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**THIS ACTION IS FUNDED BY THE EUROPEAN UNION**

**ANNEX II**

of the Commission Implementing Decision on the financing of the annual action plan in favour of the Maldives for 2023

**Action Document for Strengthening the Maldivian Civil Society as Actors of Development and Governance**

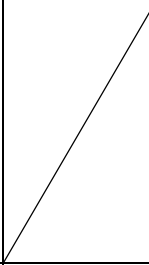
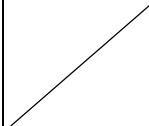
**ANNUAL PLAN**

This document constitutes the annual work programme in the sense of Article 110(2) of the Financial Regulation, and a support measure in the sense of Article 23(1) of NDICI-Global Europe Regulation.

# 1 SYNOPSIS

## 1.1 Action Summary Table

<b>1. Title OPSYS business reference Basic Act</b>	Strengthening the Maldivian Civil Society as Actors of Development and Governance OPSYS number: ACT-61804 Financed under the Neighbourhood, Development and International Cooperation Instrument ( <u>NDICI-Global Europe</u> )
<b>2. Team Europe Initiative</b>	<input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Supporting (inter alia) TEI.
<b>3. Zone benefiting from the action</b>	The action shall be carried out in the Maldives
<b>4. Programming document</b>	Multiannual indicative programme for the Maldives for the period 2021-2027
<b>5. Link with relevant MIP(s) objectives / expected results</b>	Measures in favour of civil society (relevant (indirectly) for all MIP Objectives and Expected Results for the Maldives)
<b>PRIORITY AREAS AND SECTOR INFORMATION</b>	
<b>6. Priority Area(s), sectors</b>	Not applicable
<b>7. Sustainable Development Goals (SDGs)</b>	Main SDG (1 only): 17 (partnerships for the goals) Other significant SDGs (up to 9) and where appropriate, targets: SDG 5: gender equality SDG 16: institutions SDG 10: Reduced inequalities
<b>8 a) DAC code(s)</b>	DAC code – 43010: multi-sector
<b>8 b) Main Delivery Channel</b>	60000 Private sector (service contract)

<b>9. Targets</b>	<input type="checkbox"/> Migration <input type="checkbox"/> Climate <input type="checkbox"/> Social inclusion and Human Development <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Biodiversity <input type="checkbox"/> Education <input checked="" type="checkbox"/> Human Rights, Democracy and Governance			
<b>10. Markers</b>  (from DAC form)	<b>General policy objective @</b>	<b>Not targeted</b>	<b>Significant objective</b>	<b>Principal objective</b>
	Participation development/good governance	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Aid to environment @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Gender equality and women's and girl's empowerment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Reproductive, maternal, new-born and child health	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Disaster Risk Reduction @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Inclusion of persons with Disabilities @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Nutrition @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>RIO Convention markers</b>	<b>Not targeted</b>	<b>Significant objective</b>	<b>Principal objective</b>
	Biological diversity @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Combat desertification @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change mitigation @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change adaptation @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>11. Internal markers and Tags</b>	<b>Policy objectives</b>	<b>Not targeted</b>	<b>Significant objective</b>
Digitalisation @		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
digital connectivity digital governance digital entrepreneurship digital skills/literacy digital services		YES <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	NO <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	
Connectivity @		<input checked="" type="checkbox"/>	<input type="checkbox"/>	
transport people2people		YES <input type="checkbox"/> <input type="checkbox"/>	NO <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	

	energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	digital connectivity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Migration @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Reduction of Inequalities @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Covid-19	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>BUDGET INFORMATION</b>				
<b>12. Amounts concerned</b>	Budget line(s) (article, item): 14.020131 Total estimated cost: EUR 400 000 Total amount of EU budget contribution EUR 400 000 The contribution is for an amount of EUR 400 000 from the general budget of the European Union for 2024, subject to the availability of appropriations for the respective financial year following the adoption of the relevant annual budget, or as provided for in the system of provisional twelfths.			
<b>MANAGEMENT AND IMPLEMENTATION</b>				
<b>13. Type of financing</b>	<b>Direct management</b> through: - grants			
<b>14. Type of measure</b>	<input type="checkbox"/> Cooperation facility <input checked="" type="checkbox"/> Measures in favour of Civil Society			

