO's HIP presentations.¹³

Evolution of the partnership spirit

While exploring the overall evolution of the partnership spirit between NGOs and DG ECHO, the stakeholder consultation found a general balance between NGOs who perceive that it improved, declined or remained the same. Nevertheless, several positive factors that contributed to shape the partnership were reported, as well as some points for improvement.

One of the most frequently mentioned positive aspects was **DG ECHO's commitment to humanitarian principles**. The emphasis on humanity, impartiality, neutrality, and independence aligns both DG ECHO and its partners in their humanitarian mission, particularly in conflict zones and politically sensitive areas.¹⁴ **Flexibility in response mechanisms** was also highlighted as a significant positive element, with DG ECHO's willingness to adapt funding structures to meet evolving crises (e.g. the rapid adjustments made during the COVID-19 pandemic) demonstrating its adaptability in responding to sudden crises. This flexibility allowed NGOs to reallocate resources and respond effectively to changing circumstances, contributing to a collaborative and resilient partnership.¹⁵

Another commonly praised element was **DG ECHO's emphasis on country-level engagement**. The strong in-country presence and the expertise of DG ECHO's network of Technical Assistants (TAs) and experts provide a deep understanding of local contexts and support tailored responses.¹⁶

Conversely, it was reported that the **increased emphasis on compliance and risk management**, as well as the heightened focus on audits and financial scrutiny, contributed to a more bureaucratic nature of the partnership.¹⁷ This shift brought additional pressure on NGOs, undermining the previously more collaborative nature of the relationship.

13. Online survey (3 open responses), Interviews with NGOs (1 out of 5)

14. Online survey (5 open responses), Interviews with NGOs (2 out of 5)

15. Online survey (5 open responses)

16. Online survey (4 open responses), Interviews with NGOs (2 out of 5)

17. Online survey (6 open responses), Interviews with NGOs (4 out of 5)

Partnership Framework: from the FPA to the Humanitarian Partnership 2021-2027

Between 1993 and 2020, the partnership between DG ECHO and its NGO partners was formalised through the Framework Partnership Agreement (FPA). This agreement served as the legal foundation of DG ECHO's collaboration with NGOs and international organisations (IOs). In parallel, DG ECHO's relationship with UN agencies is governed by the Financial and Administrative Framework Agreement (FAFA), which was first signed in 2003. The FPA was structured to ensure that DG ECHO-funded humanitarian partners and operations adhered to the highest standards of quality and performance. It established both the principles of partnership and the legal requirements governing DG ECHO-financed humanitarian activities, outlining the roles, rights, and responsibilities of each partner. Throughout the period, there have been five FPAs, with the first implemented in 1993, followed by subsequent agreements in 1998, 2003, 2008, and 2014.

Since 2021, DG ECHO set out a refined partnership framework for humanitarian operations, covering the period 2021-2027. The **Humanitarian Partnership 2021-2027** sets forth a structured framework for collaboration with NGOs to enhance the European Union's capacity to respond to humanitarian crises. This new framework introduced several key steps in the partnership process, particularly emphasising a comprehensive ex-ante assessment and certification stage. This phase is pivotal as it determines the eligibility of NGOs to engage in EU-funded humanitarian efforts.

Ex-ante assessment

The ex-ante assessment marks the first formal step for NGOs seeking to work with DG ECHO under the new partnership framework. This assessment process serves as a gatekeeper, establishing whether an NGO meets the rigorous requirements for effective and responsible humanitarian action. The assessment encompasses several key areas:

- Legal and organisational aspects: assessment of the organisation's legal status, governance structure and operational framework to ensure compliance with EU regulations and standards;
- Financial and administrative capacity: assessment of financial stability, accounting practices and internal control systems to verify the organisation's ability to manage EU funds responsibly;
- Technical and operational capacity: examination of the organisation's experience, technical expertise and operational capabilities in delivering humanitarian aid;
- Verification of the organisation's commitment to humanitarian principles.¹⁸

The majority of NGOs consulted reported that the **ex-ante assessment was advantageous for their organisation**, particularly because it granted access to a 7-year certification.¹⁹ However, most of them highlighted that there is room for improvement to make the ex-ante assessment process smoother and less cumbersome for DG ECHO partners. In a survey carried out in 2020 right after undergoing the ex-ante assessment, NGOs reported numerous challenges, particularly regarding the clarity and timing of guidance as well as the interpretation of criteria.²⁰ NGOs highlighted that **key questions and criteria in the ex-ante assessment were open to interpretation**, which led to discrepancies in how auditors and NGO staff understood the requirements. This ambiguity often stemmed from a lack of clear definitions or templates, especially within the annexes. For instance, annexe 4B lacked specific guidance on applicability, leaving many organisations uncertain as to whether both annexes needed submission or only one.

