



# Review of Ministry for Foreign Affairs of Finland Support to Human Rights INGOs

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Final Review Report  
Ministry for Foreign Affairs of Finland

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## **Final Review Report**

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## Acronyms and Abbreviations

BHRC	Business and Human Rights Resource Centre
CA	Contribution Analysis
CESR	Centre for Economic and Social Rights
CSDDD	Corporate Sustainability Due Diligence Directive
CSO	Civil Society Organization
FLC	Funds for Local Cooperation
FLD	Front Line Defenders
GI-ESCR	Global Initiative for Economic, Social and Cultural Rights
HRBA	Human Rights-Based Approach
HRD	Human Rights Defender
HRDD	Human Rights Due Diligence
HQ	Headquarters
ICJ	International Commission of Jurists (ICJ)
ICTJ	International Center for Transitional Justice
IDA	International Disability Alliance
ILGA	International Lesbian, Gay, Bisexual, Trans and Intersex Association
INGOs	International Non-Governmental Organisations
ICI	Institutional Cooperation Instrument
ISHR	International Service for Human Rights (ISHR)
MFA	Ministry for Foreign Affairs of Finland
MRG	Minority Rights Group
OMCT	Organisation Mondiale Contre la Torture
QA	Quality Assurance
RQ	Review Question
RSQ	Review Sub-Question
SOMO	Centre for Research on Multinational Corporations
SOGI	Sexual Orientation and Gender Identity
SOGIESC	Sexual Orientation, Gender Identity and Expressions, and Sex Characteristics
SRHR	Sexual and Reproductive Health and Rights
ToC	Theory of Change
ToR	Terms of Reference
UN	The United Nations
UPR	Universal Periodic Review
WHRDs	Women Human Rights Defenders

## Executive Summary

The Ministry for Foreign Affairs of Finland (MFA) has allocated development cooperation funds to International Non-Governmental Organisations (INGOs) whose activities **support the implementation of Finland's development policy goals and priorities**, including in the area of human rights. Covering the **2022-2024 implementation period** (for INGOs selected in the 2021 Call for Proposals), this review was commissioned to take stock of results achieved, progress and the added value of the grants portfolio. Aimed at informing and contributing to discussions and learning within the MFA on how best to support the human rights work of INGOs, it took place at a time when the global funding landscape for human rights organisations is shrinking.<sup>1</sup>

The review was undertaken between **September 2025 and January 2026** and covered the work of **11 INGOs** selected from the 2024 open Call for Proposals. These covered four thematic areas in line with Finnish policy priorities: (i) promote ending of impunity, (ii) supporting human rights defenders, (iii) strengthening the implementation of economic, social and cultural rights and addressing discriminatory practices, and (iv) support business and human rights. A key focus was to assess the interplay between the direct support to rights-holders, institutional and organisational arrangements, and engaging in national and international advocacy, while supporting the implementation of Finnish human rights policy. Between November and early December 2025, **54 key informants** were interviewed as part of this review. In addition, the review team conducted scoping interviews, reviewed project documentation and drew on insights from previous evaluations of relevance (on Finnish and Swedish experiences on supporting human rights and influencing international normative/policy dialogue).

The funded interventions demonstrated **strong relevance** through systematic monitoring and analysis of human rights situations at the local, national, regional, and international levels, with an integrated approach across these levels to ensure that local voices were heard and represented in international advocacy. Support from the MFA enabled INGOs to address long-term and often under-recognised human rights challenges while retaining the flexibility to respond to rapidly changing contexts, particularly in fragile settings. The interventions successfully elevated local human rights concerns into regional and international policy frameworks, effectively leveraging international mechanisms to address grassroots challenges. The MFA supported INGOs financially, but also acted as a valuable partner beyond funding through continuous dialogue and information sharing.

The wide geographical coverage and multilevel approaches of INGO interventions **complemented Finland's partner-country-focused development cooperation**. The MFA's proactive and responsive grant management was highly appreciated. Nevertheless, there is potential to expand contact between INGOs and MFA staff going forward. For instance, in non-cooperation countries where Finland had limited on-the-ground programming, regular information sharing was perceived as highly valuable, whereas staff in partner countries were more concerned with funded programmes in-country, managed by the embassy or country representation. INGOs were, however, considered to bring in important perspectives, particularly for strengthening the evidence base and drawing on lessons from across countries and contexts.

Gender equality and social inclusion were well integrated across the portfolio, particularly in support of women and LGBTQI+ human rights defenders (HRDs) and minority groups. The review did, however, find that there was potential for greater focus on disability inclusion and the application of intersectional analysis for cross-portfolio learning going forward.

<sup>1</sup> See e.g.: ProtectDefenders.eu. (Dec. 2025). *The landscape of Public International Funding for Human Rights Defenders: Updated Analysis* <https://protectdefenders.eu/new-analysis-reveals-stagnation-in-funding-for-human-rights-defenders-despite-rising-needs/>

In terms of **effectiveness**, the INGO interventions substantially strengthened the capacities of human rights defenders, communities, and local organisations. This included strengthening their protection, including on digital security. Capacity development support also strengthened local actors' engagement with duty-bearers, including national or local public authorities and companies, by facilitating their interaction. Robust documentation, research, and reporting underpinned advocacy across all levels, and MFA support facilitated strategic organisational and movement strengthening among INGOs and partners. The flexible funding provided was particularly well-suited to movement strengthening in the operating areas of the selected INGOs. This helped reinforce the sustainability of human rights work undertaken and their ability to respond to emerging human rights crises.

Although linkages between local action and international advocacy were evident across the portfolio, partnership structures and governance arrangements varied. Overall, MFA support was **most effective** where it combined clear policy alignment with flexible funding, localisation-oriented partnerships, and active policy dialogue, enabling INGOs to connect local human rights action with international mechanisms, protect civic space, and generate added value through movement strengthening and reinforcement of the global human rights system.

The review, therefore, concludes that INGOs have, through their direct and sustained engagement with local human rights defenders and civil society organisations and groups, enabled meaningful movement building and **strengthened the global human rights system** by providing highly technical expertise and promoting local participation. These characteristics clearly complement Finland's broader development cooperation modalities and have contributed directly to the implementation of Finnish foreign policy, including its development and human rights policy objectives. This is particularly evident at the international level, in global and regional fora. Important changes were, however, also noted in INGOs' country-level engagement through their networks of national/local partners, several of which were also supported via sub-grants. Independence and flexibility emerged as **essential enablers** of effective INGO action across diverse implementation models, underscoring the importance of adaptive programming and donor practices. The funding constitutes an essential component of **sustained support to the international human rights system and critically contributes to Finland's long-standing reputation** within it. At a time when direct funding to local civil society is increasingly constrained, it also provides for important knowledge exchange that directly supports Finland's foreign and security policy interests.

The **recommendations** from the review are summarised below.

The **overall recommendation** of this review is for sustained support to INGOs to ensure that a strong multilateral system and global human rights system is maintained and that it operates effectively in the interest of rights-holders. Such a multilateral system is one where INGOs (via their partners, members and networks) have access and ability to bring in the voices of human rights defenders, while supporting follow-up actions and accountability at multiple levels. A complete stop (or drastic reduction) to Finland's funding to INGOs would be detrimental to the international human rights movement, given the current global funding and political landscape, and would undermine **Finland's strong reputation** in human rights policy influence in the multilateral arena, which has been built up over time. It would also come with serious trade-offs for Finland in relation to continuous information gathering and exchange with funded INGOs on on-the-ground human rights situations in a wide range of countries and contexts, particularly in view of additional constraints to direct funding for local civil society organisations.

However, the review highlights the opportunity for Finland **to more strategically articulate and leverage this funding envelope**. It recommends using the INGO-specific support as a distinct instrument for reinforcing a

locally responsive global human rights system that supports movement strengthening, safeguards civic space, and enhances complementarities with Finnish NGOs and other funding channels. Of primary importance is to **preserve INGO independence, reduce administrative burdens, and maximise strategic impact** in line with INGO's own operating models, whether they are covering one or several key thematic areas. This will help sustain **Finland's strong reputation** as a principled and effective supporter of international human rights grounded in local lived realities.

Going forward, and in view of **current resource constraints**, Finland could enhance the **manageability of future INGO support** by (i) selecting a **smaller number of strategically selected INGOs or coalitions** (drawing on pre-existing coalitions or network structures and/or collaborations across already established movements); (ii) making sure that **use, uptake and interactions with INGOs and their local partners** take place through a distributed network of MFA focal points (i.e. that more MFA staff engage with INGOs on policy or technical/policy issues while grants management remain in one Unit for the sake of internal efficiency); and (iii) ensuring that the **localization process** continues to include both local representation in international fora and sub-grants to local actors as/when relevant to sustain their local and nationally focused operations.

Effectiveness could also be maintained (and further enhanced) by allowing for **flexible funding modalities while ensuring that INGOs have sufficient internal mechanisms for adaptive management, reflected in robust systems for monitoring, evaluation, learning, and communications**. As such, and to support cross-thematic lessons, future Calls for Proposals should **avoid rigid compartmentalisation of themes** and instead invite INGOs to define how their existing coalitions, competencies, and advocacy strategies span multiple and interlinked human rights issues that also **align with Finland's articulated human rights policy interests**. Additionally, more emphasis could be placed on the "soft capacities" required to achieve change, such as **responsiveness to local actors and systems for effective sub-granting**. Finally, greater **clarity on mutual partnership expectations** between Finland and the INGOs – including opportunities for structured policy dialogue, knowledge exchange, and collaboration with the MFA and Finnish-funded NGOs – would help reinforce the complementary added value of INGOs within Finland's broader human rights and development cooperation architecture.

# 1 Introduction

## 1.1 Purpose and scope of the review

The purpose of this review was to **take stock of progress and added value** of the funded projects from the 2021 Call for Proposals for international human rights NGOs (INGOs) managed by the Unit for Human Rights (POL-40) at the Ministry for Foreign Affairs of Finland (MFA), while also assessing the added value of INGO activities to Finnish development and human rights policy initiatives. An additional Call for Proposals was issued in 2024, covering similar themes. Support provided 2024 onwards was only covered by the review to the extent it was raised during interviews, and any changes in the overall composition of the grants portfolio was not covered past the 2022-2024 funding envelope.

The review of the support provided through the 2021 Call for Proposals will feed into discussions and learning within the MFA in relation to supporting and managing INGO support going forward. This will be done while bearing in mind the need to maximise the use and alignment of such support with Finnish policies in an increasingly constrained funding landscape for human rights and human rights defenders overall.<sup>2</sup>

The open call covered four thematic areas: (i) promote ending of impunity, (ii) supporting human rights defenders, (iii) strengthening the implementation of economic, social and cultural rights and addressing discriminatory practices, and (iv) support business and human rights.

The activities of the organisations under review are those that have received support from the Unit for Human Rights Policy during 2022-2024. The review took place between September and December 2025, with data collection in November and an initial workshop in December 2025 to discuss preliminary findings with the MFA. Both INGO and MFA personnel were consulted. However, given the nature and scope of the review, drawing primarily on project documentation, KIIs, and end-of-project evaluations where available, no in-country site visits were undertaken.

A key focus was to assess the interplay between the direct support to rights-holders, institutional and organisational arrangements, and engaging in national and international advocacy, while supporting the implementation of Finnish human rights policy. Support to the following INGOs or consortia led by them was reviewed:

- International Center for Transitional Justice (ICTJ)
- International Commission of Jurists (ICJ)
- International Service for Human Rights (ISHR)
- Front Line Defenders (FLD)
- Organisation Mondiale Contre la Torture (OMCT)
- Access Now
- International Disability Alliance (IDA)
- Minority Rights Group (MRG)
- ILGA World: International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA)
- Business and Human Rights Resource Centre (BHRRRC)

<sup>2</sup> See e.g.: ProtectDefenders.eu. (Dec. 2025). *The landscape of Public International Funding for Human Rights Defenders: Updated Analysis* <https://protectdefenders.eu/new-analysis-reveals-stagnation-in-funding-for-human-rights-defenders-despite-rising-needs/>

- International Alert

## 1.2 Users of the review

The primary users of this review are the Unit for Human Rights Policy (Political Department) and the Civil Society Unit (Development Policy Department) at the MFA. The Civil Society Unit manages the MFA's INGO portfolio. Other key stakeholders from the Political and Development Policy Departments may also use the results of the review. Outside Helsinki, MFA staff who cover UN processes in New York, or cover the UN Human Rights Council in Geneva, would be key users from the perspective of lessons around advocacy in the UN system. Key embassies where INGOs have active partners, or where they have been involved in national-level advocacy, may also find review findings relevant. Some INGO projects have also had a more pronounced focus in key countries, where interactions may have occurred between the INGO and the Embassy, or where such information exchange could be beneficial (see Table 2).

Potential users are also the funded INGOs (who will have been actively involved in the data collection), and Finnish NGOs that also receive MFA funding and who may have or seek to further develop partnerships or peer exchange mechanisms with the INGOs in question. Other INGOs or funders of INGOs can also be seen as potential secondary users.

## 2 Review context and past evaluations of relevance

### 2.1 Policy context

The MFA's support to Human Rights INGOs has been guided by the priorities of Finland's development policy in accordance with the goals of the Agenda 2030 for Sustainable Development as well as the Finnish Human Rights Policy within the wider framework of Finland's Foreign and Security Policy.

The long-term foundation for Finland's commitment to promoting human rights in its development policy and cooperation is found in the Constitution (1 §), which states that Finland participates in international cooperation for the protection of peace and human rights and for the development of society. This commitment has been visible in Finland's development policy since the 1990s, and Finland explicitly committed to the human rights-based approach (HRBA) to development for the first time in its *Development Policy Programme 2012*.<sup>3</sup> The *MFA Guidance Note on HRBA in Finland's Development Cooperation* was published in 2015 to provide definitions of key concepts and guidance on operationalising the approach (MFA, 2015).

The above commitment has been further confirmed in the following government reports framing Finland's development policy and cooperation, including the call for proposals and selection of funded Human Rights INGO interventions in the focus of this Review. In line with the Government Report on Foreign and Security Policy 2020 (Finnish Government, 2022), the *Report on Development Policy Across Parliamentary Terms 2021* states that Finland's development policy is based on human rights. This is clearly reflected in the development policy priorities and the cross-cutting objectives of gender equality and non-discrimination (MFA, 2021). The thematic policy priorities and the cross-cutting objectives were further concretised in the MFA Theories of Change (ToCs) and aggregate indicators (MFA, 2020 and MFA, 2023a), and in the Guideline for the Cross-Cutting Objectives in the Finnish Development Policy and Cooperation (MFA, 2023b). The *Government Report on Human Rights Policy*, published in 2022, also includes an explicit commitment to pursue a human rights-

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<sup>3</sup> Christoplos et al., 2023, MFA, 2012

based foreign and security policy, with an emphasis on non-discrimination, gender equality, and the rights of persons and groups in the most vulnerable situations and positions (Finnish Government, 2022).

The commitment to promoting democracy, the rule of law, human rights and a vibrant civil society with emphasis on the rights of persons in vulnerable situations is reaffirmed in Finland's current government policies guiding its development policy and cooperation. In line with the *Government report on Finnish foreign and security policy* (Finnish Government, 2024a), the *Report on International Economic Relations and Development Cooperation* (Finnish Government, 2024b) states that. "*well-functioning democracy, the rule of law, human rights and a vibrant civil society are prerequisites for sustainable social development. Finland's development cooperation promotes the realisation of these essential conditions*" (p. 21). It also states that "*Finland will continue its long-term human rights policy to promote and defend the rights of e.g. women, girls, persons with disabilities, indigenous peoples and gender and sexual minorities as well as other persons in a particularly vulnerable position*" (p. 22). The commitment to the HRBA has been renewed, and actions to further strengthen it have been identified in the MFA management response to the Evaluation of HRBA in Finland's Development Policy and Cooperation (MFA, 2025). The importance of strengthening civil societies and the role of civil society organisations (CSOs) in promoting socially sustainable development and human rights has been highlighted in the above-noted policy documents. The *Guidelines for Civil Society in Development Policy* notes that strengthening civil societies is both a development policy goal and a means to achieve other goals of Finland's development policy (MFA, 2017). The guidelines state that, in addition to Finnish and local CSOs, the MFA provides funding for INGOs whose activities support the achievement of Finland's development policy goals, complement the activities of Finnish organisations, and enhance Finland's influence in international forums. The following principles steer the financing of CSOs' development cooperation:

- CSOs are independent and autonomous but need to promote Finland's development policy goals.
- Application of HRBA to development.
- Principles of effectiveness in line with the Istanbul Principles of CSO Effectiveness.
- Deep understanding of the working environment.
- Results-based management
- Strengthening civil societies in developing countries.
- Clearer relationship to Finland's Country Strategies in Finland's partner countries.
- Provision of services also involves advocacy work and ensures the transfer of skills and knowledge.

The relevance of the thematic focus of the call for proposals and the supported INGO interventions in relation to MFA's thematic development policy priorities is discussed further in chapter 4 on review findings.

## 2.2 Key findings from other relevant evaluations (non-project specific)

**A review of Human Rights Advocacy of International Non-governmental Organisations (INGOs)** was conducted in 2020 to assess the relevance and effectiveness of INGOs in supporting the human rights objectives of Finland's development policy through advocacy. The review covered nine INGOs funded by the Unit for Human Rights Policy in 2015-2018, five of which are included in the current review, and one indirectly through a consortium (Hansen et al., 2020).

The report concludes that all nine INGOs had supported the policy goals of the MFA and had addressed rights-holders' needs. The prioritised themes had been gender and equity, rights of persons with disabilities, rights for all persons regardless of their sexual orientation and gender identity, indigenous peoples' rights, and support to HRDs. The report highlights the long-term nature of advocacy processes in achieving higher-level changes and brings up some examples of impressive high-level effects that have been realised after many years of engagement, coupled with windows of opportunity arising in the societal or political contexts.

The report highlights the organisational diversity of funded INGOs and their advocacy strategies, the common denominator being the organisations' foundation in human rights work and adherence to the HRBA. Most of the human rights INGOs which had received support from the Unit for Human Rights Policy were considered to have high capacity to carry out advocacy. However, the report brings up variation in the capacities of INGOs e.g. to use social media in public campaigning as well as in their reporting and documentation.

The review report notes that the direct interaction with the MFA and the diplomatic missions had varied. At the global and international level, several INGOs have conducted activities in coordination with Finland or with the coordination forums they belong to. Regarding country-level work, the organisations have a presence in several countries, also outside Finland's priority countries, which was seen to give Finland insights into a broader range of countries and issues. At the same time, the flexibility in geographical focusing has allowed the INGOs to work where most needed and to focus on cases of learning. However, the report notes that in some countries, collaboration between INGOs and diplomatic missions could be further strengthened.

The review recommends, among other things, more extensive recognition of INGO cooperation at the political level and diverse support for various INGOs, including specialised INGOs and regional INGOs. New challenges or emerging trends, such as business and human rights, climate change and corruption, were recommended to be considered in the thematic focus of the INGO support. Regarding effectiveness, the report includes recommendations for improving e.g. reporting on results, good practices and testimonies from rights-holders. It is also recommended to increase cooperation between INGOs and improve donor coordination. Dialogue with INGOs should be strategically expanded to the mission level.

**The Evaluation of the Human Rights Based Approach in Finland's Development Policy and Cooperation** analysed how the human rights-based approach (HRBA) has been implemented in Finland's development policy and cooperation during 2019-2021. The evaluation assessed how human rights norms and principles appear in the language used in various documents, the effectiveness and value of HRBA implementation, as well as the linkages of the approach with risk management (Christoplos et al., 2023).

The evaluation report highlights that *HRBA has become solidly established within MFA and its partners as the most important common normative basis for Finland's development cooperation*. However, the level of HRBA application has varied significantly across cooperation instruments, with the HRBA application being most apparent in CSO support and Fund for Local Cooperation (FLC) interventions.

The report highlights the contribution of Finland's support to strengthened capacities and voices of rights-holders in marginalised situations to demand accountability. However, the development of duty-bearers' capacities and accountability has been somewhat less in focus. Related results were found especially at the micro level, while structural influence on duty-bearers and related wider transformative outcomes has remained more limited.

The report also highlights a strong emphasis on the cross-cutting objectives of gender equality and non-discrimination in supported interventions and MFA's policy level influencing with multilateral organisations. At the same time, attention is drawn to a narrow focus on disability, gender and poverty in the implementation of the principle of non-discrimination, while discrimination related to ethnicity, religion or other social categories has often remained unaddressed. Furthermore, limited efforts to link rights claims to partner countries' legally binding human rights commitments in an explicit and informed manner are brought up as a clear weakness. The evaluation recommended reaffirming HRBA as a core principle guiding Finland's development cooperation. This should be reflected in the human rights outcomes pursued and in the processes that the MFA and its partners put into place. Especially in relation to CSO support, MFA was also recommended to encourage learning from partners with stronger capacities in HRBA implementation.

