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

**ANNEX II**

to the Commission Implementing Decision on the financing of the individual measure in favour of Bangladesh for 2024

**Action Document for Support to Civil Society in Bangladesh**

**INDIVIDUAL MEASURE**

This document constitutes the annual work programme within the meaning of Article 110(2) of the Financial Regulation, within the meaning of Article 23 of the NDICI-Global Europe Regulation.

## 1 SYNOPSIS

### 1.1 Action Summary Table

<b>1. Title CRIS/OPSYS business reference Basic Act</b>	Support to Civil Society in Bangladesh OPSYS number: ACT-62627 Financed under the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe)
<b>2. Team Europe Initiative</b>	No
<b>3. Zone benefiting from the action</b>	The action shall be carried out in Bangladesh (nationwide).
<b>4. Programming document</b>	People's Republic of Bangladesh Multiannual Indicative Programme 2021-2027
<b>5. Link with relevant MIP(s) objectives / expected results</b>	MIP 2021-2027 specific objective 1: Women and girls are free from all forms of gender-based violence in the public sphere and in the workplace.  Expected Result 1.2: Women, men, girls and boys, in all their diversity, are agents of change regarding discriminatory social norms, gender stereotypes, child marriage, and drivers of conflict as a result of gender inequality.  The action also makes use of the Support Measures in Favour of Civil Society (MIP 2021-2027 point 3.1) contributing to priority area "Inclusive Governance" and in particular to Specific objective 1 and Expected Result 1.2.
<b>PRIORITY AREAS AND SECTOR INFORMATION</b>	
<b>6. Priority Area(s), sectors</b>	151 – Government & Civil Society-general
<b>7. Sustainable Development Goals (SDGs)</b>	Main SDG: SDG 16 (peace, justice and strong institutions) Other significant SDGs: SDG 5 (gender equality)

<b>8 a) DAC code(s)</b>	15150 – Democratic participation and civil society sector – 100%			
<b>8 b) Main Delivery Channel</b>	Multilateral organisation – 40000 Other – 90000			
<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> <b>(from DAC form)</b>	<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 type="checkbox"/>	<input checked="" 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>	<b>Principal objective</b>
	Digitalisation @	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	digital connectivity digital governance digital entrepreneurship digital skills/literacy	YES <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	NO <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	

	digital services	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Connectivity @	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	digital connectivity	YES	NO	
	energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	transport	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	health	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	education and research	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Migration @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Reduction of Inequalities @	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Covid-19	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>BUDGET INFORMATION</b>				
<b>12. Amounts concerned</b>	Budget lines: 14.020131 (NDICI South and East Asia) Total estimated cost <sup>1</sup> : EUR 6 000 000 <sup>2</sup> Total amount of EU budget contribution EUR 6,000,000			
<b>MANAGEMENT AND IMPLEMENTATION</b>				
<b>13. Type of financing</b>	<b>Indirect management</b> with the entity(ies) to be selected in accordance with the criteria set out in section 4.4.1			

## 1.2 Summary of the Action

This action aims at contributing via indirect management to the activities of the Nagorikata - Civic Engagement Fund (CEF) in Bangladesh. The European Union (EU) is a long-standing and trusted partner of civil society in the country. They are key partners in devising and implementing policies and programmes that meet people's needs, reduce inequalities and social tensions, realise rights, promote democracy, deliver inclusive services, and fulfil the central commitment of the 2030 Agenda to leave no one behind. The EU has committed to strengthen Civil Society Organisations (CSOs) as independent actors of good governance and development in their own right, with a specific emphasis on providing support to local CSOs.

Despite a restrictive operational environment, the EU is actively supporting civil society in Bangladesh. This includes grant awards and a governance programme (Platforms for Dialogue) that empowered CSOs to engage with citizens and the government, strengthening governance at local and national levels.

In alignment with the EU's efforts, the Swiss Agency for Development and Cooperation (SDC) has initiated in 2023 the Civic Engagement Fund (CEF) in Bangladesh to support local and national CSOs in advancing the Sustainable Development Goals (SDGs) 16 and 5<sup>3</sup> in the country. In a context of limited space for political and policy engagement, SDG 16 and 5 are avenues for continued support to CSOs and

<sup>1</sup> The total estimated endowment of the Civic Engagement Fund, excluding the EU contribution, amounts to CHF 17,492,810.00.

<sup>2</sup> The Civic Engagement Fund, to which the action will ultimately contribute through a Contribution Agreement, is a multi-donor action with joint co-financing by: (i) The Swiss Agency for Development and Cooperation (CHF 5,000,000); (ii) - The U.S. Agency for International Development (USD 11,000,000); and (iii) Global Affairs Canada (CAD 5,000,000).

<sup>3</sup> SDG 5: Gender equality, SDG 16: Promote Just, Peaceful and Inclusive Societies.

normative dialogue, as the government of Bangladesh has made strong commitments towards the SDG framework.

The CEF design was spearheaded by SDC and the fund has since been joined by the United States Agency for International Development (USAID) and Global Affairs Canada (GAC).

The CEF, aims to create a just, and inclusive Bangladesh that upholds human rights, good governance, and gender equality while leaving no one behind. By pooling funds and promoting coordination, this multi-donor trust fund programme to be joined by the EU via a Contribution Agreement with an entrusted entity, aims at reducing costs, expanding reach, and fostering holistic support for the civil society sector. Under the CEF, grant making and capacity building for CSOs should be complemented by networking and a mechanism for policy dialogue among the Government of Bangladesh, donors, and CSOs to advance SDGs 16 and 5.