A further concern was the **timing of DG ECHO's guidance**, as essential clarifications such as FAQs and webinars were provided late in the process. This delay meant that NGOs often proceeded with the assessment without fully understanding DG ECHO's expectations. Additionally, the remote nature of the assessment due to the COVID-19 pandemic compounded these issues, requiring NGOs to invest additional time and resources to navigate technical hurdles without in-person support.

18. DG ECHO Partners Helpdesk, EU Humanitarian Partnership Certificate 2021 – 2027, <https://www.dgecho-partners-helpdesk.eu/ngo/humanitarian-partnership-2021-2027/eu-humanitarian-partnership-certificate-2021-2027>

19. Online survey (16 out of 25 responses), Interviews with NGOs (2 out of 5)

20. VOICE, 2020, VOICE FPA ex-ante assessment survey

The **ex-ante assessment** was also reported as generally cumbersome and resource-intensive, particularly for smaller NGOs. The volume of documentation required and the high costs associated with the process were burdensome, making it challenging for organisations with limited resources to meet the assessment's demands.²¹ Nevertheless, DG ECHO officers positively noted the effort made by NGOs to comply with the requirements of the assessment (and certification process as a whole), which is considered an "investment for the future collaboration".²² The ex-ante assessment Terms of Reference's emphasis on evidence-based documentation has also posed additional challenges. NGOs found it difficult to provide concrete evidence directly from project implementation, especially when some requirements demanded documentation which was hard to produce retrospectively. This evidence-based focus is perceived as overly stringent, often overlooking practical limitations in countries of operations.

Another issue highlighted was the **lack of alignment with other audits or assessments**. NGOs noted that DG ECHO's ex-ante assessment did not allow for cross-reliance on previous audits, forcing organisations to undergo redundant assessments. This lack of integration led to increased administrative burdens, particularly for NGOs that operate across multiple funding frameworks. Furthermore, NGOs observed different interpretations among auditors regarding scoring criteria, which introduced inconsistencies in the evaluation process. Similarly, one of the major concerns among NGOs consulted for this briefing was the duplication of efforts between the ex-ante assessment and subsequent compliance audits.²³ This redundancy increased administrative workload and added financial pressure on NGOs, creating frustration and a sense of inefficiency.

For the future, survey respondents recommended DG ECHO to consider implementing a **risk-based** or **fast-track system** for the ex-ante assessment, especially for NGOs with a proven history of compliance. This approach could reduce the level of scrutiny for established partners and focus assessment resources on new or "higher risk" organisations.²⁴ Some stakeholders also proposed that digital tools could simplify the ex-ante assessment process. A centralised digital platform where NGOs could upload documentation, track progress, and interact with DG ECHO, was suggested as a solution to streamline the process and reduce administrative workload.²⁵

Model Grant Agreement (MGA)

Upon successful completion of the ex-ante assessment, NGOs may be awarded the EU Humanitarian Partnership 2021 Certificate, confirming their eligibility for partnering with DG ECHO. EU-funded humanitarian programs are then regulated by the Humanitarian Aid Model Grant Agreement (MGA) introduced in January 2021, replacing the previous Framework Partnership Agreement (FPA). This transition aimed to standardise contractual frameworks across the European Commission's services, to harmonise administrative procedures for the recipients of EU funding.²⁶ As outlined in Figure 3, the MGA brought a series of changes for DG ECHO partners, as well as a new language imposed by the corporate nature of the template.²⁷

Figure 3: Changes brought by the MGA

IMPORTANT CHANGES	UNCHANGED RULES
<ul style="list-style-type: none"> • Justification for financial support to third parties above EUR 60 000 • Simplified procurement (beneficiary's usual purchasing practices apply) • Possibility to have a multi-beneficiary agreement • No derogations from exchange rate rule • Personnel cost calculation • Difference between purchase of goods/services and subcontracting • Sanctions clause (which clearly refers to the fact that DG ECHO partners are not expected to vet final beneficiaries) 	<ul style="list-style-type: none"> • Eligibility of cost • Record keeping and audits • Visibility derogation • Standards for medical supplies, devices and food • Intellectual Property Rights • Data protection

