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**GRANTS POLICY OF THE  
ARMENIAN LAWYERS’ ASSOCIATION NGO**

**(New Edition)**

## GRANTS POLICY

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## CHAPTER 1. AWARDING OF GRANTS

- 1.1 The awarding of grants by the “Armenian Lawyers` Association” NGO (hereinafter referred to as “Organisation”) is aimed at supporting separate programs and initiatives contributing to the Mission of the Organisation.
- 1.2 If the Organisation provides sub-grants in the framework of the grant provided by a Donor Organisation (hereinafter referred to as “Donor”), the provisions of this Policy contradicting the conditions set by the Donor, do not apply. If it is envisaged in the framework of the grant provided by the Donor to provide sub-grants to the organisations previously determined by the Donor, then the Organisation carries out the awarding of the amount specified by the Sub-grant project budgets in accordance with the sub-grant contracts preliminarily signed with these organisations. In this case the Organisation implements the monitoring, evaluation and receipt of the reports of these sub-grants in accordance with the procedures of the present Policy. The Organisation conducts monitoring and evaluation of the narrative report of the sub-grant project. The financial monitoring and evaluation of the sub-grant project is conducted by the audit and/or accounting firm (hereinafter referred to as a “Specialised Company) determined by the Organisation.
- 1.3 The sub-grants provided by the Organisation in the framework of the EU-funded “Commitment to Constructive Dialogue” Project are regulated under the Rules of Procedure specified in the Annex 2 of this Policy.
- 1.4 The terms “grant”, “donor”, “grantee” in this Policy should also be respectively understood as “sub-grant”, “sub-grant donor” and “sub-grantee”.

## CHAPTER 2. ELIGIBILITY CRITERIA

- 2.1 The civil society organisations (hereinafter referred to as CSOs), which comply with the following conditions, may participate in the grant competition:
  - Have been registered as non-commercial and non-governmental organisation at the State Register Agency of Legal Entities of the Ministry of Justice of the Republic of Armenia as specified by the RA Law (hereinafter referred to as “State Registration”).  
*Note 1. Separate units of CSOs cannot apply individually to the grant program.*
  - For small grant project:
    - Have participated and completed the educational certification capacity building program for CSO organised by the American University of Armenia and participated in CSO Incubators within the scope of the "Commitment to Constructive Dialogue" Project.
  - For sub-grant projects for the development, advocacy and monitoring public policies for the CSO, the creation and/or strengthening of CSOs coalitions (networks)
    - At least 1 (one) member CSO of the Coalition must have completed the CSO capacity building training organised by the American University of Armenia.
    - If the Lead Partner and/or Partner organization of the winner Coalition has not previously participated in the educational certification capacity building program for CSOs organised by the American University of Armenia, they agree to participate in a mandatory five-day advanced certification training before signing the Grant Contract.
  - The winning applicant organisations will be required to participate in mandatory one-day training with the Project representatives to receive expert counselling on the implementation process of the grants, including financial advice.

- Carry direct responsibility for preparation and implementation of the project.
- 2.2 Participation of a consortium of at least 4 (four) CSOs in the grant competition for the development, advocacy and monitoring public policies for the CSO Coalitions, the creation and/or strengthening of the CSO coalition(s) is mandatory. Participation of the CSO Consortium in the Small Grant Competition is encouraged. In the case of a joint grant application, the relationships between the parties, division of responsibilities and authorities between them should be defined. Commitment letters from all partners should be enclosed as well.

### **CHAPTER 3. SELECTION PROCESS**

- 3.2 All applications submitted to the grant competition (hereinafter, applications) are subject to the evaluation, which includes the verification of compliance with the terms of the announcement of grant competition and the attached documents. The applications shall be evaluated in accordance with the procedure set out in Annex 1, Section "Evaluation and selection criteria".

### **CHAPTER 4. COMPOSITION OF GRANTS COMMISSION**

- 4.1 The evaluation and selection of grant programs are made by the Grants Commission established by the order of the President of the Organisation. The number and composition of the personnel of the members of the Grant Commission shall be determined by the President of the Organisation.
- 4.2 Separate grant committees may be created within the framework of various programs implemented by the Organisation.
- 4.3 The Grants Commission may include representatives of the Organisation, projects implemented by the Organisation, partner non-governmental and international organisations, as well as independent sectoral experts and observers.
- 4.4 The authorized person determined by the organisation conducts the control, monitoring and evaluation of the narrative report of the sub-grant project. The financial monitoring and evaluation of the sub-grant project is conducted by the Specialised Company determined by the Organisation.
- 4.5 The Organisation may, if necessary, involve experts and (or) observers at the sittings of the Commission with the right of consultative vote.

