Funded by
the European Union
ممول من الاتحاد الأوروبي

Policy Paper 2026
Toward Strengthening Fundraising Mechanisms for Civil Society Organizations in Jordan: A Shift Toward Financing Sustainable Development Projects

Implemented by

acted

ZERO EXCLUSION CARBON POVERTY

In partnership with

KING HUSSEIN FOUNDATION مؤسسة الملك الحسين
مركز المعلومات والبحوث
INFORMATION AND RESEARCH CENTER

Funded by
the European Union
ممول من الاتحاد الأوروبي

" This publication was funded by the European Union. Its contents are the sole responsibility of Acted and IRC-KHF and do not necessarily reflect the views of the European Union"

Implemented by

acted

ZERO EXCLUSION CARBON POVERTY

In partnership with

KING HUSSEIN FOUNDATION مؤسسة الملك الحسين
مركز المعلومات والبحوث
INFORMATION AND RESEARCH CENTER

Policy Paper 2026

Toward Strengthening Fundraising Mechanisms for Civil Society Organizations in Jordan: A Shift Toward Financing Sustainable Development Projects

Project Background

This paper comes within the project of “Empowering and Strengthening Civil Society Organizations in Jordan by Enhancing Institutional and Technical Capacities to Foster Coordination for Achieving Sustainable Development Goals.” The project is implemented under the umbrella of (ACTED), in partnership with the Information and Research Center – King Hussein Foundation, funded by the European Union Delegation to the Hashemite Kingdom of Jordan.

The project aims to contribute to strengthening civil society organizations in Jordan, characterized by inclusivity, participation, empowerment, and independence, alongside supporting an open and constructive dialogue among various civil organizations. It focuses on supporting organizations operating in the fields of human rights, democracy, good governance, environmental protection, and climate change, as well as economic cooperation, with special attention given to issues of inclusivity, circular economy, and migration. Within this framework, ACTED works on providing specialized training programs for capacity building and enhancing coordination mechanisms among these organizations to support the sustainability of their work.

Through empowering 21 civil society organizations and 42 local associations in Jordan, developing their institutional structures, and enhancing their technical capacities, the project strengthens their role as active actors in protecting human rights and supporting sustainable development. It also seeks to reinforce coordination and cooperation among civil society organizations and enhance dialogue with key stakeholders, thereby contributing to supporting relevant policy reform.

In line with these objectives, the current policy paper, titled **“Towards Developing Fundraising Mechanisms for Civil Society Organizations in Jordan: Donating for the Development of Sustainable Development Projects”** was prepared in cooperation with the project’s advisory committee, which comprises experts and representatives from civil society organizations, the private sector, and official institutions in Madaba Governorate. The paper aims to analyze the legislative and institutional gaps that hinder fundraising for development projects, and to propose an integrated package of practical and actionable recommendations. This aims to contribute to simplifying procedures, stimulating local financing, transforming temporary relief donations into sustainable development investments, creating job opportunities in the governorates, and achieving the objectives of the Economic Modernization Vision (2023–2033).

Preparation Team

- Professor Dr. Ayman Halasa – Director of the Information and Research Center / King Hussein Foundation
- Mr. Majed Abu Azzam – Head of Policy and Advocacy Department – Information and Research Center / King Hussein Foundation
- Attorney Mimas Al-Qaaideh
- Ms. Rayana Abu Wendi – Advocacy Officer – Information and Research Center / King Hussein Foundation

Follow-up Team at ACTED

- Ms. Majeda Ammoura – Livelihoods Projects Coordinator
- Mr. Humam Shdeifat – Project Manager
- Ms. Aida Al-Masaeed – Monitoring, Evaluation, Accountability, and Learning (MEAL) Manager
- Ms. Tasneem Aqel – Project Development and Partnerships Officer
- Mr. Mohammad Shdeifat – Project Officer
- Mr. Majed Al-Shamlan – Project Assistant

Legal Review

- Professor Dr. Hamdi Al-Qubailat

Design: Allam Gharaibeh AG Designs

Advisory Committee Members

The Information and Research Center extends its deepest gratitude and appreciation to the members of the Advisory Committee, who actively contributed to the formulation, preparation, and review of this policy paper through their diverse expertise, insightful visions, and legal and technical feedback. Their contributions have resulted in a comprehensive paper that reflects the aspirations and impact of fundraising for sustainable development projects within the civil society organizations sector. These collective efforts, manifested in practical recommendations, reflect a genuine partnership among national institutions, civil society organizations, and experts, representing an exemplary model of collaborative work for impactful and sustainable policy reform.

No.	Name	Organization
1	Ms. Nawal Al-Shawabkeh	Union of Charitable Societies – Madaba
2	Ms. Siham Mohammad	Basha'er Al-Noor Society
3	Ms. Mariam Al-Fuqaha	Suhool Mo'ab Charitable Society
4	Ms. Fawza Al-Ajaleen	Bani Hamida Young Women Society
5	Ms. Niveen Al-Rawahneh	Al-Jawad for Charitable Works Society
6	Ms. Ibtisam Al-Shuara	New Al-Yusra Women Charitable Society
7	Mr. Qusai Al-Fushaikat	Hafez for Sustainable Development
8	Ms. Alaa Al-Karaki	Local Expert / Madaba
9	Ms. Aisheh Hawatmeh	Hamsa Ordoneyah for Development and Training
10	Mr. Khaled Al-Sararha	Attorney

Table of Contents

Executive Summary

This paper addresses policies for developing fundraising mechanisms for civil society organizations in Jordan, analyzing legislation and proposing practical recommendations to facilitate the fundraising process. It also aims to empower civil society organizations to transition from relying on relief aid to donating for sustainable development projects. This approach stems from a primary problem: the current regulatory framework, represented by the Fundraising Licensing Regulation No. (24) of 2025,[1] despite its importance in enhancing transparency and combating illicit practices, creates procedural and normative restrictions that may hinder fundraising and small community initiatives, preventing the building of long-term funding relationships with individual donors, who constitute the primary source of funding in charitable work globally.