Previous evaluations, such as the ***Evaluation of Finnish Development Policy Influencing Activities in Multilateral Organisations*** (2020), also point to the fact that Finland has built a reputation as a supporter of multilateral effectiveness and defender of human rights, with evidence of "highly effective influencing by Finland and the MFA"<sup>4</sup> in sampled multilateral organisations within the UN system. Such influencing happened over time and was closely linked to trust-building emanating from, among other things, a high degree of staff expertise and motivation as important complements to the actual financing. A conclusion was that, in certain key thematic priority areas, Finland could leverage influence beyond its financial support (as a relatively small donor), having also positioned itself as a supporter of an effective multilateral system (not just a user of its services). The evaluation does not specifically look at the role of INGOs in helping MFA staff maintain a high degree of expertise and relevance on key issues, but this is interesting to consider as an extension of this review. Finland's strong positioning and reputation on human rights is, however, evidenced in the evaluation. For instance, a stronger inclusion of a human-rights perspective in relevant WBG projects, investments and advisory offerings were successfully pursued by Finland along with increased focus on the issue of inclusion of persons with disabilities (PwD) and gender in WFP, IFAD and other multilateral agencies. An intersectional approach to women and girls with disabilities was also spearheaded by Finland (together with Australia and the UK and backed by the Nordic group) and influenced UN Women informally and formally through behind-the-scenes work, Board work, high-level meetings and side events. It also led to stronger institutionalisation of the disability work within the organisation. Similarly, Finland worked with other Nordic countries and other like-minded countries to maintain a focus on sexual and reproductive health and rights (SRHR) in UNFPA's Strategic Plan. These findings illustrate that Finland has managed to position itself as a credible bilateral donor and influential partner in the multilateral system in some of the key areas also covered by the INGO portfolio under review.

Findings from this evaluation of Finland's influence in the multilateral system resonated with findings from a recent evaluation of the Sida/Team Sweden approach regarding influencing multilateral and national policy processes through normative dialogue. This evaluation also points to how Sweden (Sida and the Swedish MFA) often uses a multi-stakeholder approach, including through its funding to NGOs and INGOs to strengthen the

<sup>4</sup> Particip GmbH and NIRAS Finland Oy (2020), Evaluation: Finnish Development Policy Influencing Activities in Multilateral Organisations, Volume 1, Main Report, Ministry for Foreign Affairs, Helsinki, [https://um.fi/documents/384998/0/Vol1+\\_MainReport\\_Evaluation+of+Finnish+Development+Policy+Influencing+Activities+in+Multilateral+Organisations+%281%29.pdf/2666cd6a-0bb2-1c76-0659-db1ac6fa30bf?t=1591860985653](https://um.fi/documents/384998/0/Vol1+_MainReport_Evaluation+of+Finnish+Development+Policy+Influencing+Activities+in+Multilateral+Organisations+%281%29.pdf/2666cd6a-0bb2-1c76-0659-db1ac6fa30bf?t=1591860985653), p. 33

evidence base and influence policy dialogue, including in the multilateral system. It was therefore considered relevant for this review. The ***Evaluation of Normative Dialogue at Sida (2015–2022), published in 2024***<sup>5</sup> found that ***positioning Sweden as a legitimate and knowledgeable resource on key thematic priorities*** increased influence and helped to “ground” higher-level policy dialogue based on operational lessons and examples. Such knowledge and evidence base came from a mix of internal staff resourcing and from partners that could complement and fill internal knowledge gaps, including INGOs (e.g. in the case of ILGA on LGBTIQ+ rights issues). Successful influence in different policy and multilateral fora often originated in processes where Sweden would facilitate multistakeholder dialogue, often together with supported INGOs and/or implementing partners in-country, along with Swedish NGOs and (when relevant) the Swedish business community or other Swedish public authorities on issues linked to Swedish policy priorities, SDGs and universal values – often referred to internally as the “extended Team Sweden approach”. Successful examples of such multistakeholder engagement included topics such as SRHR and Universal Health Coverage (UHC), but also the nexus between business and human rights and local/regional climate change adaptation. An extended Team Sweden approach in-country, involving both the MFA and Sida, along with funded partners and the business community, also helped align interests and generate multiple entry-points to advance Swedish policy priorities. It also helped boost Sida’s own knowledge base and filled knowledge gaps for the policy dialogue at different levels of operation, with explicit emphasis on integrating in-country lessons into the ongoing dialogue in national, regional and multilateral policy dialogue. In other words, the approach was found to enable Sida to use its core expertise, together with funded partners and stakeholders, to maintain and maximise its policy influence.

### 3 Description of the grants portfolio

#### 3.1 Portfolio mapping /overview

In 2021, the Unit for Human Rights granted EUR 17.82 million to INGOs for the period of 2022–2024. Core funding or project support was granted to 11 international human rights civil society organisations operating in developing countries. The total funding allocation per organisation for the three-year period ranged from EUR 949,914 to EUR 2,145,000.

In line with Finland's human rights and development policy priorities, the funded partnerships placed emphasis on the rights of women and girls, human rights defenders, persons with disabilities, sexual and gender minorities, and Indigenous Peoples. Furthermore, the increasing importance of business activities in the realisation of human rights was also reflected. More specifically, funding was provided for work in the following four thematic areas:

- Ending impunity for human rights violations, increasing accountability and strengthening victims’ access to justice.
- Supporting human rights defenders (HRDs) and fostering an enabling environment for promoting the work of HRDs.
- Strengthening the implementation of economic, social, and cultural rights in order to address discriminatory practices related to their realisation.

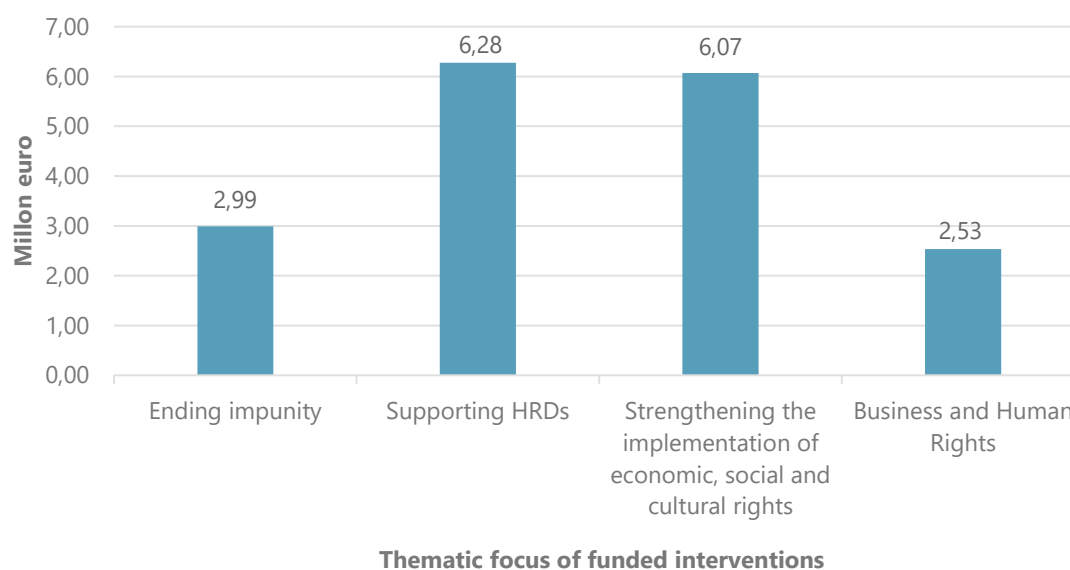
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<sup>5</sup> Ørnekmark, C., Christopolos, I., Holmberg, A., Peebles, D., Niras Sweden. *Formative Evaluation of Normative Dialogue at Sida, 2015–2022* (1a), (1b) and (1c), Sida Evaluation Unit, 2024. <https://www.sida.se/en/publications/formative-evaluation-of-normative-dialogue-at-sida-2015-2022>

- Business and Human Rights with focus on promoting decent work, corporate human rights impacts and related due diligence, including in fragile and conflict-affected situations.

The largest share of funding was allocated to supporting HRDs and strengthening the implementation of economic, social, and cultural rights to address discriminatory practices, while the smallest was allocated to interventions on Business and Human Rights. However, it is important to note that the core work or projects of many of the supported INGOs contributed directly or indirectly to several themes. (Figure 1).

Figure 1 - Total allocation of funds per thematic area of the call for proposals (MEUR)



Advocacy activities formed an important element in all reviewed partnerships. As shown in the overview table below (Table 2), the vast majority of supported INGOs have conducted advocacy at multiple levels. Similar to the findings of the earlier evaluation on INGO advocacy (Hansen et al., 2020), the geographical focus of the supported national and regional advocacy work has included Finland's partner countries (e.g. Ethiopia, Kenya, Mozambique and Myanmar), but, overall, the partnerships have had a much wider coverage in all continents.

The structures for implementing the supported activities varied depending on the organisation. Some supported projects have been implemented through country-level partnerships (e.g. ICTJ, Access Now and BHRRC), some projects have been implemented through a consortium (MRG and International Alert) or directly with HRDs (e.g. FLD, ISHR), and some in cooperation with member organisations or networks (e.g. OMCT, ILGA World and IDA). In many cases, the supported activities have included the provision of sub-grants to implementing partners or HRDs, but this has typically not been the main focus of activities.

Table 11 - An overview of the funded INGO interventions per thematic area

Thematic Focus Area	INGO	Intervention title	Geographical focus	Sub-grants	Advocacy work	Coalitions and memberships
<b>Ending impunity</b>  <b>Total allocation:</b> <b>EUR 2,991,600</b>	International Commission of Jurists (ICJ)	Achieving Justice for Gross Human Rights Violations, Supporting the ICJ's Global Accountability Initiative	Colombia, Myanmar, Nepal, Tajikistan, Tunisia and Zimbabwe, global level advocacy	No	Country-level advocacy, e.g. with national & international accountability mechanisms, regional-level advocacy, e.g. with the Council of Europe, Latin America, and global-level advocacy with the UN.	Country-level partnerships with local CSOs. Cooperation with international human rights organisations and coalitions.
	International Centre for Transitional Justice (ICTJ)	NA. Core Support	Multiple countries in Asia, Africa, Latin America and Europe + regional and global level advocacy	Financial and mentorship support through partnerships to local CSOs	National level advocacy on transitional justice, regional and global level advocacy e.g. with the UN, AU, African Transitional Justice Forum and ICRC.	Country-level partnerships with local CSOs, cooperation with international CSOs, governmental, and academic organisations.
<b>Supporting human rights defenders</b>  <b>Total allocation:</b> <b>EUR 6,275,786</b>	Front Line Defenders (FLD)	Fostering a stronger international response to key threats faced by HRDs	HRDs in a high number of countries in Asia, Africa, Latin America and Europe + EU and global level advocacy	Grants to HRDs	Evidence-based advocacy on HRD protection and related cases and policies at the national, EU and global levels	Lead partner in ProtectDefenders.eu, member in some HRD coalitions and networks.
	Access Now	Digital Rights and Digital Civic Space: Supporting HRDs and WHRDs in the Digital Age	Latin America and the Caribbean, Middle East and North Africa, Sub-Saharan Africa,	Yes, funding to support grassroots CSOs.	Global with regular interaction with the UN Human Rights Council, Freedom Online Coalition etc.;	Multiple examples of partnerships with national CSOs; members of the Freedom Online

Thematic Focus Area	INGO	Intervention title	Geographical focus	Sub-grants	Advocacy work	Coalitions and memberships
			Asia & Pacific and global		national level via local staff and partners	Coalition Advisory Network (FOC-AN), the Task Force on Digital Equality, and the Task Force on AI and Human Rights (T-FAIR).
	International Service for Human Rights (ISHR)	NA. Core support	Global, and human rights defenders from all over the world, including Afghanistan (WHRDs), Sudan	No	Emphasis on global advocacy, regional, with multilateral bodies (e.g. the African Commission, Inter-American Court of Human Rights)	Several coalitions, including around Declaration+25 articulating the international baseline on the recognition and protection of human rights defenders, gender-responsive climate justice, and work with the UN Antiracism Coalition (UNARC), etc.
	Organisation Mondiale Contre la Torture (OMCT)	Towards the right to defend – protecting, defending, and empowering a sustainable HRDs movement	Global, regional, national via its network-based approach through its members	Yes, provided financial support to 12 local human rights CSOs.	OMCT as Observatory has co-signed jointly with other human rights organisations statements and open letters urging for the release of human rights defenders; worked on restrictive legislative frameworks at national levels, and interacted with relevant UN and	Support to OMCT SOS-Torture Network with 204 members globally, launched SOS-Defenders, a platform designed to document cases of arbitrary detention of human rights defenders.

Thematic Focus Area	INGO	Intervention title	Geographical focus	Sub-grants	Advocacy work	Coalitions and memberships
					regional multilateral bodies	
<b>Strengthening the implementation of economic, social and cultural rights to address discriminatory practices</b>  <b>Total allocation: EUR 6,069,770</b>	International Disability Alliance (IDA)	Upholding diversity and inclusion of all: advancing universal economic, social and cultural rights to leave no persons with disabilities behind in Southern Africa, in a world challenged by multiple crises.	Southern Africa + global level	Yes, sub-grants to local OPDs.	National, regional (Africa), and global-level advocacy on the rights of persons with disabilities in relation to the SDGs and the UN human rights system.	IDA is an alliance of 14 global and regional OPDs.
	Minority Rights Group (MRG)	Realising Rights for All: Tackling the Structural Drivers of Economic, Social and Cultural Rights Deprivations Facing Marginalised Groups	Multiple countries in Asia, Africa, Latin America and Europe + regional and global level advocacy, Africa focus in MFA Finland's funding	Yes, sub-grants to local partners.	At the national level, supporting CSOs, communities and minority representatives to carry out advocacy on economic, social and cultural rights, related advocacy at the regional and global levels, with local stakeholders' participation.	Project implemented in consortium with Centre for Economic and Social Rights (CESR) and Global Initiative for Economic, Social and Cultural Rights (GI-ESR). Member of many coalitions and networks
	ILGA World and Regional ILGA organisations	A Rainbow Network: Strengthened LGBTI Civil Society Structures for the Collaboration to Advance Economic,	Global and regional, with indirect national-level impact through member organisations and UN mechanisms	Yes	Global norm-setting, movement coordination, knowledge production, and support to regional and national civil	ILGA World and regional offices with a focus on strengthened movement building

Thematic Focus Area	INGO	Intervention title	Geographical focus	Sub-grants	Advocacy work	Coalitions and memberships
		Cultural and Social Rights			society engagement with international human rights mechanisms	
<b>Business and Human Rights</b>  <b>Total allocation: EUR 2,532,240</b>	Business and Human Rights Resource Centre (BHRRC)	Justice in the Just Transition: Centering Human Rights in Natural Resources	Kenya, Mozambique and South Africa	Yes, sub-grants to local partners.	Local and national level advocacy towards companies in the renewable energy and extractive industry sectors as well as government stakeholders in the target countries. Evidence-based global level advocacy including UN.	Project implemented in consortium with Centre for Research on Multinational Corporations (SOMO).  Partnering with many academic and CSO organizations and initiatives.
	International Alert	Enabling the Business and Human Rights (BHR) Agenda in Conflict-Affected Settings	Kenya, Uganda, Ethiopia	Yes	Empowering civil society actors, human rights institutions, to effectively advocate for communities affected by conflict and business-related human rights concerns, enabling these communities to claim their rights from duty bearers. Some engagement with the AU and the UN Working Group on Business and Human Rights.	Implementation jointly between International Alert, Transparency International (Kenya), Bunyoro Albertine Petroleum Network on Environmental Conservation (BAPENECO) in Uganda, and Consortium of Ethiopian Human Rights Organisations (CEHRO)

## 4 Approach and methodology

### 4.1 Overall approach

The review used a **systems- and theory-based evaluation approach** combined with contribution analysis (CA) to identify and test causal pathways in terms of relevance and effectiveness of the 11 participating international INGOs towards the policy and development priorities set out in Finnish guiding documents (see section 2.1). It meant developing assumptions and pathways for change set out in an initial Theory of Change (Figure 2), which was subsequently used as a reference point and analytical framework. In the context of this review, a systems-based approach meant that a primary focus was on identifying emerging results patterns and lessons across the portfolio, while examples from individual INGOs were used as illustrating examples.

To note is also that the review was (in line with the TORs), **learning-oriented and utilisation-focused**. While evaluative in its approach, findings were transparently backed with evidence and synthesised in line with the review questions. However, given its scope and focus, full triangulation with end-beneficiaries beyond implementing INGOs and their local offices or partners was not possible (i.e. the budget and scope did not allow for field work). As mentioned in the inception report, this came with the risk of introducing a positive bias from the implementing organisations. However, multiple sources were used to the extent possible, including extensive consultations with a range of MFA stakeholders, to seek to validate self-reported results.

Given that the main aim was to inform future MFA strategic engagement and potential future funding modalities for INGOs, the utilisation focus was further enhanced by an in-person workshop with MFA personnel (December 2025) to discuss preliminary findings and workshop draft recommendations before finalising the review report.

### 4.2 Evidence base and data collection

Given the timeframe and scope of this review, it relied largely on stakeholder feedback from semi-structured **key informant interviews (KIs)**. Anonymous, in-depth KIs were conducted with a total of **54 interviewees**, of which 9 were from the MFA; 42 from INGO representatives (including, in some cases, their country offices and local partners), and 2 external stakeholders regarding questions of relevance and complementarity in relation to other civil society support through Finnish NGOs. The semi-structured nature of the interviews allowed interviewees to tell their story (anonymously), bringing up what they found most important without being overly restricted by a formal questionnaire format. This method was considered appropriate for this type of reflective and largely formative review, where the reviewers acted as much as facilitators of the conversation as external assessors. It also allowed the review team to gauge where Finnish funding had been most significant as a complement to other funding sources, exploring both contribution pathways and alternative hypothetical scenarios.

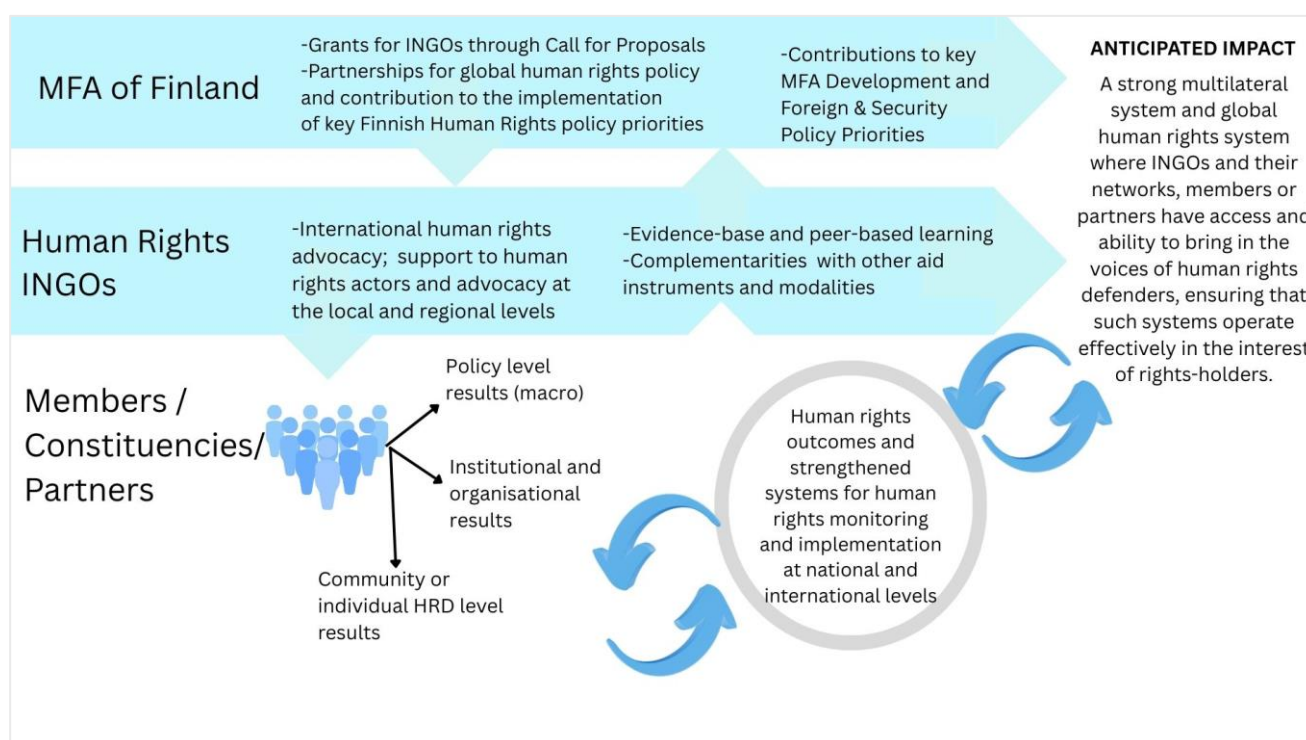
Additionally, the review team undertook an **extensive literature review** of all project-related documentation gathered by the MFA for the 11 supported INGOs, including project proposals, results frameworks, annual and final reporting and, where available, external end-of-project evaluations commissioned by the respective organisations. Additional information was gathered from the INGOs during interviews, and included, e.g., briefs, joint statements, press statements, key knowledge products, annual reports, etc., referred to during interviews and shared by INGOs.

The review used **purposive and snowball sampling** where INGOs were asked to identify 3-5 interviewees who: (i) operate at different levels (HQ and/or in the field/in advocacy offices), (ii) cover both advocacy and programming work, and (iii) are aware of how funds from Finland were specifically used or added value to other funding sources. MFA interviewees were selected based on similar criteria, representing perspectives from both HQ and embassy/UN permanent missions. Emerging issues sometimes led to the addition of interviewees, for instance in relation to MFA-INGO interactions in non-programming countries, or by external stakeholders such as KIOS and the Development Policy Committee, along with additional consortium members or local implementing partners from the INGOs. That meant that the review surpassed the 35-40 anticipated KIIs as stated in the inception report, instead covering 54 KIIs in addition to consultations with the leadership and workshop participants during the workshop held at the MFA in December 2025.

