

Raise the Bar

A Tool to Move From Harmful to Liberatory Funding Practices with Palestine as Your Compass

Grants Administration & Due Diligence Brief

Grants administration, management, and due diligence processes are more than value-neutral technical or administrative checkboxes. In fact, they are often the clearest indication of the degree to which your values are operationalized in practice.

With their tremendous impact on grantee-funder relationships, harmful practices around compliance and/or onerous technical or financial requirements can undermine otherwise liberatory approaches to grantmaking. This is particularly true for Palestinian-led organizations operating in historic Palestine or engaging in Palestinian solidarity work around the world, since such groups are often subjected to stringent, oppressive financial and due diligence requirements within an “anti-terrorism” framework that is, in the words of the Center for Constitutional Rights, “anti-Palestinian at the core.” Liberatory funding practices mitigate those requirements whenever possible, shoulder or share the burden of risk (real or perceived), and take steps to shield grantee partners from undue scrutiny.

Harmful practices tend to center funder comfort, treat grantees with skepticism, and consciously or unconsciously reproduce cultures of surveillance and criminalization. This section, which is part of [Funders4Palestine’s Raise the Bar tool](#), lifts up intentional, values-aligned approaches to grants management and administration and names the burdensome practices that Palestinian-led groups continue to face in their efforts to secure the resources needed to carry out their work.

DISCLAIMER: We are not lawyers and what we share here is not legal advice. To support raising the bar within this area, we highly recommend securing movement-aligned legal counsel to inform compliance and risk analysis practices.

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1. Approaching anti-terror financing regulations with integrity

LIBERATORY			HARMFUL
Consistently committed to harm reduction when navigating anti-terror financing regulations	<i>How to get there</i>	<i>What's holding you back</i>	Approaching anti-terror financing regulations from a self-protection perspective
<ul style="list-style-type: none"> <input type="checkbox"/> Ongoing political education for staff and board (including program staff, grants managers, finance team, leadership, etc.) on the political origins of anti-terror laws and their role in criminalizing Palestinian liberation. <input type="checkbox"/> Collaborating with funder peers to challenge the legal frameworks of anti-terrorism financing, resource legal protection for the movements that they are designed to target, and share effective tools and arguments your organization has developed. <input type="checkbox"/> Proactively communicating with grantee partners when you are compelled to comply with anti-terror financing laws in order to release funds; working with them to minimize unnecessary harm and overcompliance and setting aside time and space to answer their questions or respond to their concerns. 	<ul style="list-style-type: none"> <input type="checkbox"/> <i>Educate staff and leadership on the history and analysis in this resource as a means to ground practices in an understanding of the anti-Palestinian, racist foundation of anti-terror financing regulations.</i> <input type="checkbox"/> <i>Question your approach to risk, recognizing the shared risks and uneven power dynamics that compel funders to take on some degree of risk if they wish to support rather than undermine liberatory movements.</i> <input type="checkbox"/> <i>Be transparent with grantee partners about practices and policies in adherence with anti-terror financing regulations, and stay open to receiving and responding to feedback.</i> 	<ul style="list-style-type: none"> <input type="checkbox"/> <i>Uncritical acceptance of anti-terror financing regulations without consideration of how the "terrorist" label has been deployed selectively and politically throughout history.</i> <input type="checkbox"/> <i>Legal staff/counsel has a taken-for-granted conservative, funder-protective approach, which is not interrogated in relation to other organizational values that center grantee partners and seek to do no harm.</i> <input type="checkbox"/> <i>"Risk" is uncritically pathologized, refers only to self-risk (rather than risks to grantee partners), and is viewed as a problem to eliminate or minimize to the degree possible.</i> <input type="checkbox"/> <i>A tendency to respond to feedback or pushback from grantee partners with defensiveness and avoidance.</i> <input type="checkbox"/> <i>A belief that accountability only flows in one direction: from grantee partner to funder.</i> 	<ul style="list-style-type: none"> <input type="checkbox"/> Compliance infrastructure designed to protect institutional assets rather than movement partners. <input type="checkbox"/> Conservative approach to interpreting legal requirements, including an "above and beyond" approach to anti-terror financing compliance. <input type="checkbox"/> Outsourcing due diligence to third parties that promise extensive vetting that centers funder protection and peace of mind. <input type="checkbox"/> No meaningful consideration of potential harm to grantee partners, including lack of data privacy and protection measures and exposure to government scrutiny. <input type="checkbox"/> No transparency with grantee partners around anti-terror financing compliance practices. <input type="checkbox"/> Responding to feedback or pushback from grantee partners with defensiveness; or worse, defunding or threatening to defund their work.



