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Embeddedness Beyond Borders: Examining the Autonomy of Chinese NGOs in Their Global Endeavours

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Abstract

The internationalisation of Chinese non-governmental Organisations (NGOs) is an emerging phenomenon. As new international development actors, how independent are Chinese NGOs from the Chinese state? Based on interviews with eighteen Chinese NGOs and an analysis of secondary sources, the study finds that the internationalisation of Chinese NGOs is variegated rather than solely state-led. The state is not closely involved in much of the internationalisation processes of a majority of Chinese NGOs. However, all Chinese NGOs with overseas operations avoid overstepping a political boundary that is tacitly understood by both NGOs and the state. To explain the duality of both uniformity and diversity among Chinese NGOs, this study develops an embeddedness framework that disaggregates state influences into a primary layer of systemic regulatory guidance that affects all Chinese NGOs, and a secondary layer of influence over NGOs' operations (initiation, financing, and implementation), within which the varying levels of governmental influence upon different NGOs lie.

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Keywords

Chinese NGOs, state–society relationship, internationalisation, embeddedness

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Introduction

The internationalisation of Chinese non-governmental Organisations (NGOs) and their involvement in emergency and development aid outside China can be traced back to early 2000s in response to the 2004 tsunami in the Indian Ocean, followed by a new round of international aid activities stimulated by the 2015 earthquake in Nepal. In recent years, the Belt and Road Initiative (BRI) has also been a boosting factor, providing an encouraging policy environment for Chinese NGOs to go international. Chinese NGOs have been addressed in the “Action Plan of People-to-People Bond in One Belt One Road for Chinese Social Organizations (2017–2020)” (中国社会组织推动“一带一路”民心相通行动计划 (2017–2020), *Zhongguo shehui zuzhi tuidong “yidaiyilu” minxin xiangtong xingdong jihua* [2017–2020]), which brings up the strategic role that Chinese NGOs can play in building the “People to People Bond” (民心相通, *min xin xiang tong*) within Belt and Road countries. According to the database on Chinese NGOs’ international projects developed by the author (Wang, 2021), there are more than 100 Chinese NGOs involved in international donations or aid projects across more than 100 countries. Donations for major disaster reliefs including the 2004 Indonesian tsunami, the 2015 Nepal earthquake, and the COVID-19 pandemic since 2020 contribute to most Chinese NGOs’ international aid. Compared with western international NGOs (INGOs), Chinese NGOs are still in their infancy in terms of scale. Taking the China Foundation for Poverty Alleviation (CFPA), one of the most influential and sizable Chinese NGOs in internationalisation, as an example, its annual spending on international projects in 2020 was around USD 8 million (China Foundation For Poverty Alleviation, 2021), only a fraction of what some of the largest INGOs such as Save the Children spent during the same period (879 million USD) (Save the Children, 2021). Inadequate regulatory and policy frameworks, and difficulty in fundraising and recruiting professional talents are some of the major challenges that constrain the scale of Chinese NGO internationalisation (Li and Dong, 2018).

The Chinese state is considered the dominant actor in China’s international aid and development cooperation, providing aid to developing countries mainly through government-to-government channels. This state-led and state-centric approach is often criticised by Development Assistance Committee countries, as it does not comply with the Global North’s recently preferred mode of “non-governmental” giving (Harvey, 2009, as cited in Reeves, 2019). The internationalisation of Chinese NGOs is not unanimously seen as promising an alternative to China’s approach to aid. Instead, critics have raised concerns over these NGOs’ roles as independent actors in international issues, especially in the rising presence of Chinese government-organised NGOs (GONGOs) in international affairs (Hasmath et al., 2019). GONGOs are criticised for being part of the Chinese state’s toolkit representing state interests overseas (Walker, 2016), and being exploited for the Chinese government’s global strategic advantage (Hasmath et al., 2019).

However, the view that Chinese NGOs’ internationalisation is state-centric simplifies the fact that independent Chinese NGOs (non-GONGOs) play an important role in this

process. For example, among very few Chinese NGOs which have registered overseas, many of them are not GONGOs, such as Yundi registered in Cambodia, RamUnion registered in Ethiopia, and Rainbow Volunteer Club registered in Nepal. Many independent NGOs may not be as sizable as the GONGOs, but they do show their strong presence by bringing diversity into the scene. Some of the most eye-catching projects are carried out by independent NGOs, such as the demining project in Cambodia initiated by Peaceland Foundation and the refugee care project in Lebanon operated by Common Future.

Meanwhile, the criticism over the GONGOs overlooks the complexity within GONGOs, as different GONGOs can have different levels of autonomy from the government. GONGOs are generally understood as those established by government for addressing social problems (Deng et al., 2016). However, there is a large variation among the GONGOs, as shown in Wu's (2003) illustration of the diversity of Chinese environmental GONGOs which have different levels of closeness between their leadership and the government, organisational capacity, and access to international resources. GONGO's governmental ties should be seen as lying on a spectrum rather than absolutely defined (Hasmath et al., 2019). Being a GONGO does not necessarily mean having less autonomy than being a non-GONGO (Lu, 2007).

This research is aimed to examine the nuances of the Chinese NGO–state relationship within the process of internationalisation, addressing multiple aspects of Chinese NGOs' autonomy including the criticism that Chinese NGO internationalisation is state-led. I first review the theoretical background of the Chinese NGO–state relationship, especially the concept of embeddedness, and introduce the methodology of the research. Then I develop an integrated analytical framework based on embeddedness to conceptualise the Chinese NGO–state relationship in the internationalisation. I conclude the article with a discussion on the implication of the research.