### 4.3 Data analysis and the review ToC

**Reporting varied** greatly between organisations and the type of funding provided (core funding, country- and project-specific activities, or projectized support that was largely process-oriented and flexibly used for movement strengthening at different levels of operation). Aggregate estimates and/or a comparative analysis between different INGOs were therefore of limited use. Instead, drawing on contribution analysis, a **portfolio-wide ToC** was developed in line with the specifications in the Call for Proposals, initial scoping interviews with MFA and INGOs, and the initial literature review from the inception phase (Figure 2 below).

Figure 2 - Theory of Change (ToC) for the review



Source: Review Team's own elaboration.

The ToC was based on a number of assumptions that were then explored and used for analysis. These include:

**(i) MFA of Finland level**

- It assumes that political will and funding, even if more restrained, are available to issue targeted Calls for Proposals for human rights INGOs and that such funding relationships lead to wider trust and willingness to exchange information between the INGOs and key MFA personnel at different levels,
- It assumes that key MFA personnel (beyond those directly involved in management of the grant) have the time to invest in building such relationships with INGOs so that there is mutual understanding and the emergence of shared interests that can help support the implementation of Finnish foreign and security policy and development policy, and help boost Finnish capacity and level of influence in various international fora (e.g. through strengthening the evidence-base or providing first hand testimonials from Human Rights Defenders, undertake joint side events or other initiatives),
- It also assumes that the type of funding provided is conducive and complementary to ongoing dialogue and interaction (whether through core support or more specific country-level project activities), and
- That there is interest and capacity to engage with the supported INGOs as partners on an ongoing basis and make best use of research and other knowledge and advocacy products produced as part of the partnership with the MFA (including connecting such knowledge to other work of other Finnish-funded NGOs).

**(ii) Human Rights INGOs:**

- Assumptions are that Finnish funding is not only used by organisations to 'plug funding holes' (especially if the modality is core funding or heavily process-oriented), but that it is used to strengthen effective delivery against organisations' core mandate at multiple levels, so that the international preparedness and structural architecture for human rights advocacy is strengthened,
- That INGOs contribute to a stronger evidence-based and peer-based learning that feeds into coalitions and their own constituents and partners as membership-based organisations involved in both international, regional and national-level advocacy, and
- That INGO support is complementary to other funding modalities of the MFA, such as its support to Finnish NGOs that are also involved in advocacy and service delivery at different levels, and
- That a clear added value of INGOs and a clear role division is conducive for a regionalisation/localisation of the funding support, through partial sub-granting, capacity support or other forms of access provision and accompaniment of local actors.

**(iii) Members/constituents/partners**

- Assumptions that pathways for change are established in the priority thematic areas in ways that are inclusive, gender-responsive and targeting rights-holders in vulnerable situations, in line with the 'leaving no one behind' principle of SDGs, and as enshrined in various binding human rights conventions and treaties,
- Assumptions that there are synergies from working at policy, institutional and micro (individual) levels that can be harnessed and fed into regional and global advocacy efforts, and help inform policy dialogue around pressing human rights issues on the ground, and
- Assumptions that partners and constituents can pursue their work and mandates, even in less conducive environments and in partnership with others that can help to safeguard a space for their operations (and where INGOs can demonstrate their added value).

Different **dimensions explored** when reviewing INGO activities included:

- type of funding modality (core, or earmarked project funding);
- geographical focus;
- level of operation and degree of interlinkages between different levels (global, regional, national);
- type of beneficiaries (rights-holder, duty-bearer, policy maker, others);
- thematic focus (end impunity, human rights defenders, economic, social and cultural rights, or business & human rights);
- level of participation of rights-holders in advocacy or decision-making,
- dimensions of gender equality and non-discrimination in relation to key activities and observed results,
- level of clear role division and added value of INGOs to local actors,
- relevance to other forms of Finnish funding & engagement, e.g. through Finnish NGOs (if/as applicable, though not part of the original Call for Proposals),
- relevance to Finland's MFA for information sharing or contribution to Finnish Human Rights Policy/ Development Cooperation Policy/ Foreign & Security Policy.

Although examples were used from different organisations to illustrate different dimensions of the Review Questions (RQs), it is important to note that analysis was **synthesised at portfolio level** and does not reflect organisation- or project-specific overall performance (covered in individual project end-evaluations where applicable). Of interest was rather to seek to identify how the two impact goals outlined in the ToC interact – i.e. the goals of (i) 'a strong multilateral system and global human rights system where INGOs have access and ability to bring in the voices of human rights defenders while ensuring that such systems operate effectively in the interest of rights holders', and (ii) 'concrete human rights outcomes strengthened (or not worsened) for human rights monitoring and implementation at all levels of operation'. That meant assessing, not only final outcomes or policy changes (some which may take a long time to achieve), but also looking at core advocacy capacity built along the way.<sup>6</sup>

#### 4.4 Review questions (RQs) and sub-questions (RSQs)

The review will cover two main OECD-DAC evaluation criteria, namely **relevance** and **effectiveness**, in accordance with the TORs. The review questions (RQs) and review sub-questions (RSQs) are listed in the table below (Table 3). Sub-questions were used to answer the main RQs throughout and were not treated as stand-alone questions. See also the Evaluation Matrix (Annex 3).

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<sup>6</sup> Elbers, W. & Kamstra, J. (2020). How does organisational capacity contribute to advocacy effectiveness? Taking stock of existing evidence. *Development in Practice*. 30. 1-10. 10.1080/09614524.2020.1779664.

Table 22 - Review questions

Evaluation Criteria	Key Review Questions	Review Subquestions
<p><b>RELEVANCE:</b> the extent to which the objectives of the supported initiatives are consistent with rights holders' requirements, as well as Finland's foreign and security policy, with a specific focus on development and human rights priorities as defined in the Call for Applications.</p>	<p>RQ1: How relevant have the interventions been in terms of addressing <b>in-country, regional and international</b> human rights priorities?</p>	<p>NA</p>
	<p>RQ2: How well have the supported activities contributed to the work and supported the <b>policy goals of the Ministry</b>, in terms of both development policy and human rights policy?</p>	<p>RSQ2.1: What is the <b>additional value</b> of the work of the INGO support, and how well does it complement other types of development instruments of the Ministry?</p> <p>RSQ2.2: Are INGOs perceived as <b>strategic partners</b> to the Ministry in terms of policy goals, and what have been the strengths and weaknesses of cooperation in this regard?</p>
	<p>RQ3: How well has the promotion of <b>human rights, gender equality and non-discrimination</b> been integrated into programme design and implementation?</p>	<p>NA</p>
<p><b>EFFECTIVENESS:</b> describes the achievements towards expected outcomes and key outputs from this grant portfolio or whether they are expected to be achieved in the future.</p>	<p>RQ4: What have been <b>the overall results</b> in contributing to the better realisation of human rights from Finland's support to the INGOs? Consider rights-holders, duty-bearers and institutional dimensions.</p>	<p>RSQ4.1: What results stand out as the <b>most notable or sustainable</b> and what factors have contributed to this?</p>
	<p>RQ5: To what degree are efforts conducted <b>jointly with other actors</b> for increased coherence and greater synergies?</p>	<p>NA</p>
	<p>RQ6: How well-functioning and coherent is the <b>interplay between local/national, regional and global levels</b>, and how well have the member organisations/coalition structures benefited from the interventions?</p>	<p>RSQ6.1: Organisations are expected to have experience of advocacy at international human rights fora; what have been the benefits of this in terms of <b>international advocacy efforts and information sharing with the MFA</b>?</p>
	<p>RQ7: To what degree have <b>human rights defenders and representatives of marginalised groups</b> been active participants in the work for the purpose of effective advocacy?</p>	<p>NA</p>
	<p>RQ8: What are the <b>good practices and areas of strength</b> in terms of effecting change in the <b>grant portfolio overall</b>?</p>	<p>RSQ8.1: How could such a change be <b>further supported in the future</b>? What are the main learnings?</p>

#### 4.5 Limitations and mitigation strategies

To provide the MFA with timely inputs and learning for the future direction of its support to human rights INGOs, the review was completed within a **short timeframe** (September to January 2026), with all KIs undertaken within the scope of one month's time. Though fully in line with the scope and purpose of the review set out in the TORs, this clearly limited the ability to extensively validate findings from the perspective of end-beneficiaries. Such validation was, however, undertaken for projects that had conducted end-of-project external evaluations, and some local partners were also included as KIs (where possible, given time constraints). These measures, along with consultations with other stakeholder groups (MFA and externals), sought to mitigate self-reporting bias and the fact that the budget and time frame did **not allow for in-country field work**.

A methodological challenge referred to above was also the fact that grants used different funding modalities with no standardised reporting formats, making aggregates or comparisons across different working methods more difficult. While this was a **methodological challenge** for the review, the flexibility in the use of the funding against organisations' different needs and core mandates was, however, overall considered a strength of the support provided. The methodology of the review was therefore adapted accordingly by elevating the analysis to the portfolio level, and in relation to identifying contribution pathways in relation to an overarching ToC. Future calls could, however, consider including reporting that more clearly clusters results in line with some fundamental principles (e.g. around movement strengthening and capability to respond to local / emerging needs, complementarity in relation to other funding sources, how added value, access and provision of funding to local partners were done in line with localisation principles, etc., see recommendations section). It is also to be noted that while the exact contribution of Finnish funding to those organisations that received core funding was more difficult to trace, the more **holistic reporting of organisation-wide results** also illustrated more clearly **the enabling factor of Finnish funding** and why there was a clear alignment between INGOs and Finnish development and foreign security policy.

## 5 Key findings

### 5.1 Relevance

#### 5.1.1 *Relevance in relation to context*

*RQ1: How relevant have the interventions been in terms of addressing in-country, regional and international human rights priorities?*

**Finding 1: Systematic monitoring and analysis of the human rights situation at different levels as an integral element of the funded interventions has ensured their strong relevance to in-country, regional, and international human rights priorities.**

All MFA-funded interventions have included strong monitoring and analysis of the human rights situation and related policy frameworks and processes in target countries and/or at the regional and international level. This analysis has, on one hand, guided capacity development, facilitation and other support to partners, local civil society organisations (CSOs), communities and human rights defenders (HRDs) and their advocacy efforts in target countries. At the same time, it has been essential in creating solid evidence base also for regional and international level advocacy work. This emphasis on human rights analysis and documentation was highlighted in the reviewed reports, project evaluation reports, and interviews conducted with intervention stakeholders and MFA staff.

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*When democratic space is closing, we need the multilateral system and a strong international human rights framework more than ever. We are there to make sure local actors are included.” (INGO respondent)*

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Several interventions aimed at strengthening the **capacities of local communities and CSOs in conducting human rights analysis** as part of participatory community awareness and mobilisation processes. For example, in the business and human rights-focused project of the BHRRC in consortium with the Centre for Research on Multinational Corporations (SOMO), the local partners in Kenya and South Africa facilitated community-led assessments and analyses on human rights risks and impacts of green transition-related business operations. The outcomes were used as evidence both in local-level grievances and advocacy towards companies and government duty-bearers and in BHRRC’s international-level advocacy. In the intervention of the consortium formed by the Minority Rights Group, Global Initiative for Economic, Social and Cultural Rights (GI-ESCR) and Centre for Economic and Social Rights (CESR), the local partners and communities were empowered to advocate for their economic and social rights through participatory action research processes, and related findings were also used in international-level advocacy.

The reviewed reports and conducted interviews also highlighted the contribution of MFA funding to **the human rights situation analysis, documentation and research processes and practices** of the supported INGOs. This could be linked to country and local level human rights and stakeholder analysis as part of preparing the expansion of programme operations to new target areas. For example, MFA Finland’s core funding to ICTJ was noted to have enabled the Headquarters to support systematic stakeholder mapping e.g. in Ethiopia and the Gambia.

Contextualising the role of HRDs in conflict was also spearheaded, for example, by OMCT, particularly in Ukraine, where OMCT has been supporting its Ukrainian network members and partners through a Coalition formed immediately after Russia’s full-scale invasion of Ukraine. Several of the INGOs also used funding to publish **special reports**. In 2024 alone, OMCT published special reports on, e.g. Venezuela (on criminalisation of

HRDs), DRC (situation of HRDs and civil society), Tunisia (people on the move and restrictive civic space), Zimbabwe (shrinking civic space) and Iran (increasing use of internal exile as a punishment for human rights activism). Results related to INGOs' work on documentation and research are discussed in the findings on effectiveness further below.

**Finding 2: The MFA funding has enabled INGOs to address and draw attention to longer-term “silent” human rights challenges that have received less attention among donors, media and policy forums. At the same time, the flexibility of this support has enabled reactive work in rapidly changing human rights situations in fragile country contexts.**

The importance of the MFA support to Human Rights INGOs in addressing either new or long-standing human rights issues that have received less attention among donors and in public discussions was brought up by many interviewees. For example, ICJ was able to continue its long-term work with local partners, including victims and survivors in Nepal, on the transitional justice law and its enforcement, an area of work for which it has been difficult to raise funding. FLD and Access Now were able to conduct analysis and advocacy on a rather new human rights topic on **digital rights and related threats for human rights defenders**, this being an increasingly important topic considering the rapid growth in the development of defence technology. Likewise, promoting human rights in the **green transition** and renewable energy (e.g., BHRRC) is an example of an area of work in which systematic multi-level efforts are needed to address potential and actual negative implications of a policy and business sector promoting sustainable development and therefore generally seen in a positive light.

The **adaptability** of MFA support enabled several INGOs to address rapidly deteriorating human rights situations in fragile states and conflict contexts, including in relation to Ukraine, as highlighted by many interviewees. Timely reaction to human rights concerns in new country contexts was noted to be in the core mandate of human rights INGOs. For example, several INGOs conducted assessments, raised awareness and contributed to policy dialogues on the effects of the war in Ukraine on human rights defenders, ethnic minorities or other marginalised groups. Furthermore, MRG was supported to assess the human rights situation of Indigenous Peoples in the conflict context of Tajikistan. OMCT produced a communication to several UN special procedures on the situation of four indigenous HRDs from the indigenous territory of Mayangna Sauni, arbitrarily detained and subjected to torture in Nicaragua. This was a result of a joint effort of OMCT together with the Center for Legal Assistance to Indigenous Peoples (CALPI) and other partners. The role of INGOs in this kind of data collection and analysis has also provided important evidence-based for MFA's participation, e.g. in UN-level policy dialogue on these topics, as highlighted by several MFA interviewees.

The flexibility of the Finnish support also allowed timely adaptation of the ongoing programme work to changes in the democratic and civic spaces in the operating contexts. For example, in the worsening human rights situation in Myanmar, the ICJ could support members of its human rights-focused lawyer network to evacuate and carry out documentation of severe human rights violation cases.

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*“It was very important funding. It allowed us not only to work with the ‘hot cakes’, but we were working on almost forgotten issues” (INGO respondent)*

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**Finding 3: The funded interventions have elevated local human rights issues into regional and international policy frameworks. These long-term efforts have effectively used international mechanisms to address local human rights challenges.**

The supported INGOs have **actively facilitated the participation of local CSOs and HRDs** in regional and international human rights policy dialogue with the aim of bringing the grassroots-level experiences, views and perspectives into discussions, reporting and human rights policy making. For example, IDA has supported and facilitated the participation of local organisations of persons with disabilities in the policy discussions on the African Disability Protocol and its national level ratification, as well as the participation of Women HRDs with disabilities in UN-level events. ISHR has as one of its core competencies to train and bring HRDs to participate in sessions of the Human Rights Council in Geneva, including women environmental defenders and indigenous leaders who first received tailored training in UN system advocacy. ISHR also facilitated local actors' involvement in joint statements/letters to the HRC and participation in the UPR with several submissions yearly.

The relevance of this kind of dialogue with INGOs also for MFA's own influencing work was highlighted in many interviews. The role of Human Rights INGOs in **mobilising international support** to HRDs and individual victims of human rights violations is clearly visible also in the supported interventions. This is a core element of organisations like FLD, but is also visible in the work of other INGOs, such as ICJ, ISHR, Access Now, and OMCT. This work highlights the specific role of Human Rights INGOs in supporting the **functioning of the international human rights system**, also in situations where the national level functioning of the system is threatened, for example, by conflicts and shrinking civic and democratic spaces, or jurisdictional unclarities and uncertainties (e.g. in relation to the human rights impacts of multinational digital technology corporations).

Furthermore, the INGOs have played an active role in promoting the **relevance of international policy frameworks** and structures in addressing human rights violations and their root causes at different levels. For example, the ICJ has conducted long-term UN-level advocacy with other organisations for the establishment of a Standing Independent Investigative Mechanism (SIIM). The s FLD's advocacy inputs have been reflected, e.g. in the revised EU HRD Guidelines and the EU Visa Code Handbook. Also, several supported INGOs have advocated for alignment of the EU Corporate Sustainability Due Diligence Directive (CSDDD) with the UN Guiding Principles on Business and Human Rights. For example, International Alert conducted advocacy e.g. with the Members of the European Parliament on conflict sensitivity in corporate human rights due diligence. FLD conducted long-term advocacy for integrating protection of HRDs into the Directive. Also, BHRRC has conducted comprehensive CSDDD-related advocacy in different forums, including dialogue with Finnish government stakeholders and decision-makers.

**Finding 4: The MFA support has helped INGOs and their partners legitimise their work in a tightening funding landscape.**

The **funding landscape** for human rights work is a major concern for many organisations, as highlighted in almost all interviews. For several organisations (and their membership/network organisations), the termination of support from the US Government, with cuts from several of the other bilateral donors, have hit both individual organisations and the whole international human rights system, including the UN Human Rights Mechanisms, hard. This was also stated in a recent report by ProtectDefenders.eu (2025)<sup>7</sup> which indicates that even in 2017-2023 (partially coinciding with the time period under review), global funding for human rights

<sup>7</sup> ProtectDefenders.eu. (2025). "The Landscape of Public International Funding for Human Rights Defeinders: Updated Financial Anmalysis 2025" [https://protectdefenders.eu/wp-content/uploads/2024/06/ProtectDefenders-The-Landscape-of-Public-International-Funding-For-Human-Rights-Defenders\\_Updated-Financial-Analysis-2025.pdf](https://protectdefenders.eu/wp-content/uploads/2024/06/ProtectDefenders-The-Landscape-of-Public-International-Funding-For-Human-Rights-Defenders_Updated-Financial-Analysis-2025.pdf)

defenders decreased in its overall share of ODA to an average of 0.10%. Since then, the availability of funding has severely worsened. Nordic countries were still among the biggest contributors at the time, with Finland, Sweden and Spain singled out in particular for their investments in the promotion of economic, social and cultural rights (ESCR).<sup>8</sup> Again, KIIs undertaken during this review confirmed the importance of having pro-human rights allies among the bilateral donors. Interviewees noted that they were facing an increasingly difficult situation to access funding, and that their partners in-country (having benefited from bilateral donor support channelled via Embassies previously) were now struggling to find alternative funding channels.

**Finnish human rights funding** has therefore helped both legitimise the work of INGOs and national partners (especially in relation to multilateral and State-level advocacy) and provided critical support in that it has flexibly sought to support both concrete project activities on the ground and efforts to ensure local representation and voices are heard in the multilateral system.

This new funding landscape has both **sharpened competition for funds** while at the same time urging organisations to create more synergetic and joint efforts. Moreover, many talked about the need to diversify funding sources and how strategic partners such as the MFA could help open doors and connect organisations with other possible funders. The dire funding prospects for this type of international human rights work has led some of the INGOs to create more public-facing outreach (through arts, film, easily accessible information and results reporting, etc.). This has been noted as important for attracting a wider diversity of funders, including individual giving. However, it was also pointed out that **individual and philanthropic giving can never replace the ‘weight’ of having also a bilateral funding partner**, particularly when it comes to UN and state-level advocacy, where close links to the diplomatic community go beyond just the funding provided. As someone pointed out, “it is always easier to get those diplomatic meetings set up with human rights defenders in-country or at international UN fora if there is a connection to Finnish funding”.<sup>9</sup> Others also pointed out that diversification of funding sources is **a long-term process**, so when a lot of the traditionally more reliable funding sources from bilateral donors disappear almost simultaneously, this has devastating effects on the broader human rights system as it severely weakens its capability to push back against global violations by highlighting local cases and pursue e.g. strategic litigation. This external pressure for increased visibility at a global level could also risk detracting from other longer-term operational support to partners and processes in-country.

### 5.1.2 *Relevance in relation to key policies and working methods of MFA Finland*

*RQ2: How well have the supported activities contributed to the work and support the policy goals of the Ministry, in terms of both development policy and human rights policy?*

**Finding 5: The thematic focus of the supported interventions was strongly aligned with the MFA’s thematic development policy priorities at the time of call for proposals and remains relevant also to the more recent policy frameworks. Many of the funded interventions contributed to several MFA priority areas.**

The table below (Table 3) shows how the thematic focus of the call for proposals and the funded interventions were clearly in line with and guided by the development policy priorities defined in the Government Report on Finnish Foreign and Security Policy 2020 and the Report on Development Policy Across Parliamentary Terms

<sup>8</sup> Ibid, p. 13

<sup>9</sup> KII, INGO

2021. The analysis below also shows the linkages of these thematic priorities to the more recent policy documents, which were published at the end of the programming period in 2024.