Thus:

1. Experts are persons working in the applicant organisations and in the field of projects proposed by them or practitioners in the field. Their main function is to provide information and clarifications to the members of the Commission on various problems and issues in order to make the decision-making process more objective and impartial. Experts study the applications which are related to their field of expertise.
2. Observers are individuals outside of the Organisation who take part in the selection process, ensuring objectivity and impartiality. They have the right to opinion and expression during the discussion. Representatives of international and non-governmental organisations, grant project managers and coordinators may be invited as observers for "exchange of experience" and to express opinion on the selection process. They are not required to study the applications.

- 4.6 Any person who is a member of the Grant Commission, an expert and an observer, is obliged to declare the possible and existing conflicts of interest and not be guided by private interests. The term "conflict of interest" is defined as a situation where a member of a grant committee, an expert and an observer has economic interests related to him, his affiliated person or a third party, political or national, family or emotional relationships, or any other connection or joint interest (hereinafter referred to as "private interest"), which affects or may allegedly affect or reasonably affect the proper, objective and impartial assessment of the applications submitted for the grant competition.
- "To be guided by private interest" means performing such actions, displaying inaction, or making a decision" (including participation in decision making within the collegial body), which, although is legally valid, but may lead or promote or reasonably contribute or promote affecting on the selection process of the candidates participating in the grant competition.
- 4.7 If such situations are disclosed, the person in conflict of interest does not have the right to be involved in the evaluation process. If the mentioned circumstances arise after evaluation process of the applications it will result in termination of grant funding in the manner provided in Chapter 8 of this Policy. Commission member, expert and observer before the start of the evaluation process shall sign a certificate of absence of a conflict of interest. The certificate of absence of a conflict of interest is attached to this Policy as Annex 3. All grant decisions are approved by the Grants Commission of the Organisation.

## **CHAPTER 5. BUDGET**

- 5.1 The declared grant budget depends on the available amount allocated for grant purposes of the Organisation.
- 5.2 The grantee may make changes in the expenditures of the budget after informing the Organisation in written form. Their sum of changes should not exceed ten percent (10%) of the total budget. The sum of the changes made to the budget expenditure items by the Grantee should not exceed ten percent (10%) of the total budget, of which the Responsible Person of the Armenian Lawyers' Association (ALA) shall be notified in advance. The changes of the sum exceeding 10% of the total budget or the objectives of the grant shall be made in the form of bilaterally approved written amendments to the Grant Agreement.
- 5.3 The budget must present in detail the entire volume of financial support required for the grant project.
- 5.4 The budget must include project expenditures, salaries, equipment prices, administrative expenses, stationery, transportation, daily allowances, bank payments and other potential expenses that may arise during project implementation
- 5.5 The grantee must also provide a detailed budget description.
- 5.6 Considering the limited budget allocated to each grant project, equipment and capital expenditure financing requirements are not encouraged.
- 5.7 The Organisation finances the submitted grant projects in the amount of 90% of the budget. The applicant must contribute the remaining 10 percent of the budget through direct investment of funds.

## **CHAPTER 6. PAYMENT OF THE GRANT**

- 6.1 The Organisation must make the grant payments in the terms and procedures specified in the grant contract signed between the parties.

6.2 The Organisation, at its discretion may make direct payments to the vendor of products or services who will be selected by the grantee or on its behalf.

#### **CHAPTER 7. RESTRICTIONS FOR THE USE OF GRANT**

- 7.1 The grant funds or the equipment and services acquired by those funds shall not be transferred in the form of a grant or technical assistance to another organisation or an individual without written permission issued by the Organisation.
- 7.2 Grant funds shall not be used for payments to business partners or personal needs of family members.
- 7.3 Grant project expenses may not be carried out beyond the specified dates of grant implementation.
- 7.4 Grant project costs beyond the specified dates for grant implementation shall not be paid from grant funds.
- 7.5 Actions carried out in violation of the Grant Agreement cannot be paid for at the expense of the project budget. The Organisation shall not accept expenses incurred with violation.
- 7.6 Upon completion of the project, existing savings shall be transferred to the Organisation.
- 7.7 The financial resources of the project cannot be channelled for financing humanitarian or charitable activities.