In terms of actual implementation of the fund to date, a six-month inception phase was completed in the first quarter of 2024. The tender for a service contract for a Fund Management Agency (FMA), a private contractor, was concluded in 2023 by SDC and the chosen contractor (GFA Consulting Group) has since started its operations in Bangladesh. The FMA acts as the CEF's secretariat and is entrusted with the implementation of the funds activities such as managing calls for proposals and screening grant applications. It handles project and partner management, including partner risk assessments, compliance, and financial oversight. The FMA is also involved in organisational capacity development, networking events for peer learning, and promoting policy and dialogue aspects. The Fund Management Board (FMB), composed of senior representatives from core contributing development partners (DPs), convenes three times annually under a rotating chairmanship. The FMB's responsibilities include defining the CEF's strategic objectives, focus, and overall priorities in collaboration with the Technical Committee (CTC), comprised of the technical staff of the DPs. The FMB oversee the budget, human resources of the FMA, and appoint auditors for annual financial reviews. The FMB also allocates the CEF's budget across various funding windows, sets general grant disbursement criteria, selects final grant applicants, and approves capacity-building proposals. The EU will opt to be represented at the level of FMB and CTC where decisions are taken by consensus. Via the Contribution Agreement to an entrusted entity, the EU will channel its earmarked funding to the FMA.

Funding for the CEF is shared among contributing DPs, with contributors also able to earmark funds for specific themes. Existing development partners committed the following amounts: CHF 5 million by SDC, USD 11 million from the USAID and CAD 5 million from Global Affairs Canada (GAC). The CEF offers various funding windows for CSOs, supporting both long-term and short-term initiatives through core or project funding. Funding proposals are solicited through invitations, open calls, or procurement, with some windows requiring full proposals and others just concept notes. In its initial phase, the CEF aims to support 20-30 CSOs, impacting 150,000-200,000 people. Currently, the CEF is in the process of completing staff on boarding and the first call for proposals.

Within the framework of the EU contributing via indirect management to the activities of the CEF, the EU would contribute a wealth of knowledge on engaging with civil society in the country and throw significant political weight behind the already existing group of Development Partners. The EU would strongly advocate for the importance of continuous policy dialogue, particularly in support of an enabling environment and a policy and developmental role for civil society. This commitment draws heavily from the insights gained through managing governance and human rights project under thematic budget lines and the successful Platforms for Dialogue (P4D) governance programme. Concluded in 2023, the P4D programme facilitated policy discussions and engagement between citizens, civil society and government stakeholders across 21 districts out of 64. Emphasising social accountability tools, the programme centred on policies such as the National Integrity Strategy, the Right to Information Act of 2009, the Grievance Redress System, and the Citizen's Charter as an entry point for civic engagement. While these

tools are widely used by CSOs in Bangladesh to improve civic engagement and accountability of duty bearers, the EU could leverage its knowledge on best practice and advocate for a call window that follows a similar logic. Through P4D, the EU has engaged at various levels of policy dialogue – from grassroots to national level dialogue – and would make available its lessons-learned from a process that had various levels of success.

The overall vision of the CEF is “to contribute to a peaceful, just and inclusive Bangladesh with a vibrant, pluralistic and independent civil society that enables people to claim their civic and human rights, enhanced accountability and transparency of institutions and that defends open and democratic spaces”.

The rationale of the CEF is to contribute to build citizen voice, invest in local knowledge to improve governance, transparency, rights access to services and to ensure that CEF programme participants can take part in policy processes to strengthen public institutions and make them more responsive and accountable. Increased civic engagement is an important part of the solution to accelerate progress towards SDG 16 and 5 and improve the effectiveness of good governance and anti-corruption efforts. Increased civic engagement presents both a goal, and an important contribution through synergies with bilateral cooperation with the Government of Bangladesh (GoB) on governance and within sector specific agendas of other SDGs.

The CEF is based on several critical assumptions that extend beyond its defined objectives, outcomes, strategic principles, intervention areas, and inputs. These assumptions hinge on the government’s openness to democratic governance and reform, exemplified by initiatives such as Vision 2041 and the 8th Five Year Plan. These initiatives aim to bolster public service leadership, efficiency, and effectiveness. The active involvement and resilience of civil society are deemed essential in these guiding policy documents. Moreover, the ability to identify the rights CSO partners and support them effectively is crucial. The CEF governance structures and assistance through the Fund Management Agency, are expected to provide tailored support, facilitating connections between CSOs, government entities and stakeholders, while remaining adaptable to emerging trends.

The proposed Action intends to act as an individual measure in favour of civil society. As civil society is a cross-cutting topic, support to CSOs has the potential to support all MIP Priorities but given the focus of the programme on SDGs 16 and 5, it can be best situated under MIP priority area 3 ‘Inclusive Governance’. The modality of choice for the implementation of this action is indirect management through a Contribution Agreement with an entrusted entity which would contribute to the CEF.

The action will contribute to the realisation of the EU Gender Action Plan III 2021-2025 (GAP III)<sup>4</sup>, in particular the thematic area of engagement “Promoting equal participation and leadership”. Likewise, it will contribute to the implementation of the EU Strategy on the Rights of Persons with Disabilities, and the EU’s Action Plan on Human Rights and Democracy 2020-2024.

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<sup>4</sup> The Gender Action Plan III is a Joint communication by the Commission and the High Representative of the Union for Foreign Affairs and Security Policy which was welcomed through EU Presidency Conclusions of 16 December 2020 endorsed by 24 Member States

### 1.3 Zone benefitting from the Action

The Action shall be carried out in Bangladesh, the country is included in the list of ODA recipients.

## 2 RATIONALE

### 2.1 Context

The context for the EU's participation in the Civic Engagement Fund (CEF) within Bangladesh is linked to the EU's objectives and priorities, emphasising the promotion of inclusive governance, gender equality and women's empowerment (GEWE), human rights, and sustainable development in Bangladesh. Bangladesh's political landscape is marked by its aspirations for middle-income status, requiring strengthened governance, enhanced social justice, and greater civic engagement. The country faces challenges such as governance deficiencies, restricted civic spaces, and inequality. As Bangladesh prepares to graduate from its current Least Developed Country (LDC) status in 2026, human rights and democracy will emerge as crucial pillars for transitioning from the Everything but Arms arrangement to the Generalised Scheme of Preferences (GSP+) trade system. GSP+ integrates sustainable development with enhancements in human rights, labour standards, environmental conditions, and good governance. This presents a distinctive opportunity to harness the European Union's influence as Bangladesh's primary trading partner.