Theoretical Background – Embeddedness in Chinese NGO–State Relationship

There is a substantial body of literature on China's NGO–state relationship in the domestic setting, centred on the traditional debate between a civil society approach and a corporatist approach. The civil society approach follows the Tocquevillian tradition, emphasising the emergence of voluntary associations, the independence of the social arena from the state, and NGOs' role in fostering democracy (see Saich, 2000; White et al., 1996; Yang, 2005). However, as many have become disillusioned by Chinese NGOs' democratising effects, many scholars have turned to the corporatist framework to analyse the NGO–state relationship in contemporary China. Scholars holding a corporatist approach reject the civil society approach as an appropriate analytical framework because “it assumes too much independence in associational life” (Unger and Chan, 1995). Instead, the corporatist approach emphasises the state's control over NGOs. Under Chinese corporatism, the state grants some autonomy to social organisations, on

the understanding that they will moderate their demands and activities in accordance with government wishes (Unger and Chan, 1995).

In recent years, scholars have found that Chinese NGOs are neither idealistic agencies carrying the democratic hope of society nor robotic machines fully controlled by governments. Instead, a “contingent approach” emerged in the study of Chinese NGOs, which considers the relationship between the government and Chinese NGOs under specific contexts (Wang et al., 2015). Some examples of the contingent approach include Ma’s (2002) arguments emphasising the importance of China’s unique economic, political, and cultural history to analyse Chinese NGOs instead of making an analysis purely based on western theories and concepts such as civil society and corporatism; Ho’s (2007) “embedded social activism” to demonstrate how Chinese political system is restrictive yet conducive for green activism; Lu’s (2009) “dependent autonomy” to explain how some Chinese NGOs enjoy *de facto* autonomy though they are generally dependent on states; and Spires’s (2011) “contingent symbiosis” to illustrate that illegal grassroots NGOs can only survive in China when they limit any democratic claims-making and contribute positively to official social welfare goals. These concepts argue that the characteristics of Chinese NGOs are the result of the mutual adaptation and co-evolution of the state and society in their respective contexts (Wang et al., 2015). This study continues the tradition of the contingent approach by analysing the autonomy of Chinese NGOs through the concept of embeddedness.

Embeddedness was originally posited by Polanyi (1957) and developed by Granovetter (1985) to describe how the economy relies on social relations and institutions from which markets are inseparable. In organisational studies, embeddedness is employed as a measure of the autonomy of civic organisations from the state (Ho and Edmonds, 2007). Embeddedness is widely applied to Chinese NGOs, as it could effectively capture the contradictions NGOs face in China – an environment that is both restrictive and conducive – and the struggle they face being dependent on government for resources yet trying to maintain autonomy (Ho, 2007). Embeddedness can be the outcome of several mechanisms which work at different levels, cumulatively affecting organisational embeddedness (Dacin et al, 1999). In the context of the Chinese NGO–state relationship, one level of embeddedness reflects the structural governmental influence that affects Chinese NGOs while the other level reflects the individualised governmental influence that creates variations in the autonomy among Chinese NGOs. Ho’s (2007) analysis of Chinese environmental NGOs through the concept of embedded social activism is the best example of the first level of influence. His study illustrates how the structural political contexts influence Chinese NGOs and how Chinese environmental NGOs could survive and grow under the structural restrictive political environment. As the concept embeddedness became more popular, scholars started to address the other level of embeddedness, where they focused on the diversity and variation among Chinese NGOs to unpack the highly complex and multifaceted nature of Chinese NGO–state relationships. Yang and Alpermann (2014) take into account different dimensions of embeddedness and its opposite, marginalisation and establish a continuum comprising various ambivalent permutations of the Chinese state–NGO

relationship between embeddedness and marginalisation. They argue that the embeddedness or marginalisation that Chinese NGOs hold is a matter of degree instead of a dichotomy, indicated by three factors, formal registration, informal ties with public authorities, and the political economy of NGO–government relations. Yuen (2018) examines the varying degree of NGOs’ institutional embeddedness in relation to the local state and illustrates how such variation impacts NGOs’ capacity to carry out service activism. These studies have shown that the concept of embeddedness has theoretical power to explain both uniformity and variation among different NGOs in terms of the Chinese NGO–government relationship, though no researcher has addressed both levels of embeddedness in one framework that can be applied to Chinese NGOs’ autonomy in a certain context. This article will fill the gap and develop such an integrated framework of embeddedness, a two-layer embeddedness framework, to explain the Chinese NGO–government relationship in internationalisation, characterised by both uniformity and diversity among different NGOs.

Methodology and Data Collection

To understand the nuances in the autonomy of Chinese NGOs within the process of internationalisation, I have adopted a multiple-case method, studying a range of Chinese NGOs through interviews and secondary sources. Prior to this research, I have generated a database that compiles the public information on Chinese NGOs’ internationalisation as much as possible, the information which mainly includes a project description, year, and location. This database is built for a series of research projects around Chinese NGOs’ internationalisation, one of which is this study on Chinese NGOs’ autonomy. It serves as a sample frame for case selection of this research and illuminates me with the initial knowledge of the critical cases to be selected. With the database, I am able to narrow down the number of Chinese NGOs with international aid activities to a number of around 100. Then, several criteria for case selection are set up to ensure the selected sample satisfies “symbolic representation,” having characteristics that are expected to have salience and satisfy a high degree of diversity (Ritchie et al., 2003). First, the cases need to have a relatively high degree of international involvement. Chinese NGOs’ international involvement ranges from pure donation to permanent overseas operations. It is more effective to study organisational behaviour in international contexts if they have more active and rich international activities. Therefore, I have prioritised Chinese NGOs that have long-term establishment overseas, with multiple international projects across multiple countries and/or registration overseas. Second, the cases need to cover a variety of international activities. In general, Chinese NGOs’ international aid activities can be divided into humanitarian assistance and development projects, the latter of which can further be divided into a group of more traditional and charity-based activities and a group of activities focusing on sustainable development research and advocacy based on their distinctive operational modes. Third, the cases need to show a high degree of diversity in terms of their organisational characteristics. The cases generally fall into the categories of either GONGO or independent NGOs, with

further variation within each category. Eighteen Chinese NGOs (see Table 1) are selected for interviews and in-depth studies based on the three criteria, while secondary sources about and beyond the eighteen NGOs also contribute to my findings.