Table 3 - Overview of the alignment of the thematic focus of the call for proposals with the priorities of Finland's development and human rights policies

Thematic focus areas of the reviewed support to Human Rights INGOs	Government Report on Finnish Foreign and Security Policy 2020	The Report on Development Policy Across Parliamentary Terms 2021 (MFA, 2021) and the MFA ToCs (MFA, 2023a)	Government of Finland Report on Human Rights Policy 2022	Government Report on Finnish Foreign and Security Policy 2024 (Finnish Government, 2024a) Report on International Economic Relations and Development Cooperation 2024 (MFA, 2024b)
<p><b>Ending impunity for human rights violations, increasing accountability and strengthening victims' access to justice.</b></p> <p><i>Primary focus in the interventions of ICJ and ICJT</i></p> <p><i>Related elements included in the interventions of OMCT, ISHR</i></p>	<p>Working against impunity and supporting the fulfilment of criminal responsibility for the most serious international crimes. Supporting effective implementation of the responsibility to protect to prevent the most serious international crimes (...) (p. 37)</p> <p>Readiness to take action (...) to ensure that acute, country-specific human rights incidents are appropriately addressed. (p. 42)</p>	<p>The priority area of <i>Peaceful, democratic societies</i> includes the reduction of impunity for the most serious international crimes, transitional justice mechanisms, and the strengthening of state capacities to prevent and combat atrocities. Civil society is a key player in this. (MFA, 2021, p. 12 and MFA, 2023a, pp. 12-13)</p>	<p>Fight against impunity for the most serious international crimes will continue. Support for the prevention of the gravest international crimes. (p. 29)</p>	<p>Commitment to better exchange of information both to combat crime (incl. human trafficking) and to help victims. (Finnish Government, 2024a, pp. 30-31)</p> <p>Supporting the investigation of any serious violations of international law and providing strong support for the work of the International Criminal Court (ICC) and its independence. (Finnish Government, 2024a, p. 45)</p> <p>Continuation of Finland's long-term human rights policy. CSOs' role in promoting the rule of law and human rights is noted. (Finnish Government, 2024b, p. 22)</p>
<p><b>Supporting HRDs and fostering an enabling environment for promoting the work of HRDs.</b></p> <p><i>Primary focus in the interventions of Access</i></p>	<p>Political and practical support for defenders of human rights to allow them to carry on their activities safely. (pp. 41-42)</p>	<p>The priority area of <i>Peaceful, democratic societies</i> includes strengthening media independence and protection of whistleblowers and HRDs. (MFA, 2021, p.</p>	<p>Strengthening the capacities of HRDs and civil society, as well as organisations carrying out human rights work and</p>	<p>Promoting and defending human rights, and CSOs' role in sustainable development highlighted. (Finnish Government, 2024b, p. 32)</p>

Thematic focus areas of the reviewed support to Human Rights INGOs	Government Report on Finnish Foreign and Security Policy 2020	The Report on Development Policy Across Parliamentary Terms 2021 (MFA, 2021) and the MFA ToCs (MFA, 2023a)	Government of Finland Report on Human Rights Policy 2022	Government Report on Finnish Foreign and Security Policy 2024 (Finnish Government, 2024a) Report on International Economic Relations and Development Cooperation 2024 (MFA, 2024b)
<p><b>Now, FLD, ISHR and OMCT</b></p> <p><i>Related elements included in all interventions</i></p>		<p>12 and MFA, 2023a, pp. 12-13)</p>	<p>supporting HRDs. (pp. 39-41)</p>	<p>Finland supports the ability of civil society and defenders of human rights to act. (Finnish Government, 2024a, pp. 45, 50)</p>
<p><b>Strengthening the implementation of economic, social and cultural rights to address discriminatory practices related to their realisation.</b></p> <p><i>Primary focus in the interventions of IDA, ILGA and MRG</i></p> <p><i>Related elements included also in the interventions of Alert International, BHRRC</i></p>	<p>Increasing the political and economic participation of women and girls and giving them a stronger role in peace processes and crisis management. (p. 41)</p> <p>Special attention to the respect for the human rights of persons and groups in vulnerable situations and exposed to discrimination. (p. 41)</p> <p>The rights of persons with disabilities are an important priority in Finland's human rights policy and development policy (...) (p. 45)</p>	<p>Gender equality and the rights of persons with disabilities are addressed under the priority area of Rights of women and girls and the cross-cutting objectives of gender equality and non-discrimination. (MFA, 2021, pp. 10,13 and MFA, 2023a, pp. 6-7)</p>	<p>Combatting multiple and intersectional discrimination. (p. 55)</p> <p>Promoting the rights of Indigenous Peoples, persons with disabilities, sexual and gender minorities. (p. 55)</p>	<p>Promoting and defending the rights of women, girls, persons with disabilities, indigenous peoples and gender and sexual minorities, and other persons in vulnerable positions. (Finnish Government, 2024b, p. 22, Finnish Government, 2024a)</p> <p>Improving the rights and SRHR of women and girls. Supporting the rights girls, children and young people with disabilities and vulnerable groups to high-quality and inclusive education. (Finnish Government, 2024a, p. 42)</p> <p>Promotion of the rights of the above noted rights-holder groups (also pp. 45, 50)</p>
<p><b>Business and Human Rights</b></p> <p><i>Primary focus in the interventions of International Alert and BHRRC</i></p>	<p>Helping companies to identify the human rights and environmental impacts of their actions and meet their appropriate due diligence obligations (...) (p. 39)</p>	<p>The priority area of <i>Sustainable economies and decent work</i> includes awareness and monitoring of international Responsible Business Standards. Corporate</p>	<p>Promoting sustainable business, states' obligation to protect human rights and the obligation of businesses to respect human</p>	<p>Supporting the ability of companies to meet the EU's regulatory requirements related to responsible business, Promoting transparency and accountability of the extractive sector.</p>

Thematic focus areas of the reviewed support to Human Rights INGOs	Government Report on Finnish Foreign and Security Policy 2020	The Report on Development Policy Across Parliamentary Terms 2021 (MFA, 2021) and the MFA ToCs (MFA, 2023a)	Government of Finland Report on Human Rights Policy 2022	Government Report on Finnish Foreign and Security Policy 2024 (Finnish Government, 2024a) Report on International Economic Relations and Development Cooperation 2024 (MFA, 2024b)
<p><b>Related elements included also in the interventions of MRG, FLD, ISHR</b></p>	<p>In strengthening the multilateral trading system and open and fair trade, the promotion of the Agenda 2030 goals are taken into consideration, and human rights, equality and environmental criteria highlighted in any contract negotiations. (p. 38)</p> <p>Promoting transparency of technological systems and strengthening the capacity to assess risks caused by technologies. (p. 39)</p>	<p>human rights due diligence is included in the ToC. (MFA, 2021, p. 11-12 and MFA, 2023a, pp. 10-11)</p>	<p>rights both nationally and internationally. (p. 42)</p>	<p>(Finnish Government, 2024b, pp. 28, 37)</p>

**Finding 6: Supported INGOs value not just MFA funding but also the broader partnership for information sharing and policy influence. Strategic cooperation was notably evident during Finland’s UN Human Rights Council membership, though its intensity varied across INGOs and their thematic focus.**

While the crucial importance of financial support in the worsening funding landscape was underlined by all INGO interviewees, strong emphasis was also given to the **added value of wider policy dialogue** and related cooperation with donor countries like Finland that are actively promoting the human rights agenda, while respecting the independence of Human Rights INGOs. Many INGO representatives expressed their strong **appreciation of the open dialogue** with the MFA and shared examples of especially UN level cooperation. Similarly, most of the MFA interviewees underlined the importance and added value of partnerships with Human Rights INGOs to Finland’s influencing work in different forums, especially at the regional and international levels. It was noted that this added value is widely understood, especially among MFA staff whose work is directly linked to human rights and related influencing work, for example, within the UN and the EU, or in partner countries.

Numerous examples of policy-level dialogue and cooperation, especially in Geneva, New York and Brussels, were brought up in the interviews of both INGO and MFA representatives. Especially Finland’s membership in

the UN Human Rights Council in 2022-2024 was considered as a period during which the MFA's cooperation with several INGOs had been very fruitful. For example, support from ILGA World was seen as essential in Finland's efforts in formulating and promoting **a resolution on the human rights of intersex persons** that was adopted in April 2024. Furthermore, cooperation with IDA was essential in the formulation of a joint statement with Malawi on the sexual and reproductive health and rights of persons with disabilities. INGOs' inputs were considered valuable also in policy dialogues related to specific country situations, e.g. Russia and Afghanistan, as well as in the formulation of UPR recommendations.

The thematic and country-specific expertise of INGOs, together with their **direct contacts to the grassroots-level actors** was strongly appreciated by several MFA interviewees as something complementing and adding to MFA's own capacities. However, the MFA's limited resources for engaging with INGOs and leveraging their expertise were also raised by several interviewees, both from the MFA and INGOs. Some INGO interviewees noted that despite efforts made, their expectations of having a policy-level partnership with the MFA had not been realised. At the same time, the need to focus on MFA's key priorities, such as gender equality in policy-level cooperation with INGOs due to MFA's resource limitations, was underlined by several MFA interviewees.

**Finding 7: The broad geographical scope of INGO interventions, and their multi-level approaches, complements Finland's partner country-based development cooperation.**

The linkages between the supported Human Rights INGOs and other funding instruments have been quite limited. There has been some interaction and cooperation with the **Finnish development NGOs**, namely KIOS (BHRC, FLD, ILGA, ISHR, OMCT) and Abilis Foundation (MRG and IDA). At the level of countries, there have been some linkages to local NGOs that MFA has supported with the FLC instrument. For example, in Kenya, International Alert's local partner, Transparency Kenya, had also received FLC support from the Finnish embassy. However, no linkages to bilateral programmes, private sector interventions or ICI projects were brought up in the conducted interviews.

The **geographical focus** of several interventions included Finland's partner countries or sub-regions in Africa (especially Kenya, Mozambique, Zambia and Ethiopia), Asia (Myanmar, Nepal and Tajikistan) and Europe (Ukraine). However, their overall geographical coverage has been much wider. The interventions have covered many countries where Finland has embassies with lesser emphasis on development cooperation (e.g. Egypt, Morocco, Nigeria, Tunisia, Lebanon, India, Colombia, Chile), and also many countries in Latin America, MENA region, Asia and Africa, where the MFA is not present.

In some project level evaluations, the wide geographical coverage was brought up as a weakness affecting project level effectiveness and efficiency, and a somewhat narrower geographical focus in future projects was recommended. However, the importance of wide international networks as a specific characteristic of the Human Rights INGOs was underlined as their **clear strength** and added value in the conducted interviews. It enables them to create comprehensive evidence-base and to build expertise for regional and global level knowledge sharing and advocacy where grass-root level realities are closely linked to the international human rights system and related developments. At the same time, it enables timely reaction to rapid changes in the human rights situation in different country contexts as noted above.

The multi-level approach of Human Rights INGOs in programming and their international level influencing work towards regional and international human rights bodies and international organisations was brought up as strengths that are **not as systematically reflected e.g. in the work of most Finnish development NGOs or interventions funded through other instruments**. The INGOs' work in facilitating access of local HRDs and

CSOs to regional and global forums for sharing their grassroots level lived experiences and expertise and to support their networking was highly valued by the MFA staff involved in policy influencing work. While some Finnish development NGOs have also participated, e.g. in the UN level policy discussions and events, these wide networks and direct contacts with local level human rights actors around the globe were seen as a specific added value of Human Rights INGOs. Many of them are present in Geneva, New York or Brussels with continuous networking and access to multilateral processes and diplomatic missions.

**Finding 8: The MFA’s proactive and responsive approach in grant management was strongly appreciated by the supported INGOs. However, the reliance of the interaction between MFA and the INGOs on mostly one MFA staff member raises concerns.**

Good and **smooth cooperation** with the MFA focal point in grant management issues was highlighted in the interviews of all supported INGOs. The interviewees felt that grant management-related information was shared, and their questions and concerns were addressed in a clear and timely manner. MFA’s **flexibility to approve changes to project plans** in changing operating contexts within the target countries and openness to approve activities in new country contexts where needs for support arise due to rapid changes in the human rights situation was strongly appreciated by several INGO interviewees. For example, in Myanmar ICJ was able to use MFA funding for evacuation of lawyers working on human rights when their security situation rapidly worsened. Similarly, it allowed ISHR and Access Now to pursue litigation cases, with four court rulings in line with human rights-based law establishing legal precedents. This type of activities, it was noted, are otherwise difficult to fund in more restricted funding where funds are tied up in specific project activities.

The MFA focal point’s **understanding of thematic issues and facilitation support** in connecting the funded INGOs to relevant people within MFA was also highlighted as being very valuable. At the same time, concerns were raised about the high reliance on one MFA staff member in the interaction between INGOs and the MFA at HQ level and several organisations would welcome more contacts with different parts of the MFA. This varied somewhat between organisations and their level of presence. In addition to going through the MFA Unit for Human Rights Policy, INGOs with offices in Geneva, New York or Brussels had frequent interactions with the Finnish Permanent Missions there. Having regional country offices (e.g., OMCT in Tunisia) also facilitated more frequent interactions at country/regional level. In this regard, the MFA focal point’s introduction to a variety of MFA colleagues on issues of mutual interest was seen as particularly helpful by INGOs. Some expressed concern, however, that this crucial bridging role on content issues (beyond grant management) could be weakened in case of staff turnover or internal reorganisation. It was expressly stated that having someone at the MFA who can make these internal linkages to others in the MFA (or at Embassy/Mission level) on key human rights issues was of great value (see also under the Effectiveness section).

**Finding 9: The MFA has tried to encourage dialogue between INGOs and Finnish embassies in target countries, but interaction remains limited. Both sides express interest in greater cooperation, and regular contact is typically maintained with Finnish UN representations.**

In the beginning of the funding period, internal kick-off meetings were organised for **introducing the funded INGOs and their interventions to MFA staff** in Helsinki, relevant embassies and missions in international organisations. Some MFA staff whose work was closely related to the thematic or geographical focus of the proposed interventions had already earlier participated in the review of the proposals.

As noted above, there was regular dialogue and cooperation between most INGOs and the Finnish missions, especially in **Geneva, New York and the EU**. However, MFA and INGO representatives indicated that the level of interaction between the embassies and INGOs varied. In the preparation of future Calls, consulting with

MFA's regional teams would still be considered good practice. However, the relevance of INGOs was found to be the highest for their wide (and unrestricted) geographic coverage and their ability to respond to human rights issues globally (wherever human rights violations occur or the need for HRD protection arises). While some INGO proposals tended to pick intervention countries to coincide with Finnish bilateral programme country priorities (possibly to increase their chances of acquiring funding), this review did not find that this added much in terms of overall relevance. As such, limited embassy interaction does not imply limited relevance even if it could be strengthened. A broader geographic coverage was more in line with INGO's own core activities, if justified in their overall project proposals, and given that the main value lied in supporting Finland's multilateral diplomacy and norm-setting (e.g. for ILGA World)

Within the scope of this review, it was not possible to conduct a more comprehensive data collection with Finnish embassies, but examples show that the interaction with INGOs may have been stronger in **non-partner countries** where Finland could not rely to the same extent on its own operational programmes to follow key issues. For example, in Tunisia, where OMCT has a local office and an extensive network of members also outside the capital, Embassy staff at the time reported benefitting from regular information exchange, particularly on issues of joint policy interest and on what was happening on the ground. This was reportedly helpful in the embassy's own policy interactions. In Kenya the interaction between the embassy and the supported INGOs remained much **more limited**. The embassy staff resources were largely tied to MFA's bilateral country programme, Institutional Cooperation Instrument (ICI) and Funds for Local Cooperation (FLC), and support to Finnish development NGOs implementing projects in Kenya. An increasing emphasis was also given to private sector cooperation as a high-priority area in Finland's development cooperation. Direct interaction with INGOs remained limited, while some dialogue took place in joint donor platforms such as the Equality Donor Group.

Even though the country-level dialogue between the supported INGOs and Finnish embassies had remained rather limited in many countries, the importance and potential added value of this kind of interaction and cooperation was brought up by many INGO interviewees. It was highlighted that strategic discussions between the embassies, INGOs and their local partners on human rights issues and related grassroots level realities would be beneficial for both the INGOs and MFA. This could, on one hand, support strengthening the human rights perspective in Finland's other funding instruments, e.g. the human rights responsibility in private sector cooperation. On the other hand, the role of embassies in raising human rights concerns, especially in relation to HRDs, in their country-level policy dialogue was highlighted by several interviewees. INGOs and their local partners could play an important role in **providing evidence-base** and supporting the development of strategic and risk-conscious approaches for this work. INGOs did not express a strong view during interviews on whether Finnish support should focus more on MFA's partner countries, but favoured support that could go to HRDs or other thematic areas wherever it is most needed to inform evidence-based advocacy and policy dialogue.

Several MFA interviewees noted that the need for this kind of country-level dialogue and cooperation may be **increasingly important in the future** taking into consideration the radical decrease in Finnish development funding, ending of many country programmes and the closure of the FLC instrument.

### 5.1.3 *Gender, disability and minority inclusion*

*RQ3: How well has the promotion of human rights, gender equality and non-discrimination been integrated into programme design and implementation?*

**Finding 10: The cross-cutting objective of gender equality was generally well integrated in the portfolio through targeted actions or gender mainstreaming. Also, the principle of non-discrimination was clearly reflected in the strong focus of all interventions on the rights of persons from marginalised groups. However, disability inclusion, while highly present for organisations where it was part of their core mandate, was less mainstreamed overall. Furthermore, consistent use of intersectional analysis across the portfolio remained limited.**

Gender equality was specified both as a policy priority and as a mandatory cross-cutting objective in the Call for Proposals in alignment with the Finnish development policy. Another such cross-cutting objective was non-discrimination with particular attention to the rights and inclusion of persons with disabilities.

**Gender mainstreaming** was clearly reflected across all organisations as part of the project designs. Actions included undertaking gender analyses during the inception phase, facilitating policy debate on gender and women HRDs in contexts of crisis, gender targeting in training and support activities, and gender disaggregation of beneficiaries and recorded monitoring data. A gender mainstreaming approach was, for example, used in International Alert’s project on business and human rights in its outreach and training activities on conflict-sensitive human rights due diligence for companies operating in conflict-affected communities, and for community members. The project evaluation (commissioned by International Alert) assessed approaches to be gender transformative in nature since they aimed to both shift attitudes and structural barriers to women’s participation and decision-making influence in industries where women are typically underrepresented (such as in the oil, gas and mining industries). Although social norms are slow to shift, recorded results included increased acceptance of women as capable workers in oil-related sectors, with some examples of changes in company practices and policies.

The gender perspective was also well integrated into the interventions supporting HRDs, though primarily through **targeted interventions for women** HRDs (WHRDs) and frontline women’s human rights organisations. For instance, in terms of providing support in digital security, Access Now specifically prioritised support and sub-granting to grassroots organisations rooted in at-risk communities with limited access to funding. This included frontline organisations working in contexts where the impacts of digital rights violations were most severe, including support to feminist organisations working to protect the digital rights of women, LGBTQ+ people, and gender nonconforming people. Such grants included tailored support for survivors of online gender-based violence in addition to advancing a case against a social media company to hold the company accountable for reproducing racism in their policies, practices and automated systems.

**Box 1: Examples of facts & figures (2024):**

- OMCT supported organisations representing more than 220 WHRDs in their work on issues including gender-based violence, femicides, reproductive rights, civil and political rights, and Indigenous Peoples' rights (in 2024)
- 60% of the 1,163 HRDs from 61 countries who received intensive training or advocacy support by ISHR in 2024 were women (around 700 WHRDs) with similar numbers of trainees annually
- Access Now provided 7 grants in support of increased digital security for HRDs and WHRDs (HRDs/WHRDs) and 4 grants in support of digital rights, specifically as it relates to women’s rights and LGBTQ+ rights (2024).
- ILGA World, while acting as a global convenor for the LGBTQI+ movement across six autonomous regional organisations, supported the renewal of the UN Independent Expert on SOGI mandate (2022), involving 1,200+ organisations globally.

*Source:* Annual reports for 2022. 2024

Other examples included specific targeting of a minimum 30% of WHRDs supported and a total of 50% protecting minority rights, including disability, LGBTQI+ rights in the anti-torture movement (OMCT). ISHR also had a strong focus on equipping WHRDs with training and tools (see box) including through co-organising the annual Women’s Human Rights Defenders Week in Geneva. Before travelling to Geneva, the WHRDs joined online sessions to get specific training on the international human rights infrastructure, core principles and procedures, as well as key actors of the global human rights system, preparing them for in-depth engagement with UN officials and diplomatic missions, including from the Finnish representation, during this week.

The gender perspective was also reflected in the support to INGOs working on the thematic area of ending impunity through a mix of gender mainstreaming activities and gender-targeted interventions for WHRDs. For ICJ, mainstreaming was supported through gender-based discussions in many of its workshops and trainings, and the organisation also has a number of tools supporting a consistent approach to gender issues across countries. Protection of women HRDs, judges and lawyers was strongly visible in ICJ’s work, e.g., in Myanmar and Afghanistan. However, the project evaluation brought up the need to further systematise gender mainstreaming in programming and reporting. This review noted that this was the case for several of the organisations – i.e. given the strong gender focus through many of the undertaken activities of INGOs, more comprehensive reporting from a **gender transformative lens** could have been done, using results and insights from across their activities and the work of supported WHRDs, also from an intersectional perspective. While this featured more strongly in organisations with a specialised mandate (such as LGBTQI+ rights or disability rights, see Box below), intersectional analysis was not consistently done across projects.