The paper sought to analyze the legal aspects of the Fundraising Licensing Regulation No. (24) of 2025 in Jordan, which was issued to regulate fundraising operations and enhance transparency in managing funds allocated for charitable work. In addition, the paper examines the legal framework governing fundraising operations and analyzes several articles within the regulation from a legal perspective to identify the most prominent legal issues associated with its implementation. The paper also presents a set of recommendations aimed at developing the regulatory framework to achieve a balance between government oversight requirements and strengthening the role of charitable work and community initiatives, ultimately leading to a stimulating legislative environment that contributes to achieving sustainable development.

In its analysis and recommendations, this paper relied on a diverse methodology that combined a deep legal analysis of the Fundraising Licensing Regulation No. (24) of 2025, a review of national and regional experiences, and the outcomes of active meetings with the members of the Advisory Committee, where the committee held 6 meetings with its members. The paper also relied on quantitative field research, represented by a questionnaire specifically designed to gather the opinions and experiences of civil society organizations in Jordan, which was distributed to (99) organizations operating across various governorates of the Kingdom to monitor the reality of fundraising.

This paper emphasizes the importance of relief work as one of the fundamental roles of civil society organizations; the policy paper does not call for its elimination or reduction, but rather seeks to develop a parallel, complementary path aimed at enabling these organizations to raise funds for sustainable development projects, thereby achieving a balance between emergency response and long-term investment in development.

In light of the policy alternatives proposed by this policy paper, it adopts the "Dual Donation Model," which combines two integrated paths: the first for relief work through the current "Oun" platform, and the second for donating to sustainable development projects through the creation of a specialized national electronic platform. This platform is based on browsing projects according to national priority sectors (such as agriculture, water, environment, and economic empowerment), where the donor selects the sector and then the project they wish to support, accompanied by a transparent dashboard that displays completion rates and developmental impact. This model enhances reliance on local financing, creates job opportunities, and transforms donating from a temporary crisis response into a permanent investment in development, in alignment with the Economic Modernization Vision 2030.

1. Fundraising Licensing Regulation No. (24) of 2025. Official Gazette, Issue No. 5988, Page 2030, Dated April 16, 2025. Jordan.

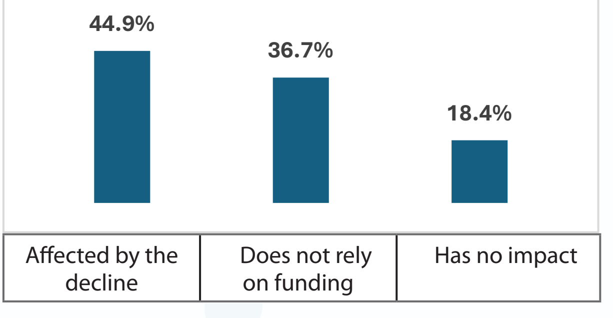
Towards Donating for Development Projects

The shift in donation culture from relief aid to funding development projects constitutes one of the most prominent strategic challenges facing civil society organizations in Jordan. Jordanian society enjoys a high spirit of solidarity and synergy, particularly in responding to urgent humanitarian appeals such as food aid, seasonal assistance, and disaster situations. However, this pattern of giving, despite its importance and humanitarian value, remains limited in impact in terms of sustainability and long-term development.[2] The transformation required today is a transition from the concept of "temporary assistance" to the concept of "development investment," whereby donating becomes a means to fund productive and sustainable projects that address the root causes of social and economic problems, rather than merely treating their immediate symptoms.

This transformation requires a deep reconsideration of legislative and institutional fundraising mechanisms, as well as the surrounding societal culture. According to international studies and experiences, donors pass through a life cycle that begins with rapid, emotional donating (in response to an emergency), then evolves into regular, habitual donating, and ultimately reaches deliberate donating, which the donor plans carefully while fully realizing its long-term developmental impact.[3] Modernizing the legal framework alone is not sufficient to achieve this transformation; rather, it must be accompanied by awareness and training programs that change prevailing concepts of giving. These programs should highlight success stories of development projects that have made a real difference in the lives of local communities, whether in the fields of economic empowerment, education, health, or employment.

The results of the questionnaire, as shown in Figure (1), demonstrated that 44.9% of organizations were directly affected by the decline in foreign funding. These organizations indicated significant impacts on the number of implemented projects—with 59.5% reporting a "significant" or "moderate" impact—as well as on the volume of activities and services, and the ability to retain qualified staff. Conversely, 36.7% of organizations reported that they do not rely on foreign funding at all. These findings confirm that the majority of organizations remain in need of sustainable local funding alternatives, which is what this policy paper adopts in the Dual Donation Model.

Figure (1): The Impact of the Decline in Foreign Funding on Community-Based Organizations



The success of the transition toward funding development projects rests on three fundamental pillars that integrate with one another to create a stimulating environment for sustainable development-oriented charitable work.

2. Barakat, Amina. (2021). "The Financing and Developmental Role of Endowment Funds - The Case of the 'Tathmeer' Endowment Fund." Journal of Economic Studies. (Journal of Economic Studies – Mohammed V University). Link: jes.um5.ac.ma

3. Klein, Kim. (2013). Fundraising for Social Change (Abridged Arabic Version). International Center for Research and Studies (Medad). Link: Home-International Center for Research and Studies (Medad)

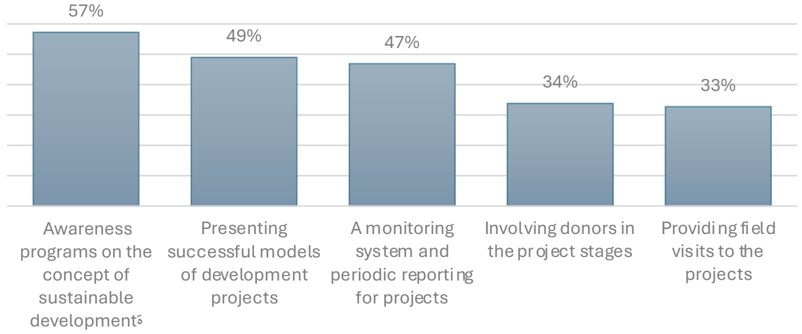
The First Pillar: Harmonizing and developing the legislation and policies governing fundraising.