#### **CHAPTER 8. EXTENSION, SUSPENSION AND TERMINATION OF GRANT**

- 8.1 On the basis of the Grantee's reasoned written application, at its discretion, the Organisation has the right to extend the grant period by one month, without having to provide additional finances. Where necessary, the Grantee has the right to invest funds for the full implementation of the Project from other sources not prohibited by the law.
- 8.2 The Organisation shall have the right to suspend or terminate the Grant project in whole or in part before the expiration of the period specified in the Grant Agreement, if it is discovered that the Grantee has breached or has failed to comply with the terms and conditions of the Grant Agreement and/or this Policy.
- 8.3 In case of detection of violations mentioned in paragraph 8.2 of this Policy, the decision to suspend or terminate the grant may be made in the following cases:
  1. The Grantee failed to provide the Organisation with narrative (descriptive) reports and other necessary documents and information in accordance with the procedure and deadlines defined in the Grant Agreement.
  2. The Grantee failed to submit the relevant financial statements and other necessary documents and information to the Organisation and/or the Accounting (Financial) Company authorised by the Organisation in the manner and within the terms stipulated by the Grant Agreement.
  3. Shortcomings in the performance of financial records.
  4. The Grantee used the grant funds for the expenses not foreseen in the project budget and not approved by the Organisation.
  5. The Grantee provided incorrect and incomplete information to the Organisation or to the authorised Specialised Professional Company, as well as false documents on the grantee organisation, its partner applicants, or any fact related to the grant.
  6. Other violations and shortcomings have been detected.
  7. Performed other activities that are beyond the scope of the activities approved by the Organisation.

8.4 The implementation of the grant is renewed in case of elimination of violations and shortcomings that served as basis for taking a decision on suspension.

8.5 The decisions provided in this Chapter are made by the President of the Organisation:

#### **CHAPTER 9. MONITORING AND EVALUATION OF THE GRANT PROJECT**

9.1 The authorised person and (or) Specialised Company conducting the project monitoring and evaluation shall verify the progress and results of the project.

9.2 Monitoring of ongoing activities and expenditures shall be carried out in line with the project proposal and its annexes approved and attached to the Grant Agreement.

9.3 The representatives of the Organisation are entitled to visit the grantee organisation at any time to check the process and results of the project.

9.4 If possible, the Organisation shall inform the grantee of its visit in advance, but the prior notice is not a mandatory requirement.

9.5 The implementation of the monitoring and evaluation ensures the description of the initial situation, changes resulting from the project implementation, compliance of the project activities with and their proportionality to the expenditures within the project budget, accompanied by relevant supporting documents, materials ensuring visibility and communication, photos, etc.

#### **CHAPTER 10. REPORTS**

10.1 The Grantee shall present a report on the project implementation, consisting of two parts (narrative (descriptive) and financial).

##### **10.2 Narrative (Descriptive) Report:**

1. The narrative report should reflect the description of activities (work) carried out in the scope of the project and an impact analysis. Interim narrative reports should be submitted after each monitoring and evaluation conducted by the Organisation.
2. The interim report should be presented prior to the next tranche in case the amount is transferred in tranches.
3. The final narrative report should be submitted within 30 days after the completion of the project.
4. The Grantee must accompany the report with the necessary documents, materials, including printing, photos, videos, etc., which support the Project implementation.

##### **10.3 Financial Report:**

1. The financial report is submitted to the Accounting (Financial) Company authorised by the Organisation and should reflect a detailed report on costs accompanied with documentation justifying every expense, i.e., invoices, receipts, service or employment contracts, banking forms, etc. (see Annex 1).
2. The grantee must submit interim financial reports prior to the next tranche, in case the amount is transferred in tranches.
3. Final financial reports should be submitted within 30 days after the completion of the project.
4. The procedure for submission of financial reports should be submitted in accordance with the procedure set out in Annex 1 to this Policy.

**RULES OF PROCEDURE  
FOR THE SUBMISSION OF FINANCIAL REPORTS**

**1. SUBMISSION**

- 1.1 The financial report is submitted after approval of the project narrative report by the Organisation.
- 1.2 The report shall be submitted by the Project Manager and (or) the responsible accountant not later than within 5 (five) days after the end of the given reporting period, and the final report shall be submitted not later than within 10 (ten) days after the approval of the narrative report.
- 1.3 The report shall be sealed with the seal of the Organisation and signed by the Project Manager and the accountant, approved by the Head of the Executive Body of the Organisation.
- 1.4 The report shall be drawn up in the form of a spreadsheet, according to expenditure items, by combining actual costs with budget expenditures and indicating the amount and percentage of deviations.
- 1.5 The report shall be accompanied with the copies of all the accounting documents and calculations, which include:
  - Salary payroll documents,
  - Performance Acts,
  - Payment records,
  - Invoices (if available), as well as payment accounts,
  - Acts of receipt and delivery,
  - Business trips orders and certificates,
  - Orders on normative costs of fuel (petrol),
  - Cash book,
  - Payment orders,
  - Bank statements,
  - Warehouse entry and exit invoices,
  - Waybills,
  - Other expenditure documents.
- 1.6 All documents shall be submitted with the requisites required by the RA law.