## 1.2 Summary of the Action

Since the inauguration of a reform-oriented government in 2018 - who pledged to consolidate democracy, uphold rule of law, fight against corruption and promote and protect human rights – the Maldives has made notable progress towards creating a more enabling environment for civil society organisations. However, inadequacies in the legal framework as well as restrictions to civic space and fundamental freedoms still persist, and it is not clear how the situation might evolve after the Presidential elections in September 2023. Activists, journalists and non-governmental organisations working on human rights, gender and other politically-sensitive topics are regularly targeted through online threats and intimidation, without adequate protection from the State. On the other hand, Maldivian civil society organisations often have to deal with significant lack of capacity and resources, especially these operating outside Male, which impede them to access donor funding and carry out their development and governance work efficiently.<sup>1</sup>

The Overall Objective of this action is to enhance the development and governance role of local civil society in the Maldives, so that they can provide services to communities more efficiently and participate meaningfully in policy-making, planning and accountability processes, leaving no one behind.

The Specific Objectives of this action are to: (1) to shift towards a more structured and inclusive EU-civil society dialogue, including with grassroots organisations, youth and women's organisations, disability organisations and with a focus on EU priority areas of the MIP for the Maldives and aligned with gender and Human Rights Based approaches (HRBA); (2) to strengthen the organisational/institutional capacities of local civil society organisations across the Maldives (in particular the ones working in the EU political and policy priority areas for the Maldives), notably in the areas of project management cycle and fundraising, protection/safety, HRBA and gender sensitive/transformational approaches, policy oversight/advocacy work as well as networking and coalition-building at different levels.

This is the first time that the EU envisages a targeted capacity-building programme to support local civil society in the Maldives. It builds however on the insights and lessons learnt from our regular dialogue with local

<sup>1</sup> CLIP Maldives

organisations and from the limited portfolio of projects implemented directly or indirectly through local civil society actors.

The action is based on the EU strategic priorities in the Maldives as outlined in the Multiannual Indicative Programme (MIP) 2021-2027<sup>2</sup>, the EU-Maldives CSO Roadmap 2021-2024, the Human Rights and Democracy Country Strategy for the Maldives 2021-2024 as well as the Country-Level Implementation Plan (CLIP) for the Gender Action Plan (GAP) III<sup>3</sup>.

The action will be implemented through a grant contract.

## 2 RATIONALE

### 2.1 Context

During the period 2014-2018, the Maldives experienced increasing political tensions, characterised by a widely reported deterioration in the respect for fundamental human, political and civil rights, and a loss of trust in state institutions. The European Parliament (EP) and the United Nations (UN) repeatedly criticised a politicised judiciary and the use of arbitrary detentions as means of pressure on political opponents. The EU Foreign Affairs Council adopted a framework for targeted restrictive measures. Freedom of expression and freedom of assembly were curtailed by amendments to the legal framework. Civil society activists, the media and opposition politicians reported regular threats and intimidation.

The 2018 presidential elections and 2019 parliamentary elections marked a turning point in the democratisation process of the country. The 2018 presidential election was organised in the context of a shrinking political space, acute polarisation and political tensions, restriction to fundamental freedoms and control over the media. The Solih government (MDP) committed to consolidate democracy, uphold human rights and fight against corruption, and managed to reconnect the country with the international community.