The Second Pillar: Providing institutional and technological support to overcome procedural difficulties by introducing unified digital platforms that facilitate electronic donations, building donor databases, and offering technical and advisory services to organizations to improve their fundraising performance.[4]

The Third Pillar: Developing the capacities of community-based organizations, building strategic partnerships with the private sector and the local community, and empowering them to design and manage fundable development projects that adhere to good governance and transparency, while adopting innovative financing mechanisms for development projects and crowdfunding. In this context, promising local experiences can serve as a replicable model at the national level, paving the way for a new, more sustainable, and deeply impactful donation culture.[5]

When organizations were asked about the mechanisms capable of ensuring the success of donating to development projects, as shown in Figure (2), awareness programs on the concept of sustainable development ranked first at (57%). This reflects an urgent need to disseminate a culture of development and to familiarize society with the feasibility of long-term development investment. Ranking second was presenting successful models of development projects at (49%), which points to the importance of documenting and publishing success stories. In third place was a monitoring system and periodic reporting for projects at (47%), reflecting the organizations' desire to enhance transparency and accountability to build permanent trust with donors. This was followed by involving donors in the project stages at (34%), and providing field visits to the projects at (33%). These results confirm that shifting the donation culture requires an integrated package of awareness, transparency, and participatory tools, rather than merely legal amendments. These mechanisms form an essential part of the design of the national platform for development projects proposed in this paper.

Figure (2): Mechanisms for the Success of Donating to Development Projects



4. The «Oun» National Platform for Fundraising is available at the following link: Oun-National Donations Platform
5. Leonard, C. (2024). NGO, NGO-ing, NG-gone: NGOs and their Social Ramifications in Jordan. University of Mississippi. LINK: Honors Theses | Honors College (Sally McDonnell Barksdale Honors College) | University of Mississippi

National and Regional Experiences in Donating for Development Projects

In February 2026, the Ministry of Social Development took the initiative to launch the "Oun" National Platform for Fundraising relief aid (oun.jo),[6] which is a governmental digital platform designated for organizing and gathering donations by civil society organizations for the benefit of needy Jordanian families, under the supervision of the Ministry and with technical support from the Ministry of Digital Economy and Entrepreneurship. The platform aims to enhance the efficiency of charitable work and ensure that support reaches its beneficiaries with transparency and reliability through an official and secure digital channel. In its current phase, the platform focuses on primary support areas for needy families, such as distributing food baskets, healthcare, supporting education and childhood, and housing. It displays the charitable campaigns of licensed societies that have met the fundraising conditions, enabling citizens and companies to donate easily through the available digital payment methods.

Furthermore, some civil society organizations face challenges in registering through the platform, particularly those that have not yet met the conditions for obtaining a fundraising license, which necessitates considering the expansion of the platform's beneficiaries base or simplifying registration procedures for small initiatives.[7]

Meanwhile, the Arab region is rich with pioneering experiences in organizing fundraising for development projects via electronic platforms, most notably the Syrian Development Fund platform (www.syrfund.gov.sy).[8] This platform represents an advanced model in displaying approved development projects with precise details, including the project name, implementing agency, objective, required budget, and achieved completion rate. The platform provides local and international donors with the opportunity to directly select projects that align with their developmental priorities within specific tracks, namely (energy, water, agriculture, health, education, and reconstruction), along with periodic monitoring of fund disbursement and implementation stages, which enhances donor trust and ensures donations reach the actual beneficiaries. This model represents a qualitative shift from random donating to systematic, sustainable financing for development projects. According to data displayed on the platform, the volume of donations for these projects reached (83.173) million dollars as of March 25, 2026.

Stemming from this national direction represented by the establishment of the "Oun" platform for relief donations, this policy paper proposes creating a complementary, specialized national electronic platform for fundraising designated solely for development projects, benefiting from the infrastructure and expertise provided by the "Oun" platform. Through this setup, the Ministry of Digital Economy and Entrepreneurship, under the supervision of the Ministry of Social Development, would develop this platform to allow societies and community initiatives that have met the requirements for obtaining a fundraising license for a specific development project to publish an integrated donation proposal. This proposal would include a precise description of the project, its objectives, location, target group, time frame, required budget, and proposed implementation mechanism. Through this integration between the two

6. The «Oun» National Platform for Fundraising is available at the following link: Oun-National Donations Platform
7. The fifth meeting of the Advisory Committee members, dated Tuesday, March 31, 2026.
8. The Syrian Development Fund platform is available at the following link: Syrian Development Fund-Building Syria's Future

platforms, the charitable and developmental work environment in Jordan would be strengthened by providing two clear paths: the first for emergency relief work (Oun), and the second for sustainable development investment (the proposed platform), thereby contributing to transforming the donation culture from temporary giving into sustainable financing for development projects.

National and International Legislation to Facilitate the Fundraising Process

Fundraising campaigns are considered among the important means that contribute to supporting charitable work and promoting social solidarity within Jordanian society, as numerous community initiatives and charitable societies rely on donations to implement their activities and provide assistance to groups in need. Given the importance of regulating these operations and ensuring transparency in managing donated funds, the Fundraising Licensing Regulation No. (24) of 2025 was issued to regulate fundraising mechanisms and establish legal controls governing this activity. Despite the importance of this regulation, certain provisions contained within it may raise a number of legal questions regarding the nature of the procedures imposed on entities wishing to raise funds, as well as the extent of the powers granted to the competent administrative authorities. Hence arises the importance of analyzing the legal aspects of this regulation, with the aim of identifying the most prominent issues that may emerge during its implementation and clarifying their legal implications, ultimately presenting a set of recommendations that can contribute to developing the regulatory framework for fundraising in a manner that achieves a balance between legal oversight requirements and supporting charitable work in Jordan.

Fundraising is not limited to being a financial activity or a charitable act; rather, it is linked to a set of fundamental rights and freedoms guaranteed by the Jordanian Constitution and international conventions. Community initiatives and fundraising campaigns represent a form of civic participation and voluntary work, and are associated with several constitutional rights, most notably: the freedom of opinion and expression provided for in Article (15) of the Constitution, the freedom of assembly and association stipulated in Article (16) of the Constitution,[9] and the freedom of association enshrined in Article (22) of the International Covenant on Civil and Political Rights.[10]

On this basis, fundraising constitutes part of the freedom of association and civil work constitutionally guaranteed in Jordan under Article (16), and an internationally guaranteed right under Article (22) of the International Covenant on Civil and Political Rights. Fundraising serves as an essential financing tool for the activities of societies, whether in providing humanitarian aid or implementing development and social projects, and reflects an actual exercise of the right of societies to engage in civil work and community initiatives.

