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## Acronyms

<table>
<thead>
<tr>
<th>AB</th>
<th>Advisory Board</th>
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<tbody>
<tr>
<td>CBPF</td>
<td>Country Based Pooled Fund</td>
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<tr>
<td>GA</td>
<td>Grant Agreement</td>
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<tr>
<td>GCA</td>
<td>Government Controlled Areas</td>
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<tr>
<td>GMS</td>
<td>Grant Management System</td>
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<td>HC</td>
<td>Humanitarian Coordinator</td>
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<tr>
<td>HCT</td>
<td>Humanitarian Country Team</td>
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<td>HFU</td>
<td>Humanitarian Financing Unit</td>
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<tr>
<td>HQ</td>
<td>Headquarters</td>
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<tr>
<td>HRP</td>
<td>Humanitarian Response Plan</td>
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<tr>
<td>ICCG</td>
<td>Inter-Cluster Coordination Group</td>
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<tr>
<td>IP</td>
<td>Implementing Partner</td>
</tr>
<tr>
<td>M&amp;E</td>
<td>Monitoring and Evaluation</td>
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<tr>
<td>M&amp;R</td>
<td>Monitoring and Reporting</td>
</tr>
<tr>
<td>MOU</td>
<td>Memorandum of Understanding</td>
</tr>
<tr>
<td>NCE</td>
<td>No-Cost Extension</td>
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<tr>
<td>NGCA</td>
<td>Non-Government Controlled Areas</td>
</tr>
<tr>
<td>NGO</td>
<td>Non-Governmental Organization</td>
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<td>OCHA</td>
<td>Office for the Coordination of Humanitarian Affairs</td>
</tr>
<tr>
<td>PP</td>
<td>Project Proposal</td>
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<tr>
<td>RC</td>
<td>Review Committee</td>
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<td>TOR</td>
<td>Terms of Reference</td>
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<tr>
<td>UHF</td>
<td>Ukraine Humanitarian Fund</td>
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<td>UN</td>
<td>United Nations</td>
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1 Introduction

1.1 Purpose
Under the direction of the Humanitarian Coordinator (HC), the Ukraine Humanitarian Fund (UHF) aims to support the timely allocation and disbursement of donor resources to the most critical humanitarian needs as defined by the Ukraine Humanitarian Response Plan (HRP) or a similar joint response plan supported by inter-agency/cluster coordination mechanisms in the country.

The purpose of the Operational Manual for the UHF is to describe the governance arrangements, allocation modalities and priorities, and accountability mechanisms of the Fund, as well as to detail the roles and responsibilities of the stakeholders involved. The Manual is issued by the HC and endorsed by the Advisory Board to:

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

The Manual seeks to guide implementing partners and to facilitate the role of the United Nations (UN) Office for the Coordination of Humanitarian Affairs (OCHA), members of the Review Committees, and sectoral experts. This Manual shall be updated on an annual basis, or more frequently if needed.

1.2 Scope

This Manual should be read in conjunction with the Operational Handbook for Country-Based Pooled Funds (CBPFs), which describes the global set of rules that apply to all CBPFs worldwide. The present document builds on this Handbook by defining the country-specific regulations that govern the UHF and is designed within the framework provided by the Operational Handbook for CBPFs, adapting specific aspects of the global regulations to the context of humanitarian response of Ukraine.

Adherence to the guidance provided in these two documents is mandatory so as to ensure standard and transparent processes.
2 Objectives of the Ukraine Humanitarian Fund

Globally CBPFs have three main objectives:

- To improve humanitarian response by increasing the extent to which funding is allocated to priority humanitarian needs through an inclusive and coordinated process at the field level.
- To strengthen the leadership of the HC.
- To contribute to the delivery of the Humanitarian Response Plan (HRP) within the context of the Humanitarian Program Cycle (HPC) and/or other joint strategic planning endeavors, for example Inter-Agency Contingency Plan or joint annual winterization operational response strategy.

CBPF aims to ensure that humanitarian needs are addressed in a collaborative manner, fostering cooperation and coordination within and between clusters and humanitarian organizations. As such, the UHF contributes to improving needs assessments, enhancing the HRP\(^1\) as the strategic planning document for humanitarian action, strengthening coordination mechanisms (and particularly the cluster system), and improving accountability through an enhanced monitoring and reporting framework. The Fund will facilitate an agile humanitarian response, which can respond to changing access conditions and allow the most critical needs to be met.

Within the above, the Humanitarian Coordinator’s decision to establish the UHF was underpinned by the commitment on the Grand Bargain and the challenging funding landscape in Ukraine, due to the protracted nature of the conflict (which however remains an active one) and the particularly difficult funding environment for NGOs which are struggling to access funding despite the added value they bring to the response.

It is foreseen that in the coming 12 months the Fund will provide humanitarian assistance to people affected by the conflict where the needs are most acute. The UHF will also support the localization agenda by empowering local responders and providing funding to NGOs, while supporting the highest-priority projects of the best placed responders.

The UHF will ensure that it supports the prioritization process that is undertaken in the development of the Ukraine HRP, although Allocations may point to further prioritization within this broader framework. The prioritization of needs supported by the UHF is in accordance with the Humanitarian Needs Overview, and as such is revised annually. For each allocation, the UHF will issue an allocation paper further specifying the needs and locations prioritized and agreed by the Advisory Board, with technical support of the Inter-Cluster Coordination Group (ICCG).

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All interventions supported by the UHF are to be consistent with basic humanitarian principles of humanity, neutrality, impartiality and independence.

3 Governance

3.1 Humanitarian Coordinator

The Humanitarian Coordinator leads the overall management and oversight of the Ukraine Humanitarian Fund (UHF) as detailed in the Operational Handbook for CBPFs, supported by the OCHA Head of Office and the OCHA Humanitarian Financing Unit (HFU), and as advised by the Advisory Board.

3.2 Advisory Board

The Advisory Board (AB) is a governance body with an advisory function that supports the HC to steer the strategy and oversees the performance of the UHF. The final decision-making authority rests entirely with the HC, who is the chair of the AB. The functions of the AB are defined in detail in the Operational Handbook for CBPFs. The Humanitarian Financing Unit (HFU) serves as the secretariat to the AB and provides the Board with regular and timely updates on the management of the Fund.

The AB meets quarterly according to an arranged schedule, with ad hoc meetings as required. Board members make a commitment to attend all meetings and to be fully engaged in all tasks required by the AB. These meetings cover a range of the above tasks, including but not limited to endorsing budgets for the HFU, reviewing the Operational Manual, providing input on allocation priorities, or to discuss changes to the humanitarian context. A higher frequency and/or ad hoc meetings may be requested by the HC – for example when the AB is required to support or review complex allocation decisions, or to meet as the Advisory Board with visiting officials and missions.

If the full membership of the AB is not present during a meeting of the AB, a quorum shall be considered reached with seven members in attendance, including at a minimum, the HC or OCHA, and at least one donor, one UN agency, one NGO.

The composition of the AB is determined based on consultations between the HC, the Humanitarian Country Team (HCT), and contributing donors. Board members serve as technical or strategic experts from their constituencies or stakeholder groups and do not represent the interests of their organizations or broader constituencies. It ensures equitable representation of the key stakeholders to the Fund (Donors, UN agencies, NGOs and OCHA). The AB will consist of:

i. Humanitarian Coordinator (Chair)
ii. OCHA Head of Office (as Custodian of the Fund, non-rotating)
iii. Two representatives of contributing donors (rotating)
iv. Two representatives of UN Agencies (rotating)
v. One representatives of the international NGO community (rotating)
vi. One representative of the national NGO community (rotating)
vii. OCHA Pooled Fund Manager (as AB secretariat, non-rotating)
viii. One representative of a non-contributing donor (as Observer, rotating)

AB membership should rotate on a regular basis. The HC and the OCHA Head of Office are the only permanent members. AB members must be at the senior leadership level (head of agency, etc.). To ensure continuity, the replacement of AB members should be staggered, as is feasible. The HC will review the composition of the Advisory Board after the first year of operation.

3.3 Review Committee
The Review Committee is responsible for the strategic and technical review of the project proposals received by the CBPF.

The functions and composition of the Review Committee is defined in detail below, in line with the Operational Handbook for CBPFs. Funding allocations pass through two types of project review: a strategic review—a first screening of project proposals in relation to the allocation paper determined by the HC and the AB and/or in relation to the Fund scope and objectives as outlined in the Operational Manual, and a technical and financial review—which assesses the technical soundness and quality of project proposals, including budget issues.

1. Review Committee will bring together Cluster Coordinators (ICCG) and one additional member from each Cluster (nominated by the active members of the Cluster) so that there is an equitable representation of UN agencies and NGOs in the ICCG Review Committee. This will also ensure that the committee has a broad knowledge of the Ukraine humanitarian context and different sectoral areas.

2. All of the members of the Review Committee will jointly conduct the strategic review of projects. Only members from relevant clusters will conduct the technical review of projects within their cluster. OCHA Finance will also review the budget during the technical review state.