Currently, CSOs in Bangladesh are navigating a complex environment characterised by a dominant one-party system, partisanship, deliberate exclusion from the political sphere and formal spaces, diminishing freedom of speech and right to assembly. The government's response to demands for fair wages and democratic elections in 2023, has led to widespread detentions, excessive use of force, and internet blackouts aimed at silencing protests. Challenges extend to the legal and regulatory domain, impacting CSOs operations and making it especially hard for grassroots CSOs to flourish, particularly those representing most marginalised groups, such as indigenous peoples or persons with disabilities. In the past, systematic efforts to suppress any opposition and critical voice have intensified and legislations such as the Cyber Security Act foster a climate of fear and self-censorship. The overall landscape is further complicated by corruption, infrastructure deficits, and an inefficient bureaucracy, affecting the business sector.

The Constitution recognizes equal rights for women and men in the public sphere, and there is a reasonably compelling legal and policy framework guaranteeing women's rights. However, people who identify as lesbian, gay, bisexual, transgender, intersex, or are part of the LGBTI community face violence, discriminatory laws and police harassment. The Universal Periodic Review (UPR) suggested removing Section 377<sup>5</sup> from the penal code, creating safe spaces for LGBTI and hijra<sup>6</sup> individuals, and including transgender identities and same-sex relationships in national policies. The UPR also highlighted the issue of excessive government restrictions undermining the right to freedom of expression, peaceful assembly and association. It also underscored the dangers faced by human rights defenders and civil society organizations in voicing their concerns without fear of reprisals and intimidation by state agencies<sup>7</sup>.

Bangladesh has a significant history of strong and vibrant movements spearheaded by women-led organizations asserting that women's rights be respected, protected and fulfilled. Over the years, women's groups have mobilized to ensure their voices are heard on various issues, including: violence

<sup>5</sup>Section 377: British colonial penal code that criminalized all sexual acts "against the order of nature". The law was used to prosecute people engaging in oral and anal sex along with homosexual activity.

<sup>6</sup>In South Asia, the term 'Hijra' refers to people who develop a gender identity other than the sex they were assigned at birth. It is often used interchangeably with the term transgender and can also include people who are intersex.

<sup>7</sup> [OHCHR | Universal Periodic Review - Bangladesh](#)



against women; gender equality in securing economic opportunities and participation; equal representation in politics; sexual and reproductive health rights; family law reforms; and gender mainstreaming in public policies. In 2020, an intergenerational feminist alliance called “Feminists Across Generations” was formed due to nationwide protest on the increased rate of rape cases in the country. Feminist networks and organisations continue to proactively outline priorities and demands for gender equality in the country’s development journey.<sup>8</sup> The CEF is seeking to work with and strengthen the women’s rights movement and organisations advancing women’s rights and gender equality.

Enhancing civic engagement is pivotal for advancing SDG 16, bridging the gap between government policies and their actual implementation, often hindered by systemic issues. The approach requires harmonizing government initiatives with societal demand, emphasizing multi-stakeholder collaborations across government, civil society, the private sector, and youth to foster comprehensive development. Central to this is the empowerment of CSOs to catalyse citizen participation, ensuring inclusivity, accountability, and oversight. This framework supports the 2030 Agenda's vision for inclusive, participatory decision-making, underpinning the importance of civil society in achieving SDG 16 and the broader SDG goals. Despite Bangladesh's commitment to democratization and citizen-centred governance, civil society faces significant challenges, including restrictive regulations and a reluctance from government bodies to collaborate, compounded by changing donor priorities and external pressures like the Rohingya crisis and the country's developmental transition.

Persons with disabilities represent around 9% of the population in Bangladesh, and continue to face widespread discrimination and stigmatization, important barriers to access their human rights, particularly education, work, and political participation. According to a UN report in 2021, while persons with disabilities are increasingly organised and have formed national networks, they face barriers to access both financial resources and capacity building support, and mainstream CSOs are not yet engaging with organisations of persons with disabilities on a regular basis. Women with disabilities are facing particular barriers to engage in civil society work with a limited number of organisations of women with disabilities are mainly based in urban cities.<sup>9</sup>

Within the outlined scenario, the CEF functions as a mechanism for donor coordination, aiming to improve synergies and collaboration among various funding bodies. It is structured to enhance the collective capacity for engaging in policy discussions with the Government of Bangladesh, specifically regarding the role and support of CSOs. This approach is intended to streamline donor efforts and strengthen dialogue with the government, focusing on civil society's engagement and governance improvements.

The CEF's approach encompasses strengthening CSOs ability to mobilise and represent marginalised communities, thereby directly targeting inequalities in societal participation and governance. By investing in local knowledge to improve governance, transparency, rights, and access to services, the CEF seeks to ensure that all program participants, especially the most marginalized, can take part in policy processes. This contributes to strengthening public institutions and making them more responsive and accountable, thereby addressing inequality both in governance and in access to services.