21. Online survey (8 open responses), Interviews with NGOs (1 out of 5)

22. Interviews with DG ECHO (3 out of 4)

23. Online survey (12 out of 16 responses, 9 open responses), Interviews with NGOs (5 out of 5)

24. Online survey (4 open responses)

25. Online survey (3 open responses)

26. Interviews with DG ECHO (2 out of 4)

27. VOICE, 2020, Update on the development of the next ECHO Partnership Certificate; DG ECHO Partners Helpdesk, EU Humanitarian Partnership Certificate 2021 – 2027, Comparison MGA and FPA 2014, <https://www.dgecho-partners-helpdesk.eu/ngo/the-humanitarian-aid-model-grant-agreement-huma-mga-for-ngos/comparison-mga-and-fpa-2014>

The stakeholder consultation highlighted several challenges that NGOs faced with the MGA, stemming from its corporate design, which is perceived as rigid and less adaptable to the specific needs of humanitarian work. One common issue revolves around the “215-day rule”²⁸ for calculating staff costs, which has led to widespread confusion and required additional clarifications from DG ECHO.²⁹ Many NGOs found this rule incompatible with the realities of in-country operations, creating complexities in budgetary planning and compliance. Furthermore, there is a general perception that the MGA, as a standardised template tied to the European Commission’s push for corporate harmonisation, lacks the flexibility required for humanitarian contexts.³⁰ In contrast, the FPA was seen as better tailored to the sector’s specificities. As also reported in the VOICE survey on the use of the tools related to the new EU Humanitarian Partnership, NGOs also expressed frustration with the sheer length and complexity of the MGA, suggesting it was originally designed with other sectors in mind, not for rapid humanitarian responses.³¹ This sentiment was also shared by one DG ECHO officer, who highlighted the **shift from a 7-page (FPA) to a 79-page contract (MGA)**.

The **MGA’s suspension and termination clauses** have also introduced further challenges. Three stakeholders noted that the MGA restricts the eligibility of costs incurred during suspensions, a significant shift from the previous framework under the FPA.³² This rigidity led to financial uncertainties and planning issues, as the humanitarian environment often needs adaptability in response to abrupt changes. Nevertheless, it should be noted that, while under the MGA costs incurred or contributions for activities implemented during grant suspension are not eligible (Article 31.1.1 of the MGA), Annex 5 contains a provision that allows the temporary interruption or reduction of activities due to exceptional circumstances. During this period, some costs would still be eligible.³³

NGOs also reported that, although DG ECHO provided some useful training, the general **guidance on the use of the MGA was insufficient**, with documents spread across various sources, further delaying understanding and compliance efforts.³⁴ The late release of the **Annotated Grant Agreement (AGA)**,³⁵ delayed by over three years, left many NGOs operating with limited clarity on essential compliance aspects, and the document was also criticised for its excessive length (350 pages).³⁶

Single Form and requirements

The **Single Form**, a comprehensive document that partners use to propose, monitor, and report on humanitarian actions, is a central component of the collaboration between DG ECHO and NGOs. The Single Form was introduced to streamline the application and reporting processes between DG ECHO and its partners. By consolidating various documents into a single template, it aimed to reduce administrative burden and ensure consistency in information exchange. This approach facilitated a unified method for submitting proposals, modification requests, interim reports and final reports, thereby promoting coherence throughout the project lifecycle. Initially, the Single Form was a static document, often completed offline and submitted via traditional means. Recognising the need for more dynamic and accessible tools, DG ECHO developed the APPEL platform, an electronic exchange system that allows partners to manage the Single Form online. APPEL enables partners to create, update, and submit documents electronically, enhancing real-time collaboration and reducing processing times. The platform also supports both online and offline applications, responding to the needs of partners operating in areas with limited internet connectivity.³⁷

In response to evolving humanitarian challenges and feedback from partners, DG ECHO has periodically updated the Single Form’s structure and content. Notably, in 2021, significant changes were implemented to improve clarity and comprehensiveness. These revisions included the introduction of new sections and the modification of existing ones to better capture the complexities of humanitarian actions. For instance, sections on needs assessment, risk analysis, and beneficiary details were expanded to provide more detailed information, facilitating more informed decision-making.³⁸

28. The total number of day-equivalents declared in EU grants, for a person for a year, cannot be higher than 215

29. Online survey (10 open responses), Interviews with NGOs (2 out of 5)

30. Online survey (6 open responses)

31. 45% of respondents to the survey

32. Online survey (3 open responses), Interviews with NGOs (2 out of 5)

33. DG ECHO Partners Helpdesk, Differences Between the Grant Agreements Under the FPA 2014 and the Certificate 2021, <https://www.dgecho-partners-helpdesk.eu/ngo/the-humanitarian-aid-model-grant-agreement-huma-mga-for-ngos/differences-between-the-grant-agreements-under-the>