3. The strategic review will assess the relevance and soundness of the projects using a scorecard developed by the Review Committee. This process will be done jointly.

4. The technical review will assess the technical soundness and quality of project proposals. It will be done on line through the GMS and will be done by the Cluster Coordinator and the representative from the same cluster. OCHA HQ Finance will also review the budget during the technical review, and comments will be provided to partners, but projects will not be scored again.

5. Committee members should excuse themselves from the review of projects, and decisions on projects submitted by their own organizations.

6. At all times, the OCHA Humanitarian Finance Unit will take part in decision making, and support committees in discharging their functions.
4 Allocation modalities

4.1 Eligibility

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

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

UN eligibility: To become eligible for funding from the UHF, United Nations agencies must fill out the Registration Form on the Grants Management System of the Fund (http://cbpf.unocha.org/). UN agencies are required to provide names and contact information for the focal point(s) and the legal representative of the organization, address of main office, and bank information. Once the registration and due diligence form is duly filled out and is submitted, OCHA will proceed with its review and approval. Approval of the registration form by OCHA determines the eligibility of the UN agency.

NGO and Red Cross/Red Crescent eligibility:

OCHA will carry out a due diligence process and an assessment of the capacity of potential NGO implementing partners. The outcomes of the due diligence and capacity assessment processes will determine the partner’s eligibility, and the risk level of the partners considered eligible. The risk rating will in turn influence the control mechanisms (Operational Modalities) that apply to the management of the partner’s grants, as described in the Operational Handbook for CBPFs. The process for due diligence is described in detail in the Operational Handbook for CBPFs. To ensure that the first allocation of the UHF is done as soon as possible, the HC and advisory board may determine a maximum number of partners that will be assessed as part of the first round of capacity assessments. The identification of partners to be assessed will be based on a set of transparent and objective operational criteria thereby reducing the number of partners to assess and the time taken to move to the allocation process. After the first allocation, further rounds of capacity assessments will be conducted.

4.2 Allocation criteria:

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

i. Partner eligibility and capacity: verified through a due diligence and capacity assessment process with valid registration certificate from Ukraine

ii. Access: accessibility and/or physical presence to areas of operation; the location of the project is clearly identified

iii. Strategic relevance: clear linkage to the strategic and sectoral objectives of the Humanitarian Response Plan, compliance with the terms of the allocation strategy as described in the allocation paper, and
alignment of activities with areas of special focus of the Fund.

iv. Needs-based: the needs are well explained and documented and beneficiaries are clearly described

v. Appropriateness: the activities are adequate to respond to the identified needs

vi. Technical soundness and cost effectiveness: the proposal meets technical requirements to implement the planned activities; and the budget is fair, proportionate in relation to the context, and adequate to achieve the stated objectives

vii. Risk management: assumptions and risks are comprehensively and clearly spelled out, along with risk management strategies

viii. Monitoring: a realistic monitoring and reporting strategy is developed in the proposal

4.3 Grant Duration

Implementation of projects funded by the Ukraine CBPF should not exceed twelve (12) months from the project start date as indicated in the final approved project documents. Project pre-financing will be limited only to the budgeted costs (of the approved project proposal) incurred in the interim period between the Project’s approval start date (first possible start date is the date when the HC and the Partner have both signed the Grant Agreement) and the date of actual cash disbursement to the recipient project.

If necessary, implementing partners can request project revisions and/or no-cost extension to re-program and/or extend the duration of the grant. Requests must be made no less than one month prior to the project end date.

4.4 Allocation Types

The UHF has two modalities to allocate funds: 1) Standard Allocation and 2) Reserve Allocation. The HC, in consultation with the AB, determines the appropriate use of the two modalities given the context. Both allocation modalities must be based on the HRP or comparable coordinated response strategies developed by the ICCG and approved by the HC to ensure the strategic use of funds.

The CBPF Global Guidelines provide a detailed guide to the use of both the allocation modalities and a summary is provided below with an optimal timeline for their use in the context of Ukraine. The steps and their sequence are mandatory and must also adhere to the five global CBPF principles of inclusiveness, flexibility, timeliness, efficiency and accountability by which performance of the Funds is measured.

4.4.1 Standard Allocation

The most common use of the Standard Allocation in Ukraine is to support targeted priorities within the Ukraine HRP, though the HC in consultation with the AB may decide to use it to fund other response plans endorsed by the Humanitarian Country Team (HCT). The allocation process is led by the HFU, informed by the AB, and conducted in
close consultation with clusters and humanitarian partners to ensure the best possible use of resources. The process contains the following mandatory steps and transparency is ensured throughout.

**Step 1: Allocation strategy development**

The HC defines the allocation priorities and financial envelope, in consultation with the Advisory Board and supported by the HFU. The HC consults the AB and ICCG to establish a process that produces credible, unbiased information to develop an allocation strategy. This process results in an allocation paper which summarizes the analysis, strategy and intent of the standard allocation. The strategic focus of the allocation paper should be as precise as possible to allow for effective prioritization and development of cluster envelopes.

The allocation paper includes information on:

- How the allocation fits into the humanitarian context
- Allocation strategy, related priorities and timeline
- Total amount to be allocated (detailed by priority/cluster/sector/region)
- Criteria for project prioritization (reflected in a prioritization matrix or “scorecard”).

The draft produced by HFU is reviewed by the ICCG and presented by the HC to the AB for inputs. The HFU collects inputs and finalizes the strategy.

**Step 2: Submission of project proposals**

Eligible partners prepare project submissions that address the priorities outlined in the allocation paper. Project proposals are submitted for consideration by the Fund through the GMS. Partners are encouraged to consult with the HFU and clusters during the development of proposals.

**Step 3: Strategic review**

Strategic review aims to identify and prioritize project proposals best suited to address needs identified in the allocation paper. The pre-selection of projects is intended to stimulate efficiency and allow for a rapid process that correctly targets identified needs. The strategic review stage applies to all standard allocations.

The strategic review is carried out on the basis of criteria outlined in a prioritization scorecard on the GMS. Scores are recorded in each of the following key areas: (i) strategic relevance, (ii) programmatic relevance, (iii) cost effectiveness, (iv) management and monitoring, and (v) engagement with coordination. The HFU plays an active role in providing oversight and support to clusters in conducting strategic reviews.

**Step 4: AB feedback and preliminary approval by the HC**

A project shortlist is shared by the HFU with the HC and AB to allow them to raise critical concerns, questions, or alerts concerning risks and provide feedback. Whilst the HC and AB are reviewing the list of projects and partners,
the technical and financial review can commence. However, no project can be approved at technical review stage until feedback on the strategic review and endorsement for the project is received from the HC and AB.

**Step 5: Technical and financial review**

The objective of the technical review process is to ensure that proposals are of the highest possible quality before final approval by the HC. The review committee members only review projects related to their cluster, and this is done on-line separately by the different clusters. The review is done by the relevant cluster coordinator and the other representative from each cluster on the review committee, and it reviews project proposals according to their technical merit and the appropriateness of budget provisions. Sufficient time and effort must be dedicated to ensure that substandard projects are improved or rejected.

The technical review stage also includes financial review by OCHA Finance (OCHA HFU and OCHA HQ Finance Unit). The financial review is part of the technical review, so that programmatic and financial feedback can be compiled by the HFU and shared with the applicant jointly.

The technical review process involves two-way communication between the review committee and the proposing organization. Partners will be able to re-submit project proposals at the most two times upon receiving written comments through the technical review process. If not feasible to arrange a meeting to conduct the technical review, other options may be considered as long as the quality of the process is maintained.

The technical review is conducted in the GMS which allows for tracking of the process until final technical clearance.

**Step 6: Final approval by HC**

If the technical review recommends a project, the HC will officially approve it. The HFU will facilitate the finalization of the contractual arrangements and the AB is informed that the project has been approved. Upon signature by the HC, the HFU sends the agreement to the partner for counter-signature. Once countersigned, the agreement will be sent to OCHA FCS Finance and Administration Unit for the final signature. Expenditure and obligations are eligible from the date of counter signature by the partner.

**Step 7: Disbursement**

Following the signature of the grant agreement by all parties (the last signatory being the holder of the delegation of authority in OCHA Headquarters), funds are disbursed within 10 working days.

**4.4.2 Reserve Allocation**

The Reserve Allocation in Ukraine can be used to support humanitarian response projects for unplanned or rapid onset emergencies that are not included in the HRP. When this modality is used for unplanned emergencies, allocation strategies must be based on response or contingency plans endorsed by the HC. As with the Standard Allocation, the process is led by the HFU and informed by clusters and humanitarian partners to ensure the best possible use of resources. The HC should inform the AB of the intention to launch a Reserve Allocation either through an emergency meeting of the AB or via email.
The Reserve Allocation process contains less mandatory steps than the Standard Allocation (see below) and emphasis is based on timeliness and efficiency rather than broad partner participation. As such the strategy development, technical and financial review phases are shortened with no need for an independent Strategic Review. Additionally, clusters can, with the approval of the HC, select a shortlist of partners for the allocation based on a set of transparent and objective operational criteria rather than opening the allocation to all, thereby greatly reducing the time taken to review and process the allocation.