The reform-oriented government has for instance, in an effort to strengthen the legal framework governing associations, submitted a revised Associations Bill to the Parliament in 2019 aiming at enhancing the governance of associations. The Associations Act as it stands provides the legal framework for the formation, registration, and operation of associations, parties and clubs. The extent of dialogue and cooperation between civil society and public authorities appears also to have improved in recent years, although there are discrepancies between the frequency and access for Male'-based CSOs vs. those that are based in smaller island communities. The Ministry of Youth, Sports and Community Engagement (which is mandated with overseeing the registration/dissolution of NGOs) has also been hosting NGO Forums to improve dialogue between the Government and civil society.<sup>4</sup>

However, inadequacies in the legal framework with regards to definitions and classifications remain a challenge, combined with the fact that NGOs, sports clubs, foundations, etc. are combined under one umbrella without regard for the nature of their work. Lack of awareness of the relevant existing regulations and legislations, along with differences of opinions over the best time of governance mechanisms (central vs. decentralised governance) are challenges to the creation of a more enabling environment for CSOs. Some CSOs also highlighted political influence as a challenge to their work, along with rigid bureaucracy, lack of government aid and of lack of public support from the population.

In addition, there are still restrictions as regards the civic space and fundamental freedoms. As noted by international NGOs such as Human Rights Watch, the Government has failed to reform some restrictive laws, for instance on freedom of assembly. Reporters Without Borders (RSF) notes that despite encouraging progress in the fight against impunity, the police has continued to use physical violence against journalists who cover demonstrations and protests. Several local and international NGOs also expressed concerns about a provision in the Evidence Act that compelled journalists to reveal sources on court orders,<sup>5</sup> as well as attempts by the government to restrict an opposition-led 'India Out' campaign, calling for the removal of alleged Indian military personnel stationed in the

<sup>2</sup> [https://international-partnerships.ec.europa.eu/system/files/2022-01/mip-2021-c2021-8994-maldives-annex\\_en.pdf](https://international-partnerships.ec.europa.eu/system/files/2022-01/mip-2021-c2021-8994-maldives-annex_en.pdf)

<sup>3</sup> [join-2020-17-final\\_en.pdf](https://join-2020-17-final_en.pdf) (europa.eu)

<sup>4</sup> <https://twitter.com/MoYSCEmv/status/1452310783480709131>

<sup>5</sup> <https://monitor.civicus.org/updates/2021/10/11/restrictions-and-attacks-journalists-protesters-reprisals-against-activists-maldives/>

Maldives.<sup>6</sup> The media landscape remains highly politicised and is facing increased restrictions as the next presidential elections approach. The Information Commission (ICOM) also reported growing difficulties to engage in dialogue with the government. The Maldives is currently ranked 87 in the Reporters Without Borders (RSF) Press Freedom Index, with a score of 59.55, which is a 15 spot drop from 72<sup>nd</sup> place in 2021.

One of the key issues that permeates the entire field of civil society is recurrent and widespread online threats and intimidation, notably from extremist groups. This continues to have a chilling and significant effect on civil society, especially when they work on sensitive or taboo/controversial topics perceived by some to be incompatible with the tenets of Islam (such as gender equality, sexual identity, prevention of violent extremism or corruption for instance). Public discourse or debate on such sensitive topics are scarce, and conservative social attitudes appear to be prevalent – and may have been exacerbated as a consequence of COVID-19. On the other hand, there is a lack of adequate protection from public authorities in that respect. Events such as the allegedly arbitrary dissolution of the leading human rights NGO Maldivian Democracy (MDN) in 2019<sup>7</sup> highlight the threats to civil society organisations and sets a precedent that challenges the relationship between civil society and public authorities. Furthermore, the trend towards increasing political and religious polarisation means that a safe space for open dialogue could shrink further in the future, especially for the organisations and activists that are vocal on issues such as democracy and human rights, religious freedom, or sexuality and gender identity.