**2. ASSESSMENT AND ACCEPTANCE OF FINANCIAL REPORTS**

- 2.1 The financial report is evaluated by a professional “Specialised Company” authorised by the Organisation within five business days of its submission, and then it compiles an opinion conclusion. The “Specialised Company” shall submit the opinion on the results of the evaluation to the authorised person of the Organisation. After the approval of the opinion by the authorised person of the Organisation, the project manager and/or the accountant are informed about it.
- 2.2 The financial report shall be deemed accepted if it is signed by the President of the Organisation and certified by the seal of the Organisation.
- 2.3 In case of shortcomings, the authorised person of the Organisation shall draw up a summary of shortcomings and provide it to the grantee.
- 2.4 After making the corrections listed in the Summary of Shortcomings, the financial report shall be re-submitted in accordance with the procedure set out in paragraph 2.1 of this procedure:



**RULES OF PROCEDURE  
FOR AWARDING SUB-GRANTS IN THE FRAMEWORK OF THE EU-FUNDED “COMMITMENT TO  
CONSTRUCTIVE DIALOGUE” PROJECT**

**1. SUBMISSION**

Two types of sub-grants shall be allocated in the scope of the “Commitment to Constructive Dialogue” Project (hereafter referred to as “CCD”).

First: Build and/or strengthen CSO coalitions (networks) or support existing CSO coalitions (networks) in 9 target areas of the project - the RA sectors of justice (1), human rights (2), public finance management (3), business (4), education (5), social sector: social inclusion of children with disabilities (6), agriculture (7), economy (8), energy (9), ensuring their development and increased impact on public policy development, advocacy and public participation in these processes in the above-mentioned sectors.

Second: Small sub-grants, which shall be provided to the CSOs to undertake effective monitoring of public budgets and policies at local governments and the regional level and to develop evidence-based public policies.

Sub-grants in the scope of sub-grant project for the creation and/or strengthening of CSO Coalitions (Networks) or support the existing CSO Coalitions (Networks) will be provided to CSO Consortia in two stages.

In the first stage sub-grants of up to 25,000,000 AMD (twenty-five million) each will be available in the first stage of the Project to support up to 9 CSO consortia providing one sub-grant in each of the 9 targeted areas of the Project.

In the second stage of sub-grants provided to CSO Coalitions (Networks), the Project will support up to 9 CSO consortia winners in the first stage, providing each of them with additional financial support up to AMD 8,500,000 (eight million five hundred thousand).

Up to 33 sub-grants each up to 5,500,000 AMD (five million five hundred thousand) will be provided to CSOs in the scope of the small sub-grants project.

This Annex complements the Grants Policy of the “Armenian Lawyers’ Association” NGO. In case of contradictions arising between the provisions of Annex 2 and the Grants Policy, the provisions of the Grants Policy of “Armenian Lawyers’ Association” NGO shall prevail.

**2. EVALUATION AND SELECTION CRITERIA OF APPLICATIONS**

2.1. Grants provided in the scope of CCD will be assessed by the Grants Commission, taking into account the following criteria:

**1. Administrative Assessment and Verification of Applicants' Compliance**

Administrative Criteria	Yes	No	Comments
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1. The application has been submitted within the deadlines.			
2. The form of the grant application and the annexes attached to the tender announcement (hereinafter referred to as the grant application form) has been used.			
3. Grant application form has been completed properly.			
4. The application package includes all the documents provided by the grant competition call.			
5. The requested project budget is in line with the project proposal and does not exceed 90% of the total budget.			
6. Duration of the project does not exceed the term mentioned in the call for proposals.			