9. The Jordanian Constitution of 1952 and its Amendments. Articles (15), (16). Official Gazette Issue No. 1093. Page 3. Dated January 8, 1952.
10. The International Covenant on Civil and Political Rights. Link: International Covenant on Civil and Political Rights | OHCHR

Harmonizing national legislation with these constitutional and international principles requires that any restrictions on fundraising be established by explicit, defined, necessary, and proportionate legal provisions to achieve a legitimate purpose—such as preventing fraud or money laundering—without imposing absolute bans or arbitrary procedures, in compliance with international standards such as the United Nations Office on Drugs and Crime Guidance (UNODC Guidance).[11] Controls must balance protecting society with encouraging charitable work, allowing community initiatives to raise funds under transparent, specific, and flexible regulations that match the nature of the activity and its humanitarian and charitable purposes.

Accordingly, the regulation of fundraising operations must be conducted within a framework that respects these rights and freedoms, ensuring that the regulatory restrictions imposed on this activity observe the following legal parameters: they must be stipulated in a clear and specific legal text, fulfill a legitimate purpose related to the public interest, and be necessary and proportionate to the objective intended to be achieved, without imposing excessive restrictions on community initiatives and charitable work. Achieving this harmonization is the path to ensuring that the Jordanian legislative framework supports development-oriented charitable work rather than acting as an obstacle to it.

Legal Issues in the Fundraising Licensing Regulation No. (24) of 2025 and the Policy Paper's Proposals Regarding Them

Developing the legislative provisions governing fundraising is not limited to correcting legal issues; rather, its impact extends to restructuring the relationship among official authorities, civil society organizations, and donors, which positively reflects on the quality and efficiency of charitable work of all kinds. The legislative harmonization proposed below consists entirely of amendments that would achieve two integrated levels of development:

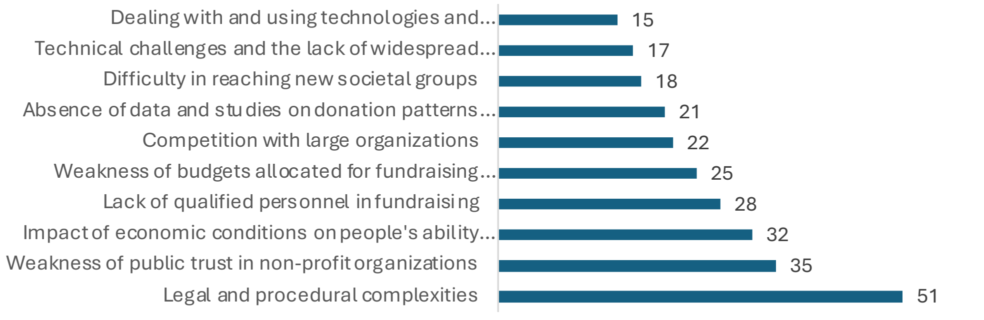
- **The first level** consists of enabling organizations to respond rapidly to urgent humanitarian cases through simplified procedural tracks that ensure the timely delivery of aid without compromising oversight and transparency requirements.
- **The second level** relates to creating a stimulating legal and technical environment for donating to long-term development projects, as legislative and technical flexibility allows societies and community initiatives to design sustainable funding campaigns that consider the nature of each project and enhance the trust of local and international donors through clear and balanced oversight mechanisms.

Furthermore, establishing objective criteria for accepting or rejecting licensing applications and reducing instances of legislative ambiguity will contribute to lowering administrative and time costs for organizations, while increasing the efficiency of available resource utilization, ultimately expanding the scope of benefits derived from donations in both relief and developmental aspects.

11. United Nations Office on Drugs and Crime (UNODC). (2015). Guidance on the Implementation of the United Nations Convention against Transnational Organized Crime. Vienna: UNODC. Link: United Nations Convention against Transnational Organized Crime

The results of the questionnaire, as shown in Figure (3), demonstrated that "legal and procedural complexities" are considered the most significant challenges facing civil society organizations in fundraising, with (51) organizations selecting them as one of the top three challenges they encounter. Ranking second was the "weakness of public trust in non-profit organizations" with (35) organizations, followed by the "impact of economic conditions on people's ability to donate" with (32) organizations, and then the "lack of qualified personnel in fundraising" with (28) organizations. These figures show that legal and bureaucratic obstacles represent a barrier to organizations. Addressing these complexities through targeted legislative amendments and the simplification of licensing procedures constitutes a priority, and its positive impacts will reflect on the operational environment and sustainability of civil society organizations in Jordan.

Figure (3): The Most Prominent Challenges Facing Civil Society Organizations in Fundraising



From this standpoint, approving the proposed legislative amendments to the Fundraising Regulation constitutes an essential step toward building an integrated fundraising system. This system is capable of achieving a balance between the requirements of effective oversight and protecting public funds on one hand, and supporting innovation in charitable work and enhancing the financial sustainability of organizations on the other, in alignment with Jordan's vision for public sector modernization and strengthening partnership with civil society organizations.

Furthermore, making explicit reference in the text of the Regulation to the principle of fundraising for development projects leads to organizing the fundraising process for development projects separately, distinguishing it from relief donation campaigns, and represents a fundamental step toward developing the environment of charitable and developmental work in Jordan. Institutionalizing development projects within the text of the Regulation allows organizations and community initiatives to engage in long-term planning, and provides donating entities with legal and procedural guarantees that increase their confidence in directing their donations toward sustainable projects with a tangible developmental impact. This legislative distinction also allows the Ministry to establish flexible controls tailored to the nature of development projects in terms of duration, required resources, disbursement mechanisms, and follow-up, without conflicting with the requirements of transparency and anti-corruption; rather, it strengthens them by reducing procedural ambiguity and defining a clear path for accountability.

Moreover, adopting this approach contributes to consolidating a culture of sustainable local financing and encourages the private sector, individuals, and national institutions to contribute to tangible development projects. This reduces reliance on volatile foreign funding and supports national economic and social development plans, particularly in vital sectors such as agriculture, environment, and economic empowerment in rural communities and governorates.