Maldivian civil society capabilities often remain quite constrained, lacking capacity and/or the necessary experiences to carry out their respective roles or manage larger, longer-term funds. The geographic spread of the inhabited islands in the archipelago, which does not facilitate strong national associations, is another challenge to building the capacity of local CSOs although this could be addressed through ongoing decentralisation efforts. Furthermore, the limited number of international NGOs due to high operational costs combined with the lack of funding results in a lack of access to technical and professional training especially at island level, making it difficult to take up more sophisticated and challenging projects. Despite the presence of several youth-led organisations, the number of young people in leadership or decision-making roles is another challenge.

A re-registration procedure launched in 2021 showed that there were 607 active CSOs in the Maldives CSO registry, with the predominant number of CSOs being based in Male. The number of CSOs that operate on an atoll-level, regional level or international level are relatively low, most likely due to lack of access to training or capacity building opportunities. According to a study done by UNDP Maldives (2022), there are challenges to the long-term viability of local CSOs, such as the halting of operations when the founder retires/becomes unavailable. Research also indicates that a large number of CSOs have no women in decision-making positions, and there was a lot of resource sharing between CSOs. The number of paid personnel employed in CSOs are also limited (with most CSOs run by volunteers). Financial constraints are the most significant barriers cited for capacity of CSOs in the Maldives, followed by human resource and other resource-related issues (such as lack of office space, technology, or time)<sup>8</sup>.

The proposed action is fully in line with the Strategic Action Plan of the Maldives SAP (2019-2023), specifically the priorities outlined in the chapter 5 of the SAP: Good Governance (judicial reform, security, eliminating corruption, state accountability, gender equality). The action is also in line with the priorities of the EU-Maldives CSO Roadmap 2021-2024 and with the Multiannual Indicative Programme (MIP) 2021-2027 for the Maldives, especially what is foreseen under the section 3.1. “Measures in favour of civil society”.<sup>7</sup>

The action will contribute to the realisation of the EU Gender Action Plan 2021-2025 GAP III in the Maldives, in particular to its thematic area of engagement: “Promoting equal participation and leadership” - Objective O3: Women’s organisations, other CSOs and women human rights defenders working for gender equality and women’s and girls’ empowerment and rights work more freely and are better protected by law”.

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<sup>6</sup> <https://en.sun.mv/72506>

<sup>7</sup> <https://mydemocracy.org/joint-statement-one-year-since-the-arbitrary-ban-of-maldivian-rights-group-the-maldivian-democracy-network-mdn/>

<sup>8</sup> For more details on CSO landscape and constraints in the Maldives, see: UNDP, “Comprehensive Study of the Maldivian Civil Society Space”, March 2022.

<sup>7</sup> REPUBLIC OF MALDIVES Multi-annual Indicative Programme 2021-2027

Finally, the action will contribute to the achievement of the Sustainable Development Goal - SDG 5 (Gender Equality), SDG 10 (Reduced inequalities), SDG 16 (Peace, Justice and Strong Institutions) and SDG 17 (Partnerships for the Goals) in the Maldives.

## 2.2 Problem Analysis

Based on the contextual analysis outlined in the section above, the proposed Action will focus on the following constraints and challenges faced by civil society actors in the Maldives:

1. Restricted enabling environment/civic space;
2. Exposure to political influence;
3. Limited capacity to deal with/cope with threats/intimidation off-line and on-line, targeting in particular human rights defenders and activists, and lack of adequate protection from the State;
4. Limited structured dialogue between the EU and local civil society at large, due notably to the geographic configuration of the country and the lack of permanent physical EU presence in the Maldives;
5. Limited/ad-hoc collaboration with public authorities at the national and local level;
6. Lack of adequate funding, skilled human resources, gender and human-rights based approaches, strategic vision and planning as well as institutional/organisational and managerial capacity constraints to perform their work professionally and efficiently in a sustainable way.

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action:

1. The main stakeholders for this Action are the Maldivian civil society organisations (including the media), which are the main target/beneficiaries, and with a particular focus on community-based/grassroots organisations, women and youth associations and persons with disabilities
2. The Action will also involve the relevant public authorities (at the central and local level), in particular the Ministry of Youth, Sports and Community Engagement, the Ministry of Gender and Family (MGF) and the Local Government Authority (LGA), as well as other relevant public bodies such as the National Disability Council and the Human Rights Commission of the Maldives.
3. Close coordination will be ensured with the key donors and implementing partners working with civil society organisations in the Maldives, in particular UNDP and USAID.