The principle of **non-discrimination** was clearly reflected in the strong focus on support to empowerment and rights of persons from different marginalised groups. The supported HRD, WHRDs and communities clearly represented a wide range of rights-holder groups, human rights issues and contexts, e.g. in relation to the rights of persons with disabilities, Indigenous Peoples’ rights, environmental justice and racial justice. ISHR, for instance, worked closely with the UN Antiracism Coalition (UNARC), which works to combat systemic racism, and ensured that civil society and HRD testimonies were at the centre of the process. Some INGOs – through their specialised mandate (such as ILGA, IDA or MRG) – clearly had a more pronounced issue focus on LGBTQI+ rights, disability rights or minority rights, yet these perspectives and rights-holder groups were reflected as cross-cutting issues across the portfolio. ILGA, due to its specialised nature and expertise, did, however, use the grant to act as a global convenor and backbone organisation for LGBTQI+ movements across six autonomous regional organisations, and supported the development of movement-wide public goods such as legal databases, UN advocacy on LGBTQI+ or the framing of SOGIESC issues, using its wide network of organisations.

**Box. 2 Gender and disability featured at the UN and in relation to a Just Energy Transition**

In the IDA project promoting the rights of people living with disabilities, specific support was provided to movement building of women with disabilities, and advocacy on their rights. For example, the project has advocated for the integration of rights of women with disabilities as well as rights of women and girls from indigenous groups in UN forums and supported organisational strengthening of Disabled Women of Africa (DWA), a Malawi-based, regional organisation of women with disabilities. Also, the project implemented by the consortium of MRG, GI-ESCR and CESR strongly included gender transformative elements. For example, GI-ESCR and its partners conducted in-depth analysis through a gender lens on just energy transition. This process culminated in the development of the Feminist Plan for a Just Energy Transition, formally titled Principles on Gender and Human Rights in the Energy Transition, which serves as a collective legal reference tool, synthesising international human rights standards to ensure a fair and just shift to renewable energy. While the project had several areas of strength in relation to promotion of gender equality and non-discrimination, the project evaluation identified challenges in project level standardised data collection and reporting,

disaggregating beneficiary data—particularly for women and persons with disabilities—having proved difficult due to fluctuating participation and self-identification barriers.

Disability inclusion emphasised in MFA’s cross-cutting objective of non-discrimination was overall **less visible as a mainstreamed issue** across the portfolio but appeared through targeted actions, e.g., IDA’s intervention in line with its core mandate and main focus. Mental health and physical disability were also strongly present in torture rehabilitation efforts, with examples from OMCT, to e.g. address the psychosocial challenges Afghan defenders face in exile. Another example, which also illustrates the strength of working through a network approach with local partners, was that OMCT, together with a local partner, submitted an alternative report to the Committee Against Torture on violence and abuse in Mongolian mental health facilities, particularly impacting LGBTIQ+ women and individuals with substance abuse issues (in 2024).

Regarding the intersectionality of **minority rights with disability rights**, MRG mainstreamed disability inclusion in each of its seven target countries by building active partnerships between Disabled Peoples Organisations (DPOs) and minority and mainstream CSOs. In 2023, the intervention led to the formation for the first time of an informal global coalition of disability activists from minority and indigenous communities, who are engaged in collective actions at the international level. This coalition, representing four continents, produced a joint submission on the rights of persons with disabilities in situations of risk to the UN Committee on the Rights of Persons with Disabilities and organised a side event with the Finnish representation to the UN in New York, during the Conference of States Parties to the Convention on the Rights of Persons with Disabilities.

Overall, given the richness of information on gender, LGBTIQ+ rights, minority rights and disability rights across this portfolio, a more **substantive intersectional analysis** (beyond the identities of different HRDs supported) would, nevertheless, be an interesting addition for cross-portfolio and wider learning going forward. This could also include other intersecting characteristics as relevant. The level and richness of data reported should allow for such analysis without necessarily adding additional reporting requirements or asking organisations to gather information that is of less interest to them (instead, analysing, e.g. how age and gender intersect with disability and conflict or similar).

## 5.2 Effectiveness

### 5.2.1 Overall results observed

*RQ4: What have been the overall results in contributing to the better realisation of human rights from Finland’s support to the INGOs? and RQ7: To what degree have human rights defenders and representatives of marginalized groups been active participants in the work for the purpose of effective advocacy?*

#### (i) Rights holders (HRDs at individual level and communities)

**Finding 11: The supported interventions have comprehensively strengthened the capacities of HRDs, communities and local human rights groups to assess and analyse human rights issues and advocate for their rights. Important results were also achieved in the protection of HRDs.**

Results for **rights holders** (HRDs at the individual level and communities) typically ranged from strengthened knowledge, skills, tools and confidence to analyse human rights challenges and take action, along with the ability to access training and services in a timely manner. Furthermore, the capacities of and support to HRDs in managing their security risks were strengthened. This capacity strengthening led to increased interaction with government duty-bearers at local or national levels, with the emergence of strengthened CSOs and civil society

networks for interventions that targeted community empowerment. In some fragile and conflict contexts, the interaction with government duty-bearers remained limited due to security risks, while the HRDs were able to continue their support to the victims as well as documentation of human rights violations – this being essential for future transitional justice processes.

**Capacity strengthening of local actors** was either done through formalising and strengthening of community-level structures/CSOs, channelling of support and training, or providing facilitation support and tools for participatory assessment, analysis processes, and action planning through their membership base/network of local actors. For example, in the BHRRC project, 72 CSOs, HRDs, and community representatives (including indigenous communities) in Kenya and South Africa assessed and analysed the actual and potential human rights risks of the renewable energy and extractives sectors, and engaged in advocacy towards companies and government duty-bearers e.g. on land rights issues and Free Prior Informed Consent (FPIC). Similarly, in the intervention of MRG with CESR and GI-ESCR, participatory community-level assessments, analysis and advocacy on discrimination of minority groups in relation to economic, social and cultural rights led to dialogue with government authorities. For example, in Kenya, the participatory processes and community-led advocacy on minority communities' access to health services led to the establishment of budget forums enabling community representatives' participation in budget discussions with government duty-bearers, and finally in the construction of new health centres.

The INGOs working on **transitional justice** had a slightly different setting compared to other thematic areas in their support to rights-holders. For example, ICJ's project supported victims, survivors, and their families and organisations, e.g. in advocacy and filing of cases. However, in country contexts with restricted democratic and civic spaces, justice professionals, including lawyers and judges, who provided support to victims of human rights violations and conducted documentation, were simultaneously HRDs themselves and faced serious risks. This was reflected e.g. in ICJ's EU and international level advocacy on human rights in Tunisia that besides HRDs and journalists, focused also on judges and lawyers impacted by the crises.

Several INGOs directly supported HRDs and local human rights organisations through **their service offerings**. Examples include the Helpline of Access Now for HRDs or civil society organisations in need of support in digital security and protection. The Finnish funding contributed to the Helpline's ability to respond to emerging needs, while the cases responded to also provided the backbone for their evidence-based advocacy in national and international fora. While the caseload of the Helpline averaged to around **4,000 per year** during the review period (increasing to 4,419 in 2024), the demand was often even bigger, particularly following specific incidents (see box 1. It included cases from 99 ODA recipient countries such as El Salvador, Ethiopia, Egypt, and Myanmar with a high caseload from countries such as Belarus, Iran, Azerbaijan and Afghanistan.<sup>10</sup>

**Box 3. Adaptability and the need to respond to emerging demand – example from Access Now**

In September 2022, following the murder of Mahsa Amini at the hands of the Iranian morality police, the Helpline (Access Now) received over 8,000 digital security requests from Iran. The Helpline quickly added a pop-up in Farsi on the website explaining the Helpline's inability to respond to the majority of requests, while providing recommendations for other organisations that may be better placed to provide digital security solutions to affected Iranian citizens. The Helpline nonetheless successfully handled more than **900 requests** for support received from human rights defenders in Iran, following internal vetting. (Source: Access Now, 2024 reporting)

<sup>10</sup> 2024 year's reporting, validated by KIIIs.

Similarly, ISHR engaged actively in national-level advocacy on the legal protection of human rights defenders and used its **extensive training programme for HRDs** to provide training, gather evidence and testimonials, and directly link HRDs (including WHRDs) to specific UN policy processes, particularly in the Human Rights Council (using its location in Geneva as a strategic entry-point for establishing relations with the relevant bilateral diplomatic missions, including that of Finland). This proved to be particularly valuable and effective during Finland's membership of the council, which coincided with this INGO support period under review. During the period in review (2022-2024), ISHR provided intensive training or advocacy support to a total of **3,317 HRDs**. While beneficial to influence discussions at the international level, this also helped leverage results at the national level. In a follow-up six months after the course, 90% of participants reported that they had engaged in follow-up actions with international mechanisms to contribute to human rights change and accountability at the national level. OMCT also worked to **directly support HRDs** through its membership base of local human rights and anti-torture organisations with: 140 HRDs released from detention, 444 cases documented of HRDs arbitrarily detained, 1319 HRDs assisted and protected, and 667 urgent interventions for HRDs and their families undertaken during the support period. Such urgent interventions included appeals, joint statements, open and closed letters and press releases concerning HRDs, often issued together with local partners. FLD's project focused on the protection of HRDs in direct interaction with them and their organisations through grants, training, support to networking and case-specific advocacy. In 2024, Front Line Defenders provided support to 3,354 HRDs and 579 organisations/communities/collectives in 147 countries. Following the urgent support, 89% of the HRDs were able to continue their work and 88% reported increased security.

An important contribution of INGOs was also to **enable local HRDs to attend regional and global level meetings** and be present and speak at side-events in the UN, EU and AU, as well as other international organizations including International Financing Institutions (see also sections 4.1.2 and 4.1.3 on gender and disability inclusion). This was supported by all supported INGOs as part of their international-level advocacy.

#### **Box 4. Examples of facts & figures:**

##### **Support to rights-holders (2022-2024)**

- FLD provided support to 3,354 HRDs and 579 CSOs/ communities/ collectives in 147 countries of which 89% were enabled to continue their human rights work
- ISHR provided intensive training or advocacy support to a total of 3,317 HRDs of which 90% engaged in follow-up action.
- OMCT reported 140 HRDs released from detention, 444 cases documented of HRDs arbitrarily detained, 1319 HRDs assisted and protected, and 667 urgent interventions for HRDs and their families undertaken
- Access Now handled around 12,000 cases for human rights defenders in need of digital security support, with a yearly caseload of around 4,000 cases.
- 18 networks of rights-holders equipped to respond new or ongoing major violations of ESCR affecting marginalized groups in the target countries of the project of MRG, CESR and GI-ESCR.
- 72 CSOs/HRDs/community representatives used tools and resources provided by the BHRRC project to engage companies and governments to prevent, mitigate, and remedy human rights abuse.
- 21 new and a total 204 members in SOS-Torture Network (OMCT)
- 8 supported networks of local CSOs (two newly formed) in communities affected by conflict and business-related human rights concerns in Ethiopia, Kenya, Uganda (International Alert)
- Direct support to dozens of human rights defenders annually to engage on LGBTQI+ rights and/or framing of SOGIESC issues with UN mechanisms, including the Human Rights Council, Treaty Bodies and the Universal Periodic Review (ILGA World)

Many INGOs used their own **strategic locations** in Geneva and Brussels to enable and facilitate **networking and access for HRDs**, combining larger UN events, side-events and meetings with bilateral meetings with donor country representatives and other stakeholders (OMCT, ISHR and others). Many KIIs pointed out the strong added value for both the INGOs, HRDs and their groups/organisations and the decision-makers, including the MFA representatives, of bringing HRDs from a diversity of contexts to such meetings. For HRDs and their organisations, these were reported as empowering experiences of getting their voices heard and knowledge and perspectives shared internationally and allowing them to network with other civil society actors and donors. For decision-makers, including representatives of donor governments, including the MFA, direct contacts with HRDs and other rights-holder groups representatives were essential for getting in contact with grassroots level representatives and learning from their lived experiences. All this supported INGOs' aims in movement building and advocacy.

For instance, in 2024, OMCT enabled defenders from Kazakhstan, Honduras, Libya, Colombia and Turkey to have direct engagement with key decision makers. Co-organised side events at UN meetings or at the EU were also used to highlight the work of local partners and to have them attend and speak in person. Such side-events were found to be particularly effective when **co-organised by one or several bilateral donors and their diplomatic representations**. Similar support for HRD participation was also strongly visible, e.g. in the FLD, IDA, and MRG interventions. While participation in Geneva, New York and Brussels-based forums formed a major share of this work, other international institutions/organisations were also targeted. For example, HRDs' participation in the African Disability Protocol-related influencing in the AU is an essential element in the project of IDA. Furthermore, in the MRG intervention, CESR participated with IBON International, its local partner from the Philippines, in the IMF annual meeting in 2023 in Tunisia to conduct research-based advocacy on the actualised impacts of IMF loans on smallholder farmers and peasant communities in the country. As pointed out by ILGA, representation in international fora is critical not only to make local voices heard but also as a form of capacity building. In their 2024 reporting, they stated that: "... *We have learnt that we often do not bring a new capacity to the table; instead, we assist groups in communicating more effectively and in technical language.*"

#### (ii) Duty bearers and policy processes at different levels of operation

**Finding 12: The supported interventions have clearly contributed to strengthened interaction and dialogue among government duty-bearers, companies, and international-level actors with HRDs and CSOs on human rights. In some cases, this has already led to concrete policy-level changes. Extensive documentation of cases, research, special reports and other publications was critical for advocacy at all levels.**

In relation to **duty bearers** (policymakers and responders at different levels, including at both local/national levels and at the international level), the portfolio of support produced a range of anticipated results at different levels. Local and national level results included strengthened awareness on human rights and rights-holders' related perspectives and interest in dialogue with them. The review also came across some institutional changes in either policies, human rights defender protection laws, new consultation or monitoring mechanisms or a commitment to adopting human rights due diligence practices (e.g. in the field of business and human rights).

For instance, in the area of **business and human rights**, the external project evaluation of International Alert found that constructive dialogue led to increased company responsiveness to community concerns in some cases, with the documentation of human rights issues synthesised for inputs and advocacy to develop and

monitor National Action Plans (NAP).<sup>11</sup> Seen as a novel approach to linking business and human rights more closely to community-driven peacebuilding efforts, the project encouraged companies to go beyond merely 'doing no harm' to more fundamentally understand their roles in conflict escalation/de-escalation. In terms of getting companies on board, a key limitation was, however, the lack of enforcement mechanisms (largely depending on corporate goodwill to respond), noting that "for companies, actual uptake of the project's approaches depended heavily on the openness of their systems and their willingness to engage."<sup>12</sup> The example (and evaluation recommendations) underscore the importance of linking on-the-ground efforts to larger advocacy and enforcement mechanisms. Examples of such advocacy include the Business Network on Civic Freedoms and Human Rights Defenders (or Biznet), initiated by other INGO grantees such as the BHRRC, ISHR and others, where business and civil society can engage in regular dialogue. As part of its core funding, ISHR, alongside BHRRC, continued to support the dialogue meetings of Biznet alongside its support to other HRD coalitions. The example also highlights the need to connect on-the-ground and community-driven initiatives with mechanisms for accountability at an international level, and the vantage point of INGOs to effectively bridge such levels of engagement. Future support in this area could seek to make even more use of this, through coalitions that are already actively engaged in pressing for corporate accountability at different levels.

Several INGOs provided **direct support to country-level partners/ members in advancing national policies** or in countering repressive ones. Results combine ongoing monitoring and analysis of the situation with an explanation of their role and support to local partners, while actual contribution to these complex and long-term processes is sometimes more difficult to fully assess. Support provided typically included fact-finding missions, technical support and national-level advocacy and follow-up on relevant conventions or treaties. Several INGOs would directly support as many as **15-20 local partners in their engagement in national legislative processes yearly**, e.g. on the ratification of key human rights treaties and implementation through bills and policies, with extensive advocacy at the legislative level. Many more are, of course, indirectly supported, e.g. through more general training on human rights advocacy. Such support also allowed INGOs to gather lessons from across countries and contexts and engage members and HRDs in peer-based learning on specific themes or operating contexts. This was described by KII as **a less visible, but critical "behind the scenes" role** played by INGOs

#### **Box 5. Examples of facts & figures:**

##### **Support to duty-bearers/policy-level**

- 200 government & company staff (Kenya, Uganda, Ethiopia) on HRDD and conflict sensitivity (International Alert)
- 4 court rulings in line with human rights-based law establishing legal precedents (Access Now)
- SOS-Torture Litigators Groups of 36 lawyers in Africa, Asia and Latin expanded with a Litigators' Group for Europe, Central Asia and Turkey (12 lawyers) by OMCT
- Over 80 joint statements at the HRC and 15 submissions to UPR in 2023-2024 (ISHR)
- Policy changes achieved in 8 of 15 target countries of the project **of MRG, CESR and GI-ESCR.**
- 12 companies adopted new or improved human rights policies or practices in the target areas of the BHRRC project in Kenya and South-Africa.
- The European Commission adopted a revised Visa Code Handbook including for the first time references to HRDs as a special category throughout the document with FLD's advocacy inputs reflected in the text.
- ICJ's advocacy contributed to the initiative of the High Commissioner for Human Rights to establish the OHCHR Inquiries Branch in 2023.

<sup>11</sup> Centre for Analytical Research in Development. End of Project Evaluation Report: Enabling the Business and Human Rights Agenda in Conflict-Affected Settings in Kenya, Uganda and Ethiopia, June 2025 (Submitted to International Alert).

<sup>12</sup> Ibid, p. 14

that nevertheless directly added value to national-level processes and allowed INGOs to more effectively feed information into global advocacy processes.

Several concrete examples of changes in **local and national-level policies and their implementation**, to which the INGO interventions had clearly contributed, could be observed. For example, in Nepal, the ICJ and its local partners did long-term advocacy for the amendment of the Transitional Justice Act that finally took place in 2024. The ICJ also supported the endorsement of the Detention Monitoring Guidelines by three provinces. In the MRG project, the participatory action research and advocacy of GI-ESCR and its local partner in Côte d'Ivoire led to the adoption of a new Executive Instrument by the Council of Ministers, ensuring stricter regulations and oversight for private healthcare centres. Furthermore, a Region level complaint management committee with community level representation was established to handle complaints, ensure independent decision-making, and strengthen the healthcare social protection system. . Additionally, after several years of sustained advocacy by ISHR in partnership with local civil society organisations, a human rights defender protection law was adopted in Niger, adding to human rights defender laws previously secured in countries such as Côte d'Ivoire, Burkina Faso, Mali and Mongolia. Subsequent engagement on implementation included the development of an action plan for its operationalisation in e.g. Côte d'Ivoire, and facilitation of dialogue and peer learning from similar processes in other countries.

Likewise, numerous results were reported at the **international and global advocacy levels**. This is also where **the strategic partnership with Finland (beyond funding) was most important**. A major achievement was the adoption of the resolution on the rights of intersex persons, from Finland co-organising an event on the topic in 2022, to the adoption of the resolution "*Combating discrimination, violence and harmful practices against intersex persons*" by the Human Rights Council in 2024. Throughout the process, Finland worked very closely with ILGA, which provided technical expertise and backstopping, and which has continued to monitor and support its implementation afterwards.

All INGOs undertook a number of international advocacy actions, ranging from global campaigns in coalitions with others, to making joint statements to HRC and UPR, including (joint) submissions to various Committees. ISHR also engaged on **issues of efficiency of the HRC**, and on issues of stronger membership and cooperation with human rights bodies, monitoring States' cooperation with UN treaty bodies, the HRC, UPR and the African Commission on Human and Peoples' Rights, etc. Similarly, other INGOs actively **monitored the effectiveness of the international human rights system** as a way to help their network members strategically engage.

Several of the INGOs also fed information to **UN Special Rapporteurs**. For instance, in 2024, Access Now made submissions to, e.g. the UN Special Rapporteur on Freedom of Opinion and Expression and the UN Special Rapporteur on the Promotion and protection of human rights in the context of climate change. Access Now, along with several other INGOs, also engaged in strategic litigation (with four court rulings on digital rights), and the observation of trials (OMCT).

The above examples illustrate the **critical role played by INGOs in safeguarding space** for local HRDs and make sure that **evidence gathered by their local partners** helps ground international human rights deliberations and dialogue in the lived realities on the ground. Examples also point to the critical role INGOs play both as partners and monitors of the international human rights system performance. While major achievements exist, most processes are nevertheless long-term and increasingly "to avoid backsliding of former progress" (in the words of one KII). While this makes aggregate results assessment over the period more difficult, it is clear that INGOs have played **a critical role in upholding and protecting human rights in the interest of frontline actors**. KIIs therefore stressed that a scenario where INGOs would not be able to fill this

bridging function would be detrimental for the broader global human rights system to function well, potentially with devastating effects.

**Box 6. Strengthening evidence-based advocacy: The importance of documentation and research**

The work of INGOs in documenting human rights violations, publishing related data as well as conducting and publishing studies was found to be an important results area on its own, with wide uptake and use of published materials in various advocacy (joint) advocacy efforts, and also referenced by MFA personnel. This included special reports and tools, e.g. OMCT’s Global Torture Index, SOS-defenders.org (documenting HRDs arbitrarily detained), as well as the ILGA World Database, FLD’s HRD Memorial on HRD killings, BHRRC’s Renewable Energy & Human Rights Benchmark (REB), etc. The research and documentation supported **both country-level work** (often supported by sub-grants to local actors) and produced data that was continuously used in **international-level advocacy** by the INGOs themselves. Evidence also played an important role in **movement-building**, (e.g., the ILGA World Database had a quick and wide uptake for taking stock of laws, human rights bodies, advocacy opportunities, and news related to sexual orientation, gender identity and expression, and sex characteristics issues worldwide. Examples of special reports include ICJ’s paper on ‘*Options for the establishment of a Standing Independent Investigative Mechanism (SIIM)*’ which would support and complement the existing human rights and international justice architecture, including the work of the International Criminal Court (ICC). The paper supported ICJ in conducting long-term advocacy, e.g. in cooperation with the University of Oxford, and can be seen to have contributed to the decisions of the UN High Commissioner on Human Rights to create a UN Inquiries Branch.