**Step 1: Allocation strategy development**

The HC will define the allocation priorities and financial envelope based on priorities outlined in a response plan developed by relevant clusters or the ICCG. The response plan provides an analysis to support the rapid development of an allocation strategy. The allocation paper includes information on:

- How the allocation fits into the response plan
- Allocation strategy, related priorities and timeline
- Total amount to be allocated (detailed by priority/cluster/sector/region)
- Criteria for project and partner prioritization (reflected in a prioritization matrix or “scorecard”).

The draft produced by HFU is shared by the HC with the AB for inputs. HFU collects inputs and finalizes the strategy.

**Step 2: Submission of project proposals**

Identified partners prepare project submissions that address the priorities outlined in the allocation paper. Project proposals are submitted for technical review through the GMS.

**Step 3: Strategic/technical and financial review**

The review committee reviews project proposals according to their technical merit and the appropriateness of budget provisions. The review committees must develop their own criteria including strategic components. The technical review stage also includes financial review by OCHA Finance (HFU and CBPFS).

**Step 4: Final approval by HC**

Once the technical review recommends a project, the HC will officially approve it. Upon signature by the HC, the HFU sends the agreement to the partner for counter-signature. Once countersigned, the agreement will be sent to OCHA FCS Finance and Administration Unit for the final signature. Expenditure and obligations are eligible from the date of counter signature by the partner.

**Step 5: Disbursement**

Following the signature of the grant agreement by all parties (the last signatory being the holder of the delegation of authority in OCHA Headquarters), funds are disbursed within 10 working days.
5 Accountability

Accountability is the foundation of effective management of the UHF. It is exercised through a set of different components enabling the HC to ensure that: 1) implementing partners are delivering intended programmatic results; 2) the UHF is managed responsibly and according to established guidelines; and, ultimately, 3) the UHF is achieving its main objectives.

The accountability framework provides an overview of the four pillars around which accountability of the UHF is structured: risk management; monitoring and reporting; capacity assessment and performance management; and auditing. The objective is to manage risk and verify performance in line with the UHF strategy and approved project plans. The accountability framework is annexed to this manual, with a summary of components listed below.

5.1 Risk Management

The management of the UHF uses a risk-based approach to ensure that a thorough analysis of risks is undertaken and that adequate assurance modalities are identified to mitigate these risks. Risks will be analysed at the level of the partner by undertaking due diligence activities and a comprehensive capacity assessment, as well as at the level of the CBPFs locally and globally.

Fund Level Risk Management
A number of strategic, programmatic, financial and management risks are inherent as part of the administration of the UHF. The fund-level risk analysis and management based on OCHA’s Global Guidelines for Risk Management, is designed to assist the HC in making strategic decisions to mitigate the risks faced by the UHF and enable the Fund to achieve its objectives.

The UHF Risk Management Framework, a comprehensive risk analysis matrix developed by the AB, is annexed to this manual.

5.2 Risk-based grant management

NGOs interested in applying for funding under the UHF must undergo a capacity assessment process to become eligible as partners. The main aim of this assessment is to ensure that the HFU possesses basic information about the NGO and necessary information regarding their capacities.

The capacity assessment methodology includes a desk review of the documentation received from the organization and visits to the organization’s main office where interviews will be conducted with staff members, financial and organizational systems verified, and additional documents requested. The capacity assessment determines whether an NGO has enough institutional, managerial, financial and technical capacity to be considered for funding. Organizations are categorized according to a specific risk level. The principle is that the higher the risk, the more stringent assurance mechanisms will apply. The system encourages improvements in capacity as partners can migrate to lower risk levels through good performance (see PI below) and by addressing capacity weaknesses.
The procedures that will be utilized to assess the capacity of implementing partners in the context of the UHF are described under 4.2.

**Partner Risk Rating and Operational Modalities**

Based on the score obtained during the capacity assessment, eligible partners will be categorized in three risk-level categories (low, medium and high). The resulting risk level, along with the duration and budget of the project, will determine the eligibility thresholds and control mechanisms that are applicable as defined in the Fund’s Operational Modalities. These include funding ceiling and disbursement modalities, frequency of narrative and financial reporting, and requirements for field monitoring visits and financial spot checks.

**Operational Modalities**

<table>
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<tr>
<th>Risk level</th>
<th>Project duration (months)</th>
<th>Project value (thousand USD)</th>
<th>Max amount per project (thousand USD)</th>
<th>Disbursements (in % of total)</th>
<th>Financial reporting</th>
<th>Narrative reporting</th>
<th>Monitoring</th>
<th>Audit</th>
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<tr>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>For disbursements 31-Jan Final</td>
<td>Progres s Fin al</td>
<td>Project monitorin g</td>
<td>Financia l spot-check As per plan</td>
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* Three progress reports are only required for projects of 10 months or more.
** Additional field visits are only required for projects of 10 months or more.
*** Monitoring arrangements for projects implemented by UN agencies will be determined at the country level according to specific agreements outlined by the HC and the AB. Monitoring of UN agency projects is mandatory and should be based on a sampling methodology considering country-specific factors as required (see 4.5 Monitoring).
**Partner Performance Index**

The PI tool, introduced in 2017, is a key part of the CBPF accountability framework, for it allows OCHA to aggregate an updated rating of partner performance. A systematic evaluation of partner performance in their project implementation will be used alongside the original capacity assessment results to determine and adjust as necessary partner risk levels.

The PI tool scores the performance of partners from project submission to closure. During project implementation, the following categories of partner performance are tracked and scored: i) quality and timeliness of submissions of project documents (proposals, budget and concept notes); ii) quality and timeliness of implementation against approved targets; iii) quality and timeliness of reporting; iv) frequency, timeliness and justification of project revision requests; v) quality of financial management; and vi) audit findings.

To reward sound project implementation, the score from PI will progressively be given more weight and the capacity assessment score will become less significant as partners implement more projects. The partners’ scores on the most recent projects will be considered most important and given the most weight in calculating the overall risk rating. The calculation and relative weighting of project scores and the original capacity assessment is explained in Annex 10.4 of the CBPF Global Guidelines, Performance Index Tool. The scoring and weighting are standardized across funds and calculated by the GMS.

If a partner performs poorly consistently and its risk rating score moves from high risk to the threshold of ineligibility, it will be rendered ineligible based on poor performance. Ineligible partners can re-apply for capacity assessment one year after being rendered ineligible, if they can demonstrate that the elements that caused the poor performance have been addressed.

UN Agency projects must also be scored for performance in all areas with the exception of financial spot check and audit. The PI score can be used to inform future funding decisions and frequency of monitoring. The monitoring mechanism can be tailored to the type of project such as stakeholder satisfaction survey for pipeline projects.

### 5.3 Monitoring

As part of the Fund’s accountability framework, a **UHF Monitoring and Reporting Framework** will be developed. It will define the Fund’s monitoring strategy and clarifies its objectives, processes, approaches and tools. The Monitoring and Reporting Framework ensures the Fund’s accountability to its donors and beneficiaries by evaluating partner performance through systematic feedback mechanisms. Results and observations from the completed monitoring missions, the review of partners’ narrative and financial reports, and audit findings all feed into the partners’ PI.

**Monitoring objectives**

The main objective of monitoring is to assess progress made towards the set activities, targets and indicators, as well as to verify the accuracy of reports submitted by partners. Building on this concept, the UHF has the following monitoring objectives:

1) Verify partner’s progress in delivering project outputs and activities (as per proposed log frame and work plan), the beneficiary targeting process, and the use of resources (as per budget).
2) Contribute to strengthen partners’ internal monitoring and reporting systems.
3) Assist partners to achieve quality and timely delivery of assistance through the sharing of monitoring findings in feedback sessions.

Identification of projects for monitoring

The UHF’s minimum monitoring arrangements for projects implemented by NGOs is determined as per the Fund’s Operational Modalities (see page 12), based on the risk level assigned to the partner, the duration of project implementation and the size of the project budget. For projects implemented by UN agencies, the monitoring modality applicable to low-risk NGO partners is applied.

Monitoring approaches

The UHF has adopted the following contextually relevant monitoring approaches based on factors including access and security.

1) Support and follow-up on IP-led internal monitoring
2) OCHA-led on-site monitoring
3) Financial spot check at the office of the IP

5.4 Reporting

All UHF-funded partners are required to report on their project implementation so as to ensure that activities carried out are on track to achieve or have achieved proposed project objectives. Narrative and financial reporting requirements for partners are determined according to the Operational Modalities (see page 12).

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

5.5 Audit

Audit of UN Organizations: UN Organizations are audited in accordance with their own financial rules and regulations and the framework for auditing multi-donor trust funds (agreed to by the Internal Audit Services of Participating UN Organizations and endorsed by the UN Development Group in September 2007).

Audits of NGOs: NGO-implemented projects will be audited in compliance with applicable financial regulations, rules and directives as per the OCHA CBPF Grant Agreements. The costs of such an exercise will be borne by OCHA from the donor contributions to the UHF. One or several external auditing companies will be contacted by OCHA to
deliver on the audit requirements of NGO partners. The HFU will keep a log of all audit findings to ensure that partners address previous findings on management weaknesses before applying for new UHF funding. The audit performance will feed into the partner Performance Index.