## 3 DESCRIPTION OF THE ACTION

### 3.1 Objectives and Expected Outputs

The Overall Objective of this action is to enhance the development and governance role of local civil society in the Maldives, so that they can provide services to communities more efficiently and participate meaningfully in policy-making, planning and accountability processes, leaving no one behind.

The Specific Objectives of this action are to:

1. To shift towards a more structured and inclusive EU-civil society dialogue, including with grassroots organisations, youth and women's organisations, disability organisations, and with a focus on EU priority areas of the MIP for the Maldives and aligned with gender and HRBA approaches.
2. To strengthen the capacities of local civil society organisations across the Maldives (in particular the ones working in the EU political and policy priority areas for the Maldives), with a focus on: project management cycle, resources mobilisation/fundraising (including on knowledge of EU rules and requirements), human resources and financial management, protection/safety, HRBA and gender sensitive/transformational approaches, policy oversight/advocacy, engagement with public authorities and administration as well as coalition-building at various levels.

The Outputs to be delivered by this action contributing to the corresponding Specific Objectives are:

- 1.1 contributing to Outcome 1 (or Specific Objective 1): increased EU knowledge and monitoring of the enabling environment/civic space and legal environment for civil society (in its whole diversity) in the Maldives.
- 1.2 contributing to Outcome 1 (or Specific Objective 1): EU-civil society dialogue enhanced and broadened, with a focus on key CSO players and EU political and policy priorities for the Maldives.
- 2.1 contributing to Outcome 2 (or Specific Objective 2): enhanced EU knowledge/understanding of local CSOs capacity needs and constraints.
- 2.2 contributing to Outcome 2 (or Specific Objective 2): tailor-made trainings and capacity-building delivered across the islands/atolls including the gender perspective.

## 3.2 Indicative Activities

### Activities related to Output 1.1:

- Detailed mapping of the local civil society landscape (in its whole diversity), with data disaggregated at least by age and sex.
- Regular analyses /monitoring of legal, institutional and political country developments and debriefing to the EUD;
- Regular consultations with local CSOs (including women's organisations, activists/human rights defenders working on women rights and gender equality, youth organisations, disability organisations) to collect insights and discuss on evolution of the enabling environment/civic space.

### Activities related to Output 1.2:

- Design strategies to increase EU outreach and dialogue with CSOs beyond Male and beyond its usual partners;
- Strategise and organise regular consultations with civil society actors on different topics, in close connection with the EU-Maldives political and policy dialogue and cooperation.
- Explore options to strengthen the dialogue between local civil society and public authorities at the local and national level in certain strategic areas.

### Activities related to Output 2.1:

- Carry-out a detailed needs assessment and gender analysis of local civil society organisations' main constraints and priority needs, focusing in particular on the organisations which are active in the EU political and cooperation priority areas for the Maldives;

### Activities related to Output 2.2:

- Design tailor-made training/capacity-building programmes (including gender transformative training) for the targeted organisations;
- Roll-out the trainings/capacity-building programmes across the islands;
- Survey/monitoring of impact.

## 3.3 Mainstreaming

### Environmental Protection & Climate Change

**Outcomes of the EIA (Environmental Impact Assessment) screening** (relevant for projects and/or specific interventions within a project): The EIA (Environment Impact Assessment) screening classified the action as Category C (no need for further assessment).

**Outcome of the CRA (Climate Risk Assessment) screening** (relevant for projects and/or specific interventions within a project): The Climate Risk Assessment (CRA) screening concluded that this action is no or low risk (no need for further assessment).