**(iii) Movement strengthening**

**Finding 13: The MFA support has enabled strategic organisational strengthening and impact orientation of INGOs and their partners. This movement strengthening contributes to the longer-term sustainability of their human rights work.**

Another cluster of results, often referred to in KII with INGOs, related to the importance of Finnish funding for strengthening the various human rights movements they are part of – often through a combination of aligning their own organizational **practices** with the **ability to respond** to membership/ constituents’ needs, or the **ability to innovate and adapt together with others** to respond to new contexts and emerging issues.

The flexible nature of Finnish support allowed for this type of institutional strengthening, which, to many INGOs, was seen as invaluable, particularly to **foster stronger links** between the local/national and international levels and to create a sense of **trust and mutuality** in their networks. Several INGO respondents regarded it as a critical step in their contribution to the **localisation agenda**. Ensuring that funding is more equitably distributed to local actors was seen as a critical aspect of this agenda. Some were being clear about the internal role division (where INGOs stick to activities where they have clear added value) and providing support (technical and financial) to local HRDs or organisations to attend international events and be part of global campaigns and joint action.

Several organisations noted an increasing demand on them from donors to provide **sub-granting** to local partners. Therefore, some used Finnish funding to strengthen internal systems to manage such sub-granting, both by establishing clearer internal criteria and by strengthening systems for monitoring, including financial tracking of such sub-grants to partners (OMCT). Others also used (in part) MFA funding to improve their grants management system (Access Now). As part of the MFA fund management, the INGOs underwent rigorous external reviews, which looked at whether they had adequate management and internal control frameworks in relation to the size of the organisation. The review covered, among other issues, their defined organisational mandates, structures and roles, documented procedures and policies for financial and donor reporting, procurement and forwarding of funds, risk management and anti-corruption measures, and audit mechanisms, etc. Organisations found these reviews initially time-consuming and demanding, but also expressed an appreciation for the rigour which helped them review, update and strengthen some of their internal procedures. Consequently, thanks to this grant, some organisations were able to develop clear and transparent criteria and guidelines for sub-granting, including for financial management, monitoring and reporting. OMCT and, to some extent, also ISHR and Access Now (which already had a developed programme for sub-granting) referred to the fact that this had helped them strengthen their internal mechanisms for impact orientation, results management and learning. For OMCT, this meant that they were now able to more easily trace contributions, even of non-earmarked support, to different organisational outcome areas, expressing that this will help them predict any potential funding gaps and align donor contributions more clearly with the implementation of their strategic plan, which will be helpful for future fundraising and reporting.

*“The Finnish grant helped us sharpen our impact orientation in our work with human rights defenders. But the development of a new results framework has benefitted us at a broader level – across all our work.”*  
(INGO respondent)

It was also mentioned that strengthened internal controls will also enable better tracing of what share of the overall budget for a certain results area is **invested in local partners** and how (i.e. as operational support or as project-specific reimbursement for certain activities). At present, this type of information is not consistently available across all INGOs for the purposes of this review, even if some organisations provided details on the percentage of the overall budget that was used for sub-granting to local partners on a yearly basis. Across the portfolio, a majority (8 out of 11) grantees engaged in some form of sub-granting. A couple also had more limited sub-granting to one or two local implementing partners for joint activities while others provided more extensive sub-granting support to a larger number of local actors.

Flexible funding was also important for the INGOs in **widening their outreach and engagement in joint actions** with local partners. This was most visible, although not only for INGOs, which used a strong networking and movement-building approach. An example is OMCT, which explicitly uses a network approach in all of its work, based on its membership of local anti-torture organisations, and ILGA, which consists of regional hubs of LGBTQI+ organisations and HRDs. ILGA also used the Finnish grant explicitly in its process of **regionalisation**, which meant setting up a regranting mechanism to the regions and institutionalising the regional secretariats (with proper registrations). This helped both in coordination with a

**Box 7. Example of sub-granting (Access Now)**

Access Now grants awarded in 2024 under the following categories:

- 7 grants in support of increased digital security for HRDs and WHRDs (HRDs/WHRDs)
  - 13 grants in support of digital rights, especially as it relates to human rights, including economic, social, and cultural rights
  - 4 grants in support of digital rights, specifically as it relates to women’s rights and LGBTQ+ rights
  - 9 grants in support of media freedom online, especially for independent media organizations, journalists, and bloggers
- Source:* Access Now, 2024 year’s reporting

wider range of local LGBTQI+ organisations across regions and reinforced the notion of ILGA being a horizontal global movement. Similarly, a ‘matrix’ programmatic organigramme allowed for closer integration between thematic and regional programming and an organisation-wide planning, monitoring and results reporting system for OMCT.

Some organisations did, however, point to the need to observe a **fine balance** in all sub-granting relationships to maintain their status as networks and movements rather than being forced into more of a “donor-grantee” relationship with their local partners. A couple of the INGOs pointed out that to make such relationships work without skewing power dimensions in the movement, it had also pushed them to more clearly demonstrate to local partners how they could use the leverage potential, access and knowledge repositories of the INGO and not just see them as a means to access international funding. Others valued sub-granting as a means also of strengthening local ownership and strengthening of local human rights movements as indicated above.

A local partner also pointed out the importance of INGO support in terms of **safeguarding their security**, specifically referring to digital security, where national capabilities and systems are by default insufficient. When national (digital) systems fail from a security point of view, having an external, international actor intervene can be of fundamental value, and even be “a question of life or death”<sup>13</sup> when it comes to arbitrary detention, referring specifically to the support of Access Now. Access Now also pointed out that donors need to be “educated” about the need to also fund preventive measures, including capacity building, when it comes to digital security, not only the Helpline, which an increasing number of HRDs turn to when they are already under severe threat. Similar issues were also brought up in the FLD project evaluation. This is another example of an area where increased international regulation needs to go hand in hand with practical solutions to the digital security threats experienced by HRDs on a daily basis, and where INGOs have a clear added value and role to play.

Movements were also strengthened by **expanding local partnerships with new members** or expanding operations in certain areas (geographically or thematically). For some, including OMCT, it enabled them to further develop their response to **HRDs in armed conflict** while connecting WHRDs from different conflict countries for peer learning and support. This was seen as an important step to increase geographic diversity and facilitate localised action, particularly in new countries and conflict zones, including e.g. Ukraine, Tajikistan and Egypt.

5.2.2 **Effectiveness in ensuring interplay between different levels and with other actors**  
*RQ5: To what degree are efforts conducted jointly with other actors for increased coherence and greater synergies?, and RQ6: How well-functioning and coherent is the interplay between local/national, regional and global levels, and how well have the member organisations/coalition structures benefited from the interventions?*

**Finding 14: Linkages between local-level work and international-level advocacy were observed in all interventions. However, the structure and governance of such partnerships varied.**

All supported INGO interventions have followed a **multi-level human rights-based approach**, where the global and regional human rights system has provided a framework for local and national level work, and where the evidence and experiences from the grassroots and national levels have fed into regional and global level advocacy. However, as reflected in Table 4 below, there’s clear variation between how such local-to-global partnerships are constructed and governed (see also Portfolio Mapping, Section 3.1).

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<sup>13</sup> KII.

Table 3 - Cooperation structures in the supported interventions

INGO intervention	Cooperation structure in the intervention implementation			
	Consortium and local partners	Alliance structures	Local and international partners	N/A (core funding)
ICJ			X	
ICTJ			(X)	X
FLD			X	
Access Now			X	
ISHR			(X)	X
OMCT			(X)	X
IDA		X		
MRG	X			
ILGA		X		
International Alert	X			
BHRC	X			

For example, the evaluation report of the project implemented by MRG with CESR and GI-ESR brings up the **multi-level approach** engaging marginalised groups and the CSOs representing them and targeting key stakeholders across different sectors and governance levels (local/national, regional and global) as a notable strength of the intervention. In the business and human rights-focused project of BHRC with SOMO, the emphasis was more on **local and national level capacity development**, mobilisation, and advocacy processes with linkages to global-level advocacy and tools development, while regional-level work remained less visible. On the other hand, in the Front Line Defenders' HRD protection focused project, FLD provides support from the regional and local level to **HRDs in their countries** and facilitates their **international networking** especially through the Dublin Platform, while the HRD protection related advocacy takes largely place at the regional level (especially EU institutions and member states) and global level (UN, EU's external relations). In the work of the INGOs that received core funding (ICTJ, OMCT, ISHR) along with Access Now, **the interplay between the three levels is also clearly visible and more seamlessly built into their respective operating models.**

These differences are, on the one hand, related to the differing **programme approaches** of the supported INGOs with their partners. However, differences also originated in the organisational structure and strategic focus of their work. For example, FLD does not have a direct country-level presence due to its focus on HRD protection. Similarly, ISHR focuses on supporting human rights defenders and strengthening human rights systems at **an international level, primarily working with the UN**, which means that it has a key presence in places that provide such access (e.g. Geneva, New York, Brussels and Abidjan for African regional mechanisms). Additionally, it uses its extensive network of trained HRDs and local partner organisations to undertake its advocacy and provide legal expertise at different levels. On the other hand, as reflected in the intervention implemented by International Alert and BHRC, their thematic focus (business and human rights) led to prioritisation of **local and national level activities.**

The supported interventions were implemented through different kinds of **cooperation structures.** Some projects, for example, the projects of BHRC and MRG, were implemented through **consortia with INGO partners** that supported and provided sub-grants to their local NGO partners in three target countries. ILGA

and IDA are global **alliances of rights-holders' networks** with a focus on equitably sharing tasks and resources among alliance members. For example, in IDA's project, strong emphasis was given on strengthening the Organisations of Persons with Disabilities' (OPDs) movement building at the country and regional level through the African Disability Forum, which is a member of IDA. Another member organisation, namely Inclusion International, was involved in the ongoing project to promote stronger inclusion of persons with an intellectual disability in the African disability movement. The project was providing sub-grants to local OPDs to support their advocacy work. ILGA favoured a similar movement strengthening approach across its regional hubs, which in turn support LGBTQI+ organisations in each respective region.

Some projects were implemented **with local and international level partners** and in cooperation with **international networks**. For example, in the ICJ project, there was close cooperation at the country level with local CSOs sharing the same goals with the ICJ, as well as advocacy-related cooperation with other INGOs, academia, UN and state actors at the international level. OMCT used a **network approach** via its membership of local organisations, with more hands-on programmatic work coordinated through its office in Tunis, but working across its membership in its advocacy.

Within the scope of this review, it was not possible to conduct wider data collection with partners in-country (apart from some KIIs, including with national offices of the INGOs). However, the interviews and the conducted desk review, including project-level evaluations, bring up **overall positive results and feedback from the national and local level partners** on the benefits of the partnerships and projects. This reflects the participatory bottom-up approaches widely applied in the interventions. At the same time, **resource constraints** for local partners and the need to facilitate local partners' networking with donors were brought up in one project evaluation.

In the **consortium structures**, interviewed partners were satisfied with the benefits gained from the intervention in support of their organisations' local and international level work and partnerships, and strengthening of their methodologies. However, for example, in the evaluation report of the MRG project, it is noted that while the cooperation between consortium members had functioned well, the cooperation didn't go beyond project management and reporting to cover, e.g. joint reflection and learning during the implementation. Similar issues were pointed out in relation to the consortium created by International Alert for conflict-sensitive community engagement on business and human rights in East Africa (in their end-of-project external evaluation, and KIIs).

Several of the 11 INGOs knew of each other, and had collaborated, already previous to their selection for Finnish support. For instance, Access Now was brought in to do training for HRDs and LGBTQI+ HRDs, and there were examples of OMCT and FLD working with the International Federation for Human Rights within the framework of the Observatory for the Protection of Human Rights Defenders in following up with the UN Human Rights Committee on its review of India's situation when it comes to civil and political rights. Other examples of cross-INGO collaboration include that ICJ cooperates with OMCT and IDA. In some of the reviewed project-level evaluations, cooperation with relevant actors in advocacy work was highlighted as a strength (e.g. ICJ and MRG with CESR and GI-ESCR), while recommendations for strengthening international-level advocacy cooperation with other organisations were made for FLD and International Alert in relation to business and human rights. While such horizontal cooperation between INGOs was not specifically asked for in the call (or specifically facilitated by the MFA apart from during initial kick-off meetings), some interviewees felt that there would be scope to explore this further in future calls on specific themes of common interest or where selected INGOs could provide different viewpoints.

All INGOs worked in numerous coalitions and networks, including with academia and the media. Many also welcomed working more closely with **Finnish NGOs** supported by the MFA. Some degree of brokering such relations would, however, be helpful, as was done in the case of linking some INGOs to KIOS and Abilis.

### 5.2.3 *Effectiveness in generating good practices and main lessons for the future*

*RQ8: What are the good practices and areas of strength in terms of effecting change in the grant portfolio overall?*

**Finding 15. The MFA’s support to international human rights INGOs was most effective when it combined policy alignment with flexible funding, clear localisation-oriented partnerships, and active policy dialogue. This enabled INGOs to link local human rights action with international mechanisms and safeguard civic space. The portfolio’s greatest added value lies in movement strengthening and reinforcement of the global human rights system, with close interlinkages between the different thematic areas of the call.**

While many different strengths were noted for individual interventions, at an overall portfolio level, **effective change and operating models** were noted when:

- (i) The MFA grant coincided with an **alignment of interests** between the INGO (its core mandate and strategy) and the priorities set out in the **Finnish development cooperation and foreign policies**,
- (ii) Support was granted in a way that **maximised flexibility and response capacity** for the INGO, e.g. in relation to emerging human rights issues or contexts, while still allowing for rigorous reporting and accountability of how Finnish support contributed, alongside that of other donors, to its operations and reported results,
- (iii) Part of the grant also went to strengthening the capacity of INGOs and their movements to **track, communicate, and engage** with MFA on such results and/or data gathered,
- (iv) There were **clear operating principles and role divisions in place** among the INGO and its local partners/stakeholders so that the value added of the INGO was maximized (for peer learning, advocacy access, security and protection etc.) and there was no confusion in roles at the local level (i.e. local actors were in the lead in their local contexts),
- (v) Key principles of **localisation** (e.g. through a mix of less restrictive sub-granting and other forms of capacity support) enabled local actors to fully benefit from the added value of the INGO offerings,
- (vi) Finnish INGO funding went **beyond a grant management relationship** to more fully be utilised in policy dialogue by multiple/relevant stakeholders within the MFA at HQ, UN representations or embassy levels, and
- (vii) When the dual goals of both **safeguarding a strong multilateral/global human rights system** overall and **engaging on specific human rights issues and outcomes at local/national levels** were being addressed, effectively linking and using international mechanisms and expertise to add to national-level efforts.

Enabling and securing **local presence** of individual HRDs (and WHRDs, those defending disability human rights and minority inclusion) in international human rights fora was essential. The added value in terms of briefing, bringing and providing access for such HRDs and local civil society actors by the INGOs should not be underestimated. Examples of such essential “background work” were, e.g. ISHR’s work on lifting travel bans and other reprisals – i.e. negative actions taken against HRDs and their organisations for cooperating with international human rights systems – and helping them get registrations to attend different UN meetings. At other times, INGOs could legitimately have a more frontline and visible role, especially when working in coalitions to raise issues or in how the international human rights system was functioning and delivering through various mechanisms and processes (e.g. in relation to efficiency issues of the Human Rights Council, also monitored by ISHR).

Without INGOs filling these critical functions to optimise and make the international human rights system work for rights holders, it is difficult to see who would step in to secure and safeguard the space for HRDs and local civil society participation in these international human rights fora. A weakened role of INGOs would also leave **substantial gaps** when it comes to their important work in documentation and evidence-provision, which directly informs policy dialogue processes based on lived realities on the ground. These **functions** were found to be of primary importance in order to achieve results in the policy priority areas reflected in the Call for Proposals (thematic areas). Future calls could, however, to a larger degree acknowledge that many of the INGOs work simultaneously on **more than one** of the thematic areas detailed in the MFA call, with more flexibility for exploring synergies between them (particularly relevant for those supporting a diverse group of HRDs).

## 6 Conclusions

**Conclusion 1: The multi-level approach with strong interplay between the operations at the local/national, regional and global levels, together with strong human rights monitoring and analysis, has been essential in ensuring the relevance and effectiveness of supported interventions.** (Related to findings 1, 2, 3, and 14)<sup>14</sup>

The strong global and regional level presence in human rights and other multilateral fora with direct linkages to local level human rights actors, including HRDs and CSOs, is a specific characteristic of Human Rights INGOs, enabling global human rights movement building. This work is supported by their comprehensive human rights monitoring, assessment and analysis work, which produces a strong evidence base not only for their own work but also for the work of many other human rights actors, including governments. These specific characteristics clearly strengthen the complementarity and added value of this funding modality with the MFA Finland's other funding instruments and modalities.

**Conclusion 2: The supported interventions have clearly contributed to the Finnish development and human rights policy goals and the MFA Finland's related work. Added value is most visible in global-level influencing and policy dialogue, while the extent to which its potential has been used in the country-level work varies.** (Related to findings 5, 6, 9, 15)

The alignment with the policy goals is clearly reflected in the thematic focus of the portfolio. Also, the cross-cutting objectives of gender equality and non-discrimination have been, overall, well integrated into the design and implementation of supported interventions, while the progress made in strengthening disability inclusion in programming varied.

There is clear interest both in INGOs and within MFA to build more strategic partnerships beyond pure funding relationships, and the added value of the Human Rights INGOs' support to MFA's influencing work, especially at the global level, is widely recognised. This was strongly reflected, especially in their strategic cooperation during Finland's UN Human Rights Council membership in 2022-2024. At the country level, the level of interaction and cooperation between the MFA and funded INGOs and their partners has varied greatly. The remarkable cuts in the Finnish development funding, closing of many country programmes, closure of the Funds for Local Cooperation instrument together with strong emphasis on private sector cooperation requiring new kind of attention to human rights, will further increase the potential added value of the partnerships with Human Rights INGOs in the future. This is especially so at the country level, where there is an increasing emphasis in MFA's

<sup>14</sup> For a complete list of Findings, see Annex 3

work is on policy influencing. Engaging not only in exchange of information but longer-term strategic discussions with INGOs and their local partners could support MFA in basing its policy inputs and messages on local-level evidence, thematic expertise, operational realities and testimonials, while maximising synergies with other actors with a similar agenda.

**Conclusion 3: A vast range of results were reported at multiple levels to strengthen human rights systems and enhance local representation in advocacy. Enabling factors included capacity strengthening of local actors and support to their security and protection, whereas the technical support of INGOs could help in national and international level advocacy and in providing access to duty-bearers. Another important enabling factor was investing in strengthening the evidence base and ensuring that internal systems for sub-granting, learning, and communications were sufficient.** (Related to findings 11-15)

The **long-term nature** of the policy influencing processes at different levels is strongly visible in the work and progress towards the expected results of all supported INGOs. Nevertheless, tangible results could be observed in the capacities of rights-holders, CSOs and duty-bearers and to some extent in targeted policies and their implementation. These incremental but essential contributions could be even more clearly articulated at outcome-level in the reporting (beyond activities and specific outputs). For instance, seemingly disparate activities could be tied together more clearly under broader measures that illustrate INGOs' response capacity, and the ability of the human rights system to adaptively respond to emerging issues and needs. Moreover, it is important to keep in mind that, especially in fragile and conflict contexts, the work may need to focus on **preventing negative developments**, supporting the HRDs and keeping the human rights work ongoing even when no immediate results are visible or even feasible. In other words, **upholding the universal values of human rights and the need for a strong international human rights system to protect these** can be an equally important results area, which comes with its own monitoring challenges in the area of results reporting (again, preferably beyond separate or stand-alone activities). This requires adaptive approaches and adaptive programme management practices, not only from the INGOs and their partners, but also from donors.

**Conclusion 4: Independence and flexibility, regardless of the implementation model, were critical for INGOs to respond optimally to emerging human rights challenges and to act swiftly in their advocacy work. Complementarities with other funding channels (such as via Finnish NGOs) could be structurally built into future support.** (Related to findings 2, 8, 15)

Given the **differences in approach** applied by the different INGOs supported (all of which, in different ways, linked local-level work to international advocacy), it is difficult for the review to clearly conclude which implementation model was more effective. As noted, implementing models varied from both geographical targeting and how they worked with partners at different levels (though consortia, alliances or broader networking approaches). There were also variations in terms of how and to what degree sub-granting was part of their implementation approaches. Even so, some key enablers could be identified across projects (see section 5.2.3). Such enablers, or operating principles, could be further emphasised in future calls to more clearly

articulate the **purpose and strategic value of the human rights INGO portfolio**, particularly as a complement to other channels, including civil society support provided via Finnish NGOs. For instance, if the **main purpose** of the INGO funding envelope indeed is both to strengthen and safeguard a strong and locally responsive global human rights system at all levels in the interest of rights-holders and

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*“When civic space is shrinking, we need to reinforce the data infrastructure to call this out. It is important document these trends, not just at a national level, but as a global phenomenon. Finland as a donor understood this both as a funder and at a more political level.” (INGO respondent)*

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make sure that local voices are heard and included in such systems, a focus on **movement strengthening in line with INGO's own chosen operating models and strategic priorities** is important. Complementarities where there is convergence on interests between Finnish NGOs and the INGOs could also be more structurally built into (or encouraged) in future calls. This could be on joint efforts or information exchange in relation to safeguarding civic space, HRD security and protection (including digital security), and in INGOs' provision of access to local partners for increased influence in international fora and UN advocacy processes.