5.6 Complaint mechanism
Stakeholders with insufficiently addressed concerns or complaints regarding the UHF processes or decisions can at any point in time contact the OCHA Head of Office and or request information at feedback-UHF@un.org. Concerns and complaints will be compiled, reviewed and raised to the HC, who will then take a decision on necessary action(s). The HC will share with the AB any such concerns or complaints and actions taken thereof.

6  Administration of the UHF

6.1 Budget preparation principles
A clear segregation of duties underpins the preparation, review and clearance of the project budget. This is critical to preserve the country-driven nature of CBPFs and necessary to ensure central and internal controls to reduce the risk of approving erroneous or inappropriate project budgets (e.g. miscalculations, inconsistency or admission of ineligible costs). In this regard, fund managers in the field, certifying finance officers at headquarters, and partners have specific roles and responsibilities, as follows:

Fund managers are responsible to ensure that:

i  The principles of economy, efficiency, effectiveness, transparency and accountability are adhered to in the sense that the project budget inputs are commensurate with the planned activities and the expected outputs, more specifically, that the project budget is a correct, fair and reasonable reflection of the project proposal/logical framework

ii  The cost estimates are reasonable in the specific country context so that funding will be used in the most efficient way.

The role of certifying finance officers in headquarters is to:

i  Verify the budget’s factual correctness, checking coherence with the project proposal and logical framework.

ii  Flag concerns and seek clarification from fund managers on issues that may compromise compliance with UN rules and affect financial transparency and accountability.

In the budgeting process, partners are expected to:

i  Provide a correct and fair budget breakdown of planned costs that are necessary to implement activities and achieve the objectives of the project.

ii  Use and comply with the budget template (Annex 13 a and b of the Operational Handbook for CBPFs: Project Budget and Financial Reporting Tool)
iii Provide a budget narrative that clearly explains the object and the rationale of every budget line. For example, shared costs, expensive assets, and costs/equipment required to support the regular operation of the partner, are clear cases that require a budget narrative.

6.2 Eligible and Ineligible Costs

The following attributes define the nature of eligible costs:

i Must be necessary and reasonable for the delivery of the objectives of the project.

ii Must comply with the principles of sound financial management, in particular the principles of economy, efficiency, effectiveness, transparency and accountability.

iii Must be identifiable in the accounting records and backed by original supporting evidence as incurred in accordance with the approved project proposal and period.

These may include

i All staff costs (including salaries, social security contributions, medical insurance, hazard pay when applicable) and any other cost included as part of the salary benefits package of the organization. Salaries and costs may not exceed the costs normally borne by the partner in other projects.

ii Costs for consultancies involved in the implementation of the project.

iii Support staff costs at country-level directly related to the project.

iv Travel and subsistence costs directly linked to the project implementation for project staff, consultants, and other personnel that may also be eligible, provided the costs do not exceed those normally borne by the partner.

v A contribution to the partner’s Country Office costs, as shared costs charged on the basis of a well explained calculation and reasonable allocation system. Shared costs must be itemized.

vi The financial support to beneficiaries, including cash and voucher-based distribution.

vii Purchase costs for goods and services delivered to the beneficiaries of the project, including quality control, transport, storage and distribution costs.

viii Costs related to non-expendable items (assets) such as equipment, information and technology equipment for registration and similar field activities, medical equipment, water pumps and generators.

ix Expenditure incurred by the partner related to awarding contracts required for the implementation of the project, such as expenses for the tendering process.

x Costs incurred by sub-implementing partners, directly attributable to the implementation of the project.
xi Other costs derived directly from the requirements of the grant agreement such as monitoring, reporting, evaluation, dissemination of information, translation and insurance, including financial service costs (in particular bank fees for transfers).

Ineligible costs
i Costs not included in the approved budget (taking into consideration duly approved budget revisions).
ii Costs incurred outside the approved implementation period of the project (taking into consideration duly approved no-cost extensions).
iii Debts and provisions for possible future losses or debts.
iv Interest owed by the implementing partner to any third party.
v Items already financed from other sources.
vi Purchases of land or buildings.
vi Currency exchange losses.
viii Cessions and rebates by the implementing partner, contractors or staff of the implementing partner of part of declared costs for the project.
ix Government staff salaries.
x Hospitality expenses, provision of food/refreshments for project staff (not including water and hospitality for trainings, events and meeting directly related to project implementation).
xi Incentives, mark-ups, gifts to staff.
xi Fines and penalties.
xxiii Duties, charges, taxes (including VAT) recoverable by the implementing partner.
xxiv Global evaluation of programmes.
xxv Audit fees/system audit fees – these costs are paid directly by the fund.

Other Types of costs
On a case-by-case basis and depending on the objectives of the fund, the fund manager retains the flexibility to consider the following costs as eligible:

i Government staff training as a component of a project activity that contributes to the achievement of the overall project objectives.
ii Visibility material of the implementing partner directly related to projects funded by CBPFs.
iii International travel costs when directly linked to the delivery of the project objectives. When international travel costs are requested to support additional activities outside those of the project, such costs can only be considered if they are well justified and in the proportion attributable to the project.
iv Vehicles.

v Depreciation costs for non-expendable/durable equipment used for the project for which the cost is not funded in the current budget or prior CBPF funding.

vi Equipment for the regular operations of the implementing partner.

vii Recurrent costs for the implementing partner’s current operations.

For more detailed guidance on budget preparation including direct and indirect costs, shared costs and itemization of budget lines, please refer to page 41 of the Operational Handbook for CBPFs.

The use of the GMS is the pre-requisite for implementing the process described below. The GMS supports the full implementation of standard procedures and due diligence processes, it provides support throughout the entire project cycle management, it is the repository of necessary supporting project documents and it ensures timely and effective implementation of control mechanisms to manage and mitigate risks associated with the fund management.

6.3 Guidelines on requesting project changes

Changes in a project may be required due to various reasons and may have different consequences to the project’s scope, duration and budget. Variations of all forms must be brought to the fund manager’s attention in a time sensitive manner. The fund manager in consultation with cluster/sector coordinators will assess whether the proposed changes need formal written authorization, whether an amendment to the initial grant agreement is necessary or whether the breath of the proposed changes is such that the project needs to be terminated.

Depending on the nature of the revision, relevant GMS workflows will be activated by the HFU allowing partners to request the required amendments. Partners will need to seek approval for the proposed changes from the relevant Cluster Coordinator.

A signed Grant Agreement Amendment will be required in the following circumstances:

i Changes to the project budget exceeding the 15 per cent tolerance allowed for all categories except the “Staff and other Personnel Costs” category. Any variation in “Staff and other Personnel Costs” should be approved in writing by OCHA.

ii Addition of a new budget line, irrespective of whether it is below or over the 15 per cent tolerance allowed for each Budget Category

iii Change in duration of the project

iv Change of banking information relevant to the project

v Any other changes that have financial or legal implications and are part of the Grant Agreement

The following changes do not require a Grant Agreement Amendment and will be approved in GMS through the approval without GA amendment’ feature.

i Change in project location, unless the entire project area has been changed.
ii Change in number of beneficiaries, unless this changes the nature of the project.

iii Change in approved project activity, unless this changes the project objective and key result.

For more detailed guidance on project changes including budget modifications and no-cost extensions (NCEs), please refer to page 46 of the Operational Handbook for CBPFs.

6.4 Project closure

A project will be considered closed when the following conditions are met:

i Final narrative report received and cleared by the fund manager. Partners must submit the final narrative report within two calendar months after the end of the project implementation (including NCEs). The fund manager has up to one calendar month from receipt to review and clear the final narrative report.

ii Partners must submit the final financial statement (including an inventory of assets purchased under the grant with purchase value over $10,000 per asset) within two calendar months after the end of the project implementation (including NCEs). Once the final financial statement has been received, it will be pre-cleared by the fund manager and cleared by OCHA Headquarters/FCS (within one month).

iii After clearance of the final financial report, projects will be audited within 2 months.

iv OCHA HFU and FCS will review and close the project within 2 months from receipt of the audit report.

v Following the closure of a project and its audit (when applicable), partners will be notified by OCHA about the exact amount to be refunded. Partners have one month from the date of notification to refund amounts due. Non-compliance with the request will be subject to specific measures (see Annex 15 of the Operational Handbook for CBPFs: Compliance Measures). Proof of payment needs to be received and acknowledged by OCHA.

OCHA reserves the right to audit NGO partners. On this basis, OCHA may also request the reimbursement of unspent or qualified expenditures. Upon written notification from OCHA, the implementing partner shall refund the requested amount within one calendar month.

For more detailed guidance on the audit process, please refer to chapter 5.5 (above) and to page 47 of the Operational Handbook for CBPFs.