An analysis of several articles of the Regulation reveals the existence of certain legal issues that may affect the practical implementation of the Regulation, the most prominent of which can be highlighted as follows:

1. Article (3/A): Absolute Ban on Fundraising Without a License

- **Cause of the Issue:** The article imposes an absolute ban on fundraising without obtaining prior licensing, making the license a fundamental condition for practicing this activity. This may lead to restricting community initiatives, especially in urgent humanitarian cases or small-scale campaigns.
- **Human Rights Impact:** This may lead to restricting certain forms of community participation and charitable work, which could infringe upon rights associated with the freedom of civic action guaranteed by **the Jordanian Constitution**.
- **Recommendation:** Explicitly state specific exceptions for urgent humanitarian cases or small-scale campaigns, allowing fundraising in these instances under **a prior notification system** instead of requiring full licensing.

2. Article (3/D): Restricting Individual and Community Initiatives (Natural Persons)

- **Cause of the Issue:** The article grants the Minister the authority to determine the foundations upon which individuals may raise funds without defining clear criteria, thereby expanding the scope of administrative discretion.
- **Human Rights Impact:** This may lead to ambiguity in application and limit certain forms of social solidarity, and it may also undermine **the principle of legal certainty**, which requires legal rules to be clear.
- **Recommendation:** Establish clear and specific criteria within the Regulation itself to govern fundraising by natural persons in cases of social solidarity, thereby limiting broad administrative discretion and reinforcing **the principle of legal certainty**.

3. Articles (5), (6), (8), (14), and (15): Procedural Strictness and Excessive Administrative Requirements

- **Cause of the Issue:** The aforementioned articles impose a number of requirements and procedures to obtain a license, which may create an administrative burden on small community initiatives, as the procedural density may exceed necessity and reasonable limits in some cases.

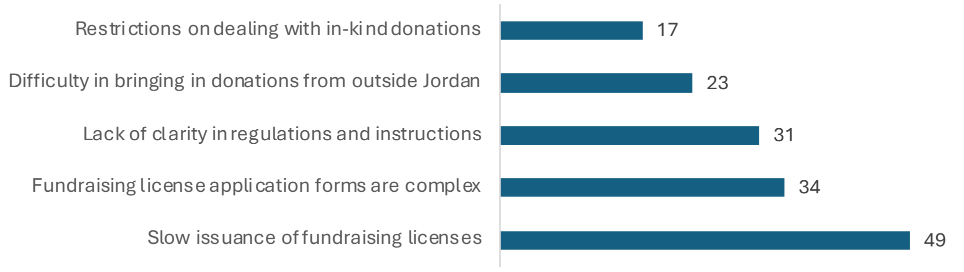
- **Human Rights Impact:** This may lead to difficulties in organizing donation campaigns, reduce opportunities for community participation in charitable initiatives, and impose regulatory burdens that are disproportionate to the scale of certain charitable campaigns.
- **Recommendation:** Simplify licensing procedures by reducing unnecessary administrative requirements and adopting expedited procedures for small-scale or short-term campaigns, thereby achieving a balance between oversight and the stimulation of charitable work.

4. Article (5/B): Failure to Determine the Status of a License Application in the Event of Silent Administration

- **Cause of the Issue:** The article mandates submitting the fundraising license application at least thirty business days before the fundraising process begins. However, the article does not indicate the status of the application if the administration remains silent and fails to respond with either acceptance or rejection. This may drive the competent authority to misuse power by resorting to silence and non-response, which could defeat the purpose of fundraising due to the lapse of time.
- **Human Rights Impact:** Leaving this matter unaddressed implies that the application is rejected after thirty days from its submission date. This is not in the best interest of the applicant, who would have no option left except judicial appeal after proving the issuance of an implied decision of refusal.
- **Recommendation:** Add a new paragraph to Article (5) that deems the application accepted in this scenario. (5/D): "If thirty days pass from the date of submitting the license application and no decision accepting or rejecting the application has been issued, the application shall be considered accepted".

When civil society organizations in Jordan were questioned about the most prominent legal, administrative, and procedural obstacles in the fundraising process, as illustrated in Figure (4), the findings indicated that the slow issuance of licenses is the most prominent obstacle, appearing in the responses of (49) organizations. This was followed by the complexity of license application forms with (34) organizations, and then the lack of clarity in regulations and instructions, which received (31) responses. Additionally, (23) organizations pointed out the difficulty of bringing in donations from outside Jordan, while (17) organizations reported the existence of restrictions on dealing with in-kind donations. These figures confirm that procedural complexities and the lack of clarity of regulations constitute a series of interconnected obstacles that begin from the moment of submission (licenses and forms) and extend to the execution and follow-up phases. Therefore, the legislative amendments proposed in this paper—which include standardizing forms, setting binding timeframes for deciding on applications, and establishing clear definitions for broad concepts—represent an integrated package to address these obstacles.

Figure (4): The Legal and Procedural Obstacles in the Fundraising Process



5. Article (6): Composition of the Committee and Requesting the Opinions of "Relevant Authorities"

- **Cause of the Issue:** The committee is composed of employees within the executive authority, without independent representation or clear procedural guarantees for neutrality. The phrase "relevant authorities" is undefined, which may open the door to introducing non-financial considerations without explicit controls.
- **Human Rights Impact:** Higher susceptibility to politicization or inconsistency in decisions, which undermines the principle of legal certainty.
- **Recommendation:** Restructure the composition of the committee to ensure more diverse and independent representation, while defining exactly what is meant by "relevant authorities" in a clear text to avoid ambiguity and ensure transparency in decision-making.

6. Article (6/D): Absence of Clear Criteria for Rejecting a License Application

- **Cause of the Issue:** The Regulation only states that the Ministry must "state the reasons" when rejecting a license, but it does not specify what these reasons or their parameters are. This makes almost any rejection a final decision and leaves significant room for personal discretion by officials, thereby weakening fairness and transparency.
- **Human Rights Impact:** Uncontrolled expansion in the criteria for accepting or rejecting a license application, combined with a failure to specify their nature, which may conflict with the fundamental requirement of a "clear and specific text."
- **Recommendation:** Stipulate objective and specific cases or criteria for rejecting license applications, while obligating the Minister to provide sufficient legal justification for the rejection decision to facilitate administrative judicial review of the grounds for rejection if the decision is appealed.