Such initiatives may be aligned with **one or multiple policy priorities (or themes)** detailed in future Call for Proposals to better reflect how INGOs operate (mostly across a range of human rights issues which are linked and indivisible). While different INGOs clearly operate in different human rights areas with different core competencies, the review found little grounds for organising the Call around four main thematic strands, implicitly signalling to INGOs that they must "fit" within these and choose between them. Instead, a somewhat **less prescriptive approach**, listening into how they see interest alignment (across themes and global human rights challenges), and how they would hope to use a partnership with Finland, may be more informative. This would be particularly true for INGOs that work with a wide range of diverse HRDs and local CSOs across many varying contexts and human rights themes. Some **earmarking of funds** could, however, make sure that such policy/thematic (or cross-thematic) results are well documented and accounted for, while still allowing for a high degree of flexibility in the partnership arrangement. This would seek to accommodate the fact that partnerships between the MFA and INGOs were most effective when joint policy agendas were identified, and acknowledging that within the MFA, there is pressure to align the support with these priorities. Finland was seen and appreciated for being a highly responsive and flexible donor already. Yet, while alignment with Finnish policies is important to prove, future Calls for Proposals could allow organisations to work on **more than one relevant human rights theme** within the framework of Finnish development policy priorities.

**Conclusion 5: Finland's current positioning and strong reputation for protecting human rights – and for supporting an effective international system that can uphold and implement these based on local lived realities – aligns well with this grants portfolio. To sustain this, it is advisable to optimise both the strategic orientation and internal use of this INGO human rights support going forward.** (Related to finding 5. 6, 15).

The 2022-2024 implementation period coincided with a **consolidation of the (long-term) role and reputation of Finland** as an important bilateral donor and supporter of the multilateral/international human rights system.<sup>15</sup> This was, at least in part, linked to its membership of the Human Rights Council, during which MFA representatives had frequent interactions with INGOs on various human rights policy priorities at different levels, and which facilitated access to insights from the ground and documented evidence. This positioning can now be strategically leveraged. However, it would require the MFA to more clearly answer: (i) how they would like to optimally use this funding envelope (possibly by drawing on some of the lessons from this review), and (ii) how such potential use and linkages could be widely communicated to ensure wide internal consideration and uptake (across relevant focal points in HQ, representations and embassies).

## 7 Recommendations

In line with the TORs and the scope of this review, the below recommendations are primarily for the MFA to consider in its future support to human rights INGOs.

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<sup>15</sup>Based on feedback from KIIs and literature review.

## A. Relevance:

**Recommendation 1 (and sub-recommendations). Revise the purpose, funding modalities and selection criteria for future Calls for Proposals to allow for clearer added value of INGOs to be articulated, and to encourage wider use of their services and products at different levels of operation.**

In the current global funding and political landscape, where funding and political will for sustained human rights support has been decreasing, there was an overall very strong sentiment that Finland's continued financial and political support was much needed to maintain strong human rights movements and an international, effective and responsive multilateral system and global human rights system. Having built a strong international reputation for promoting human rights across a range of thematic issues, INGO support is one contributing component for Finland in maintaining this strong positioning in the multilateral arena. However, to optimise future Calls of Proposals and subsequent funding to human rights INGOs, the following could be considered:

- (i) In line with the enabling criteria for effective cooperation outlined in this review (see section 5.2.3), and given the current resource constraints for Finland's funding in this field, consider selecting fewer but potentially broader existing coalitions of INGOs/INGOs and their constituents or local partners in line with the organizations' own core mandate that can help maintain and advance Finland's positioning and strong reputation in the area of human rights at multiple levels
- (ii) Make sure that supported partnerships are communicated and relationships brokered with relevant staff (HQ, Embassies, representations in multilateral settings - Geneva, Brussels, New York). Make sure that these "few but strategically important" INGOs/INGO coalitions are engaged in processes where Finland also has an interest in learning and policy dialogue, and that mutuality in the partnership goes beyond just fund management to also make use of relevant knowledge and resources.
- (iii) Sustain support in areas where Finland has established a strong reputation in line with policy priorities. e.g. gender equality and disability rights, LGBTQI rights, digital security for HRDs, business and human rights, Indigenous Peoples rights, civic space and human rights defenders (etc). Yet consider maintaining flexibility in terms of how INGOs work on these themes (focusing on one or several) in line with their own strategic plans and work plans.
- (iv) Consider incentivising (through a revision of the selection criteria) coalition structures or horizontal learning between INGOs on disability mainstreaming, gender equality and LGBTQI+ rights, and other cross-cutting issues, making better use of in-depth gender and intersectional analysis
- (v) Ensure that the mainstreaming of disability inclusion described in proposal documents is systematically monitored and reported throughout the intervention cycle.
- (vi) Allow INGOs to define in their proposals what policy areas they anticipate working on and how they would ensure adaptive management and increased response capacity within these fields,
- (vii) Ensure that INGO support goes to strengthening existing movements and coalitions, while a smaller, flexible part could be earmarked to innovation and expanding into new areas/responding to emerging needs.
- (viii) Also consider how MFA's internal communication can be improved on issues discussed with the INGOs that do not relate to funding (policy or technical issues) in order to widen internal use and uptake of knowledge produced by partner INGOs.

## B. Effectiveness

**Recommendation 2: Maintain flexibility in funding modalities that allow for multi-level interventions (local-regional-global) and internal strengthening of communications and coordination, effectively enabling HRDs to attend events, and receive funding to their national/local organisations.**

Considerations would include:

- (i) Keep funding flexible in line with INGO's core mandates -- but make sure that some of the funding is earmarked to internal systems strengthening for results monitoring to ensure rigorous MEL practices and reporting on the use of Finnish funds alongside that of other donors.
- (ii) Ask organisations to be more explicit regarding what results look like in their operating contexts and what benchmarks would be most suitable to gauge progress, noting that even a lack of progress could be an achievement in relation to avoid backlash or secure space for participation,
- (iii) Ask INGOs to more clearly explain what an ideal policy partnership with Finland would look like (on what topics/in what settings or policy processes), laying a foundation for dialogue and partnership management,
- (iv) Avoid prescriptive division of support into parallel thematic strands (that INGOs have to choose between) and instead suggest that INGOs should define which themes/coalitions they already are part of and how these align with Finland's thematic policy priorities,
- (v) Base performance criteria also on 'soft skills and capabilities' to create change, including, for instance, improvements in organisations' level of responsiveness to local actors and systems for sub-granting to local partners (as relevant).
- (vi) Maintain flexibility in funding while allowing for an earmarked proportion set aside for internal tracking and communication of results,
- (vii) Look for ways to support adaptive management of interventions, proposals and reporting. For example, "ability to respond to HRDs in conflict settings" where the "responsive capacity" needs to be demonstrated (to complement more simplistic measures such as "number of HRDs trained").

**Recommendation 3: Focus on roles and complementary added value of INGOs (or networks of INGOs) in line with their own strategies and priorities, while being transparent about Finland's human rights policy interests (without being too restrictive about main themes).**

Avoid too strict thematic orientation in future calls since most INGOs work on more than one human rights area. To be even more strategic about how to work with INGOs, it will be important to clearly state Finland's policy priorities, but future Calls for Proposals could be more explicit about the roles, knowledge and capacities that INGOs intend to bring:

- a) to advocacy (at different levels and their interlinking),
- b) in strengthening local partners (whether through sub-granting or capacity building in other ways),
- c) in bridging national/local efforts with regional and global levels, and possibly how they could interlink with Finnish NGOs that also receive MFA funding (as relevant).

Ideas could also be solicited as part of the Calls for Proposals process for how they would envisage dialogue and knowledge exchange with Finland as a bilateral donor, and how/under what circumstances/in what contexts such dialogue would be considered strategic (e.g. in relation to different multilateral processes or on specific topics etc.).

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## Annexes

### Annex 1 – Terms of reference

Prepared by: Unit for Human Rights Policy, POL-40

#### Background to the review

##### Programme context

The Ministry for Foreign Affairs of Finland (MFA) has allocated development cooperation funds to International Non-Governmental Organizations (INGOs) whose activities support the implementation of Finland's development policy goals and priorities, including in the area of human rights, as guided by the 2030 Agenda for Sustainable Development. This form of support complements Finland's development cooperation in sectors that are of strategic importance to Finland. Finland targets its support to a limited number of proposals by INGOs and conducts active dialogue with the INGOs that receive funding.

All interventions follow the Human Rights Based Approach (HRBA) and cross-cutting objectives of Finland's development policy. The Unit for Human Rights Policy has also emphasized the track record in human rights advocacy and planned advocacy work when selecting partners through open calls.

INGO support is guided by the priorities of Finland's development policy in accordance with the goals of the Agenda 2030 for Sustainable Development, the Guidelines for Civil Society in Development Policy (2017), the Guidance Note for the Human Rights Based Approach in Finland's Development Cooperation (2015), the Finnish Government's Human Rights Report and the related Strategy, and the Theories of Change and Aggregate Indicators for Finland's Development Policy (2020).

##### Description of the evaluand

In 2021, the Unit for Human Rights granted EUR 17.82 million to INGOs for 2022–2024. Support was granted to 11 international human rights civil society organizations operating in developing countries. The work focused on four themes: ending impunity; supporting human rights defenders; strengthening the implementation of economic, social and cultural rights and addressing discriminatory practices; and business and human rights<sup>16</sup>.

The Unit for Human Rights Policy managed funding for human rights INGOs from 2003 up to the period in question.

##### Results of previous evaluations

The human rights advocacy of the INGOs supported by the Unit was previously reviewed in 2020, focusing on the advocacy work of INGO projects implemented in 2015-2018. The evaluation was carried out by the Finnish consulting Group (FCG) and its purpose was to examine the relevance and effectiveness of INGOs' advocacy work in relation to the objectives of Finland's development and human rights policy. The evaluation recommended, among other things, more extensive recognition of INGO cooperation at the political level and diverse support for various INGOs, including specialised INGOs and regional INGOs. Cooperation between INGOs should be increased and donor coordination improved. It was also proposed that dialogue with INGOs be expanded strategically to the level of missions.

In addition, the 2023 Evaluation of the Human Rights Based Approach in Finnish Development Cooperation has recommendations relevant to INGO cooperation. The independent evaluation analysed how human rights and the so-called human rights-based approach (HRBA) has been implemented in Finland's development policy and cooperation

<sup>16</sup> For more information please see [https://um.fi/press-releases/-/asset\\_publisher/ued5t2wDmr1C/content/tukea-kansainvalisille-kansalaisjarjestoille-ihmisoikeuksien-edistamiseen-kehittyvissa-maissa/35732](https://um.fi/press-releases/-/asset_publisher/ued5t2wDmr1C/content/tukea-kansainvalisille-kansalaisjarjestoille-ihmisoikeuksien-edistamiseen-kehittyvissa-maissa/35732)

during 2019-2021. The evaluation assessed how human rights appear in the language used in various documents, how effectively the human rights-based approach has been implemented and its value. Lastly, the evaluation assessed its linkages with risk management. The evaluation recommended reaffirming HRBA as a core principle guiding Finland's development cooperation. This should be reflected in the human rights outcomes pursued and in the processes that the Ministry for Foreign Affairs and its partners put into place. The evaluation also includes case studies involving INGOs the work of which is covered in this review.

### **Rationale, purpose and objectives of the review**

The evaluation norm (1/2015) of the Ministry for Foreign Affairs guides all evaluations that relate to development policy and cooperation funded by Finland. This assignment responds to the requirements of conducting decentralized evaluations.

According to the Finnish Act on Discretionary Government Transfers (688/2001) According to Section 15 of the Act (State aid authorities' duty) *"State aid authorities must take care that there is appropriate and sufficient supervision of discretionary Government transfers by obtaining information on their use and monitoring,( ...)"*.

Based on this mandate, the MFA launches a review of the funded projects in order to ascertain an overview of their overall results and effectiveness at the country, regional and international level, including in relation to human rights advocacy. The review should assess the relevance of the results of INGOs activities in supporting Finland's human rights and development policy priorities at the national, regional and international levels, as stated in the call for applications and the funding proposals. Where possible, the review should also consider the degree to which the contributed activities complement and add value to other Finnish development and Human Rights Policy initiatives.

The review will comprehensively assess the grants portfolio provided by Finland to international human rights organizations (INGOs) (2022-2024) in alignment with Finland's human rights policies and development priorities at the national, regional and international levels to (i) promote ending of impunity, (ii) supporting human rights defenders, (iii) strengthening the implementation of economic, social and cultural rights and addressing discriminatory practices and (iv) support business and human rights. It will also seek to assess how interventions cut across, and seek to harness, the interplay between direct support to rights-holders, institutional and organizational arrangements, and engaging in national and international advocacy, reaffirming a human rights-based approach (HRBA) to Finland's development cooperation, while supporting the implementation of Finnish human rights policy.

### **Scope of the review**

The activities of organizations under review are those which have been receiving support from the Unit for Human Rights Policy during the period 2022-2024. Some funding projects have been extended to 2025 or 2026, and where possible the review can also assess activities undertaken during 2025, but the review should focus in particular on the period 2022-2024.

- International Center for Transitional Justice (ICTJ)
- International Commission of Jurists (ICJ)
- International Service for Human Rights (ISHR)
- Front Line Defenders
- Organisation Mondiale Contre la Torture (OMCT)
- Access Now
- International Disability Alliance (IDA)
- Minority Rights Group (MRG)
- ILGA World: International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA)
- Business and Human Rights Resource Centre (BHRR)

- International Alert

The evaluators are expected to review the reporting and, where relevant, project specific and other organizational evaluations of the funded initiatives and to interview representatives of each of the funded INGOs. Colleagues from the Ministry for Foreign Affairs and 3-4 Embassies should also be interviewed. No site visits are expected to take place.

### Issues to be addressed and review questions

**Relevance:** the extent to which the objectives of the supported initiatives are consistent with rights holders' requirements, as well as and Finland's foreign and security policy, with a specific focus on development and human rights priorities as defined in the Call for Applications.

More specific questions:

- How relevant have the interventions been in terms of addressing in-country, regional and international human rights priorities?
- How well have the supported activities contributed to the work and support the policy goals of the Ministry, in terms of both development policy and human rights policy?
  - What is the additional value of the work of the INGO support, and how well does it complement, other types of development instruments of the Ministry?
  - Are INGOs perceived as strategic partners to the Ministry in terms of policy goals and what have been the strengths and weaknesses of cooperation in this regard?
- How well has the promotion of human rights and gender equality, non-discrimination been integrated into programme design and implementation?

**Effectiveness:** describe the achievements towards expected outcomes and key outputs from this grant portfolio or whether they are expected to be achieved in the future. More specific questions:

- What have been the overall results in contributing to the better realization of human rights from Finland's support to the INGOs? Consider rights-holders, duty-bearers and institutional dimensions. What results stand out as the most notable or sustainable and what factors have contributed to this?
- To what degree are efforts conducted jointly with other actors for increased coherence and greater synergies?
- How well-functioning and coherent is the interplay between local/national, regional and global levels, and how well have the member organizations/coalition structures benefitted from the interventions? Organizations are expected to have experience of advocacy at international human rights fora; what have been the benefits of this in terms of international advocacy efforts and information sharing with the MFA?
- To what degree have human rights defenders and representatives of marginalized groups been active participants in the work for the purpose of effective advocacy?
- What are the good practices and areas of strength in terms of effecting change in the grant portfolio overall? How could such change be further supported in the future? What are the main learnings?

The review team may suggest modifications or additions to the review questions.

### Methodology

The detailed review methodology will be left to the evaluators to propose and will be elaborated in the Inception Report. Multiple methods are expected to be used to validate the findings, both quantitative and qualitative. No in country travel is expected as part of the review.

The overall approach will be to analyze the portfolio of grantees its entirety and how different partners contribute to results and shared expertise. The review will seek to establish patterns across grantees in terms of common barriers, opportunities, and lessons with less emphasis on individual project-by-project performance although the results of individual projects will also form a basis of the review. The review will also be utilization-focused, ensuring that findings and recommendations are relevant to the main users (Ministry staff).

The work will be divided into an inception phase during which the detailed review methodology, final review questions and work plan will be prepared. This will be followed by the actual review phase consisting of analyses of documentation and stakeholder consultations. The following methods can be used to complete the above-mentioned tasks and fulfil the purpose as defined by this ToR.

- Desk review of the relevant documents (INGO reports, strategies, policy/strategy documents of MFA)
- Literature review, as relevant (reports, publications)
- Consultative meetings, interviews (face-to-face, virtual)
- Other methods such as facilitated self-reviews may also be applied

Each deliverable (Inception Report, Draft Final Report, Final Report) is subjected to specific approval. The Review Team is able to move to the next phase only after receiving a written statement of acceptance by the MFA.

The review reporting shall follow the MFA's review manual's outline guidelines: <https://um.fi/kehitysyhteistyon-evaluointikasikirja> and should be prepared in English, consisting of a summary report. The report is to be concise. Conclusions and recommendations are to be based on evidence and be clear, concrete, accessible and presented in a way that they can be used internally for the MFA's purposes and externally.

The review design, methodology and process should itself comply with the human rights-based approach, including non-discrimination and participation. The proposals should identify ways in which the review approach intend to comply with it.

### **The review process and time schedule**

The review is to be started in September 2025. The review shall include the following:

- Draft Inception Report within four weeks after commencing the review. The Inception Report will include a detailed review methodology and work plan for the review.
- Final Inception report (October 2025)
- Draft Final Report (December 2025)
- Final Report after receiving the comments from the MFA (January 2026)

An in-person meeting to present preliminary findings and facilitate a discussion on recommendations with MFA staff will be accounted for before finalization of the review report.

### **Quality assurance**

The review is commissioned by POL-40. The Senior Adviser of the unit will be responsible for the overall management of the process. They will work closely with other units/departments of the MFA and other stakeholders in Finland and abroad.

The Team Leader will manage the review team. This requires careful planning to ensure that a common, consistent approach is used to achieve comparability of the data gathered and the approach used in the analysis. The Team Leader will develop a set of clear protocols for the team to use and will convene regular online team meetings to discuss the

approach. Particular attention should be paid to strong inter-team coordination and information sharing within the team during the process.

The evaluation team is responsible for identifying relevant stakeholders to be interviewed or surveyed and organizing the interviews. The MFA and embassies will not organize these or meetings on behalf of the evaluation team, but will assist in identifying people and organizations to be included in the evaluation.

Management of the evaluation entails risk management. The most pertinent risks are identified at the time of proposal submission and proactively discussed, monitored and managed during the evaluation process by all parties. The service providers will identify key risks and their mitigation in their proposals.

The tenderer should propose and implement a quality assurance system for the evaluation. The proposal must specify the quality assurance process, methodology, tools, and resources.

### **Expertise required**

One expert shall be nominated as the Team Leader. Where possible, the team should also include an emerging evaluator or a junior expert.

The review evaluation team shall ensure solid experience and knowledge in the following fields:

- Proven experience of conducting reviews, programme evaluations and planning in the human rights, and development cooperation and policy sectors. Experience of the work of International Non-Governmental Organizations.
- For the team leader candidate, additionally experience in serving in TL role and substantive experience in evaluating human rights and HRBA.
- Proven experience of project cycle management (PCM) and Results Based Management (RBM), and their application in programme design, monitoring and evaluation (M&E) and an understanding of how they relate to HRBA.
- Understanding of the human rights based approaches to development, including the approach applied by Finland.
- Experience in integrating cross cutting objectives in project planning, implementation, monitoring, and evaluation: gender equality, non-discrimination and climate resilience.
- Quality assurance in accordance with the quality assurance approach proposed in the tender.

### **Budget**

The total budget available for the review is 70 000 euros (excluding VAT).

### **Mandate**

The review team is entitled and expected to discuss matters relevant to this review with pertinent persons and organizations. However, it is not authorized to make any commitments on behalf of the Government of Finland.

Annex 1: MFA evaluation manual <https://um.fi/development-cooperation-evaluation-manual>

## Annex 2 – Number persons interviewed per organisation

Organisation	Number of interviewees
<b>MFA, (HQ and Missions)</b>	15 <sup>17</sup>
Human Rights Policy Unit	3
Civil Society Unit	5
Unit for Human Rights Courts and Conventions	2
Unit for Security Policy and Crisis Management	2
Representative Office of Finland, Ramallah	1
Embassy of Finland	1
Management of Department for Development Policy	1
<b>INGO Grantees</b>	37
Access Now	4
Business & Human Rights Resource Centre (BHRRC)	2
International Center for Transitional Justice (ICTJ)	4
International Commission of Jurists (ICJ)	4
International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA World)	1
International Service for Human Rights (ISHR)	4
<b>Organisation Mondiale Contre la Torture (OMCT)</b>	2
Front Line Defenders	5
Minority Rights Group	4
Global Initiative on Economic, Social and Cultural Rights	1
Centre for Economic and Social Rights	1
International Alert	2
BAPENECO	1
International Disability Alliance (IDA)	2
<b>Others</b>	2
KIOS Foundation	1
Development Policy Committee	1
<b>Total number of interviewees</b>	<b>54</b>

<sup>17</sup> Key informant interviews and participants in the workshop on initial review results.