7 Contact information and resources

Ukraine Humanitarian Fund, United Nations Office for Coordination of Humanitarian Affairs (UNOCHA) – Kyiv, Ukraine
8 List of Annexes


Annex 2: Ukraine Humanitarian Fund (UHF) Operational Modalities

This manual will be reviewed no longer than one year after it is endorsed by the Advisory Board and may be reviewed earlier as needed.

I. Risk management process

Risk management performed by the Country-based Pooled Funds (CBPFs) constitutes an important element of their overall accountability framework. A dynamic and periodically updated Risk Management Framework (RMF) is used to reflect changes in the risk environment that may affect the achievements of the Fund’s objectives as well as progress and lessons learned from ongoing risk mitigation activities.

This initial Risk Management Framework was developed in accordance with the methodology and process set out in the Operational Handbook for Country-based Pooled Funds. In addition, relevant experiences from other CBPFs and experiences operating in Ukraine were considered as outlined in section IV.

Figure 1 describes the overall process for developing the RMF, while Table 1 gives further details of each of the key steps involved.

Table 1: Key steps in RMF development

<table>
<thead>
<tr>
<th>STEP 1: Establish context</th>
<th>Establishing the context focuses on developing a structure for the risk identification tasks to follow. This includes reviewing the context in which the Fund is operating in (security, coordination, program priorities etc.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>STEP 2: Risk identification</td>
<td>Identifying risks associated with the Fund (what incidents can occur and why the incident could occur)</td>
</tr>
<tr>
<td>STEP 3: Risk Analysis</td>
<td>The likelihood and magnitude of the risks - categorization of risk in terms of their likelihood and consequence (this is typically done in a heat-map)</td>
</tr>
<tr>
<td>STEP 4: Risk Evaluation</td>
<td>Strategies for pre-empting and treating the occurrence of a risk (options to reduce likelihood or alternatives to treat risk if it occurs)</td>
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</table>
II. Operating context

Six years into the crisis, the human toll of the armed conflict in eastern Ukraine is substantial with 3.5 million people affected by the crisis (including 1.5 million registered internally displaced people), of whom 2.3 million require humanitarian assistance and protection. For 2019, the humanitarian response will require $162 million to continue to provide lifesaving humanitarian assistance and protection. The crisis in eastern Ukraine is complex, whilst the response is severely underfunded and largely forgotten by the international community.

The populations living in the areas experiencing active conflict have needed to adapt to the new reality of living in a territory divided into Government Controlled Areas (GCA) and Non-Government Controlled Areas (NGCA). Access to people in need remains the key challenge for humanitarian actors in eastern Ukraine, and access to the affected population in NGCAs has been severely restricted since July 2015 when most aid agencies were asked to leave the NGCAs of Donetsk and Luhansk oblasts following the de facto entities’ introduction of extensive bureaucratic restrictions for humanitarian operations.

Recent needs assessments noted that populations living in the area closest to the 427-km long ‘contact line’ in both GCA and NGCA are the most vulnerable to experiencing the primary effects of conflict. It found that the vast majority (94%) of conflict-related incidents occur within 5km of the ‘contact line’.

Populations living further from the ‘contact line’, therefore, are less likely to be directly affected by ongoing primary effects of conflict, though the secondary effects permeate further from the ‘contact line’. An assessment of needs in GCA found that those living within 5km of the ‘contact line’ were significantly more likely to have unmet needs in at least one sector, (78% (<5km) to 51% (5km to 20km) to 41% (20km+).

One of the objectives of the UHF is to catalyse and support humanitarian actors in Eastern Ukraine to help reach these people in need. The first allocation of the UHF will specifically target the most vulnerable, and largely underserved population in the hardest to reach areas (5km of the contact line in NGCA). This represents an ambitious and potentially risky approach, as previous response projects have not reached these people to the desired level.

The UHF also seeks to support localization by providing funding directly to NNGOS, while UN agencies in general have been granted more permission to operate along the contact line in NGCA than INGOs, and there is a limited number of NNGOs operating in NGCA.

There are also differences of access and permissions within Donetsk and Luhansk areas of NGCA. Prior to May 2018, the de-facto authorities in Donetsk NGCA were only granting permission for NNGO activities, and all UN agencies carried out their activities through these Implementing Partners. After May 2018, UN agencies were granted

2 Risk treatment is a risk modification process. There are several options for risk treatment, including reducing the risk, sharing the risk, removing the source of the risk, accepting the risk, perhaps even increasing the risk if the risk could become an opportunity. Once the treatment option has been implemented it becomes a control, or a modification of a control.
permission to operate, and this permit has been automatically extended every three months. The NNGOs operational permit procedure has been simplified as well.

Despite these improvements the criteria for approval remains in Donetsk NGCA unclear and exceptionally vague and permission to operate is still sometimes delayed. Recently in April and May 2019, some 56 projects were stuck with the de-facto Humanitarian Committee for unknown reasons, which was only resolved after the HCs interaction with the de-facto authorities. The HC advocacy and CERF allocations in 2018/19 have helped to create better climate for UN/NNGO/INGO to facilitate negotiations, but gaining additional access still needs to be materialized.

In NGCA Luhansk there are no operational NNGOs and only limited number of INGOs have currently permission to operate in certain areas and are limited to specific projects. From May 2018 until October 2018 all UN agencies that applied (OCHA, IOM, UNICEF and UNHCR) for permission were granted permission to carry out their activities in NGCA Luhansk. However, UNHCR does not have permission to operate in Luhansk since October 2018, and their approval is still pending. IOM and UNICEF received formal permission to administer their projects and at the moment the implementation of these projects is continuing. WHO has not applied for the permission to operate but has continuous dialogue in both NGCAs, and as well gained access for activities in Luhansk NGCA, whereas access in Donetsk NGCA remains limited despite continuous bilateral discussions.

Keeping in mind that one of the objectives of the UHF is to support localization and increase access the UHF will seek to provide funding to INGOs and NNGOs, and OCHA sub-offices will advocate for increased access for their projects. It is therefore important to acknowledge and as much as possible, address the risks that that these constraints create.

In order to minimize risks of delays in project approval, or not being able to access these areas, the UHF and its partners will ensure strong consultation with relevant authorities in order to ensure, to the extent possible, full access to the project areas, including for monitoring of projects by OCHA staff. When responding to allocation strategies, partners will be required to confirm this access during project submissions, and the duration of the projects in order to ensure OCHA monitoring access.

Beyond the restrictions on access there are some international sanctions imposed in NGCA which impact financial systems, and make financial payments, procurement and accessing markets much more complicated. Humanitarian partners have largely been able to address these constraints by having registration and a bank account in GCA and almost all procurement is done in GCA. While this addresses some of the financial risks, this leads to unpredictable transportation times and increases in transportation costs that affect project delivery.

III. The Role of the Ukraine Humanitarian Fund

The UHF will allow humanitarian actors in Ukraine direct access to flexible, timely, and context-responsive funding to facilitate targeted, complementary and mutually-reinforcing responses by UN agencies, NGOs, donors, governments, and other partners. The UHF seeks to enhance humanitarian leadership by enabling the HC to allocate resources to priority needs in alignment with the collective Strategic Priorities agreed in the HRP.

As a flexible tool governed by the HC, the UHF should translate into well-coordinated, relevant, transparent and accountable funding decisions. The Fund will ensure that partners who are the most operationally effective, meeting the humanitarian needs of those most vulnerable, the most agile, the most efficient, and working in prioritised areas – will be supported. This will lead to a more efficient, highly targeted, prioritised and cost-effective response.
IV. Risk Identification: Risks associated with the Ukraine Humanitarian Fund

The methodology and process followed in establishing the Fund-level Risk Management Framework for the UHF in 2019 included discussions within OCHA and with OCHA sub-offices and within the Inter Cluster Coordination Group. The key operational risks to the fund, and possible impacts on approvals, targeting of people in need and implementation constraints were also discussed with UN Agencies and NGO partners in UHF focused discussions in Kyiv, Kramatorsk, Sievierendonetsk, and on line with partners in Donetsk. In additions, the key risks experienced in other established CBPFs, and a desk review were conducted to help identify risks and develop a shared risk management framework.

This Risk Management Framework presents Fund-level risk analysis aimed at providing a set of tools to support the decision-making process and the achievement of the UHF’s objectives. Partners’ related risks are dealt with in the UHF accountability framework which includes partners’ capacity review, partners’ risk classification, and the application of appropriate compliance measures to mitigate risk. To minimise risks of politicisation specifically, the Fund will promote the non-negotiable adherence to humanitarian principles and codes of conduct among its potential stakeholders – both the Fund contributors and Fund recipients.

V. Category of Identified Risks UHF

A) Strategic and programmatic: Coherence between strategic objectives, funding levels, programmatic priorities and funding decisions. Risks under this category include:

- Lack of Financial Support leads to some limited participation in coordination and prioritization or frustration on part of eligible partners.
- Poor targeting due to inadequate needs assessments or poor quality of data;

B) Governance and Fund management: Adherence to policies and decisions, and internal controls and oversight.

- Inadequate support and interest in the Fund, which may impact an attempt to build up its overall reputation;
- Delayed funding due to inadequate commitment and participation in governance bodies (i.e. review and advisory board);
- Inadequate oversight and reduced Fund’s accountability to donors and affected people.