34. VOICE survey on the use of the tools related to the new EU Humanitarian Partnership, 40% of respondents

35. The AGA - Annotated Grant Agreement is a user guide that aims to explain to applicants and beneficiaries the EU Model Grant Agreements for the EU funding programmes 2021-2027

36. Online survey (7 open responses), Interviews with NGOs (3 out of 5)

37. DG ECHO Partners Helpdesk, Appel and the Submission of the Single Form, <https://2014-2020.dgecho-partners-helpdesk.eu/ngo/action-proposal/appel-and-submission-of-the-single-form>

38. DG ECHO, 2024, Single Form Guidelines 2021

To assist partners in navigating these changes, DG ECHO has provided updated guidelines and support materials. These resources offer step-by-step instructions on completing the Single Form, explanations of new sections, and examples of best practices. Additionally, DG ECHO has conducted training sessions and webinars to ensure partners are well-equipped to utilise the updated form effectively.³⁹ Despite the numerous changes introduced, 80% of respondents to the 2021 VOICE survey on the use of the tools related to the new EU Humanitarian Partnership reported that the revisions of Single Form guidelines did not lead to confusion or additional work during the proposal process.

The consultation with NGOs highlighted that **the Single Form offers several advantages, such as centralisation of information and data validation**, which many NGOs found beneficial. In particular, it was reported that this centralised tool enables consolidated project management and reporting, and its capability to pre-fill data from previous submissions helps avoid duplication and streamlines the proposal and reporting process, which is particularly beneficial for organisations managing multiple projects.⁴⁰ Validation features also help prevent submission errors, ensuring accuracy before final submission.

Consulted partners generally considered the instructions for the Single Form as clear and easy to follow. However, technical constraints such as byte limitations on text fields and the inability for multiple users to work on the form simultaneously can pose challenges, as they can hinder collaborative input and impact the efficiency of proposal submissions.⁴¹ Furthermore, the complexity of the Single Form's interface was reported as a challenge⁴², as it often requires extensive training for new users.

Lastly, there was a call for the **simplification of the Single Form**, ideally through the use of the harmonised reporting template or "8+3 template", which aims to standardise, streamline, and unify the reporting process for humanitarian projects and programmes. Designed to encompass all types of humanitarian work, from brief projects to multi-year programmes, its widespread adoption by donors and partners could significantly reduce administrative burdens.⁴³ DG ECHO tested simplified reporting (e.g. one Interim Report instead of many) as well as the 8+3 template in its pilot Programmatic Partnerships,⁴⁴ however, no evidence was found on future plans to adapt these tools to HIP-funded actions.

Throughout the years, DG ECHO has also modified the Single Form to include features of some of its new **Policies, Guidelines and requirements**. For example, only between 2022 and 2023, DG ECHO published nine updated or new documents and requirements.

DG ECHO POLICIES, GUIDELINES AND REQUIREMENTS (2022-2023)

1. Technical guidance on Protection Mainstreaming Indicator (January 2022)
2. Thematic Policy Document on Humanitarian Logistics Policy (February 2022)
3. Thematic Policy Document on Cash Transfers, including an Annex 1 on Large-scale Cash Guidance Note (March 2022)
4. Guidance on the operationalisation of the Minimum Environmental Requirements and Recommendations for EU-funded humanitarian aid operations (August 2022)
5. Guidance note on Promoting Equitable Partnerships with Local Responders in Humanitarian Settings (March 2023)
6. Guidance to DG ECHO partners funded under the Humanitarian Partnership Certificate - Yearly reporting on allegations of sexual exploitation, abuse and harassment (SEAH) (2023)
7. Note to ECHO Partners Implementing Humanitarian Aid Actions in Countries Where the Use of Money Transfer Agents is Needed (November 2023)
8. Communication and Visibility Manual for European Union-funded Humanitarian Aid Actions (December 2023)
9. New environmental indicators (December 2023)

39. DG ECHO Partners Helpdesk, The Single Form & how to fill it in, <https://www.dgecho-partners-helpdesk.eu/ngo/action-proposal/fill-in-the-single-form>

40. Online survey (3 open responses)

41. Online survey (3 open responses), Interviews with NGOs (2 out of 5)

42. Online survey (4 open responses), Interviews with NGOs (1 out of 5)

43. IASC, 2019, The 8+3 Template - A New Way of Standardizing, Simplifying and Harmonizing Humanitarian Reporting, https://interagencystandingcommittee.org/sites/default/files/migrated/2019-09/83_template_final.pdf