### Gender equality and empowerment of women and girls

As per OECD Gender DAC codes identified in section 1.1, this action is labelled as G1. This implies that gender equality is a cross-cutting issue that will be mainstreamed throughout the different activities and envisioned outputs and outcomes of the Action. In particular, local civil society organisations working on gender equality

and women's rights in the Maldives will be targeted both in the context of dialogue/consultations and of the capacity-building activities.

#### **Human Rights**

Respect for human rights and fundamental freedoms is an essential component of the proposed action since one key component is for the EU to better understand, monitor and discuss the country developments and trends as regards the state of the civic space and the enabling environment for civil society organisations (including women's organisations, human rights defenders and activists, youth organisations, disability organisations) to operate. Besides, local rights-based organisations will be privileged interlocutors and beneficiaries under this action.

#### **Disability**

As per OECD Disability DAC codes identified in section 1.1, this action is labelled as D0. This implies that the action is not considered directly relevant as regards the inclusion of persons of disabilities (although efforts will be made to identify and involve local CSOs working on disability issues in the scope of the dialogue and capacity-building activities supported by the action).

#### **Reduction of inequalities**

Local CSOs often play an important role as actors of development at the local level, including in terms of providing essential services in remote areas/to disadvantaged communities and hence contributing to the reduction of inequalities.

#### **Democracy**

The main objective of the proposed action is to strengthen the role of civil society as an actor of development and governance in the Maldives, so that CSOs can also perform their oversight/watchdog role and participate meaningfully in policy-making, planning and accountability processes.

#### **Conflict sensitivity, peace and resilience**

Several societal topics are sensitive in the Maldivian society. Conflict-sensitive approaches will be adopted when mapping/identifying the targeted civil society organisations to be covered by the action as well as when designing and rolling-out the capacity-building activities.

#### **Disaster Risk Reduction**

N/A

#### **Other considerations if relevant**

N/A

### 3.4 Risks and Lessons Learnt

Category	Risks	Likelihood (High/ Medium/ Low)	Impact (High/ Medium/ Low)	Mitigating measures
External environment	Significant changes in the Maldivian political landscape (after the 2023 elections) leads to a more restrictive environment for civil society to operate	Medium	High	<ul style="list-style-type: none"> <li>- Closely monitor country political, legal and institutional developments and its implications on human rights/fundamental freedoms/civic space</li> <li>- Maintain regular political dialogue with the Government on civic space/enabling environment-related issues (advocacy)</li> <li>- Explore how to involve public authorities/institutions at the central and</li> </ul>



				<p>local level in the implementation of some capacity-building project activities as well as how to enhance dialogue between civil society and public authorities.</p> <p>- Consider project adjustments if necessary, using built-in project flexibility</p>
External environment	New wave of COVID-19 pandemic leading to country lock-downs and other movement restrictions	Low	High	<p>- Closely monitor the epidemiological country situation and its possible impact on the action</p> <p>- Consider project adjustments if necessary, using built-in project flexibility including switch to digital/remote implementation strategies</p>
External environment	Conservative beliefs and attitudes within the population make project implementation challenging in some areas	High	Medium	<p>Carry-out political ecology and political no-harm” analyses to strategize the interventions, identify socio-cultural sensitivities and monitor the interventions, identify incentives and disincentives and tailor the designed communication strategies, with attention on the specific needs of vulnerable categories of the population in the atolls</p> <p>-Put emphasis on inclusive and participatory raising/sensitisation and to fully design communication strategies, with attention on the specific needs of vulnerable categories of the population in the atolls</p> <p>-Conduct regular field missions in the Maldives for proper project monitoring and understanding of the local context including from the gender perspective</p> <p>- Consider project adjustments if necessary, using built-in project flexibility</p> <p>- Identify local “allies” and work with them on gender and HRBA approaches (including among local authorities)</p>