2. Approaching due diligence compliance practices with integrity

LIBERATORY			HARMFUL
Practicing compliance as shared responsibility and risk, prioritizing grantee protection and community vetting	<i>How to get there</i>	<i>What's holding you back</i>	Weaponizing compliance (including pre-compliance) to block support for liberatory and solidarity organizing
<ul style="list-style-type: none"> <input type="checkbox"/> Holding a clear organizational understanding that risk is necessary, and there are many risks we cannot afford not to take. <input type="checkbox"/> Engaging in joint risk analysis with grantee partners, understanding that compliance practices built on trust allow risk thresholds to rise as needed. <input type="checkbox"/> Applying minimum standard lens to due diligence, in accordance with organizational and movement values (e.g., when searching for red flags online, searches are limited to terms like “fraud” or “corruption” rather than “activism,” “advocacy,” or “direct action”). <input type="checkbox"/> Using community and peer funder vetting sources (e.g., letters of reference), instead of external sources or third party vetting services, particularly for unregistered groups. <input type="checkbox"/> Coordinating with other funders supporting the same groups to share materials where possible as a means to minimize grantee partner labor and scrutiny. 	<ul style="list-style-type: none"> <input type="checkbox"/> <i>Ensure program staff and grants managers are aware of compliance processes, and start exploring training in harm reduction and deepening shared understanding of the political and regulatory context for compliance.</i> <input type="checkbox"/> <i>Ensure that practices are in place to assess the credibility and values alignment of sources used in due diligence. This includes documentation of allegations found to be spurious and politically motivated.</i> <input type="checkbox"/> <i>Adopt a more expansive understanding of risk that contextualizes individual institutional security within wider philanthropic and movement landscapes. Recognize that risk is an intrinsic aspect of mission-based work, rather than a liability to be avoided and/or minimized by those who can afford to avoid or minimize it.</i> <input type="checkbox"/> <i>Start exploring if/when compliance practices stray from stated organizational values.</i> 	<ul style="list-style-type: none"> <input type="checkbox"/> <i>Heavy bureaucratic burden (e.g., requests for unnecessary information and documentation) passed onto grantees as part of standard compliance practices.</i> <input type="checkbox"/> <i>Legal counsel advising on compliance is not values-aligned and/or lacks the political education and/or analysis to place restrictions on funds going to Palestinian-led work inside a wider political and historical context.</i> <input type="checkbox"/> <i>General lack of transparency with grantees about compliance practices.</i> <input type="checkbox"/> <i>Using third party and/or AI tools to support vetting.</i> <input type="checkbox"/> <i>No meaningful collaboration, connection, or communication between program staff and grants management staff, which often generates uninterrogated disconnects between stated grantmaking values and due diligence processes.</i> 	<ul style="list-style-type: none"> <input type="checkbox"/> Using Zionist or anti-Palestinian media and blacklists (such as NGO Monitor) as sources in due diligence. <input type="checkbox"/> Red-flagging online references to necessary liberatory movement practices such as “direct action.” <input type="checkbox"/> Approaching Palestinian organizing—or any liberation-focused work—as a threat to other priorities, fostering division and competition and undermining cross-movement, cross-border solidarity. <input type="checkbox"/> Including language in your grant agreements that prohibits grantee partners from criticizing the state of Israel or questioning US/Israel relations, or equates anti-Zionism with antisemitism.



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- Compliance staff are trained in harm reduction frameworks, equipped to resist pre-compliance, and resourced to adapt flexibly to changing political and legal contexts (e.g., ongoing education for staff on the evolving legal definitions of terrorism and how to distinguish between current laws and political rhetoric designed to menace).
- Regularly eliciting feedback on due diligence and grants administration processes via robust, accessible channels and practices.
- Educating other donors on the security risk to grantee partners posed by certain compliance practices, such as releasing/storing information on them into databases, and using third parties and AI tools.

- Seek out values-aligned and politically educated legal counsel.*
- Stop requesting unnecessary information from grantee partners, and consider the potential impacts on grantee partners and liberatory movement organizing of all information collected.*
- Adopt trust-based forms of vetting, such as endorsements from civil society partners and aligned foundations.*
- Be transparent with grantees about compliance and evaluation/reporting practices, including when, what, why, and how (e.g., be explicit when asking for names of staff and leadership that they will be run through due diligence; if data on certain metrics is required by source funders, let grantees know this and explain how it will be used).*
- Pay for grantee costs related to compliance, such as covering costs for audits, insurance, or legal counsel.*
- Engage in peer learning with other funders to discuss, troubleshoot, and evaluate your own practices (e.g., are you doing unnecessary, overly extensive, and/or more funder-protective practices?)*
- Open channels to receive and*



respond to feedback from grantees on due diligence processes.