7. Article (15/H): Overly Broad Phrasing for Verifying Donor Identities / and Exercising "Ordinary Diligence" to Identify Donors

- **Cause of the Issue:** "Ordinary diligence" is an undefined and broad concept, which may justify excessive requests for personal data.
- **Human Rights Impact:** Risks to privacy, potential donor reluctance, and a chilling effect on the practice of charitable work, while keeping in mind the necessity of balancing this with anti-money laundering and counter-terrorism financing requirements.
- **Recommendation:** Establish a clear definition for the concept of **ordinary diligence** in verifying donor identities, while specifying the minimum required data to achieve a balance between transparency and privacy protection.

8. Article (15/B): Setting Fixed Administrative Percentages Without Considering the Nature of the Activity

- **Cause of the Issue:** Setting a fixed percentage for administrative expenses—such as (20%) across all fundraising campaigns—fails to account for differences in the nature of activities or the unique requirements of each campaign. Some campaigns may require higher expenses (such as advertising, transportation, storage, and organization), while others may require less, making a fixed percentage inflexible and unreflective of the practical reality of charitable work.
- **Human Rights Impact:** This may restrict the ability of societies and charitable organizations to manage their campaigns with flexibility and efficiency. It may also limit their capacity to execute campaigns that demand higher operational expenditures, thereby negatively affecting the effectiveness of charitable work and defeating the purpose of fundraising.
- **Recommendation:** Replace the fixed percentage for administrative expenses with a flexible range that allows the percentage to be determined based on the nature and practical circumstances of each individual fundraising campaign.

9. Article (16): Cabinet Approval for Transferring Funds Outside the Kingdom

- **Cause of the Issue:** Requiring the prior approval of the Cabinet as a political/administrative measure to transfer funds outside the Kingdom, without distinguishing between different purposes of transfer such as humanitarian relief, development projects, or international partnerships.
- **Human Rights Impact:** This may restrict international cooperation and cross-border humanitarian work in a manner that might exceed the requirements of necessity and proportionality, as stipulated by Article (22) of the International Covenant on Civil and Political Rights.
- **Recommendation:** Establish more flexible procedures for transferring funds for humanitarian or developmental purposes, while defining clear criteria for cases that require approval instead of mandating Cabinet approval across all instances.

10. Article (17/D): Deprivation of Licensing for Two Years and the Failure to Stipulate the Principle of Graduated Penalties

- **Cause of the Issue:** The Regulation allows for the imposition of severe penalties, such as withholding licensing for a long period that could reach two years, without distinguishing between minor infractions and grave violations. This means a minor administrative error could be punished with the exact same penalty applied to major or severe violations.

- **Human Rights Impact:** This may lead to a lack of proportionality in the penalties imposed on the entities involved, violating the principles of proportionality and fairness in enforcing sanctions, and negatively affecting the operational continuity of societies or entities undertaking fundraising.

- **Recommendation:** Adopt the principle of **graduated sanctions** so that penalties begin with a warning or a fine before escalating to the two-year licensing ban. This should be coupled with amending Article (18) of the Regulation by deleting the automatic revocation of the license for a mere violation of the Regulation's provisions, regardless of the severity of the violation. It is essential to distinguish between minor and grave violations when selecting the appropriate sanction, in compliance with the principle of proportionality between the offense and the penalty.

11. Article (18): Revocation of License for Violating the Regulation's Provisions

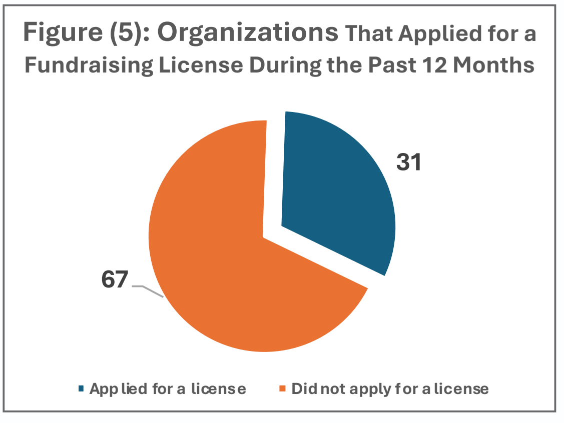
- **Cause of the Issue:** The revocation of an issued fundraising license occurs automatically upon committing any violation of the Regulation, regardless of whether it is minor or grave.

- **Human Rights Impact:** This violates the principle of proportionality, which requires that a penalty fit the infraction without being excessive. It negatively affects the operational continuity of societies or entities undertaking fundraising, in addition to depriving them of the collected proceeds, which will revert to the Societies Support Fund established under the Provisions of the Societies Law.

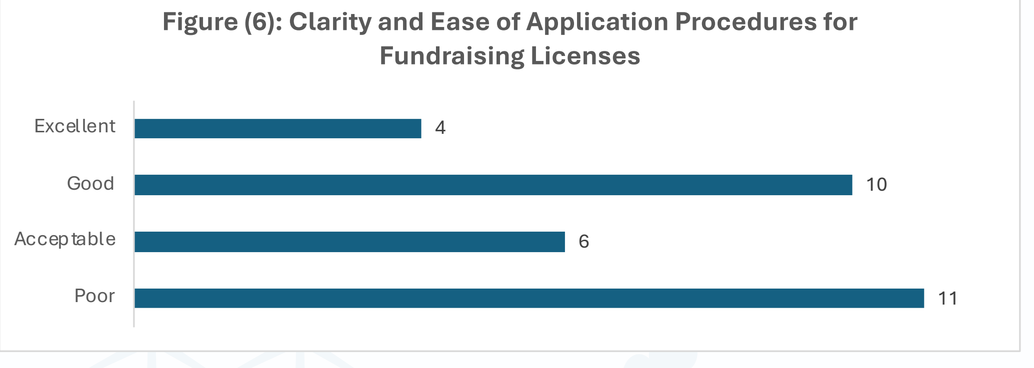
- **Recommendation:** Amend Article (18) of the Regulation by deleting the automatic revocation of the license for a mere violation of the Regulation's provisions, regardless of the severity of the violation. It is essential to distinguish between minor and grave infractions when selecting the appropriate sanction, in compliance with the principle of proportionality between the offense and the penalty.