Frame of Analysis

The study combines the two levels of embeddedness analysis that focus on structural and individualised governmental influence, respectively, in the current literature into one integrated two-layer framework as the theoretical base to explain both the similarity and diversity in the Chinese NGO–state relationship among different NGOs. I further develop and enrich the framework by adding more dimensions into the framework, such as the main sources of governmental influences and the impact on NGOs' behaviour, based on the empirical fieldwork for studying the Chinese NGOs–state relationship in internationalisation (see Table 2).

The primary embeddedness reflects the structural governmental sources that affect every Chinese NGO, while the secondary layer reflects the individualised governmental sources that create variations in Chinese NGOs' autonomy. All Chinese NGOs could not avoid the governmental influence from the primary layer while there is room for some Chinese NGOs to exercise agency to avoid all or some direct governmental influences in the secondary layer. The major structural governmental influence in the primary layer comes from regulatory and supervision systems, while the individualised governmental influence comes from the direct governmental involvement in NGOs' operations. In this research, such direct governmental involvement is examined through the lens of a three-phase NGO project cycle including project initiation, financing, and implementation, which is adapted from the Project Management Cycle Guideline proposed by the European Union for aid projects in development agencies including civil organisations (European Commission Humanitarian Aid Office, 2003; Papadimitrov and Nikolovski, 2017). Different layers of governmental influence will have different dimensions of impact on Chinese NGOs. For example, the primary layer of influence will impact Chinese NGOs' approaches towards their work while the governmental influence in the secondary layer will impact key operational decisions, such as decisions to go

Table 1. Characteristics and Distribution of Chinese NGOs Interviewed.

Degree of international involvement	Issues	Organisational background
Only donation: 1	Development: 13 (3 for sustainable development)	GONGOs: 5
One project: 3	Humanitarian assistance: 3	Non-GONGOs: 13
Multiple projects: 14 (4 with overseas registration)	Humanitarian assistance: and development: 2	

Note. GONGO = government-organised NGO.

Table 2. Two-layer Embeddedness Framework.

	Primary embeddedness	Secondary embeddedness
Type of governmental influence	Structural and systemic influence	Individualized influence
Main sources of governmental influences	Regulatory and supervision systems	Direct involvement in operations (through a three-phase project cycle)
Applied NGOs	All NGOs	Some NGOs
Examples of areas of concern for NGOs	Approaches towards making changes	Operational decisions (e.g. decisions to go international or not, how to finance)
Chinese NGOs behaviour	All NGOs try to avoid using confrontational approaches, while some NGOs take further tactics to earn governmental trust	NGOs establish diversified ways of dealing with direct government involvement if any

international or not, and decisions on financing. To react to the primary layer of governmental influence, all Chinese NGOs avoid taking confrontational approaches and some NGOs take extra tactics to earn governmental trust, while in the secondary layer there is no uniform behaviour among Chinese NGOs given the high diversity of direct operational links between NGOs and the Chinese government.

Primary Embeddedness: The State’s Systemic Influence on Internationalisation

One major question regarding the autonomy of Chinese NGOs in their internationalisation is that if their political limits extend overseas or if they have a larger room for autonomy, for example, by adopting a more confrontational approach and involving in more politically sensitive issues. Based on the cases under study, all Chinese NGOs that go abroad understand the political boundaries set up by domestic systems and structures. In other words, the limits to Chinese NGOs’ autonomy, especially their political autonomy, cannot be expanded, since their primary embeddedness in domestic society extends overseas. In an embedded, semi-authoritarian context, the rules of engagement are negotiable, but it is the state that ultimately sets the limits (Ho, 2008). Any potential threat to the Chinese state’s monopoly on political power is constrained. Ultimately, internationalised Chinese NGOs are still Chinese NGOs. The Chinese regulatory and supervision system for NGOs is the major source for such primary embeddedness which serves to enforce the “Chineseness” of Chinese NGOs.

The case of JX (pseudonym) illustrates how political autonomy cannot be expanded overseas. JX is an environmental NGO actively involved in the empowerment of local communities affected by unsustainable investments in China and Southeast Asia. JX

conducted several workshops to train local NGOs on self-protection against investments (not only Chinese investments) with negative environmental and social consequences. Once a Chinese governmental agency related to international affairs recognised that JX conducted international activities, it went to JX and opened an enquiry into these activities. Although there were no direct consequences to this ad hoc examination, the case demonstrates that the Chinese state does respond to cases it deems untrustworthy and open to potential risk. JX was closed in recent years as the incumbent supervisory agency showed no interest in extending its supervision, and JX could not find an alternative supervisory body. JX's suspension was mainly due to its rights-based and participatory approaches to sustainable development within China. Although their international activities were not specifically prohibited by the Chinese state, they may not have been encouraged either. When asked about a potential expansion of their international activities, one of JX's leaders, who has been testing political boundaries for years highlighted that "If the international activities we are doing become bigger, they will get more government attention and be banned for sure" (Anonymous 1, 2020). However, JX is an exceptional case, since most Chinese NGOs have non-confrontational approaches to delivering basic social welfare overseas. NGOs with a non-confrontational approach do not face any interference from the government, and many of them have indeed been praised by the government for their international activities. A stable mode of interaction has been established between Chinese NGOs and the Chinese state over the years as the Chinese government establishes boundaries and Chinese NGOs become embedded in these regulatory environments to gain governmental trust.