From mid-July 2024, Bangladesh experienced political instability and unrest triggered by student protests against a government job quota system. The EU expressed its concerns over violence and loss of life in the context of these protests and called for a peaceful solution, respect for human rights and a thorough investigation. Prime Minister Sheikh Hasina resigned on 5 August. On 8 August, President Shahabuddin swore in an interim government which is tasked with steering the country through a transition that prepares the ground for democratic elections and ensures accountability for the deaths and violence that have occurred. The interim government is led by Nobel Peace Prize laureate Muhammad Yunus who has

<sup>8</sup> Gender Equality Brief Bangladesh, April 2024: [https://asiapacific.unwomen.org/sites/default/files/2024-04/bd-c836-gender-equality-brief\\_bangladesh\\_2024.pdf](https://asiapacific.unwomen.org/sites/default/files/2024-04/bd-c836-gender-equality-brief_bangladesh_2024.pdf)

<sup>9</sup> UNPRPD (2021). Situational analysis of the rights of persons with disabilities Bangladesh. Country report 2021. [https://unprpd.org/new/wp-content/uploads/2023/12/CR\\_Bangladesh\\_2021-f6f.pdf](https://unprpd.org/new/wp-content/uploads/2023/12/CR_Bangladesh_2021-f6f.pdf)

the title of Chief Adviser. On 8 August the High Representative issued a statement saying that the “EU looks forward to engaging with the new administration and to supporting this critical transition which should be part of a peaceful and inclusive process underpinned by good governance, democratic values and respect for human rights.” The EU has closely followed the situation and the actions of the authorities in the context of this crisis and will continue to do so.

## 2.2 Problem Analysis

In addressing the problem analysis for the EU’s participation in the Civic Engagement Fund (CEF), we recognise the critical challenges undermining civic engagement and the effectiveness of CSOs in Bangladesh. These challenges include a trend of closing civic space, constrained spaces for civil dialogue and participation, a restrictive regulatory and legal framework, coupled with limited organizational capacity and difficulties to access funding. While organisations that extend services to poor and marginalised groups face less restrictions to carry out their operations, those that maintain rights-based advocacy and lobbying efforts face various issues from restrictive institutions and laws, surveillance, intimidation, mistrust and deliberate efforts to keep them from the political sphere. This results in the weakness of some CSOs to effectively play their role to advocate for vulnerable and marginalised groups, people living in poverty, religious and ethnic minority groups, LGBTI people and persons with disabilities. In addition, especially community based and grassroots CSOs have weak capacities in terms of utilising open internet and digital skills to support their efforts.

Despite efforts and recent positive trends, the rapid economic growth experienced by Bangladesh in recent years has exacerbated patterns of marginalisation in addition to the negative effects of climate change, disproportionately affecting women and girls negatively. Inequality gaps persist in labour markets, and in particular, regarding women’s participation and representation in high levels of decision making, women’s participation in the formal economy and the persistent wage gap between women and men in most sectors. Rates of sexual and gender-based violence are high in Bangladesh. Moreover, discriminatory laws and provisions remain in the national legislation, and monitoring and implementation remain insufficient. Children from poor households, especially female children, are equality at risk facing various forms of exploitation, forced labour, child marriage and violence. The EU’s involvement is predicated on strengthening these CSOs to bolster inclusive governance, justice, and gender equality in alignment with SDGs 16 and 5. Key stakeholders include local and grassroots organizations, government agencies responsible for civil society engagement, and international partners. The action aims to address institutional barriers to effective civil society participation, ensuring that interventions do not inadvertently harm the very groups they intend to support.

The main assumption is that increased civic engagement is part of the solution to accelerate progress towards SDGs 16 and 5 and improves good governance efforts. Increased civic engagement presents both a goal and an important contribution through synergies with bilateral cooperation with the government on governance and sector-specific agendas of other SDGs. The SDGs serve as an entry point and provide a framework where all sides have an interest to advance and CSOs have significant added value acknowledged by the government. In other words, there needs to be a certain level of government commitment to democratic governance, reform and political will for an inclusive and engaged dialogue to take place.

Amidst a constrained political environment, the emphasis on SDGs 16 and 5 becomes crucial for supporting CSOs and fostering normative discussions: the CEF is designed as a fund to support activities aligned with SDGs 16 and 5, promoting citizen participation in governance and human rights monitoring. It aims to bolster CSOs at various levels, amidst shifting donor priorities and reduced funding for governance and human rights. The CEF thus serves as a collaborative platform for dialogue between civil society and the government, facilitating pooled resources from development partners to enhance aid effectiveness.



It is assumed that having multiple donors with a history of working with CSOs, can give more weight to lobbying and dialogue activities and to promote an adequate operational environment. The CEF intends to achieve this by i) managing several funding windows for CSOs, ii) complementing the funding windows with other activities such as capacity building, policy dialogue as well as political and diplomatic engagement, iii) CSOs outreach and representation of the diverse citizens' voice, iv) expanded civil society cooperation, partnerships, and networks, v) increased cooperation, interaction and policy dialogue between CSOs and government, vi) research, policy analysis and evidence generation, vii) piloting of innovative processes for citizens' voice and inclusion in governance, and viii) improving coordination and harmonisation among development partners.

Through this action, the EU aims at leveraging its expertise and resources to foster a more inclusive, equitable, and democratic environment in Bangladesh, directly contributing to the country's sustainable development and stability.

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

The primary stakeholders, who represent the rights-holders, involved are local and national CSOs in Bangladesh. Facilitating ongoing policy dialogue through interaction between civil society organizations and local authorities is a key objective of this initiative.

The key duty-bearers are, among others:

The NGO Affairs Bureau: this is a government department directly under the Prime Minister's Office which is the regulator for NGOs operating in Bangladesh, especially entities that receive entities that receive foreign funding. It is afforded wide powers as such as the (de-)registration of NGOs, the authority to approve projects and the power to approve or delay implementation of projects based on work plans and reports shared with them before funds are released. Deputy commissioners and Upazila (sub-district) officers in turn monitor NGO activities at the field level and report to the NGOAB.

The Department of Social Services: this is a government department under the Ministry of Social Welfare. It is responsible for carrying out social services, social safety nets, and welfare programs in Bangladesh. In this capacity, it is responsible for approval or delay of projects to be implemented by CSOs registered with them.

The Department of Women Affairs: this is a government department under the Ministry of Women and Children Affairs. It is responsible for the welfare of women in Bangladesh, and, in this capacity, it is responsible for approval or delay of projects to be implemented by CSOs registered with them.