Experiences of Civil Society Organizations in Applying for Fundraising Licenses

Out of the (98) organizations surveyed, (31) organizations indicated that they had applied for a fundraising license to the Ministry of Social Development during the past (12) months, while (67) organizations replied that they had not applied, as shown in Figure (5). This means that (31.6%) of the organizations have direct experience with the licensing procedures, making their opinions regarding these procedures highly critical.



Among the organizations that submitted licensing applications, as shown in Figure (6), (11) organizations rated the application procedures as "poor," (6) organizations as "acceptable," while (10) organizations viewed them as "good," and only (4) described them as "excellent." This means that more than half of the applicants (54.8%) were not satisfied with the clarity of the procedures.



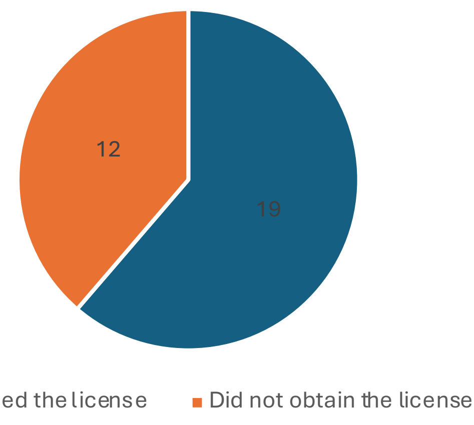
Regarding the timeframe for deciding on license applications (30 days), (21) organizations viewed it as long, while (7) organizations considered it "appropriate," and only (3) as short. From the perspective of civil society organizations, this reflects that the 30-day period is incompatible with the required speed of charitable work, supporting the proposal for simplified and expedited procedural tracks, particularly for urgent humanitarian cases.

Concerning the perspective of civil society organizations that applied for a fundraising license regarding the availability of the guidelines necessary to complete the application, only (8) organizations answered "yes," while (15) organizations said "partially," and (8) organizations said "no." This means that (23) organizations did not find the guidelines sufficient, which underscores the need to develop simplified and updated guidelines written in clear language.

Among the most recurring answers in the questionnaire directed at civil society organizations that actually applied for a license regarding the main challenges they faced during the application phase, organizations focused on aspects of complexity: from routine and procrastination to changing the application form three times, non-response to applications, lengthy approval times, and the weak awareness of employees regarding the procedures. Furthermore, some organizations pointed out that rejections sometimes come without clear or justified reasons. These direct testimonies reflect weaknesses in current procedures and demonstrate that the obstacles are divided into components, including legal provisions and administrative practices.

Ultimately, as shown in Figure (7), (19) out of the (31) organizations indicated that they had obtained the license, while (12) organizations reported that their applications were rejected. Here lies the focus of this policy paper: it is imperative to work on the clarity of acceptance and rejection criteria, the adequacy of required documentation, and the objectivity of the committee's decisions. This supports the paper's recommendation to include clear and specific criteria for rejection within the Regulation itself, and to obligate the committee to provide sufficient legal justification for its decisions.

Figure (7): Results of Applications for Obtaining a Fundraising License



Proposed Policy Alternatives for Developing Fundraising Mechanisms

Based on the analysis of the legal and regulatory issues within the Fundraising Licensing Regulation No. (24) of 2025, and building upon the three pillars that this paper is founded upon, the policy paper puts forward three progressive strategic alternatives. These alternatives provide decision-makers with the opportunity to choose the most suitable path according to available capabilities and the desired future vision. Each alternative aims to achieve a balance between government oversight requirements and enhancing the capacity of civil society organizations to raise funds for development projects, while outlining the advantages and challenges associated with each alternative.

Alternative 1: Improving Performance Within the Current Regulatory Framework (The Status Quo)

Continuing the implementation of the Fundraising Licensing Regulation No. (24) of 2025 as it is, while focusing on improving the institutional and technical performance of the Ministry and societies through issuing executive and explanatory instructions, training personnel, and simplifying administrative procedures without amending the legislative texts themselves.

This option is characterized by speed of implementation, as it does not require legislative amendment, and it avoids the political and procedural complexities associated with amending regulations. Additionally, it is relatively low-cost and can improve the awareness of civil society organizations regarding procedures through guidelines. However, this option faces fundamental challenges, most notably that it does not address the core restrictions in the legal texts (such as the absolute ban, broad administrative discretion, and the ambiguity and lack of definition of rejection criteria).

Most importantly, this option does not enable us to achieve the desired objective of the policy paper, which is transitioning toward donating to development projects, as the situation remains as it is without bringing about a fundamental change in the fundraising environment. Therefore, the paper does not recommend relying on this option as a sole solution.

Alternative 2: Legislative Amendments to the Current Fundraising Regulation

Enacting limited legislative amendments to the existing Regulation, focusing on the most problematic articles without changing the overall structure of the regulation. This includes: adding exceptions for urgent humanitarian cases and small-scale campaigns under a prior notification system; establishing clear criteria for rejecting license applications and obligating the Ministry to provide justifications for rejection decisions; defining the concept of "ordinary diligence" in verifying donor identities; adopting the principle of graduated sanctions (warning → fine → temporary suspension → license revocation → withholding licensing); and simplifying procedures for transferring funds abroad for humanitarian and developmental purposes.

This alternative is characterized by addressing the core issues faced by civil society organizations in practical application, achieving a balance between oversight and flexibility. It also establishes a clear foundation for distinguishing between relief and developmental donations through simplified procedures for urgent cases, enhances the confidence of local and international donors, and can be implemented within a reasonable timeframe (6–12 months).

On the other hand, this alternative faces challenges, most notably that it requires a Cabinet decision or a legislative amendment, which may prolong the implementation timeframe. It also necessitates an awareness and training campaign for both civil society organizations and staff to ensure proper enforcement. However, what is more important in the context of this paper is that this option only addresses issues related to relief fundraising, it does not touch upon developing new strategies, tools, or mechanisms for fundraising for development projects, nor does it include creating an integrated digital platform for development projects, or keeping pace with the complete transition toward digital financing and long-term projects. Therefore, this option is considered a partial and transitional solution, rather than a sufficient alternative to achieve the paper's strategic goal.