Regulation and Supervision Systems

The regulatory and supervision environments of Chinese NGOs internationalisation include three systems: the registration and supervision systems through civil affairs offices and NGOs' supervision bodies, applying to every registered Chinese NGO; the national security system that is particularly active in the supervision of suspicious NGOs' activities, many of which are internationally connected; and the foreign affairs system that deals with the internationalisation of Chinese NGOs.

The primary embeddedness of Chinese NGOs is largely due to the Chinese state's control through registration and supervision systems. Through the registration system, the state has constructed the concept of what an NGO is, defined its legitimate scope of activity, and limited its autonomy (Hildebrandt, 2013). The key feature of NGO registration is the dual surveillance system established by the Regulations on the Registration and Management of Social Organizations (社会团体登记管理条例, *shehui tuanti dengji guanli tiaoli*) in 1989 (revised in 1998), a system that requires Chinese organisations to seek approval by a government-related body as the "professional management unit" (业务主管单位, *yewu zhuguan danwei*) to supervise its daily operation, before registration in the civil affairs system. This requirement becomes a major challenge for organisations to be officially registered under the civil affairs system, as it is challenging to find such a professional management unit that has enough incentives to become the

supervisor. In recent years, organisations in the fields of industry and commerce, science and technology, public welfare and charity, and services for urban and rural communities can register directly with civil affairs departments without a professional management unit, but registration remains the greatest challenge for many civil groups. An NGO needs to follow routine supervision by its professional management unit and annual checks by civil affairs offices once it is formally registered. If a registered NGO fails to comply with registration and routine supervisory measures, the relevant civil affairs office can force the NGO to correct its wrongdoings by issuing a warning, suspending the NGOs' activities, asking the NGO to replace culpable leaders, confiscating illegal income, collecting fines, and revoking the NGO's registration (Ru and Ortolano, 2008). Currently, while there are some GONGOs set up solely for conducting international affairs as a way of public diplomacy by governmental agencies, there is no way for civil groups registering an organisation solely for international development purposes in China. A non-profit entrepreneur cannot simply go to the civil affairs offices and register an NGO to provide education to children outside China. Strictly speaking, there are no Western-style INGOs that are set up solely for international development and primarily operate internationally. The projects of Chinese NGOs are primarily domestic, and international projects are additional to their domestic operations. Furthermore, international activities are not worth the risk of affecting domestic operations. A non-profit entrepreneur may choose another route for international projects, such as affiliating its international project with an established domestic foundation. For example, the Common Future, established to address issues facing Syrian refugees, was once affiliated with the China Children and Teenagers' Fund. This affiliation legitimatised the group for official recognition and public fundraising. However, through registration or affiliation, these organisations are enmeshed in a social and regulatory network that limits their behaviour.

In addition to the civil affairs system that an NGO usually needs to face, the national security system, including public and state security agencies, also plays an important role in supervising Chinese NGOs (Kang and Han, 2008; Wu and Chan, 2012). The international actions of NGOs, from either international or Chinese NGOs, can be particularly sensitive. Effective since 2017, China's Foreign NGO Law mandates that foreign NGOs must register with public security agencies, officialising the role of the national security system in NGO management. The shift of management to public security agencies shows that the leadership of China views that INGOs can be sources of threat to national security (Lang, 2018). At least two leaders of the NGOs researched for this study, including both GONGOs and independent NGOs, have been investigated by these security systems for their accidental or indirect involvement with suspicious international forces.

In addition to the civil affairs and national security systems, Chinese NGOs sometimes need to interact with the foreign affairs system when carrying out international activities. Currently, the government has not installed any regulation related to NGOs' internationalisation and overseas activities in any of the existing NGO regulations. There are no regulatory bodies specifically supervising all Chinese NGOs' international activities. However, the lack of clear and specific regulations does not mean that the government

turns a complete blind eye to Chinese NGOs' international activities. The China NGO Network for International Exchanges (CNIE), founded by the International Department of the Central Committee of the Chinese Communist Party (中共中央对外联络部, *zhong-gong zhongyang duiwai lianluo bu*) to coordinate Chinese NGOs going abroad and promote cooperation between Chinese and foreign NGOs, plays a tacit role in watching the international activities of Chinese NGOs by collecting information from Chinese NGOs and organising international activities for them. Local foreign affairs offices may also need to be informed if the NGOs involve in government-related projects or establish overseas offices. However, as there is no clear regulation on the roles of foreign affairs offices, different NGOs behave differently when they interact with the foreign affairs system. Some NGOs will inform their local foreign affairs offices about their international activities while some NGOs bypass the step and conduct international activities directly.