Intelligence Agencies – Directorate General Forces of Intelligence / National Security Intelligence / Special Branch: these are intelligence branches of the executive some of whom directly report to the Prime Minister's Office. They monitor the actions of CSOs especially those advocating for civil and political rights of the citizens and the minorities as well as those vocal about political freedoms and other sensitive issues.

National Human Rights Commission of Bangladesh: A national advocacy institution for human rights promotion and protection. The commission is tasked with accomplishment of human rights in a broader sense, as enshrined in the Constitution of the People's Republic of Bangladesh and different international human rights conventions and treaties to which Bangladesh is a signatory.

The program's structure and management framework guarantee CSO involvement by incorporating them into the Central Advisory Committee to the CEF. This will take into account equal gender representation and including those representing most marginalised civil society groups. This committee serves in an advisory capacity to the Programme Management Board, offering insights on the overall strategic direction and pertinent contextual priorities and opportunities related to SDGs 16 and 5, as well as the program's objectives.

### 3 DESCRIPTION OF THE ACTION

#### 3.1 Objectives and Expected Outputs

The **Overall Objective** of this action is to contribute to a just, and inclusive Bangladesh with a vibrant, pluralistic, and independent civil society that enables people to voice their concerns and claim their civic and human rights, enhances accountability and transparency of institutions, and defends open and democratic space.

This is aligned with the overall goal of the CEF: increased voice, representation, recognition, and participation of civil society (especially women, youth and members of marginalised communities) in decision-making, influencing, holding government to account, and seeking redress for violations.

The **Specific Objectives** of this action are to:

1. Outcome 1: Increased outreach to and mobilisation of citizens, including especially women, youth and members of marginalised communities, at all levels.
2. Outcome 2: Expanded cooperation, partnerships, and networks among civil society entities (organisations)
3. Outcome 3: Increased interaction and dialogue between civil society entities, individual citizens, and GOB representatives towards more responsive and inclusive policies
4. Outcome 4: Increased capacity and knowledge of civil society entities.

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

For Outcome 1:

5. Output 1.1 – Civil society initiatives reach more and diverse citizens, especially women, youth and marginalised communities.
6. Output 1.2 – Civil society initiatives successfully mobilise diverse citizens.

For Outcome 2:

7. Output 2.1 – Civil society establishes and/or strengthens alliances for the purpose of enhancing their influence on policy- and decision-making, holding the government to account, and advocating for democratic reforms.
8. Output 2.2 – Civil society alliances take collective advocacy action on CEF themes.

For Outcome 3:

9. Output 3.1 – Civil society initiates interactions and dialogues with GOB at all levels on governance themes.

For Outcome 4:

10. Output 4.1 – CSO personnel, especially women, receive training to enhance their technical knowledge and organizational skills.
11. Output 4.2 – Civil society leaders and personnel apply their learning in their organizations, including grant project planning and implementation.

The action is designed to encompass both the protection and promotion of human rights through capacity-building of duty-bearers as well as rights-holders, including affected individuals and groups, and the organisations that represent them.

### 3.2 Indicative Activities

By contributing via indirect management to the CEF, the donors will work to strengthen the demand side of democratic governance, accountability and rule of law by increasing voice, representation, recognition and participation of civil society. It will influence and hold government to account on decision-making, legislation, policy development and implementation relevant for the CEF thematic focus areas, and corresponding challenges and opportunities. This long-term outcome will be achieved via several activities, mostly through funding and support (in the form of grants and non-grant support such as networking and capacity building) to civil society organisations:

#### **Outcome 1:**

##### **Indicative activities related to Output 1.1**

1.1.1 – Support to civil society initiatives/campaigns activities to increase outreach to and/or mobilisation of citizens locally or nationally (including through the use of digital technologies).

1.1.2 – Support to civil society to engage with women, youth, and members of marginalised communities participating in civil society initiatives.

##### **Indicative activities related to Output 1.2**

1.2.1 – Support to civil society to encourage people (especially women, youth, members or marginalised communities) to take a leading role and/or proactively take further initiatives.

1.2.2 – Support to civil society to ensure active participation of people and communities in their initiatives.

1.2.3 – Support to civil society to ensure that people and communities influence public service provision, decision making and budgets in their localities.

1.2.4 – Piloting innovative processes for enhancing the diversity of citizens' voice and inclusion.

#### **Outcome 2:**

##### **Indicative activities related to Output 2.1**

2.1.1 – Support the formation and strengthening of civil society alliances, networks and partnerships that serve the purpose of enhancing their influence on policy-and decision making.

2.1.2 – Creation of inclusive forums for civil society organisations to engage in policy discussions, promoting more accountable and responsive public institutions.

2.1.3 – Support and ensure the functionality of alliances on human rights and governance related topics.

2.1.4 – Support a positive image and collaboration between civil society organisations based on trust and established modes of cooperation.

##### **Indicative activities related to Output 2.2**

2.2.1 – Support collective civil society action on governance themes, including peer-to-peer learning and knowledge sharing activities.

2.2.2 – Support collective civil society actions such as research, action-oriented projects, policy positions, and joint recommendations and media campaigns.

2.2.3 – Support civil society organisation that contribute to multi-stakeholder dialogue.

### **Outcome 3:**

#### **Indicative activities related to Output 3.1**

3.1.1 – Support dialogue and negotiation skills of civil society organisations.

3.1.2 – CSO (and CEF) led research, policy analysis, and evidence generation to support informed advocacy and policy dialogue.

3.1.3 – Support interaction and dialogue between civil society and government at all levels.

3.1.4 – Support the inclusion of women, youth and members of marginalised communities in the interaction/dialogue between government and civil society at all levels.

3.1.5 – Support civil society organisations with the rights-based advocacy and enhancing people's access to justice.

### **Outcome 4:**

#### **Indicative activities related to Output 4.1**

4.1.1 – Capacity building and support activities to increase civil society organisations operational effectiveness and impact including digital skills.

4.1.2 – Assessment of capacity building and organisational capacity needs of civil society organisations.