Alternative 3: The Dual Donation Model - Relief and (Long-Term Developmental)

This option represents a qualitative shift in the philosophy of regulating fundraising in Jordan. It goes beyond merely amending legislative provisions to restructuring the entire system, with the aim of enabling civil society organizations to have two available and integrated options: short-term relief donating to meet urgent and humanitarian needs, and sustainable developmental funding to support long-term projects, so that both paths are accessible according to the needs and capacities of each organization, without abolishing or marginalizing either. This option is based on the following:

First: Targeted legislative amendments to enable donating to development projects:

The Fundraising Licensing Regulation No. (24) of 2025, in its current text, does not conflict with organizations raising donations for development projects, as the Regulation did not explicitly prohibit this type of donation. However, practical application shows that the absence of clear and flexible provisions for development projects creates a state of ambiguity and variation in procedures. It subjects these projects to the same strict controls and procedures applied to relief campaigns, which constitutes an indirect obstacle. Therefore, it is important and necessary to introduce specific legislative amendments to the Regulation, which were detailed in the previous section of this paper (Legal Issues and Recommendations).

Second: Establishing a specialized national electronic platform for development projects (according to national priorities):

This option proposes that the Ministry of Digital Economy and Entrepreneurship, under the guidance of the Ministry of Social Development, develop an independent electronic platform (complementary to the "Oun" relief platform). This platform would rely on a browsing mechanism categorized by developmental sectors of national priority, which are determined in consultation with relevant ministries. These sectors include, for example: agriculture and food security, water and irrigation, environment and climate change, renewable energy, economic empowerment and employment for youth and women, education, tourism, and health. The platform is characterized by the following features:

- **Sector-Based Browsing**: Donors (individuals, companies, or institutions) can log onto the platform and select the developmental sector they wish to support (e.g., "Agriculture" or "Environment"). They are then automatically directed to a page displaying all approved and proposed development projects by civil society organizations that have obtained approval to raise donations within that specific sector.
- **Brief Project Display**: A concise profile card appears for each project and includes: the project title, the name of the implementing organization, the project location (governorate/area), a summary of the developmental problem it addresses, the general objective, the required budget, the timeframe, and the percentage of funding achieved so far.
- **Detailed Project Page**: Clicking on any project opens an expanded page containing a precise description of the project, measurable Key Performance Indicators (KPIs), the target group (number of direct and indirect beneficiaries), a detailed action plan, a detailed budget (main items), expected performance indicators, and the periodic reporting mechanism.
- **Multiple, Flexible, and Electronic Donation Mechanisms**.
- **Transparent National Dashboard**: Real-time display of total donations, completion percentages for each project, funding distribution by governorates and sectors, and developmental impact indicators (such as the number of job opportunities created, the number of beneficiaries, etc.).

Advantages of Alternative 3:

- **First**, it will enhance the reliance of local organizations on national and local funding as a primary source, instead of a near-total dependence on foreign funding—which is often tied to conditions—thereby achieving greater independence for organizations and ensuring their operational sustainability.[12]
- **Second**, it contributes to supporting job opportunities and local development, especially in rural communities where small societies and community initiatives are widespread; through the platform, these entities can market their development projects (such as sustainable agricultural projects, climate change adaptation projects, green economy projects, etc.) to attract direct funding from local community members and the national private sector.
- **Third**, the platform will foster a culture of targeted donating toward development projects rather than emergency relief, contributing to transforming charitable giving from a temporary response to crises into a permanent investment in sustainable development, which aligns with the Economic Modernization Vision and Jordan Vision 2030.[13] Entrusting the supervision of this platform to the Ministry of Social Development ensures a high level of oversight and credibility, reassuring donors, enhancing trust in organized charitable work, and creating a new, more transparent, and sustainable funding environment.

12. Arab Barometer. (2023). Jordan Country Report. Link: Jordan Country Report 2022-2021 – Arab Barometer
13. Economic Modernization Vision. Link: Economic Modernization Vision

- **Fourth,** it provides genuine job opportunities and stimulates the local economy through the creation of development projects, particularly in rural communities and less-developed governorates.

Recommendations

- **First:** Recommendations related to policy alternatives: Based on the comparison provided in the policy alternatives section, this policy paper views the second option (legislative amendments to the current Fundraising Regulation) as a short- and medium-term priority. It achieves a practical balance between speed of implementation and the effective resolution of current issues in both relief and developmental donation, and it can be completed within a reasonable timeframe without requiring a comprehensive structural overhaul. However, this option alone does not achieve the strategic objective of the policy paper, as it does not address the development of strategies or tools for fundraising for development projects.
- Meanwhile, the third option (the Dual Donation Model - Relief and Long-Term Developmental) is recommended as a strategic vision for the medium term. It is capable of achieving donation for sustainable development projects by developing the specialized national platform, adopting innovative digital and financial mechanisms, and building the capacities of societies. It is recommended to work on this option in parallel with the second option, so that the legislative amendments serve as a prelude to developing the platform, making the development of the national platform for development projects a priority within this vision.
- The paper also recommends not relying solely on the first option (improving performance within the current framework), as it does not achieve any of the desired objectives, does not address existing issues, and leaves the situation as it is without change.
- **Second:** The paper recommends the development of an official, specialized national electronic platform for financing development projects by the Ministry of Digital Economy and Entrepreneurship, under the supervision of the Ministry of Social Development. This platform would form an integrated extension of the "Oun" platform dedicated to relief work, operating under a transparent and interactive digital model that directly connects projects with donors.
- **Third:** Adopting an integrated electronic system for submitting fundraising license applications by civil society organizations, whether for relief or development projects. All submission, review, and approval procedures would be carried out through the designated national platform without the need to visit the Ministry with paper applications, provided that the application form is standardized and simplified, with the ability to track the application status electronically.
- **Fourth:** Launching a national capacity-building program for civil society organizations in designing development projects, preparing feasibility studies, financial governance, and utilizing digital platforms.