It is in 2016 that the government started to issue some specific guidance specifically on the internationalisation of Chinese NGOs. In the "Opinion on Reforming the NGO Management System to Promote Healthy and Orderly NGO Development" (关于改革社会组织管理制度促进社会组织健康有序发展的意见, *guanyu gaige shehui zuzhi guanli zhidu cujin shehui zuzhi jiankang youxue fazhan de yijian*), some regulatory ideas were suggested that approval must be obtained from the professional management unit or the foreign affairs administration if Chinese NGOs need to establish overseas offices. Since the publication of this document, relevant government agencies have adopted more stringent measures regarding overseas registration. It now takes a longer time for NGOs to register overseas as they need to obtain regulatory approval (批准, *pizhun*) instead of simply informing (报备, *baobei*) relevant authorities (Anonymous 2, 2020). Though most Chinese NGOs are not affected by the Opinion document, as they have not or will not register overseas, it does show that the government tries to formalise and manage the internationalisation process, if Chinese NGOs want to make significant moves.

Strategies of Chinese NGOs

Embeddedness does not only account for how government deals with Chinese NGOs, but also how Chinese NGOs react to the regulative and political environments. To survive and prosper, Chinese NGOs have acquired a set of tactics to accommodate this regulatory and administrative environment, such as avoiding confrontational approaches, complementing government policies, and giving credit to government officials. Some of these tactics are used even by NGOs with no governmental involvement in their operations.

One key to avoiding a negative state response is for NGOs to avoid confrontational approaches. Chinese NGOs are much more likely to behave like service providers than advocates for society (Hildebrandt, 2013). Even for NGOs promoting advocacy, China's authoritarian context forces activists to abandon any radical, confrontational, and mass mobilisation tactics to achieve political objectives (Ho and Edmonds, 2007). This feature has also extended overseas. Most Chinese NGOs' international projects are service-oriented. These NGOs are often considered the first (relief and welfare) and

second (community development) generations of development NGOs instead of the third (sustainable systems development) and fourth (people's movements) generations that play a more catalytic role rather than a mere operational role to enable changes in development, based on Korten's (1987, 1990) categorisation for development NGOs when he calls for NGOs' leadership in addressing policy and institutional changes supportive of people-centred development. There are few Chinese NGOs involved in sustainable system development, though their advocacy approaches are milder than their international peers. For example, one NGO involved in sustainable development advocacy to the Asian Development Bank said that they would never go to protests, like many Southeast Asian NGOs do, by sitting and protesting in front of the Asian Development Bank. As indicated by one project manager from a Chinese sustainable development NGO regarding the sensitivities of international advocacy, "it's the same as for domestic projects and what you cannot do domestically are also not allowed overseas" (Anonymous 3, 2020). The room for advocacy does not expand for international projects. The non-confrontational approaches taken by Chinese NGOs have made boomerang effects in transnational network advocacy (making domestic changes through the international community) less likely in the Chinese context.

Another common tactic is to gain political legitimacy by complementing government policies (Hildebrandt, 2013). Chinese NGOs usually conform to official ideology and support official policies. This goes beyond a minimalist position of not violating political standards and demonstrates active support of the state's goals (Lu, 2007). Most of the NGOs interviewed said that they have referred to the BRI in their interactions with the government (e.g. Anonymous 4, 2020; Anonymous 5, 2020). The discourse that the Chinese government supports NGOs' role in the BRI has become a panacea for many Chinese NGOs dealing with government officials in meetings, conferences, funding applications, and administrative approvals. Chinese NGOs need legitimacy not only in the eyes of the state, but also in society, which often depends on the state as well (Lu, 2007). An NGO leader (Anonymous 6, 2020) told me that he used to spend much time explaining to donors and the public why he carries out international projects when there are still many social problems domestically. Now he can simply explain that these projects benefit the BRI and the state. Interestingly, some NGOs avoid referencing the BRI in front of foreign donors and media in recipient countries, while positioning their projects as relevant to BRI domestically (e.g. Anonymous 3, 2020). This particularly shows that the BRI is sometimes used intentionally as a marketing strategy for gaining political and public trust in China.

Another prevalent tactic is to credit relevant government officials for their support. One NGO leader (Anonymous 5, 2020) mentioned that he would credit all his international achievements to relevant government officials to maintain a supportive relationship with the government. In the media, NGOs would always credit their governmental partners, even if these partners did not play a substantive role.

The government trusts most Chinese NGOs, as they are deeply embedded through regulative and supervising systems. This trust has earned Chinese NGOs more operational autonomy overseas. Lu (2007) illustrates the importance of governmental trust

by arguing that trust in their leaders, who are usually former officials from supervisory agencies, is one of the major reasons why some GONGOs have even greater autonomy than independent NGOs. Similarly, in the context of internationalisation, the established trust between these Chinese NGOs and the government makes those overseas operations less precarious. This balance and trust are achieved when the Chinese state believes that a group's existence both helps the state with a pressing need and does not pose a threat to its monopoly on political power (Hildebrandt, 2013).

Secondary Embeddedness: The State's Diverse Influence on Chinese NGOs' International Operations

Chinese NGOs' organisational embeddedness is not only shaped by the structural influences of government through regulatory and supervision systems that set the boundaries of Chinese NGOs' autonomy, but also affected by the direct concrete governmental involvement in their operations. The secondary layer of embeddedness is aimed to illustrate the specific operational links between each Chinese NGO and the Chinese government through three stages of the project cycle: initiation, financing, and implementation. The analysis below will show how diverse these NGO-government links can be during the three stages of internationalisation. Some NGOs have strong operational links with governments that they have links with the Chinese government in all three stages while some NGOs have weak influence from the government that none of the direct governmental involvement is found.

Initiation

Chinese NGOs go international for a variety of reasons, and only a few of the NGOs interviewed attribute their direct motivation to the leadership of the Chinese state. The empirical findings of my study serve to categorise Chinese NGOs based on the original drivers of Chinese NGOs' internationalisation in relation to the Chinese state into Obligators, which are directly asked by the government to go international, and Opportunists, which are indirectly influenced by the government and Independents, which base their internationalisation decisions on factors independent of the state.