44. DG ECHO Partners Helpdesk, Pilot Programmatic Partnerships, <https://www.dgecho-partners-helpdesk.eu/programmatic-partnership/programmatic-partnership/pilot-programmatic-partnerships>

Consulted NGOs appreciated the work done by DG ECHO in developing Guidelines in collaboration with its partners. For example, the process for the design of the SEAH reporting template was highlighted as collaborative, and the transparent approach undertaken for the rollout and consultation around the Minimum Environmental Requirements was noted as an example to follow for the future.⁴⁵ Nevertheless, NGOs almost unanimously reported that, in order to allow partners to adapt and understand new Policies and Guidelines, their rollout should be executed with a more diluted approach, avoiding the parallel publication of multiple new or updated requirements.⁴⁶ For instance, as highlighted in an HP Task Force letter to DG ECHO, the challenges faced by partners during the autumn of 2023, during which numerous last-minute changes including the publication of three Guidelines (in addition to two others published in the previous months) were brought by DG ECHO, disrupted the HIPs 2024 proposal phase.⁴⁷

While partners are generally able to adapt to individual updates or new requirements, several NGOs reported that last-minute changes to requirements, guidelines, or templates by DG ECHO could cause significant disruptions, particularly if these changes are introduced in the final stages of proposal drafting. Given the complex and time-intensive nature of proposal development, any “last-minute” additions can create challenges for partners in effectively incorporating new elements, especially for proposals involving consortia.⁴⁸ Furthermore, it was suggested that **DG ECHO could more consistently present updates on its Policies, Guidelines and requirements to its partners**, for example during HP Watch Group meetings or Directors’ presentations, and plan a specific period for the release of requirements which have an impact on the Single Form and proposal development (e.g. between April and July), thus allowing partners to potentially share feedback and make the necessary internal arrangements in order to comply with the upcoming changes. Also, the current overhead allowance of 7% is considered insufficient to cover the costs tied to compliance with DG ECHO Guidelines and requirements. Partners reported that the financial support for compliance activities does not reflect the true costs involved, particularly given the requirements for compliance capacity building among local actors and the sharing of overheads.⁴⁹

45. Feedback from the workshop with NGOs

46. Interviews with NGOs (4 out of 5), Feedback from the workshop with NGOs

47. HP Task Force letter to DG ECHO, 29 January 2024

48. Interviews with NGOs (3 out of 5), Feedback from the workshop with NGOs

49. Online survey (5 open responses), Interviews with NGOs (3 out of 5)

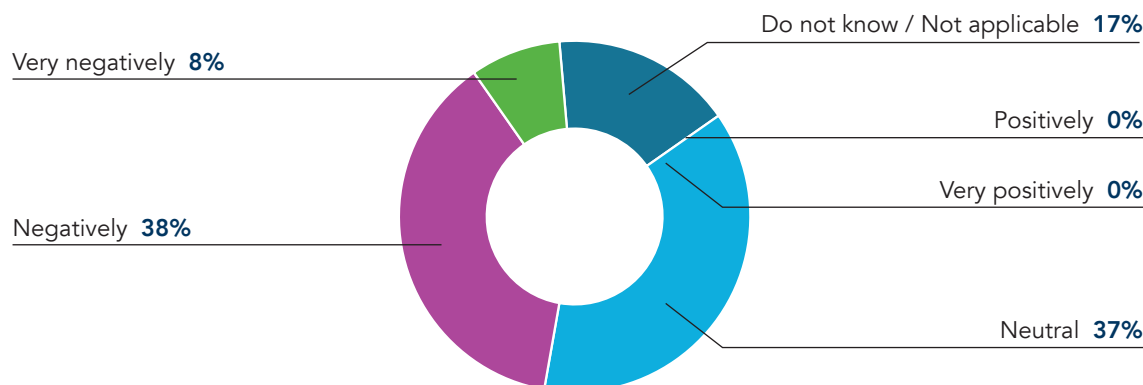
A partnership within the evolving EU institutional and political setting

As outlined in the previous sections, following the European Commission's adoption of a "corporate approach", DG ECHO has undergone transformations in the way it funds and collaborates with its partners. The "corporate approach" strategy aims to standardise and streamline processes across various departments, enhancing efficiency and coherence within the Commission's operations.