**Note: Sub-grant applications may not be reviewed if they do not meet the above administrative criteria.**

## 2. Evaluation of the Project Proposal

The project proposal will be evaluated in accordance with the evaluation criteria below:

Section	Maximum points
<b>1. Impact and innovation</b>	<b>30</b>
1.1. How effective (relevant) is the Project Proposal from the aspect of implementation of the CCD project and the sub-grant project objectives?	20
1.2. To what extent does the project proposal offer innovative approaches and solutions?	10
<b>2. Project Description</b>	<b>25</b>
2.1. Does the project proposal reflect the analysis of targeted issues, risks, external factors and are the relevant stakeholders taken into account? Is there a connection between the purpose and the problems?	10
2.2. Effectiveness of the project proposal: Is it realistic with respect to achieving the targeted outcomes and the terms of achieving them?	8
2.3. Has the proposal been submitted jointly with a consortium and does the proposal reserve for partnerships between the parties, the division of responsibilities and authorities between them?	3
2.4. Is the project implementation team sufficiently professional and competent to implement the program?	2
2.5. Does the project proposal contain activities to ensure gender equality and equal opportunities?	2
<b>3. Project Sustainability</b>	<b>25</b>
3.1. Is the project likely to have a tangible impact on public policy, and hence on	15

its target groups?	
3.2. Does the project proposal ensure the applicant's sustainability in the following issues? <ul style="list-style-type: none"> <li>– In financial terms (<i>How will the activities be financed after the project is completed?</i>)</li> <li>– Institutionally (<i>Will the project implementers continue to work after completion of the project?</i>)</li> <li>– At policy level (where applicable) (<i>What types of policies will be elaborated in the scope of the Project and what impact can they have in the public sector?</i>)</li> <li>– Environmentally (where applicable) (<i>Will the project have a negative/positive environmental impact?</i>)</li> </ul>	10
<b>4. Budget and Cost Effectiveness of the Project</b>	<b>20</b>
4.1. Are the activities appropriately reflected in the budget?	5
4.2. Do the expenses and actions, as well as the costs and expected results, match each other?	10
4.3. Is the proposed co-financing sufficient and realistic?	5
<b>Total Score</b>	<b>100</b>

2.2. During the work of the Grant Commission, representative(s) of the European Union Delegation to Armenia will be involved as (an) observer(s)

2.3. In the event when applicants (applicant organisations) try to obtain information about the application evaluation process, that will create an obvious advantage over other applicants and will try to influence the decision-making process in any way, the applicant will be deprived of the right to participate in the competition

### 3. APPLICANTS

Information on eligibility criteria and conditions to apply for the grants competition is provided in Chapter 2 of this Grants Policy.

### 4. DURATION

For sub-grants for the development, advocacy and monitoring public policies for the CSO Coalitions (Networks), the creation and/or strengthening of CSOs coalitions (networks)

1st stage – duration of each project 12 months.

2nd stage – duration of each project 6 months.

Small sub-grants program for CSOs - duration of each project from 4 to 6 months.

## **5. PROCEDURES**

The following procedures will govern the whole cycle of grant allocation and project implementation:

1. Announcement of the call for proposals.
2. Evaluation of submitted applications and approval of the shortlist of winners.
3. Signing sub-grant agreements with successful applicants.
4. Organisation of training aimed at providing experts support for implementation of grant programs, including providing financial consultancy. In case of sub-grant project for the development, advocacy and monitoring public policies for the CSO Coalitions (Networks), the creation and/or strengthening of CSOs coalitions (networks): participation in certification training by the American University of Armenia prior to the launch of the project.
5. Announcement of successful grant projects on the Project website and signing grant agreements with successful CSOs and CSO Coalitions (Networks).
6. Monitoring and evaluation of Grant projects.
7. Publication of the results of the Grant Program.
8. Evaluation of the completed stage of grants and lessons learned.

## **6. GRANTS COMMISSION**

The number of members and the composition of the Grants Commission has been approved by the procedure set in provision 4.1. of the Grants Policy of the “Armenian Lawyers’ Association” NGO.

**STATEMENT OF ABSENCE OF A CONFLICT OF INTEREST**

I, \_\_\_\_\_ (position, name, surname) hereby certify that I have been fully acquainted with the Grants Policy of the “Armenian Lawyers’ Association” NGO and that I have no conflict of interests at the moment of signing this certificate. Under the concept of “conflict of interests”, I understand the situation, where I have no economic interests related to myself, my affiliated person or a third party, political or national, family or emotional relationships, or any other connection or joint interest, which affects or may allegedly or reasonably affect the proper, objective and impartial assessment of the applications submitted for the grant competition.

I hereby undertake the obligation not to be guided by private interests, perform any act, display inaction, or make a decision (including participation in decision making within the collegial body), which, in spite of being legally valid, leads to or promotes or can reasonably lead or affect the selection process of the candidates participating in the grants competition.

I hereby undertake the obligation to immediately inform the Armenian Lawyers’ Association about any situation which is a conflict of interest or may cause a potential conflict of interests.

I acknowledge that the Armenian Lawyers’ Association is entitled to verify the accuracy of this information. I am aware of the consequences that may arise from providing false statements.