Obligators are NGOs whose international projects are directly influenced by the Chinese government. These NGOs are usually founded by governmental bodies for the purposes of international exchange, cooperation, and assistance. I label them as Obligators because they have to be involved in international activities, as they are directly asked by the government to carry out international projects. Obligators are usually created through a top-down approach with a public diplomacy purpose. Their projects primarily focus on international exchange and traditional forms of aid, such as holding conferences for international exchanges or building education and healthcare infrastructure and facilities. Obligators are usually set up within three official Chinese systems related to international affairs: one from the party through the Communist Party of

China's international department and its affiliates, one from the state through the foreign affairs departments, and the last from the state through commerce departments. For example, CNIE, founded by the International Department of the Central Committee of the Chinese Communist Party to coordinate between Chinese and foreign NGOs, is a regular participant in international conferences and a frequent organiser of international exchange and development programmes. The Shenzhen Foundation for International Exchange and Cooperation (SFIEC) is founded and supervised by the Foreign Affairs Office of Shenzhen to conduct international exchange programmes and promote Shenzhen's international image. Its projects on knowledge sharing and charitable donations under the "Shenzhen × Lancang-Mekong Initiative" are meant to respond to China's national strategy in the Lancang-Mekong region and connect Shenzhen to international partners. The China Association for NGO Cooperation and Yunnan International Non-Governmental Organization Society are examples associated with the ministry or departments of commerce. They are responsible for cooperation between domestic and INGOs, promoting international exchanges, and conducting international projects.

Opportunists refer to Chinese NGOs that decide to go international under the indirect influence of the state with the motivation to leverage governmental resources, usually financial or political. For these NGOs, an international component is nice to have in addition to domestic operations if external opportunities are available and the government is supportive of international expansion. A supportive policy environment, for example, when NGOs were officially recognised as agents to promote the "People to People Bond" in the BRI, and governmental funds can attract NGOs to go international. Unlike Obligators, Opportunists are not directly asked by the government. Instead, they choose to seize opportunities provided by the government and go international. For example, a Yunnan-based NGO initiated its first international project after it recognised that the Department of Commerce of Yunnan allocated part of its budget to aid through NGOs. The South-South Cooperation Assistance Fund (南南合作援助基金, *nan nan hezuo yuanzhu jijin*) was established in 2015 to support post-2015 sustainable development goals and is managed by China International Development Cooperation Agency (CIDCA), part of which will be allocated to Chinese NGOs for internationalisation, has received applications from NGOs that lacked previous international experience. This is a clear indication that some NGOs are motivated by available governmental resources. It can be expected that as the official financial channel for NGO internationalisation scales up, more Opportunists will emerge.

Up to now, most of the Chinese NGOs' international aid projects are not requested by the Chinese government, nor created solely to gain governmental resources. They are Independents in terms of the decision over internationalisation. Among the Independents, there are notable three variations based on their different intentions for internationalisation, coined as Organic Growers, Strategists, and Occasionalists. Organic Growers refer to NGOs with missions which are cross-border or global in nature. For Organic Growers, internationalisation follows an internal development logic, which often relates to the issues that NGOs are addressing. For example, the Shenzhen Long Yue Foundation helps overseas Chinese veterans, many of whom are

located in Myanmar, to return home to China. The Ruili Women and Children Development Centre, located in Ruili on the border of Myanmar and China, supports Burmese children both in China and Myanmar. Global Environmental Institute (GEI), an independent NGO working on sustainable investment and environmental issues, started to work in Myanmar after following the case of illegal logging and its associated trade between China and Myanmar. These NGOs are termed Organic Growers because they do not intentionally go global. Instead, their international behaviour is organic, given that their areas of concern are cross-border. Strategists refer to NGOs that have made internationalisation an organisational strategy and actively seek diverse opportunities for international expansion. Strategists usually show strong motivation for internationalisation by constantly initiating a variety of international projects across various countries. Many of them are registered overseas. Their first international project is usually self-initiated without any official financial resources, and their willingness to go international is independent of government funding opportunities. For example, CFPA started to make international donations to tsunami disaster areas in Indonesia through Mercy Corps instead of the Chinese government, which became the first step in its internationalisation trajectory (Deng, 2019). Over the years, CFPA's international presence has developed from simple international donations to the establishment of permanent offices in Nepal, Myanmar, and Ethiopia. CFPA, with the mission of alleviating poverty in China, has made internationalisation a long-term strategy, as its leaders recognise that the future of the organisation would gradually shift from domestic to international affairs as China eventually puts an end to extreme poverty. Occasionalists refer to Chinese NGOs that occasionally contribute international donations or conduct international projects. They usually donate once per humanitarian objective or conduct sporadic projects. For example, there are many NGOs whose international involvement is limited to international donations to Nepal in 2015, with no follow-ups or consistent international activity. Because the international presence of these NGOs is sporadic and temporary, Occasionalists are less visible internationally than other NGO types.

Except for Obligators, Chinese NGOs have gone international via their own paths. Obligators only include GONGOs, while the other categories include both GONGOs and independent NGOs. A GONGO can decide to go international on its own, as shown by CFPA. Most independent NGOs fall under the categories of Organic Growers, Strategists, and Occasionalists,

Financing

Financial sources are critical for the internationalisation of Chinese NGOs. There is very limited financing from governmental sources for Chinese NGOs. Most NGOs interviewed do not rely on governmental financial sources. Instead, they finance through a diverse range of channels, for example, private funds, companies, international foundations, public, and government. Though governmental funding is limited in scale, its variation is noticeable. There are four types of financial links between Chinese NGOs and the

government: directly through official aid, indirectly through official aid, through supervisory bodies, and through non-aid governmental projects.