The transition from the FPA to the Humanitarian Partnership 2021-2027 aimed to align DG ECHO's procedures with the Commission's broader corporate standards, ensuring consistency and transparency in partnerships. As part of this approach and following the Commission Decision of 12 June 2020 (C(2020)3759 final), which imposes a new MGA on all Commission services as of January 2021, DG ECHO's Humanitarian Aid MGA was rolled out. The corporate approach also emphasises robust audit and compliance mechanisms. DG ECHO has intensified its audit strategy, increasing the frequency and scope of audits to ensure accountability and adherence to EU regulations.

As outlined in Figure 4, the majority of survey respondents reported that the changes brought by the "corporate approach" have negatively affected their partnership with DG ECHO.

Figure 4: How has the European Commission's "corporate approach" affected your partnership with DG ECHO?



Amongst the specific aspects of the "corporate approach" which had the greatest impact on NGOs, the following were the most commonly reported during the consultation:

- > **Staff cost calculation:** the new methodology for calculating staff costs, particularly the "215 days" rule, was frequently highlighted as a significant issue under the corporate approach. NGOs noted that this standardised calculation method does not reflect the variable work structures common in humanitarian settings, leading to confusion and challenges in accurately accounting for staff costs. Many organisations indicated that this requirement complicates financial planning and reporting, detracting from operational efficiency;⁵⁰
- > **Standardisation of documentation:** the adoption of uniform formats and documentation requirements, aligned with broader European Commission standards, was seen as both beneficial and challenging. While NGOs appreciated the consistency this brought, they expressed that these formats are not always suitable for the complex realities of humanitarian work;⁵¹
- > **Model Grant Agreement (MGA) and increased administrative complexity:** the introduction of the MGA as a standard contract template has added complexity for NGOs, as it contains detailed requirements that do not always align with humanitarian contexts. Nevertheless, there were efforts from DG ECHO to address humanitarian specificities in the MGA, particularly in its Annex 5, which contains specific rules on communication and visibility requirements and for carrying out an action;⁵²

50. Online survey (7 open responses), Interviews with NGOs (3 out of 5)

51. Online survey (5 open responses)

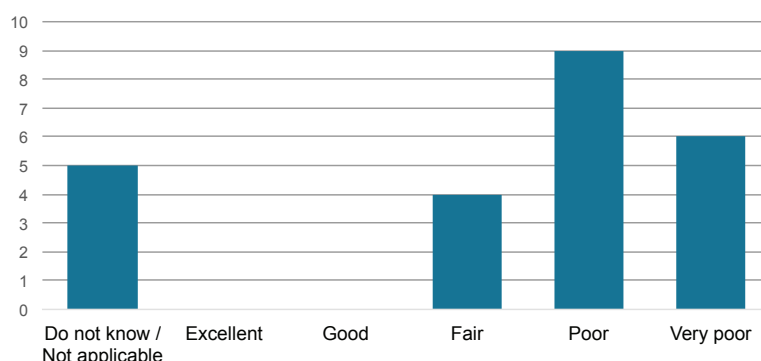
52. Online survey (5 open responses), DG ECHO Partners Helpdesk, The Humanitarian Aid Model Grant Agreement (HUMA MGA) for NGOs, <https://www.dgecho-partners-helpdesk.eu/ngo/the-humanitarian-aid-model-grant-agreement-huma-mga-for-ngos>

- **Audit frequency and documentation demands:** the corporate approach's intensified focus on frequent audits and comprehensive documentation for compliance led to the adoption by DG ECHO of a new audit strategy, outlined in the 2022 Audit Info Paper (a document designed by DG ECHO E2 External Audit Sector (EAS) to inform and explain partners about the procedures governing audits planned and undertaken by the EAS). The new approach has significantly impacted NGOs. While these measures aim to uphold financial integrity, the frequency and scope of audits, combined with the need for numerous supporting documents, were seen as increasing the administrative burden and detracting from operational efficiency, as these processes demand considerable resources to meet DG ECHO's expectations;⁵³
- **Future systems and digital integration:** two NGOs raised concerns about potential upcoming digital transitions, such as the replacement of the APPEL system with the e-Grants platform. They expressed uncertainty about the consistency and efficiency of these new digital tools, as past experiences with Commission-wide digital systems have introduced complexities that increased administrative requirements without necessarily supporting the agile needs of humanitarian work.