#### Lessons Learnt:

This is the first time that the EU envisages such a targeted capacity-building programme to support local civil society in the Maldives. It builds however on the insights and lessons learnt from our regular dialogue with local organisations and from the limited portfolio of (past and ongoing) projects implemented directly or indirectly by local civil society organisations, notably in the context of the PSF-funded project “Supporting Justice Sector Reform and Anti-Corruption in the Maldives” (around EUR 1 million - ended in November 2022), the Transparency International/Transparency Maldives technical assistance project “Support to anti-corruption frameworks” (200,000 EUR – ended in Dec 2020) as well as through calls for proposals under the thematic instruments. This includes notably significant institutional and organisation capacity constraints (including in terms of project design/management/monitoring) and the limited number of professionally-run organisations, the lack of funding opportunities and limited international NGOs’ presence in the country, the fragmentation across the numerous islands/atolls as well as the overall “apathy” and lack of trust of civil society vis-à-vis public authorities and institutions in a context marked by restricted civic space and regular threats/intimidation. Partnership with civil society is also rendered more challenging due to the lack of physical

presence of EU in the country, which complicates notably the monitoring of projects, as well as logistical challenges linked to internal travels between islands/atolls. The EU maintains an open and constructive dialogue with the main Male-based NGOs, but to increase the outreach to make it more inclusive is challenging.

### 3.5 The Intervention Logic<sup>9</sup>

The underlying intervention logic for this action is to support the EU-Maldives partnership. It will enable the EU to better understand the civil society landscape in the Maldives, its dynamics and its specific constraints/challenges; to identify the most relevant organisations active in the key priority areas of the EU-Maldives Partnership (for both the political dialogue and development cooperation), and; to build over time a more regular and inclusive structured dialogue with civil society. Furthermore, this action will be instrumental to strengthen local CSOs' organisation/institutional, oversight/advocacy and project management capacities. This will make them better equipped to participate in policy dialogue and carry out their watchdog and awareness raising role, as well as lead to an increased strategic cooperation between the EU and civil society and an enhanced participation of local CSOs in the implementation of EU-funded projects and programmes under the MIP 2021-2027 and beyond. These objectives are totally in line also with the EU Roadmap for Engagement with Civil Society in the Maldives 2021 – 2024. Due attention will be given to ensure the introduction of gender sensitive indicators as well as the collection of gender disaggregated data when monitoring the impact of the Action.

### 3.6 Logical Framework Matrix

Given the nature of this Action a Logical Framework Matrix is not required at Action level

## 4 IMPLEMENTATION ARRANGEMENTS

### 4.1 Financing Agreement

In order to implement this action, it is not envisaged to conclude a financing agreement with the partner country.

### 4.2 Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 3 will be carried out and the corresponding contracts and agreements implemented, is 48 months from the date of adoption by the Commission of this Financing Decision.

Extensions of the implementation period may be agreed by the Commission's responsible authorising officer by amending this Financing Decision and the relevant contracts and agreements.

### 4.3 Budget Support – NOT APPLICABLE

### 4.4 Implementation Modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures<sup>10</sup>.

<sup>9</sup> @TEI Methodological Note to Support Design

<sup>10</sup> [www.sanctionsmap.eu](http://www.sanctionsmap.eu). Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

#### 4.4.1 Direct Management (Grants)

Grants: (direct management)

(a) Purpose of the grant(s)

Grant(s) will be used to achieve all the objectives/outputs and implement all the activities for this action, as outlined under sections 3.1 and 3.2 here above.

(b) Type of applicants targeted

Targeted applicants will be NGOs and international organisations. Key selection criteria will be notably the knowledge of the country context, local presence as well as professional experience and expertise in providing capacity building support to local civil society in the Maldives.

#### 4.4.2 Changes from indirect to direct management mode (and vice versa) due to exceptional circumstances (one alternative second option)

If part of the action cannot be implemented in direct management due to circumstances outside of the Commission's control, indirect management will be used with a pillar assessed entity, which will be selected by the Commission's services using the following criteria: technical expertise in the targeted sector (support to civil society, gender equality); knowledge of the political context and civil society landscape in the Maldives; close connection/networks (or demonstrated ability/willingness to develop them) with the relevant Maldivian public institutions, professional associations and civil society organisations; sufficient implementation/absorption capacity (including in terms of M&E) and; willingness to provide adequate visibility to the EU as per the EU visibility requirements.