The first type is official aid budgeted directly for NGOs. This has been such a widespread practice in OECD countries that twenty billion USD was funded to or through development civil society organisations in 2017 (OECD-DAC, 2019), accounting for approximately 14 per cent of the total official aid in the same year. Currently, the only official aid funding channel in China is through the South–South Cooperation Assistance Fund. Only trustworthy Chinese NGOs can be short-listed for funding. For example, one independent NGO mentioned that it needed endorsement from the local foreign affairs office to be short-listed for the fund (Anonymous 5, 2020). The fund has not completed its first allocation process yet by the completion of this research. There is no public disclosure of any detail about the fund allocation yet, but according to several anecdotal sources, the amount of funding is around USD 160,000 (CNY 1 million) per project. At the provincial level, the Department of Commerce of Yunnan has specific funding for NGOs as part of provincial official aid through a public application process with less than USD 95,000 (CNY 600,000) per project (Department of Commerce of Yunnan Province, 2020). Official aid funding is preferably awarded to, but not only allocated to, GONGOs. For example, Yundi, as an independent NGO, has received funding from the Department of Commerce of Yunnan for several of its projects. This donor–recipient relationship between the government and NGOs follows a classic principal–agent relationship. In such cases, an NGO’s autonomy may be compromised as it faces constant pressure to please donors and pursue policy goals to maintain funding (see Cooley and Ron, 2002; Gent et al., 2015).

The second is the official aid budget for international projects in which NGOs act as sub-contractors. Currently, CIDCA does not include NGOs as contractors when implementing Chinese official aid. However, some Chinese NGOs participate in official aid projects as sub-contractors to the contractors appointed by CIDCA. One example is the Tibet Shan Yuan Foundation working as a sub-contractor to Tibet University, which has contracted a training project for Nepalese professionals from CIDCA. Under such a scenario, Chinese NGOs work indirectly as part of the official aid program.

The third type of financial link between the government and Chinese NGOs is when NGOs’ international projects are funded directly by their supervisory bodies through non-transparent channels. For example, CNIE’s projects are exclusively funded by the Central Committee of the Chinese Communist Party, which concurrently functions as the supervisor of CNIE (Brenner, 2012). In this context, Chinese NGOs work more like an extension of the government beyond a simple principle–agent relationship, as these NGOs tend to be the types of GONGOs that have very close ties with the government.

The fourth type comprises international projects that are funded as part of governmental programmes (not as official aid through commerce departments or CIDCA). For example, GEI was funded through a contract with the National Development and Reform Commission for a project on the evaluation of the governmental donation of clean energy products to six countries.

However, government funding in all the above four categories is still very limited in terms of funding opportunities and funding sizes. Most Chinese NGOs are funded through non-governmental channels, even GONGOs, for international aid projects. For example, international projects for both CFPA and the China Red Cross Foundation are predominantly funded by the public and corporations, although some of the latter may fall under different types of state ownership. Many of the GONGOs interviewed for this study have concerns over financial resources and would like to receive more financial support from society and diversify their financial resources instead of relying on existing governmental funding (e.g. Anonymous 7, 2020; Anonymous 8, 2020; Anonymous 9, 2020).

Implementation

In the implementation stage, the Chinese governmental influence mainly involves making connections for local partnerships. Finding partnership through governmental connection is common for GONGOs. For example, through governmental referral, CFPA established a partnership with the Pakistan Red Crescent Society, which supports the distribution of CFPA's school bags in Pakistan. Local partners reached by official Chinese sources are often government-related as well. For example, in Cambodia, Chinese NGOs, usually through the introduction of CNIE, work directly with the Cambodia CSO Alliance Forum, established by the Council of Ministers in Cambodia to receive funding from China and distribute the funds to Cambodian NGOs. As both the Chinese and host government are directly involved in channelling Chinese NGOs' funds and projects, this approach can sometimes be seen as quasi-government-to-government aid. One characteristic of the top-down approach is that government officials from both China and the recipient country participate in the project's opening ceremony and the mainstream media publicises the event. This may contribute to the skewed attention towards government-influenced projects. On the other hand, some Chinese NGOs directly access local civil society, bypassing any major official involvement in either China or the host country. This path does not include any governmental interference. For example, GEI is in partnership with four local civic organisations in Myanmar to promote sustainable projects in local communities.

Though GONGOs tend to rely more on governmental referrals, not all of them do. Some GONGOs work directly with civil society and communities in host countries. For example, the SFIEC implemented a project in Myanmar through a partnership with a local NGO referred by Diinsider, an independent development enterprise, instead of through any governmental referrals, such as through the Chinese embassy, as sometimes it can be more efficient to go through an independent connection than a more bureaucratic official channel. This case also shows that a GONGO whose projects may be initiated for certain official causes does not need to rely on the official system to operate and conduct projects overseas. Sometimes, a GONGO can make decisions based on its own evaluation of what is best for a project's implementation. On the other hand, not all independent NGOs work directly with their host community. For example, Yundi

and Peaceland Foundation both work directly with the CSO Alliance Forum to carry out projects in Cambodia.