In light of the evolving EU institutional and political landscape, consulted NGOs reported that improved dialogue with other Commission services (e.g. the Directorate-General for Budget – DG BUDG) could benefit the DG ECHO-NGO partnership. Currently, most of the NGOs feel that there are not enough opportunities for dialogue with other DGs and EU services (see Figure 5 below) and suggested some ways forward to foster closer and more consistent dialogue with DG ECHO, other DGs and EU services, which is essential to improving the partnership. For instance, NGOs reported establishing structured, regular meetings between DG ECHO and other DGs (e.g. DG INTPA, DG BUDG) with NGO representation, would enable the alignment of humanitarian, development and climate action strategies, creating a cohesive approach to addressing crises that cross sectoral boundaries. Regular interactions would allow DGs to better understand countries of operations' realities and improve the integration of humanitarian actors' perspectives into strategic planning.⁵⁴ Furthermore, respondents highlighted the need for raising awareness of humanitarian contexts across DGs involved in budget, development and compliance, to gain a clearer understanding of the unique challenges NGOs face in delivering humanitarian action (e.g. conflicts, high volatility, etc.). NGOs suggested that DG ECHO could facilitate this by sharing operational insights and challenges with other DGs, helping to develop tools and regulations that are better suited to these challenging environments.⁵⁵

Direct engagement with DGs responsible for financial compliance and audit was also viewed as beneficial. NGOs felt that direct dialogue would allow them to discuss the impacts of regulatory requirements more effectively, including the implications of stringent financial regulations on humanitarian operations. This engagement could be managed by leveraging existing networks, such as CONCORD for development and VOICE for humanitarian issues, to facilitate dialogue with DGs. By strengthening these networks' roles in representing their interests, NGOs could more effectively provide input in key budgetary and regulatory discussions, particularly as the EU prepares for its next Multiannual Financial Framework (MFF).⁵⁶ Lastly, NGOs suggested that involving representatives from other relevant DGs in VOICE-led discussions, Partner Segments and NGO forums would allow for more integrated decision-making. This approach would make NGOs feel more heard at the policy level, as it would bring together multiple EU services to address shared challenges in humanitarian (and development) work.⁵⁷

Figure 5: How would you rate the opportunities for dialogue with other DGs and/ or EU services in relation to the DG ECHO partnership?



53. Online survey (3 open responses), Interviews with NGOs (4 out of 5)
 54. Online survey (5 open responses)
 55. Online survey (4 open responses)
 56. Online survey (4 open responses), Interviews with NGOs (2 out of 5)
 57. Online survey (3 open responses)

To jointly navigate the current EU political, institutional and political setting, NGOs identified several key elements of the DG ECHO-NGO partnership which are vital to be maintained and nurtured. **Open communication, flexibility, principled action, predictable funding, and inclusivity** are seen as foundational to effective collaboration and the delivery of impactful humanitarian action. Figure 6 outlines the key elements reported by consulted NGOs.

Finally, to further strengthen the partnership and better equip it to navigate complex crises and meet humanitarian needs effectively within the evolving EU context, **NGOs called for DG ECHO to continue increasing flexibility in its funding**, particularly by expanding multi-year funding to allow for long-term planning in protracted crises, which would help NGOs respond effectively to evolving needs without the constraint of frequent reapplications or restricted budgets.⁵⁷

Figure 6: DG ECHO-NGO partnership – Elements to be maintained and reinforced



58. Online survey (5 open responses), Interviews with NGOs (2 out of 5)

Conclusions

The DG ECHO-NGO partnership, as redefined by the EU Humanitarian Partnership (HP) 2021 – 2027, marks a significant evolution in how the European Union collaborates with non-governmental organisations to deliver humanitarian action. Through this new framework, DG ECHO has sought to bring a structured approach to funding and partnership, ensuring compliance with EU regulations and aligning with the European Commission's broader "corporate approach." While the HP has brought positive developments - such as streamlined procedures, enhanced oversight and more rigorous standards - these advancements have also introduced challenges that impact the partners' operational effectiveness.

Overview of the partnership space

Dialogue between DG ECHO and its NGO partners has been maintained through several platforms, mainly the HP Watch Group but also the recently introduced Partners' Segment. These mechanisms have proven invaluable for fostering open communication, facilitating feedback and ensuring NGO perspectives are included. The HP Watch Group is seen as an essential body that maintains consistent dialogue on key operational topics. Its evidence-based contributions to the collaborative dialogue and exchange between DG ECHO and its certified NGOs have significantly enhanced the overall quality, efficiency and effectiveness of the partnership. This progress has been further supported by the efforts of its sub-working groups, which concentrate on addressing specific aspects of the partnership. However, NGOs expressed a desire for more extensive and interactive engagements that allow for deeper, focused discussions on practical and operational issues.