## Annex 3 – Complete list of findings

### Relevance:

*Finding 1:* Systematic monitoring and analysis of the human rights situation at different levels as an integral element of the funded interventions has ensured their strong relevance to in-country, regional, and international human rights priorities.

*Finding 2:* The MFA funding has enabled INGOs to address and draw attention to longer-term “silent” human rights challenges that have received less attention among donors, media and policy forums. At the same time, the flexibility of this support has enabled reactive work in rapidly changing human rights situations in fragile country contexts.

*Finding 3:* The funded interventions have elevated local human rights issues into regional and international policy frameworks. These long-term efforts have effectively used international mechanisms to address local human rights challenges.

*Finding 4:* The MFA support has helped INGOs and their partners legitimise their work in a tightening funding landscape.

*Finding 5:* The thematic focus of the supported interventions was strongly aligned with the MFA’s thematic development policy priorities at the time of call for proposals and remains relevant also to the more recent policy frameworks. Many of the funded interventions contributed to several MFA priority areas.

*Finding 6:* Supported INGOs value not just MFA funding but also the broader partnership for information sharing and policy influence. Strategic cooperation was notably evident during Finland’s UN Human Rights Council membership, though its intensity varied across INGOs and their thematic focus.

*Finding 7:* The broad geographical scope of INGO interventions, and their multi-level approaches, complements Finland’s partner country-based development cooperation.

*Finding 8:* The MFA’s proactive and responsive approach in grant management was strongly appreciated by the supported INGOs. However, the reliance of the interaction between MFA and the INGOs on mostly one MFA staff member raises concerns.

*Finding 9:* The MFA has tried to encourage dialogue between INGOs and Finnish embassies in target countries, but interaction remains limited. Both sides express interest in greater cooperation, and regular contact is typically maintained with Finnish UN representations.

*Finding 10:* The cross-cutting objective of gender equality was generally well integrated in the portfolio through targeted actions or gender mainstreaming. Also, the principle of non-discrimination was clearly reflected in the strong focus of all interventions on the rights of persons from marginalized groups. However, disability inclusion, while highly present for organisations where it was part of their core mandate, was less mainstreamed overall. Furthermore, consistent use of intersectional analysis across the portfolio remained limited.

### Effectiveness:

*Finding 11:* The supported interventions have comprehensively strengthened the capacities of HRDs, communities and local human rights groups to assess and analyse human rights issues and advocate for their rights. Important results were also achieved in the protection of HRDs.

*Finding 12:* The supported interventions have clearly contributed to strengthened interaction and dialogue among government duty-bearers, companies, and international-level actors with HRDs and CSOs on human rights. In some cases, this has already led to concrete policy-level changes. Extensive documentation of cases, research, special reports and other publications was critical for advocacy at all levels.

*Finding 13:* The MFA support has enabled strategic organisational strengthening and impact orientation of INGOs and their partners. This movement strengthening contributes to the longer-term sustainability of their human rights work.

*Finding 14:* Linkages between local-level work and international-level advocacy were observed in all interventions. However, the structure and governance of such partnerships varied.

*Finding 15:* The MFA's support to international human rights INGOs was most effective when it combined policy alignment with flexible funding, clear localisation-oriented partnerships, and active policy dialogue. This enabled INGOs to link local human rights action with international mechanisms and safeguard civic space. The portfolio's greatest added value lies in movement strengthening and reinforcement of the global human rights system, with close interlinkages between the different thematic areas of the call.

Annex 4 – Summary table on findings, conclusions and recommendations

FINDINGS	CONCLUSIONS	RECOMMENDATIONS
<p><b>Relevance:</b> the extent to which the objectives of the supported initiatives are consistent with rights holders' requirements, as well as Finland's foreign and security policies, with a specific focus on development and human rights priorities as defined in the Call for Proposals.</p>		
<p><u>Finding 1:</u> Systematic monitoring and analysis of the human rights situation at different levels as an integral element of the funded interventions has ensured their strong relevance to in-country, regional, and international human rights priorities.</p>	<p><u>Conclusion 1:</u> The multi-level approach with strong interplay between the operations at the local/national, regional and global levels together with strong human rights monitoring and analysis has been essential in ensuring the relevance and effectiveness of supported interventions.</p>	<p><u>Recommendation 3:</u> Focus on roles and complementary added value of INGOs (or networks of INGOs) in line with their own strategies and priorities, while being transparent about Finland's human rights policy interests (without being too restrictive about main themes).</p>
<p><u>Finding 2:</u> The MFA funding has enabled INGOs to address and draw attention to longer-term "silent" human rights challenges that have received less attention among donors, media and policy forums. At the same time, the flexibility of this support has enabled reactive work in rapidly changing human rights situations in fragile country contexts.</p>	<p><u>Conclusion 4:</u> Independence and flexibility, regardless of the implementation model, were critical for INGOs to respond optimally to emerging human rights challenges and to act swiftly in their advocacy work. Complementarities with other funding channels (such as via Finnish NGOs) could be structurally built into future support.</p>	<p><u>Recommendation 2:</u> Maintain flexibility in funding modalities that allow for multi-level interventions (local-regional-global) and internal strengthening of communications and coordination, effectively enabling HRDs to attend events, and receive funding to their national/local organisations.</p>
<p><u>Finding 3:</u> The funded interventions have elevated local human rights issues into regional and international policy frameworks. These long-term efforts have effectively used international mechanisms to address local human rights challenges.</p>	<p>Conclusion 1 (see above)</p>	<p>Recommendation 3 (see above)</p>
<p><u>Finding 4:</u> The MFA support has helped INGOs and their partners legitimise their work in a tightening funding landscape.</p>	<p><u>Conclusion 2:</u> The supported interventions have clearly contributed to the Finnish development and</p>	<p><u>Recommendation 1</u> (and sub-recommendations): Revise the purpose,</p>

FINDINGS	CONCLUSIONS	RECOMMENDATIONS
<p><u>Finding 5:</u> The thematic focus of the supported interventions was strongly aligned with the MFA's thematic development policy priorities at the time of call for proposals and remains relevant also to the more recent policy frameworks. Many of the funded interventions contributed to several MFA priority areas.</p>	<p>human rights policy goals and the MFA Finland's related work. Added value is most visible in global level influencing and policy dialogue, while the extent to which its potential has been used in the country level work varies.</p>	<p>funding modalities and selection criteria for future Calls for Proposals to allow for clearer added value of INGOs to be articulated, and to encourage wider use of their services and products at different levels of operation.</p>
<p><u>Finding 6:</u> Supported INGOs value not just MFA funding but also the broader partnership for information sharing and policy influence. Strategic cooperation was notably evident during Finland's UN Human Rights Council membership, though its intensity varied across INGOs and their thematic focus.</p>	<p>Conclusion 4 (see above)</p>	<p>Recommendation 3 (see above)</p>
<p><u>Finding 7:</u> The broad geographical scope of INGO interventions and their multi-level approaches complement Finland's partner country-based development cooperation.</p>		
<p><u>Finding 8:</u> The MFA's proactive and responsive approach in grant management was strongly appreciated by the supported INGOs. However, the reliance of the interaction between MFA and the INGOs on mostly one MFA staff member raises concerns.</p>		
<p><u>Finding 9:</u> The MFA has tried to encourage dialogue between INGOs and Finnish embassies in target countries, but interaction remains limited. Both sides express interest in greater cooperation, and regular contact is typically maintained with Finnish UN representations.</p>		
<p><u>Finding 10:</u> The cross-cutting objective of gender equality was generally well integrated in the portfolio through targeted actions or gender mainstreaming. Also, the principle of non-discrimination was clearly reflected in the strong focus of all interventions on the rights of</p>		<p><u>Recommendation 1, Sub-recommendation (iv):</u> Consider incentivizing (through a revision of the selection criteria) coalition structures or horizontal learning between INGOs on</p>

FINDINGS	CONCLUSIONS	RECOMMENDATIONS
<p>persons from marginalized groups. However, disability inclusion, while highly present for organisations where it was part of their core mandate, was less mainstreamed overall. Furthermore, consistent use of intersectional analysis across the portfolio remained limited.</p>		<p>disability inclusion (currently less visible), gender equality and LGBTQI+ rights, and reward more in-depth intersectional analysis at structural/programme level beyond the identities of individual HRDs, also on other intersecting dimensions (such as age, etc.),</p>
<p><b>Effectiveness:</b> describes the achievements towards expected outcomes and key outputs from this grant portfolio or whether they are expected to be achieved in the future.</p>		
<p><u>Finding 11:</u> The supported interventions have comprehensively strengthened the capacities of HRDs, communities and local human rights groups to assess and analyse human rights issues and advocate for their rights. Important results were also achieved in the protection of HRDs.</p>	<p><u>Conclusion 3:</u> A vast range of results were reported at multiple levels to strengthen human rights systems and enhance local representation in advocacy. Enabling factors included capacity strengthening of local actors and support to their security and protection, whereas the technical support of INGOs could help in national and international level advocacy and in providing access to duty-bearers. Another important enabling factor was investing in strengthening the evidence base and ensuring that internal systems for sub-granting, learning, and communications were sufficient.</p>	<p>Recommendation 1 (and sub-recommendations)</p>
<p><u>Finding 12:</u> The supported interventions have clearly contributed to strengthened interaction and dialogue among government duty-bearers, companies, and international-level actors with HRDs and CSOs on human rights. In some cases, this has already led to concrete policy-level changes. Extensive documentation of cases, research, special reports and other publications was critical for advocacy at all levels.</p>		
<p><u>Finding 13:</u> The MFA support has enabled strategic organisational strengthening and impact orientation of INGOs and their partners. This movement strengthening contributes to the longer-term sustainability of their human rights work.</p>		
<p><u>Finding 14:</u> Linkages between local-level work and international-level advocacy were observed in all interventions. However, the structure and governance of such partnerships varied.</p>	<p>Conclusion 1 (see above)</p>	<p>Recommendation 2 (see above).</p>

FINDINGS	CONCLUSIONS	RECOMMENDATIONS
<p><u>Finding 15:</u> The MFA’s support to international human rights INGOs was most effective when it combined policy alignment with flexible funding, clear localisation-oriented partnerships, and active policy dialogue. This enabled INGOs to link local human rights action with international mechanisms and safeguard civic space. The portfolio’s greatest added value lies in movement strengthening and reinforcement of the global human rights system, with close interlinkages between the different thematic areas of the call.</p>	<p><u>Conclusion 5:</u> Finland’s current positioning and strong reputation for protecting human rights – and for supporting an effective international system that can uphold and implement these based on local lived realities – aligns well with this grants portfolio. To sustain this, it is advisable to optimize both the strategic orientation and internal use of this INGO human rights support going forward. (Also conclusion 2, 4 - see above)</p>	<p>Recommendation 1 (and sub-recommendations)</p>

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## Annex 5 – Evaluation matrix

Main Review Questions	Review Sub-Questions	Data Sources	Assessment criteria	Notes for the Analysis
<p><b>RELEVANCE</b> : the extent to which the objectives of the supported initiatives are consistent with rights holders' requirements, as well as and Finland's foreign and security policy, with a specific focus on development and human rights priorities as defined in the Call for Applications.</p>				
<p>RQ1: How relevant have the interventions been in terms of addressing <b>in-country, regional and international</b> human rights priorities?</p>	<p>NA</p>	<p><b>Secondary data:</b></p> <ul style="list-style-type: none"> <li>• Programme documentations &amp; reports</li> <li>• Existing monitoring &amp; evaluation data where applicable</li> </ul> <p><b>Primary data:</b></p> <ul style="list-style-type: none"> <li>• Interviews with INGOs (3-5 representatives) with an emphasis on in-country representatives and members/partner organisations receiving sub-grants (if applicable)</li> </ul>	<ul style="list-style-type: none"> <li>• Level of alignment with national, regional and international human rights commitments</li> <li>• Level of inputs into normative policy dialogue at different levels</li> <li>• Degree to which rights-holders have been facilitated to participate and share their testimonials</li> </ul>	<p>The main point of analysis will be at the macro and policy level.</p>
<p>RQ2: How well have the supported activities contributed to the work and support the <b>policy goals of the Ministry</b>, in terms of both development policy and human rights policy?</p>	<p>RSQ2.1: What is the <b>additional value</b> of the work of the INGO support, and how well does it complement other types of development instruments of the Ministry?</p> <p>RSQ2.2: Are INGOs perceived as <b>strategic partners</b> to the Ministry in terms of policy goals and what have been the strengths and weaknesses of cooperation in this regard?</p>	<p><b>Primary data:</b></p> <ul style="list-style-type: none"> <li>• KIIs with MFA personnel at different levels of operation (Human Rights Policy Unit, Civil Society Unit, missions, 2-3 embassies)</li> </ul> <p><b>Workshopping:</b></p> <ul style="list-style-type: none"> <li>• Additional feedback during in-person meeting to workshop preliminary findings with MFA staff</li> </ul>	<ul style="list-style-type: none"> <li>• Level of awareness and use of INGO activities and knowledge products by MFA staff,</li> <li>• Frequency/occurrence of regular interaction and dialogue between INGOs and MFA on human rights policy issues</li> <li>• Degree of perceived value added of INGOs by MFA personnel operating at different levels and different contexts, including with the Human Rights Council and in other multilateral policy fora</li> <li>• Level of perceived complementarity between INGO support and MFA's other CSO support.</li> </ul>	<p>Where possible, the main indicators used by the INGOs will be compared to those used by the Ministry (in policy TOCs), and/or with SDG indicator tracking and alignment.</p>

Main Review Questions	Review Sub-Questions	Data Sources	Assessment criteria	Notes for the Analysis
RQ3: How well has the promotion of <b>human rights and gender equality, non-discrimination</b> been integrated into programme design and implementation?	NA	<b>Secondary data:</b> <ul style="list-style-type: none"> <li>• Programme documentations &amp; reports</li> <li>• MFA Quality Assurance Group memos</li> <li>• Existing monitoring &amp; evaluation data, where applicable</li> </ul>	<ul style="list-style-type: none"> <li>• Degree to which programme documentation and reporting include information on gender aspects (including gender disaggregated data) and non-discrimination issues</li> <li>• Degree to which this is reflected also in sub-granting arrangements and focus of activities of members</li> </ul>	<ul style="list-style-type: none"> <li>• Main point of analysis will be at the institutional (meso) level using available literature. This can be complemented during interviews with sub-grantees or members if information is lacking in the main reporting.</li> </ul>
<b>EFFECTIVENESS:</b> describes the achievements towards expected outcomes and key outputs from this grant portfolio or whether they are expected to be achieved in the future.				
RQ4: What have been <b>the overall results</b> in contributing to the better realisation of human rights from Finland's support to the INGOs? Consider rights-holders, duty-bearers and institutional dimensions.	RSQ4.1: What results stand out as the <b>most notable or sustainable</b> and what factors have contributed to this?	<b>Secondary data:</b> <ul style="list-style-type: none"> <li>• Programme documentations &amp; reports</li> <li>• Existing monitoring &amp; evaluation data</li> </ul> <b>Primary data:</b> <ul style="list-style-type: none"> <li>• Interviews with INGOs (3-5 representatives) with a focus on programme managers and INGO leadership (Director of programming, Executive Director etc.)</li> </ul>	<ul style="list-style-type: none"> <li>• Degree to which achievements have been reported on against project proposals or annual plans of INGOs</li> <li>• Degree to which results achievement varies based on geographical focus, context, implementation and funding modality, level of operation and per type of beneficiary group etc.</li> <li>• Extent to which good practices can be extracted as examples for learning and possible replication going forward.</li> </ul>	<ul style="list-style-type: none"> <li>• Results will be logged based on a number of variables (see methods section) in an Excel file to allow for filtering of results and see patterns across the portfolio.</li> <li>• Differentiation of results affecting rights-holders, duty-bearers and institutional dimensions will be undertaken.</li> </ul>
RQ5: To what degree are efforts conducted <b>jointly with other actors</b> for increased coherence and greater synergies?	NA	<b>Secondary data:</b> <ul style="list-style-type: none"> <li>• Programme documentations &amp; reports</li> <li>• Existing monitoring &amp; evaluation data</li> </ul> <b>Primary data:</b> <ul style="list-style-type: none"> <li>• Interviews with INGOs (3-5 representatives) with a focus on programme managers</li> </ul>	<ul style="list-style-type: none"> <li>• Extent to which there are examples of collaboration or information exchange among Finnish-funded INGOs working on similar/complementary human rights issues,</li> <li>• Extent to which INGOs participate in coalitions and degree to which they play a role in movement</li> </ul>	<ul style="list-style-type: none"> <li>• Several examples were noted during the inception phase where INGOs reported collaborating with others receiving MFA funding. The extent to which MFA played a brokering role in this, or how partnerships created synergetic effects, will be</li> </ul>

Main Review Questions	Review Sub-Questions	Data Sources	Assessment criteria	Notes for the Analysis
		<p>and INGO leadership (Director of programming, Executive Director etc.)</p> <ul style="list-style-type: none"> <li>• Validation through cross-checking among INGOs who report that they have undertaken joint activities or advocacy</li> <li>• Interviews with MFA personnel on potential donor coordination in core support to INGOs</li> </ul>	<p>strengthening, involving also local actors,</p> <ul style="list-style-type: none"> <li>• Examples of donor coordination or exchange on INGO support and added value (if applicable)</li> </ul>	<p>further looked into in the analysis.</p> <ul style="list-style-type: none"> <li>• All INGOs being active in various global and multi-level advocacy coalitions, the analysis will seek to highlight their role in such joint efforts and the degree to which Finnish funding contributed to strengthening the international human rights advocacy movement in alignment with Finnish policy and the international normative framework for human rights.</li> </ul>
<p>RQ6: How well-functioning and coherent is the <b>interplay between local/national, regional and global levels</b>, and how well have the member organisations/coalition structures benefited from the interventions?</p>	<p>RSQ6.1: Organizations are expected to have experience of advocacy at international human rights fora; what have been the benefits of this in terms of <b>international advocacy efforts and information sharing with the MFA</b>?</p>	<p><b>Primary data:</b></p> <ul style="list-style-type: none"> <li>• Interviews with INGOs (3-5 representatives) with a focus on programme managers and INGO leadership (Director of programming, Executive Director etc.)</li> <li>• Interviews with MFA personnel at different levels of operation</li> </ul> <p><b>Workshopping:</b></p> <ul style="list-style-type: none"> <li>• Additional feedback during in-person meeting to workshop preliminary findings with MFA staff</li> </ul>	<ul style="list-style-type: none"> <li>• Level of interaction between different levels of intervention</li> <li>• Degree to which information sharing has taken place with the MFA at different levels of operation, and whether such information sharing initiatives have been systematic and coordinated</li> <li>• Factors facilitating or hindering such interactions across levels of operation and with the MFA</li> </ul>	<ul style="list-style-type: none"> <li>• A first review of the literature generated few concrete examples of how the interplay between different levels of operation occurs and will therefore have to be looked into during KIIs with INGOs.</li> <li>• Similarly, the review team came across few examples or references to information exchange between the INGOs and the MFA. The analysis will therefore rely primarily on primary data gathering which can be further workshopped with MFA staff to explore factors hindering or enabling such interactions.</li> </ul>

Main Review Questions	Review Sub-Questions	Data Sources	Assessment criteria	Notes for the Analysis
<p>RQ7: To what degree have <b>human rights defenders and representatives of marginalised groups</b> been active participants in the work for the purpose of effective advocacy?</p>	<p>NA</p>	<p><b>Secondary data:</b></p> <ul style="list-style-type: none"> <li>• Programme documentations &amp; reports</li> <li>• Existing monitoring &amp; evaluation data</li> </ul> <p><b>Primary data:</b></p> <ul style="list-style-type: none"> <li>• Interviews with INGOs (3-5 representatives) with a focus on programme managers and INGO leadership</li> </ul>	<ul style="list-style-type: none"> <li>• Extent to which there has been participation of relevant rights-holder groups in advocacy or programme decision-making,</li> <li>• Strengths and weaknesses in ensuring participation of different rights-holder groups,</li> <li>• Degree to which their participation has strengthened advocacy efforts,</li> <li>• Degree to which Finnish funding contributed to such participation.</li> </ul>	<ul style="list-style-type: none"> <li>• This will be logged and across all significant results.</li> </ul>
<p>RQ8: What are the <b>good practices and areas of strength</b> in terms of effecting change in the <b>grant portfolio overall</b>?</p>	<p>RSQ8.1: How could such change be <b>further supported in the future</b>? What are the main learnings?</p>	<p><b>Secondary data:</b></p> <ul style="list-style-type: none"> <li>• Programme documentations &amp; reports</li> <li>• Existing monitoring &amp; evaluation data, including case study reports</li> </ul> <p><b>Primary data:</b></p> <ul style="list-style-type: none"> <li>• Interviews with INGOs (3-5 representatives) with a focus on programme managers and INGO leadership</li> </ul> <p><b>Workshopping:</b></p> <ul style="list-style-type: none"> <li>• A facilitated discussion (based on review findings) on areas of strength and good practices can be further enhanced in the future with MFA staff</li> </ul>	<ul style="list-style-type: none"> <li>• Degree to which assumptions laid out in the ToC for this review are true, and under what conditions/in what contexts this is the case,</li> <li>• Degree to which alternative pathways of change are more effective, and the extent to which a redrawn/further elaborated ToC for the MFA INGO portfolio could help illustrate this.</li> </ul>	<ul style="list-style-type: none"> <li>• Pattern analysis across results logged across the 11 INGOs and based on emerging themes during KIIs.</li> <li>• Of particular interest will be whether perceived good practices vary depending on theme, funding modality or level of engagement across INGOs and between INGOs and MFA staff.</li> </ul>