Discussion

The framework of initiation, financing, and implementation shows the variety of ways Chinese NGOs internationalise and challenge the traditional view that Chinese NGOs internationalise primarily for state interests. As this analysis unfolds, it becomes apparent that the internationalisation of Chinese NGOs is hardly uniform. The state wields influence mainly over Obligators, who by definition need to fulfil governmental goals when conducting international activities, and through officially funded NGOs, some of which are Opportunists. Some GONGOs conduct international projects by adopting a top-down approach to finding local partners, an approach which bears similarities to the government-to-government mode of aid. However, the widespread presence of other non-state influenced motivations, financial sources, and paths to local communities are also important to understanding the vibrant complexity of Chinese NGO internationalisation. The lack of widespread governmental involvement in the process of internationalisation leaves room for many Chinese NGOs to exercise agencies and enjoy autonomy at a level that is satisfactory to themselves. “I think the operational autonomy is high,” some NGO leaders have responded in such a way when I ask how they think about the NGOs’ autonomy in their internationalisation (e.g. Anonymous 6, 2020). To many Chinese NGOs, the constraints due to lack of human resources and financial resources are much more urgent challenges than constraints from the Chinese government in the process of internationalisation (e.g. Anonymous 6 2020, Anonymous 10, 2020).

The research shows that being GONGO or not alone does not indicate the exact NGO–government link in the internationalisation process and GONGOs are not necessarily more tied to government than independent NGOs, though the Obligators only consist GONGOs and GONGOs tend to rely more on the governmental referrals for implementation in the host countries. Among NGOs focusing on different types of issues, humanitarian NGOs and sustainable development NGOs do have certain characteristics. For example, no Obligators are established solely for humanitarian assistance purposes and humanitarian NGOs need to rely mostly on non-governmental sources for fundraising. In the implementation stage, humanitarian NGOs rely more on local connections, for example, local Chinese business associations, than Chinese governmental referrals for implementation but they usually notify Chinese embassies in the host country of their actions. Sustainable development NGOs tend to attract more funding from international foundations or organisations, thus they usually can work more independently from the Chinese government, but they are not near to adopting a confrontational approach towards government.

Conclusion and Future Aspects

The research has contributed to both theoretical literature and empirical study. Theoretically, through the study of Chinese NGO internationalisation, the research

combines two different levels of embeddedness into a unified one that provides a new and comprehensive angle to analyse the Chinese NGO–state relationship. The two-layer embeddedness framework is particularly useful to study both uniformity and diversity of Chinese NGO–government relationships in a certain social context, as shown in the context of Chinese NGO internationalisation. Meanwhile, through the analysis of the secondary layer, the research has illustrated the diverse connections between Chinese NGOs and government, indicating that the degree of embeddedness is not binary, further supporting the view of Yang and Alpermann (2014).

In terms of empirical contribution, the research has established a comprehensive view of the autonomy of Chinese NGOs in internationalisation through the two-layer embeddedness framework. The major structural governmental influence for the primary layer comes from the regulation and supervision systems consisting of civil affairs, national security, and foreign affairs systems, while the major governmental influence for the secondary layer comes from direct governmental involvement in NGOs' three-phase operations including initiation, financing, and implementation. In the primary layer, structural forces imposed by the Chinese government have contoured Chinese NGOs' behaviour while in the secondary layer Chinese NGOs exhibit diversity in their interactions with the Chinese government. The primary layer emphasises on the structural forces from regulations imposed by the government while the secondary layer is more dominated by the agencies of Chinese NGOs. The diversity of Chinese NGO–government links in the secondary layer shown in the research is against the claim that Chinese NGOs are the sole extension of China's state-led model of development cooperation. Most Chinese NGOs are not fully state-led in terms of their project initiation, financing, and implementation, even for GONGOs.

In addition to presenting the current state of Chinese NGOs' autonomy in internationalisation, this research can be considered the initial step in providing a preliminary explanation of the diverse degrees of embeddedness. For example, the current research shows that the variable of being a GONGO or independent NGO alone does not explain the complexity and degree of Chinese NGOs' embeddedness. More future research can be done to explore different variables that cause such diverse interactions between Chinese NGOs and government. For example, international factors, such as INGOs, which are important intermediaries in China's "going out" strategy (Farid and Li, 2021), can balance some Chinese NGOs' reliance on government as indicated in this research by sustainable development NGOs and host country-specific contexts may play a role in affecting Chinese NGOs' relationship with government, as indicated in this research that it is more likely for Chinese NGOs to rely on governmental referrals for local implementation in some countries than others. Another direction for improvement for future research is to bring more data on the scale of each type of governmental involvement on top of the variety when more data are accumulated and publicly available.

One factor that may be particularly relevant to affect future research on the Chinese NGO–government relationship with internationalisation is the development of South–South Cooperation Assistance Fund. The Measures For The Administration Of

Foreign Aid (对外援助管理办法, *duiwai yuanzhu guanli banfa*) effective since October 2021 states that the South–South Cooperation Assistance Fund is to support projects conducted by institutions such as international organisations, social organisation, and think tanks. This is the first time that Chinese NGOs appear in any official aid documents. It shows that Chinese NGOs have been officially recognised by the government for their roles in China’s development cooperation. With the establishment of funds coming from the South–South Cooperation Assistance Fund to support Chinese NGOs, the Chinese government can play a more influential role in the landscape of Chinese NGOs’ internationalisation, by determining the size of funding, preference over NGO types, issue areas, and geographical locations. To some Chinese NGOs, which have waited for government funding for a long time as resource constraints are the most salient challenge for them, they look forward to such funding opportunities, even though they have to make a compromise on autonomy. However, there are other Chinese NGOs that strategically decide not to apply for any governmental funds to be more autonomous. We can still expect the diversity in Chinese NGOs’ internationalisation, though it is likely that more Chinese NGOs will be influenced by the Chinese government once the channel of official funding becomes full-fledged.


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