- Move any external vetting practices in-house and ensure communication and awareness across organizational areas (grants management, finance, legal, etc.).*

3. Considering grantee partner burden in grants administration

LIBERATORY			HARMFUL
Requiring lowest possible grantee partner labor in grants administration	<i>How to get there</i>	<i>What's holding you back</i>	Little to no consideration of grantee partner labor in grants administration, often attended with weaponized bureaucracy
<ul style="list-style-type: none"> <input type="checkbox"/> Minimizing paperwork and grantee partner labor by eschewing proposals, or by accepting minimal burden universal proposals, proposals prepared for other funders, or simple application forms. <input type="checkbox"/> Allowing phone conversations, voice notes, videos, or other media in lieu of written applications, ensuring that all forms are simple and accessible, and can be completed in multiple languages. <input type="checkbox"/> For new grantee partners, accepting endorsements from trusted foundations or civil society in lieu of full written proposals, and requiring no 	<ul style="list-style-type: none"> <input type="checkbox"/> <i>Structure grants to be flexible (e.g., time periods are determined in communication with grantee partner needs, with access to low-burden extensions) and require minimum necessary low-burden reporting (e.g., accepting annual reports or reports prepared for other funders).</i> <input type="checkbox"/> <i>Regularly interrogate how low-burden your practices actually are, and start conversations with peers to find out if they have more streamlined processes, and if so, how they got there.</i> 	<ul style="list-style-type: none"> <input type="checkbox"/> <i>Materials required to be submitted in English and/or in writing only, without considering accessibility in terms of language, ability, literacy, consistent internet connectivity and bandwidth, or technical capacity.</i> <input type="checkbox"/> <i>Requiring grantee partners to apply for funds via a specific online platform that may not be accessible for grantees in remote areas, or under occupation and siege.</i> <input type="checkbox"/> <i>Not notifying grantee partners (or failing to notify grantee partners</i> 	<ul style="list-style-type: none"> <input type="checkbox"/> Applications and reports are overly extensive and complex, with little to no flexibility on deadlines or required materials, for organizations facing volatile political conditions with limited access to supportive infrastructure. <input type="checkbox"/> Reporting functions as a form of monitoring and surveillance alone, rather than an opportunity for learning and mutual accountability. <input type="checkbox"/> Requiring grantee partners to provide receipts and show proof of all transactions. <input type="checkbox"/> Using bureaucracy and compliance



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or minimal (only absolutely necessary) documentation for renewal grants.

- Adapting practices to grantee partner contexts: recognizing that Palestinians in Gaza and the West Bank are under siege and displacement, so all bureaucratic requirements must be radically reduced.
- Grants are structured without requiring formal reporting or requiring that funds be spent within a time period.
- Reviewing grant agreement language with grantee partners before grant agreements are sent out for signature, making adjustments wherever possible.
- Practicing informal reporting as an opportunity for shared reflection and learning, rather than monitoring and surveillance.
- Using participatory and partner-led processes for learning and evaluation, including avoiding imposing or predetermining measures of success; allowing grantee partners not only to set priorities, but also to determine what meaningful change looks like.

- Question what information and documentation is actually necessary for compliance, particularly under heightened scrutiny of liberatory work, when extensive documentation may carry more risk for all parties than protection.*
- Request feedback from grantee partners about grants administration practices as a means to start building a case for specific improvements in accessibility (including languages offered, online and offline options, etc.), security, formats accepted, time/labor required, etc.*
- Provide support to grantee partners on how to navigate grants administration processes and platforms, including when they change (e.g., offering tutorials, walk-throughs, space and time to answer questions).*
- Allow confidential or low-visibility funding arrangements (e.g., not publicizing grants, using intermediaries) when public association with a funder could endanger grantee partners.*
- Coordinate with other funders on grants administration during periods of grantee partner crisis—what knowledge and resources might be pooled to support partners? Are there practices others are using that you can adopt?*

in a timely manner) about changes to grants administration processes, and/or failing to offer or provide adequate support on navigating new systems.

- Requiring grantee partners to notify funders of any deviations from the proposed work or budget, even if they fall within the grant terms and agreement.*
- Gathering information from grantee partners (e.g., via lengthy applications or reports) without considering why it is being gathered or how it will be used.*

as an excuse to slow or block Palestinian-led organizations from accessing resources.

- Requiring grantee partners to scrub anti-Zionist and/or pro-Palestinian language from their application or reporting materials.