C) Financial and Accountability: Relating to effective and efficient management and use of financial resources and the reliability of financial reporting by implementing partners. Effective and efficient management and systems to support operations and meet performance standards.

- Fraud/Corruption, including in procurement: in insecure operations there is high risk of corruption, theft and diversion of goods. Fraud/corruption is believed to be widespread and deeply rooted in Ukraine.
- Poor financial management: Since the Fund targets frontline organizations, some of these organizations may not have proper financial systems and may not comply with international accounting standards. There is some risk of allocating funding to organizations with weak financial capacity.
D) **Internal risk**: Effective and efficient management and systems to support operations and meet performance standards.

- Inadequate partner support due to insufficient human resources (i.e. high staff turnover, not enough staff, and staff lacking required skill sets not getting qualified staff with the right skills to do the work.)

- Poor or insufficient monitoring to support the operation of the Fund (e.g. travel, monitoring and reporting costs, risk management costs). Lack of access to conduct monitoring would result in reduced Fund’s accountability to donors and affected people. This would in the long run affect donors’ support and contribution to the Fund.

E) **Coordination and partnerships**: Effectiveness of the humanitarian coordination system vis-à-vis the operation and management of the Fund, and engagement and participation of humanitarian partners in the coordination structures:

- Difficult working relationship with government and de facto authorities

- Limited number of implementing partners (UN and NGOs)

- In order to support sound funding decisions, cluster coordinators and coordination fora in NGCA areas should support in prioritization/ project selection and monitoring and quality assurance.

- Limited information sharing among humanitarian partners

- Inadequate understanding of the UHF process and poor project design and implementation.

F) **Political risk**, which may include, but not limited to:

- Continuation of international sanctions imposed against some areas of Ukraine, which impact financial systems, particularly in the areas beyond the control of the Government of Ukraine;

- Limited and/or unpredictable access to people in need due to bureaucratic constraints and insecurity.

- Politicisation of the Fund by parties to the conflict and/or some Member States who may not be perceived as neutral;

- Potential political influence that affects approval of humanitarian projects or prioritization of response

- Any other complications as result of the ‘special’ status extended to eastern Ukraine by various policies and legislations, including ‘decentralisation’ reforms and the imposition of the Joint Force Operations.

G) **Hazard risks**: Events and situations (e.g. natural or man-made disasters) outside of the Fund’s control; domestic political instability, continuation or escalation of the armed conflict and possible resistance to humanitarian action; threats/hazards to safety and security of humanitarian workers; and mobility restrictions due to insecurity and/or bureaucratic constraints.

**TABLE 2: Risk Identification for the Ukraine Humanitarian Fund**

<table>
<thead>
<tr>
<th>Risk Category A: Strategic and programmatic</th>
<th>Risk (1) Lack of Financial Support for the UHF</th>
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</thead>
<tbody>
<tr>
<td><strong>Key Drivers:</strong></td>
<td>• Inadequate financial support for UHF to have critical mass required to leverage stakeholders and improve access to hard to reach people</td>
</tr>
</tbody>
</table>
- Competing humanitarian priorities elsewhere, resulting in persistent severe underfunding for humanitarian action in Ukraine;
- Some donor preference for development funding or other political or strategic interest that impact funding decisions;
- Perception that Ukraine government should provide more public funding for humanitarian action

**Risk Category B: Governance of the Fund:**

**Key Drivers:**
- Weak participation and engagement of stakeholders in governance bodies
- If few financial resources are available, there could be less incentive for clusters and partners to engage in prioritization and development of allocations for the fund

**Risk (2) Stakeholder Commitment and input**
- Inadequate commitment, and lack of active participation among key actors in governance process;
- Lack of interest and support in strategy development and project review from clusters/OCHA resulting in weak targeting and or weak project review;
- Inadequate needs assessment or other challenges in properly utilizing analysis to inform prioritization.

**Risk Category C: Financial and accountability**

**Key Drivers:**
- Working with frontline responders who may have limited financial capacity and controls
- Prevalence of cash payments
- Lack of experience implementing projects directly and lack of financial capacities
- Concerns over partner capacity and lack of knowledge for proper financial management

**Risk (3) Fraud and corruption**
- Procurement fraud using fake vendors and procurement documentation
- Inflated costing or willful non-compliance with prescribed procurement policies
- Poor and insufficient financial controls and fraud prevention systems due to limited partner capacity
### Risk Category D: Internal risk

**Key Drivers:**
- Limited flexibility to provide required internal capacity and cost plan;
- Small Humanitarian Finance Unit is focused on complying with OCHA and CBPF requirements on reporting, management and donor commitments rather than supporting Implementing Partners;
- Delay in recruiting staff or high staff turnover;
- OCHA conducts poor or rushed partner capacity assessments and partners are not properly equipped to implement projects;
- Continuous performance monitoring including on-site monitoring and reporting is weak;
- Poor analysis and use of monitoring findings to influence intervention and enforce compliance measures;
- Insufficient capacity required to support partners leads to delays or weaker projects;

### Risk Category E: Coordination and partnerships

**Key Drivers:**
- Restrictions on access and permissions to operate in NGCA granted by the de facto authorities;
- Unpredictable approval of UN, NGO projects with unclear criteria and decision in NGCA;
- Pockets of areas affected by security concerns;
- Affected people living in scattered locations;
- Few implementing partners willing and able to operate in some hard-to-reach areas and/or areas beyond the Government’s control;
- Limited partner capacity to carry out quality humanitarian programmes in a coordinated manner as part of cluster response;
- Pressure and uninformed expectations for localization/nationalization;
- Lack of operational partners in some priority areas;
- Frontline partners lacking awareness or incentive to access hard to reach areas;
- Needs are significantly greater than the resources in hard to reach places and there is a lack of predictable and adequate funding to reach critical mass.

### Risk (4) Weak oversight and support to partners

- Most vulnerable groups are excluded from assistance due to unpredictable and delayed permissions to operate in NGCA granted by the de facto authorities;
- Leads to slow project approval and lack or no access to people in need due to government restrictions;
- Expulsion of humanitarian partners in areas of acute needs – this can be sudden or intentionally refusing to renew permission to operate and/or making bureaucratic requirement and procedures more complicated;
- Allocations planned for hard to reach areas need to be reprogrammed to other vulnerable but easier to access communities.

### Risk (5) Access to targeted groups is restricted

- Few implementing partners already present and able to operate in some hard-to-reach areas hard-to-reach areas in NGCA.
- Poor project design and implementation/ IP performance due to lack of understanding on UHF process, strategic objectives, and tools in particular among some IPs due to limited IP capacity, inadequacy of orientation, support and coaching;
<table>
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<tr>
<th>Risk Category F: Political risk</th>
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<tr>
<td><strong>Key Drivers:</strong></td>
</tr>
<tr>
<td>• Potential political influence that affects approval of humanitarian projects and or affects prioritization of response;</td>
</tr>
<tr>
<td>• Politicization of the Fund by parties to the conflict and/or some Member States who may not be perceived as neutral;</td>
</tr>
<tr>
<td>• Continuation of international sanctions imposition against some areas of Ukraine, which impact financial systems, particularly in NGCA;</td>
</tr>
<tr>
<td>• Any other complications as result of the ‘special’ status extended to eastern Ukraine by various policies and legislations, including its ‘decentralization’ reforms and the imposition of the Joint Force Operations (JFO).</td>
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</table>

<table>
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<tr>
<th>Risk (7) Politicization of Fund or Response</th>
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<tr>
<td>• Political Instrumentalization of the Fund affecting its overall reputation;</td>
</tr>
<tr>
<td>• Fund becomes politicized by parties to the conflict and/or some Member States who may not be perceived as neutral;</td>
</tr>
<tr>
<td>• Response efforts could become politicized if NGCA de facto authorities seek to obstruct or target aid based on political interests, and not humanitarian needs</td>
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<tr>
<th>Risk Category G: Hazard/Security risks</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Key Drivers:</strong></td>
</tr>
<tr>
<td>• Growing armed conflict and insecurity;</td>
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<tr>
<td>• Severely limited access in areas beyond the Government’s control;</td>
</tr>
<tr>
<td>• Imposition of martial law by the President or ‘red zone’ by the JFO Commander.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Risk (8) Sanctions or Restrictive Legislation</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The lack of a banking system in NGCA impedes or leads to delays in response of partners;</td>
</tr>
<tr>
<td>• Use of cash in NGCA is a concern that could limit OCHA and auditors ability to trace payments and transaction.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Risk (9) Increased Intensity of Conflict</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Inability to implement humanitarian projects due to increased intensity of armed conflict and insecurity;</td>
</tr>
<tr>
<td>• Partners are not able to access project areas due to conflict and insecurity;</td>
</tr>
</tbody>
</table>