The implementation by this entity entails the whole set of objectives, results and indicative activities under this action as outlined under sections 3.1 and 3.2 here above.

#### 4.5 Scope of geographical eligibility for procurement and grants

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply.

The Commission's authorising officer responsible may extend the geographical eligibility on the basis of urgency or of unavailability of services in the markets of the countries or territories concerned, or in other duly substantiated cases where application of the eligibility rules would make the realisation of this action impossible or exceedingly difficult (Article 28(10) NDICI-Global Europe Regulation).

## 4.6 Indicative Budget

Indicative Budget components	EU contribution (amount in EUR)
<b>Implementation modalities</b> – cf. section 4.4	
<b>Grant (direct management)</b> – total envelope under section 4.4.1	400 000
<b>Evaluation</b> – cf. section 5.2 <b>Audit</b> – cf. section 5.3	may be covered by another Decision
<b>Strategic communication and public diplomacy</b>	0
<b>Contingencies</b>	0
<b>Totals</b>	400 000

## 4.7 Organisational Set-up and Responsibilities

A Technical Steering Committee will be established to coordinate and monitor the efficient implementation of this action. This Committee shall meet indicatively every three months. The final composition, meetings' frequency and organisational set up (including whether selected CSOs and international organisations could participate occasionally) will be confirmed and further detailed during the inception of the project.

As part of its prerogative of budget implementation and to safeguard the financial interests of the Union, the Commission may participate in the above governance structures set up for governing the implementation of the action and may sign or enter into joint declarations or statements, for the purpose of enhancing the visibility of the EU and its contribution to this action and ensuring effective coordination.

# 5 PERFORMANCE MEASUREMENT

## 5.1 Monitoring and Reporting

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process, and part of the implementing partner's responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced.

The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews).

## 5.2 Evaluation

Having regard to the nature of the action, a final evaluation may be carried out for this action or its components via independent consultants contracted by the Commission.

It will be carried out for accountability and learning purposes at various levels (including for policy revision), taking into account in particular the fact that this is quite an innovative action for this partner country (never been tested in the Maldives).

The Commission shall inform the implementing partner at least 90 days in advance of the dates envisaged for the evaluation missions. The implementing partner shall collaborate efficiently and effectively with the evaluation experts, and inter alia provide them with all necessary information and documentation, as well as access to the project premises and activities.

The evaluation reports may be shared with the partners and other key stakeholders following the best practice of evaluation dissemination. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, apply the necessary adjustments.

The financing of the evaluation may be covered by another measure constituting a Financing Decision.

### 5.3 Audit and Verifications

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audit or verification assignments for one or several contracts or agreements.

## 6 STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY

The 2021-2027 programming cycle will adopt a new approach to pooling, programming and deploying strategic communication and public diplomacy resources.

In line with the 2022 “[Communicating and Raising EU Visibility: Guidance for External Actions](#)”, it will remain a contractual obligation for all entities implementing EU-funded external actions to inform the relevant audiences of the Union’s support for their work by displaying the EU emblem and a short funding statement as appropriate on all communication materials related to the actions concerned. This obligation will continue to apply equally, regardless of whether the actions concerned are implemented by the Commission, partner countries, service providers, grant beneficiaries or entrusted or delegated entities such as UN agencies, international financial institutions and agencies of EU member states.

However, action documents for specific sector programmes are in principle no longer required to include a provision for communication and visibility actions promoting the programmes concerned. These resources will instead be consolidated in Cooperation Facilities established by support measure action documents, allowing Delegations to plan and execute multiannual strategic communication and public diplomacy actions with sufficient critical mass to be effective on a national scale.