4.1.3 – Development of manuals, guidelines and training courses and curricula.

4.1.4 – Organise trainings for civil society staff.

#### **Indicative activities related to Output 4.2**

4.2.1 – Training and mentoring to civil society leaders and personnel to apply their learning in their organisations, including knowledge and skills on project implementation and management.

4.2.2 – Finance innovative ideas as a result of initial support that address challenges and problems.

4.2.3 – Support civil society initiatives that contribute to preventing or reducing conflicts.

The activities above will be largely achieved by proving grants but also through and non-grant support provided through the fund in the form of capacity building, networking, outreach, peer-to-peer learning etc. While the tripartite policy dialogue will primarily involve engaging with DPs, the majority of the funding will be directed through the fund's grant windows:

1. The Strategic Partnership window aims for long-term collaboration with organizations deeply involved in SDGs 16 and 5, focusing on substantial, strategic support.
2. The Research, Outreach, and Facts-based Policy Dialogue window supports national policy dialogue and coalition-building aimed at broad societal outreach and mobilisation.
3. The Innovation, Learning, and Replication window promotes small-scale innovations in public engagement and governance, focusing on local organizations and practical implementation strategies to enhance public influence and accountability.

### 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).

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#### **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 this implies that while gender equality is a significant objective of this action, it is not the sole focus. The initiative aims to integrate gender equality considerations across its activities, ensuring that efforts to empower women and girls are incorporated into broader objectives. The action seeks to address gender inequalities and promote equal opportunities for all people, contributing to more inclusive and equitable outcomes in its implementation.

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#### **Human Rights**

This action is deeply integrated with the promotion and protection of human rights, aiming to ensure that all individuals have the ability to exercise their rights fully. It encompasses efforts to advocate for legal and social reforms, enhance access to justice, and support initiatives that safeguard human rights, with a particular emphasis on the rights of all women and girls, thereby contributing to a more just and equitable society.

The action follows a Human Rights Based Approach (HRBA) that puts the human rights of all persons living in multidimensional poverty and under oppression, and especially the most marginalised and discriminated among them, at the centre of development cooperation. The approach aims to enable persons living in poverty and under oppression to take steps out of that situation, and pinpoints actors and institutions responsible for respecting, protecting, and fulfilling those human rights. The HRBA includes:

On the one hand, the empowerment of women and men, girls and boys in all their diversity, including those with disabilities. This empowerment involves providing them with confidence, assertiveness, knowledge, skills, tools, networks, communication channels, and access to justice to enable them to claim their rights both individually and collectively.

On the other hand, developing the capacity of duty bearers – those obligated to respect, protect, promote, and fulfil human rights – by enhancing their knowledge, skills, incentive structures, and human and financial resources. This will be achieved indirectly through policy dialogue and interactions with civil society entities that have increased capacity and knowledge.

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#### **Disability**

As per OECD Disability DAC codes identified in section 1.1, this action is labelled as D1. This implies that the action has will mainstream disability in all the activities, and addressing issues directly related to disabilities, aiming to enhance accessibility, inclusion, and empowerment for persons with disabilities. The action will implement specific measures designed to improve the living conditions, rights, and participation of persons with disabilities, particularly women in civic activities, ensuring they are at the core of project interventions and policy advocacy. Specific attention will be made to ensure that organisations of persons with disabilities can access capacity building activities as well as grants and other financial support, by making all processes as accessible as possible.

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### **Reduction of inequalities**

In Bangladesh, inequalities manifest across various dimensions, including income, education, gender-based discrimination, and geographic location, significantly impacting the bottom 40% of the population and socio-economically disadvantaged groups. Key drivers include limited access to quality education and healthcare, disparities in employment opportunities, and gender-and disability-based barriers. Rural areas, in particular, face higher poverty rates and less access to services compared to urban areas. Trends indicate a widening gap between the wealthy and the poor, exacerbated by rapid urbanization and insufficient and inaccessible social safety nets. Addressing these inequalities requires targeted interventions in education, healthcare, and economic opportunities, with a focus on inclusive policies that consider the unique needs of marginalized communities.

This is closely linked with applying the Leaving no one Behind (LNOB) principle:

Prioritising activities that seek to reach or include the voices of those most at risk of being left behind. As such, projects to be supported by CEF must demonstrate how the intervention will empower the most marginalised communities with an emphasis on women and young people, including those with disabilities. Both the CSO grantees and CEF managers must demonstrate the knowledge, understanding and plans to address the differentiated impacts and to bridge the divide amongst the diverse programme participants / target groups, and the policies adopted by the Government.

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### **Democracy**

In Bangladesh, the state of democracy is complex, characterized by challenges in electoral transparency, freedom of expression, and political participation. Key issues include restrictions on media and civil society, impacting the democratic discourse. Efforts to strengthen democracy involve enhancing the electoral process, safeguarding human rights, and promoting active civic engagement. Addressing these areas is critical for the development of a more inclusive and participatory democratic environment.

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

In addressing conflict sensitivity, peace, and resilience, it is crucial to consider Bangladesh's context, marked by political tensions, the Rohingya refugee crisis, and environmental vulnerabilities. Strategies should focus on promoting social cohesion, addressing grievances, and strengthening community resilience against shocks. Effective peacebuilding requires inclusive dialogue, equitable resource distribution, and respect for human rights, ensuring that interventions do not exacerbate existing conflicts but rather contribute to a sustainable peace.

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### **Disaster Risk Reduction**



While the action is mainly aimed at strengthening governance and civil society, it can indirectly support Disaster Risk Reduction (DRR) efforts and the implementation of the Sendai Framework by promoting policies and practices that reduce risks and enhance community resilience. Through its support for civil society organizations, the CEF can contribute to building awareness, advocacy, and actions towards inclusive DRR, aligning with broader efforts to mitigate disaster impacts and enhance preparedness within the framework of sustainable development and governance. Furthermore, the proposed action aims to enhance service delivery by civil society organisations, making it more efficient, accessible, and cost-effective for citizens across Bangladesh, including those residing in climate-vulnerable and remote areas.