**UHF Risk Analysis Matrix and Heat Map**

**TABLE 3: Risk consequence**
<table>
<thead>
<tr>
<th>Scale</th>
<th>Descriptor</th>
<th>Example</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Insignificant</td>
<td>No impact</td>
</tr>
<tr>
<td>2</td>
<td>Minor</td>
<td>Negative outcomes from risks or lost opportunities unlikely to have a permanent or significant effect on the Fund and OCHA’s reputation or performance</td>
</tr>
<tr>
<td>3</td>
<td>Moderate</td>
<td>Negative outcomes from risks or lost opportunities having a significant impact on the Fund/OCHA. Can be managed without major impact in the medium term</td>
</tr>
<tr>
<td>4</td>
<td>Major</td>
<td>Negative outcomes from risks or lost opportunities with a significant effect that will require major effort to manage and resolve in the medium term but do not threaten the existence of the Fund;</td>
</tr>
<tr>
<td>5</td>
<td>Catastrophic</td>
<td>Negative outcomes from risks or lost opportunities which if not resolved in the medium term will threaten the existence of the Fund</td>
</tr>
</tbody>
</table>

**TABLE 4: Risk likelihood – probability**

<table>
<thead>
<tr>
<th>Scale</th>
<th>Descriptor</th>
<th>Example detail descriptor</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Rare</td>
<td>Highly unlikely, but it may occur in exceptional circumstances. It could happen, but probably never will</td>
</tr>
<tr>
<td>2</td>
<td>Unlikely</td>
<td>Not expected, but there’s a slight possibility it may occur at some time</td>
</tr>
<tr>
<td>3</td>
<td>Possible</td>
<td>The event might occur at some time as there is a history of casual occurrence</td>
</tr>
<tr>
<td>4</td>
<td>Likely</td>
<td>There is a strong possibility the event will occur as there is a history of frequent occurrence</td>
</tr>
<tr>
<td>5</td>
<td>Almost certain</td>
<td>Very likely. The event is expected to occur in most circumstances as there is a history of regular occurrence</td>
</tr>
</tbody>
</table>

**TABLE 5: UHF Risk Analysis:**

<table>
<thead>
<tr>
<th>Risk</th>
<th>Consequence</th>
<th>Likelihood</th>
<th>Level (C x L)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Risk (1) Lack of Financial Support for the UHF</td>
<td>4</td>
<td>3</td>
<td>12</td>
</tr>
<tr>
<td>• Inadequate financial support for UHF to have critical mass required to leverage stakeholders and improve access to hard to reach people</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
- Low levels of funding lead to small allocations that lack ability to make significant impact on response
- Limited number of eligible partners receive funding and IPs become frustrated so do not engage in coordination and prioritization.
- Insufficient reserve to provide funding for sudden onset emergencies.

**Risk (2) Stakeholder Commitment and input**

- Inadequate commitment, and lack of active participation among key actors in governance process;
- Lack of interest and support in strategy development and project review from clusters/OCHA resulting in weak targeting and or weak project review;
- Inadequate needs assessment or other challenges in properly utilizing analysis to inform prioritization.

**Risk (3) Fraud and corruption**

- Procurement fraud using fake vendors and procurement documentation
- Inflated costing or willful non-compliance with prescribed procurement policies
- Poor and insufficient financial controls and fraud prevention systems due to limited partner capacity

**Risk (4) Weak oversight and support to partners**

- OCHA conducts poor or rushed partner capacity assessments and partners are not properly equipped to implement projects;
- Continuous performance monitoring including on-site monitoring and reporting is weak;
- Poor analysis and use of monitoring findings to influence intervention and enforce compliance measures;
- Insufficient capacity required to support partners leads to delays or weaker projects;
<table>
<thead>
<tr>
<th>Risk (5) Access to targeted groups is restricted</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Most vulnerable groups are excluded from assistance due to unpredictable and delayed permissions to operate in NGCA granted by the de facto authorities;</td>
</tr>
<tr>
<td>• Leads to slow project approval and lack or no access to people in need due to government restrictions;</td>
</tr>
<tr>
<td>• Expulsion of humanitarian partners in areas of acute needs – this can be sudden or intentionally refusing to renew permission to operate and/or making bureaucratic requirement and procedures more complicated;</td>
</tr>
<tr>
<td>• Allocations planned for hard to reach areas need to be reprogrammed to other vulnerable but easier to access communities.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Risk (6) Poor Project Delivery</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Few implementing partners already present and able to operate in some hard-to-reach areas hard-to-reach areas in NGCA.</td>
</tr>
<tr>
<td>• Poor project design and implementation/ IP performance due to lack of understanding on UHF process, strategic objectives, and tools in particular among some IPs due to limited IP capacity, inadequacy of orientation, support and coaching;</td>
</tr>
<tr>
<td>• Inadequate cluster level engagement in part of some remotely located partners</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Risk (7) Politicization of Fund or Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Political Instrumentalization of the Fund affecting its overall reputation;</td>
</tr>
<tr>
<td>• Fund becomes politicized by parties to the conflict and/or some Member States who may not be perceived as neutral;</td>
</tr>
<tr>
<td>• Response efforts could become politicized if NGCA de facto authorities seek to obstruct or target aid based on political interests, and not humanitarian needs</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Risk (8) Sanctions or Restrictive Legislation</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The lack of a banking system in NGCA impedes or leads to delays in response of partners;</td>
</tr>
</tbody>
</table>
• Use of cash in NGCA limits OCHA and auditors ability to trace payments and transactions.

Risk (9) Increased Intensity of Conflict
• Inability to implement humanitarian projects due to increased intensity of armed conflict and insecurity;
• Partners are not able to access project areas due to conflict and insecurity;

3 3 9

FIGURE 2: Heat map UHF
# UHF Risk evaluation and risk treatment

## TABLE 6: UHF Risk treatment and mitigation matrix in order of severity

<table>
<thead>
<tr>
<th>Risk (From most to least critical)</th>
<th>Mitigation strategy</th>
<th>Timeframe</th>
<th>Risk Owners</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Risk (1) Lack of Financial Support for the UHF</strong>&lt;br&gt;• Inadequate financial support for UHF to have critical mass required to leverage stakeholders and improve access to hard to reach people;&lt;br&gt;• Small allocations that lack ability to make significant impact;&lt;br&gt;• Limited number of eligible partners receive funding and IPs become frustrated so do not engage in prioritization;&lt;br&gt;• Insufficient reserve to provide funding for sudden onset emergencies.</td>
<td>OCHA and HC will ensure systematic outreach to donors highlighting impact and effectiveness of the Fund. Contributions from regular supporters of CBPFs who have not yet contributed to the UHF will be approached and encouraged to contribute. HC and OCHA will leverage ability of allocations, and the targeted assistance to vulnerable people to showcase impact of the UHF. All donors with interest in the humanitarian response in Eastern Ukraine will be approached regularly, including those that have already contributed to the UHF.</td>
<td>Ongoing with increased advocacy in September and October following first allocation</td>
<td>OCHA/HC and donors on the Advisory Board</td>
</tr>
<tr>
<td><strong>Risk (5) Access to targeted groups is restricted</strong>&lt;br&gt;• Most vulnerable groups are excluded from assistance due to unpredictable and delayed permissions to operate in NGCA granted by the de facto authorities;&lt;br&gt;• Leads to slow project approval and lack or no access to people in need due to government restrictions;&lt;br&gt;• Expulsion of humanitarian partners in areas of acute needs – this can be sudden or intentionally refusing to renew permission to operate and/or making bureaucratic requirement and procedures more complicated;</td>
<td>The HC and OCHA offices in NGCA will continue to advocate for better access and the HC and OCHA will seek to use the UHF to provide leverage and momentum to improve access for UHF projects and other humanitarian activity. OCHA already discussed with the Chairman of the de facto Humanitarian Committee how the UHF will provide the needed support for humanitarian projects. In line with the first allocation, OCHA will actively engage with the de facto authorities and consider if a Memorandum of Understanding or other agreement can be a point of discussion to cover the projects and improved access. In order to minimize risks of delays in project</td>
<td>Ongoing with increased advocacy in August/September and then ongoing</td>
<td>HC with support from OCHA Head of Office and OCHA sub-offices. Implementing Partners and UN Agencies.</td>
</tr>
</tbody>
</table>
• Allocations planned for hard to reach areas need to be reprogrammed to other vulnerable but easier to access communities.

When responding to allocation strategies, partners will be required to confirm this access during project submissions. It is important to recognize that some decisions are taken with no consultation and with little warning or explanation and so this risk will likely remain throughout the response. In case it is not possible to address the obstacles and the delays are unreasonable, OCHA and clusters will work with implementing partners to adjust project targeting to other vulnerable people in need.