Model Grant Agreement (MGA)

The adoption of the Model Grant Agreement has played a central role in the restructured partnership, replacing the previous Framework Partnership Agreement. The MGA is intended to standardise agreements across EU-funded initiatives, aiming to promote consistency and transparency. NGOs, however, have encountered difficulties in adapting to the MGA's complex provisions, many of which are seen as rigid and lacking adaptability to the unique demands of humanitarian operations. Requirements such as the "215-day rule" for calculating staff costs and stringent eligibility criteria for certain costs have introduced administrative burdens that, while aligned with EU accountability standards, often hinder operational flexibility in crisis contexts. Moreover, the increased focus on compliance and audits led to heightened scrutiny, with frequent audits and extensive documentation requirements placing additional strain on NGO resources.

Ex-ante assessment

The ex-ante assessment process has similarly brought both positive and negative outcomes for the partnership. Designed as a preliminary certification for NGOs seeking EU funding, the ex-ante assessment rigorously evaluates an organisation's financial stability, operational capacity and commitment to humanitarian principles. While NGOs appreciate the seven-year certification it grants, which offers a stable foundation for long-term collaboration, the assessment process has been criticised for its heavy administrative and financial demands, particularly on smaller organisations with limited resources. Calls for a future risk-based or fast-track approach for the ex-ante assessment suggest that a more tailored process could alleviate some of these burdens and better support the partnership's goals of efficiency and responsiveness.

A partnership within the evolving EU institutional and political setting

Another critical element identified by NGOs is the need for improved coordination with other Directorate-Generals (DGs) and EU services. The EU's "corporate approach" has standardised procedures across DGs, yet the partnership would benefit from structured engagement with EU services such as DG BUDG and DG INTPA, to ensure that financial and operational requirements align with the complex realities of humanitarian work. Regular interactions, facilitated by VOICE, would enhance the understanding across EU DGs, allowing policies and regulations to reflect country-level realities and fostering a more cohesive and aligned strategy to address cross-cutting issues.

The evolving political and institutional landscape of the EU further underscores the need for adaptability within the DG ECHO-NGO partnership. With crises becoming increasingly protracted and complex and the growing funding gap, NGOs are advocating for greater flexibility in funding structures, particularly through expanded multi-year funding. At the same time, several foundational elements must be maintained and strengthened to ensure a resilient and impactful collaboration. Open communication, flexibility, a commitment to humanitarian principles, predictable funding and inclusivity are, and should remain, essential pillars of the partnership.

References

Stakeholders' consultation

This briefing is based on an in-person workshop and an online survey conducted with the HP Watch Group members (31 responses received to the survey), as well as 9 semi-structured interviews undertaken online in September and October 2024 with the following stakeholders:

1. Concern;
2. IRC;
3. Medair;
4. NRC;
5. War Child NL;
6. DG ECHO – Unit B1;
7. DG ECHO – Unit D2;
8. DG ECHO – Unit E1;
9. DG ECHO – Unit E2.

Desk review with 18 sources:

1. DG ECHO Partners Helpdesk, Appel and the Submission of the Single Form;
2. DG ECHO Partners Helpdesk, Differences Between the Grant Agreements Under the FPA 2014 and the Certificate 2021;
3. DG ECHO Partners Helpdesk, EU Humanitarian Partnership Certificate 2021 – 2027;
4. DG ECHO Partners Helpdesk, Pilot Programmatic Partnerships;
5. DG ECHO Partners Helpdesk, The Humanitarian Aid Model Grant Agreement (HUMA MGA) for NGOs;
6. DG ECHO Partners Helpdesk, The Single Form & how to fill it in;
7. DG ECHO, 2024, Single Form Guidelines 2021;
8. FPA Task Force feedback on the ECHO Partnership Certificate, 2020;
9. HP Task Force letter to DG ECHO, 29 January 2024;
10. ASC, 2019, The 8+3 Template - A New Way of Standardizing, Simplifying and Harmonizing Humanitarian Reporting;
11. VOICE survey on the use of the tools related to the new EU Humanitarian Partnership;
12. VOICE, 2020, Update on the development of the next ECHO Partnership Certificate;
13. VOICE, 2020, VOICE FPA ex-ante assessment survey;
14. VOICE, 2022, Good practices around DG ECHO HIPs and contracting cycle;
15. VOICE, 2023, DG ECHO Partners' Segment 2023 - VOICE Factsheet;
16. VOICE, Partners' conferences: What is missing?;
17. VOICE, Terms of Reference Humanitarian Partnership (HP) Task Force 2022 – 2027;
18. VOICE, Humanitarian Partnership Watch Group 2022 – 2027 - Terms of Reference.



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