### **Youth as Change Agents**

The CEF supports a guided process for youth-led organisations to be able to continue to grow and contribute to governance and human rights objectives. Valuing youth as change agents, the CEF will provide necessary capacity development, as well as linkages to intergenerational and intersectional networks and coalitions. In engaging with young people, particular emphasis will be placed on young women and those who face marginalization due to disability, gender inequality, ethnicity, religion, geographic location, and other factors.

### **Multi-stakeholder Partnerships**

The promotion of networks and diverse partnerships across CSO sectors, including among think tanks, movements, unions, national and local CBOs, private sector stakeholders and between national and local level actors is central to the action.

## **3.4 Risks and Lessons Learnt**

<b>Category</b>	<b>Risks</b>	<b>Likelihood (High/ Medium/ Low)</b>	<b>Impact (High/ Medium/ Low)</b>	<b>Mitigating measures</b>
Contextual Risks	Declining government commitment to SDG 16 and 5	Medium	High	DPs lobbying for SDG agenda and favourable CSO context
	Shrinking civic space	Medium	High	DPs lobbying for SDG agenda and favourable CSO context
	Political instability	Low	High	DPs to continue support CSOs
Programmatic Risks	Changes in government agenda	Medium	Medium	Coordination structure for alignment with NGO AB
	Limited buy-in from stakeholders	Low	Medium	CSO capacity building

	Barriers to implementation	Low	Medium	Information sessions for consortia formation
Institutional Risks	Fiduciary misconduct	Low	Medium	Regular monitoring and capacity building to CSOs on finance and administration, grants management
	Inadequate capacity of management board or partners	Low	Medium	Ensuring dedicated staff for fund management and participation

#### **Lessons Learnt:**

Notable contextual risks include declining government commitment to the SDG 16 and 5 political changes or political instabilities. As regards shrinking space for civil society, Bangladesh CSOs are currently navigating a repressed to closed space, especially for rights-based organisations, with various success levels. Important lessons learned stem from a range of sensitive projects funded by the EU focusing on democracy, freedom of speech, and human rights during the 2023/2024 election period. Despite significant delays in some critical projects, the EU managed to secure funding for all initiatives through sustained political engagement. With civil society spaces for civic engagement contracting, it is vital to actively preserve current spaces and, where feasible, restore and reclaim those that have been lost. It is also a reality of the civic space, that the closing does not affect all organisations in the same way, with some (usually those more in alignment with government or engaging in service delivery type of activities) are facing less restrictions compared to rights-based organisations. Despite the restrictive environment, a range of organisations have proven experience in navigating the existing space and to ensure successful implementation of project in support of SGD 16 and 5.

The DPs will continue to lobby for the SDG agenda and a favourable operational CSO context. The elections took place in early 2024 and as expected the post-election environment does not represent a significant departure from the status quo.

Programmatic risks thus include changes of the government's agenda, DPs ability to create collective momentum and coordination, limited buy-in from key government stakeholders or concrete barriers to implementation such as approvals by the government regulating agency, the NGO Affairs Bureau (NGOAB), of specific projects or specific CSOs. As regards interaction with the NGOAB, the fund is expected to set up a coordination structure that will allow for better alignment of DPs when interacting with the NGOAB in a more regular and structured manner. Experience has shown that CSOs are skilfully navigating approval processes and that donor interventions have largely managed to resolve concerns or blockages of the NGOAB. Other risks are challenges regarding the capacity of CSO implementing partners or lack of interest or ability to establish consortia relevant for the funding windows. This will be mitigated by investing in CSO capacity building in parallel to providing funding and information sessions about the funding windows where consortia are encouraged.

Institutional risks include fiduciary misconduct or corruption, or low administrative and financial capacities of grantees, in the management of grants (regular monitoring and capacity building on financial management is foreseen), inadequate capacity of the Programme Management Board or implementing partners (should be a minor risk as all partners have dedicated staff managing the fund), limited development partner buy-in, funding (as it stands, there is interest from further DPs)) or inability to mobilise for increased coordination with CSO and government dialogue.

**From a programmatic standpoint, the EU will contribute lessons-learnt from the Platform for Dialogue (P4D) project.**

Overall, the goal and objective of the P4D project were highly relevant for the country and set a high level of ambition for the intended impact of the work. While the project achieved notable successes in certain areas, particularly at the local and district levels, the wider external context in which the project

was operating in was extremely challenging. The relevance of investing in civic engagement and dialogue, given the continued centralisation of power in Bangladesh by the national government, hierarchical governance structures, weak and highly politicised local government, political polarisation, restrictive space of journalists and civil society, and restrictions on the freedom of expression, remains high. This led to the observation that the EU should continue to promote the key role of civil society, and citizens in decision-making processes, including through the promoting the accountability tools.

Emphasise the process in the lead up to civic engagement and dialogue: Part of the success of P4D can be attributed to prioritising processes over products. While outputs were achieved as designed on paper, the emphasis on the process of achieving these outputs facilitated bridge-building and trust-building between citizens and government officials, which was crucial given the political landscape in Bangladesh. This means that significant investments (capacity-building, mentoring) were made in accompanying citizens with their journey towards becoming organised, gaining confidence and skills to engage with government stakeholders and ensure positive outcomes for citizens they represent. CSOs felt more confident and empowered to engage in dialogue once they had received training and support themselves. Citizens finding their voices and gaining confidence, was a lengthy process that has to be taken into consideration when deciding on timeframes for potential grants under the CED.