<table>
<thead>
<tr>
<th>Risk (6) Poor Project Delivery</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Few implementing partners present and able to operate in some hard-to-reach areas in NGCA.</td>
</tr>
<tr>
<td>• Poor project design and implementation/ IP performance due to lack of understanding on UHF process, strategic objectives, and tools in particular among some IPs due to limited IP capacity, inadequacy of orientation, support and coaching;</td>
</tr>
<tr>
<td>• Inadequate cluster level engagement in part of some remotely located partners</td>
</tr>
<tr>
<td>• The needs are significantly greater than the resources in hard to reach places and there is a lack of approval, or not being able to access these areas, the UHF and its partners will ensure strong consultation with relevant authorities in order to ensure, to the extent possible, full access to the project areas, including for monitoring of projects by OCHA staff.</td>
</tr>
</tbody>
</table>

In line with objective of increasing humanitarian access and footprint, partners will be encouraged and expected to respond in new areas. It will be important to ensure local needs and contexts are properly understood. Good quality support will be provided by clusters in particular in needs analysis, and quality assurance. OCHA will support quality project design and closely review narrative and financial report and conduct regular project monitoring.

Considering that the UHF is newly established, OCHA will ensure regular briefings support and coaching for IPs and this will be strongly

| From project design in August through implementation |
| Implementing Partners, Cluster Coordinators and OCHA |

| Project design in August through implementation |
| Implementing Partners, Cluster Coordinators and OCHA |
predictable and adequate funding to reach critical mass.

<table>
<thead>
<tr>
<th>supported by Cluster Coordinators and coordination fora in NGCA.</th>
</tr>
</thead>
<tbody>
<tr>
<td>HC and AB will ensure that OCHA consults adequately with clusters, and clusters will ensure that they are well informed of remotely located partners. Allocations will be based on strong needs assessment and good quality data. The UHF seeks to support coordination and inter-cluster responses but is only a small part of the humanitarian response (less than 10% of funding). The UHF also seeks to encourage and push other donors and responders to also respond in these areas through demonstrating results and advocacy. In order to achieve these results, the Review Committee and the ICCG will play a key role in strategy and project review. OCHA will seek regular feedback on appropriateness of UHF mechanisms. Advisory Board will review performance of the Fund in line with CBPF Common Performance Framework and objectives of the UHF. OCHA will ensure regular reporting on achievements, and contributions of different stakeholders.</td>
</tr>
<tr>
<td>Each allocation and regular monitoring advocacy and outreach in October following first allocation Annually during: Common Performance Framework and UHF annual Partners survey.</td>
</tr>
<tr>
<td>HC/OCHA and clusters</td>
</tr>
<tr>
<td>OCHA/HC and Advisory Board</td>
</tr>
<tr>
<td>OCHA and Advisory Board</td>
</tr>
</tbody>
</table>

Risk (2) Lack of Stakeholder Commitment and weak analysis

- Inadequate commitment, and lack of active participation among key actors in governance process;
- Lack of interest and support in strategy development and project review from clusters/OCHA resulting in weak targeting and or weak project review;
- Inadequate needs assessment or other challenges in properly utilizing analysis to inform prioritization.

Risk (7) Politicization of Fund or Response

- Fund becomes politicized by parties to the conflict and/or some Member States who may not be perceived as neutral;
- Response efforts could become politicized if NGCA de facto authorities seek to obstruct or target aid based on political

Fund stakeholders will regularly highlight the humanitarian principles by which the UHF operates and ensure that all activities are implemented in line with these activities. Capacity assessments review partners adherence to these principles, and allocations focus on humanitarian needs. Further training may be conducted if needed. OCHA/HC will advocate with NGCA for Ongoing with increased advocacy in August/September and then ongoing

Implemen ting Partners, OCHA, HC and AB
<table>
<thead>
<tr>
<th><strong>Risk (9) Increased Intensity of Conflict</strong></th>
<th><strong>Risk (4) Weak oversight and support to partners</strong></th>
<th><strong>Risk (3) Fraud and corruption</strong></th>
<th><strong>Risk (8) Sanctions or Restrictive Legislation</strong></th>
</tr>
</thead>
</table>
| • Inability to implement humanitarian projects due to increased intensity of armed conflict and insecurity;  
• Partners are not able to access project areas due to conflict and insecurity; | • OCHA conducts poor or rushed partner capacity assessments and partners are not properly equipped to implement projects;  
• Continuous performance monitoring including on-site monitoring and reporting is weak;  
• Poor analysis and use of monitoring findings to influence intervention and enforce compliance measures;  
• Insufficient capacity required to support partners leads to delays or weaker projects; | • Procurement fraud using fake vendors and procurement documentation  
• Inflated costing or willful non-compliance with prescribed procurement policies  
• Poor and insufficient financial controls and fraud prevention systems due to limited partner capacity | Implementing Partners have been working in NGCA under similar conditions |
| prompt and needs-based project approvals.  
In case of security issues and constraints, the UHF will seek to adopt appropriate safety and mitigation strategies to continue to deliver services as long as possible. However, there is a risk it may not be possible to implement projects in some or all areas. | HC/AB will provide enough time for OCHA to conduct partner capacity assessments, and OCHA will conduct thorough assessments in line with procedures and tools. OCHA and cluster coordinators will support IPs with good performance monitoring including on-site monitoring and reporting and provide strong technical reviews and support of projects. | OCHA will conduct good capacity assessments of partners and provide training on financial rules upon initiating projects. Partners will ensure good financial management and oversight. OCHA will also conduct regular spot checks and monitoring based on risk level of partner and audit all projects. | Implementing Partners should continue |
| If conditions deteriorate, stakeholders review implementation modalities. | During Capacity Assessments and throughout implementation | Capacity Assessment in July/August, training in September. Oversight ongoing | Ongoing |

United Nations Office for the Coordination of Humanitarian Affairs (OCHA)

www.unocha.org
- The lack of a banking system in NGCA impedes or leads to delays in response of partners;
- Use of cash in NGCA limits OCHA and auditors ability to trace payments and transactions.
- Issues around VAT can lead to delays in GCA.

conditions and constraints for over 5 years and have adopted appropriate measures to maintain implementation. While this addresses some of the risks, this leads to unpredictable transportation times and increases in transportation costs that affect project delivery, so the impact cannot be completely mitigated. Additionally, partners can face delays and constraints around VAT exemption and registration.

| mitigation work and OCHA/HC should monitor any changes that could impact delivery |

V. Monitoring and Review of the Risk Management Framework

This framework takes into account contextual changes and as a living document will continuously be updated by the UHF Humanitarian Financing Unit in consultation with the OCHA Head of Office. The HC as custodian of the Fund will ensure that the risk management framework is regularly updated and utilized.
## Annex 2

### Operational Modalities

<table>
<thead>
<tr>
<th>Risk Level</th>
<th>Project Duration (months)</th>
<th>Project Value (thousand USD)</th>
<th>Max Amount per Project (thousand USD)</th>
<th>Disbursements (in % of total)</th>
<th>Financial Reporting</th>
<th>Narrative Reporting</th>
<th>Monitoring</th>
<th>Audit</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>For disbursements</td>
<td>31-Jan</td>
<td>Final</td>
<td>Progres</td>
</tr>
<tr>
<td><strong>NGOs</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>High</td>
<td>&lt; 7</td>
<td>&lt; 250</td>
<td>60-40</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>1 mid</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>&gt; 250</td>
<td>500</td>
<td>50-50</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>1 mid</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>7 - 12</td>
<td>&lt; 250</td>
<td>40-40-20</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>2</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; 250</td>
<td>800</td>
<td>40-30-30</td>
<td>Yes</td>
<td>Yes</td>
<td>2 - 3*</td>
<td>Yes</td>
</tr>
<tr>
<td>Med</td>
<td>&lt; 7</td>
<td>&lt; 250</td>
<td>100</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>1 mid</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>&gt; 250</td>
<td>700</td>
<td>80-20</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>1 mid</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>7 - 12</td>
<td>&lt; 250</td>
<td>80-20</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>1 mid</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; 250</td>
<td>1,200</td>
<td>60-40</td>
<td>Yes</td>
<td>Yes</td>
<td>1 mid</td>
<td>Yes</td>
</tr>
<tr>
<td>Low</td>
<td>&lt; 7</td>
<td>&lt; 400</td>
<td>100</td>
<td>Yes</td>
<td>Yes</td>
<td>-</td>
<td>Yes</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>&gt; 400</td>
<td>-</td>
<td>80-20</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>-</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>7 - 12</td>
<td>&lt; 400</td>
<td>100</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>1 mid</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; 400</td>
<td>80-20</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>1 mid</td>
<td>Yes</td>
</tr>
<tr>
<td><strong>UN Agencies</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>&lt; 7</td>
<td>-</td>
<td>100</td>
<td>-</td>
<td>Yes</td>
<td>-</td>
<td>Yes</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>7 - 12</td>
<td>-</td>
<td>100</td>
<td>-</td>
<td>Yes</td>
<td>Yes</td>
<td>1 mid</td>
<td>Yes</td>
</tr>
</tbody>
</table>

* Three progress reports are only required for projects of 10 months or more.
** Additional field visits are only required for projects of 10 months or more.
*** Monitoring of UN agency projects is based on a sampling methodology considering country-specific factors as required and will be part of the monitoring plan developed within 2 months of project selection.

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**About Country-based Pooled Funds (CBPFs):**

CBPFs allow donors to pool their contributions into single, unearmarked funds to support local humanitarian efforts. This enables humanitarian partners in crisis-affected countries to deliver timely, coordinated and principled assistance.  