Diversify government partnerships to enhance effectiveness and efficiency: Relying on a sole entity/government partner is a strategy that make sense in a context where there is a single government entity mandated in terms of strategic engagement with and nurturing the CSO sector as such. However, in Bangladesh the main regulatory entity for foreign funding is the NGO Affairs Bureau (NGOAB), an institution that serves mainly an administrative and controlling function. Distributing responsibility and accountability among multiple government partners may enhance effectiveness and efficiency while still ensuring governmental buy-in and endorsement. At the same time, different topics that will emerge under the fund and especially its call windows, will vary and hence demand the engagement of different government partners. It has been a proven approach that engagement between government and CSOs functions better when it is structured around specific thematic topics and tries to engage at various levels (from grassroots to national level). This approach involves government bodies responsible for various thematic areas where CSOs operate, notably the Department of Social Services, the Department of Women Affairs, the Human Rights Commission and intelligence agencies, alongside other relevant ministries depending on specific call themes, such as the Ministry of Environment or Ministry of ICT but also to engage with local government authorities. A key learning in this regard, was the importance of tackling both demand and supply issues to build trust and facilitate open exchange at the local and district levels, where government officials tended to be more receptive to civil society dialogue once they have been sensitised to the issues.

Dialogue: While the focus on dialogue was an important element of the project with positive results to be found at local level, where citizens engaged over thematic issues relevant to local communities such as early child marriage and community health clinics, more specific and long-term monitoring would have been needed to assess whether there are policy outcomes as a result of dialogue engagements. Nevertheless, it is important to ensure momentum, interest and engagement from CSOs in this regard. With certainty, it can be said that it is paramount to continue with the grassroots-drive as a locally led approach to issues and engagement with lower levels of government, where political will was more readily found, likely due to their closer direct relationships with local communities.

As regards the national level dialogue, or generally activities at national level, they suffered a number of delays, in part due to a lack of political will to engage in dialogue with civil society. The lack of political will and hesitancy by the government to engage with CSOs in dialogue forums provided a major barrier to success. While national forums were held, they were delayed to such an extent (also the result of the Covid-19 pandemic) that it was challenging to see clear outcomes from those discussions before the end of the project period. That said, the facilitation of such dialogue opportunities, is in itself a key success given the wider political context and lack of civic space. Where political will was found, it was likely

supported by the selection of themes/issues which are less controversial, sensitising government officials, building the confidence and professionalism of the CSO interlocutors via trainings for effective dialogue with government and establishing clear local ownership of the initiative (with the lead implementing partner playing a facilitating role but stepping back from active management of the discussions).

Key recommendations in this regards are: 1) The EU should seek to engage more closely with CSOs in the country and the wider donor community to share learnings, experiences and examples of best practice in gaining the buy-in of the government and 2) Future engagements with the national level government should be planned to allow more space, skills and time for building national level buy in where feasible based on Political Economy Analysis, Stakeholder Analysis, and global and tactical theories for advocacy and policy change, such as Power Elites theory etc.

Gender Equality: P4D did not achieve the level of success initially planned with regard to the inclusion of women and girls. Engagement of women and girls at comparative levels to men remained challenging given the cultural/social context. A key recommendation was to undertake a contextual analysis with input from experienced gender equality experts in Bangladesh to inform a gender mainstreaming strategy for the project and to ensure activities are designed in a way in which women can equally participate and benefit. Issues related to gender equality (the same is true for human rights and the leave no one behind principle) should be made explicit in the project's theory of change, logframe reporting, MEL data collection and design, to demonstrate more visibly the contribution to the UN SDG agenda.

Horizontal scaling for broader impact: Programmatic efforts could expand horizontally to other regions of the country to generate critical mass and extend improvements in democratic culture across various areas.

Amplify social and traditional media campaigns: While social media campaigns offer broad reach, television remains a significant communication channel in Bangladesh. Large-scale TV communication campaigns, which include accessible means of communication (caption, sign language interpretation etc.) still hold value in communication strategies, and future programming should not overlook the potential of this important media platform.

Shift focus from knowledge-raising to behaviour change: Most project hope to influence behaviour, often through knowledge and awareness raising activities. P4D's behaviour change approach, drew from behavioural economists and behavioural scientists' understandings of key factors and sought to influence stakeholders' capabilities, opportunities and motivations through project interventions rather than simple awareness-raising or training activities. This approach, to leverage behavioural theory should be made available to CSO partners that seek to influence behaviours and encourage them to move beyond simplistic awareness raising activities and training models.

Utilise cost category-based budget templates for transparency and oversight: For projects spanning three years or more and exhibiting complexity akin to the P4D programme (involving multiple activities, tasks, and expenditures), budget templates categorised by cost are preferable. These templates depict costs against results, ideally at the output level, offering greater transparency, accuracy, and oversight for budget implementation, including by the donor. Budgets will also include gender sensitive and disability inclusive requirements.

### 3.5 The Intervention Logic

The underlying intervention logic for this action is twofold:

The Theory of Change pertaining to the action and support provided to CSOs through the CEF:

*If civil society entities in Bangladesh have increased knowledge and capacity; and*

*If civil society entities increase their outreach and mobilization of diverse citizens (especially women, youth, and members of marginalized communities) at all levels; and*

*If civil society entities expand their cooperation, partnerships, and networks at local and national levels; and*

*If civil society entities increase their interactions and dialogue with Government of Bangladesh (GOB) representatives towards more responsive and inclusive policies,*

**Then** *civil society entities and citizens in Bangladesh, including women, youth, and marginalized communities, will have increased voice, representation, recognition, and participation in decision-making, influencing, holding government to account, and seeking redress for violations; and*

**Then** *civil society entities and citizens will make a significant contribution to a peaceful, just, inclusive society that respects human rights, establishes good governance, and ensures gender equality,*

**Because** *the capacity and engagement of civil society entities are strengthened to enable people to claim their civic and human rights, improve governance of institutions, and defend open and democratic spaces in Bangladesh.*

The Theory of Change related to the EU participating in the CEF and its governance structure:

*If the EU joins the CEF; and*

*If the EU leverages its political weight and bilateral engagements; and*

*If the EU and other DPs coordinate their support for civil society organizations; and*

*If the EU and other DPs support tripartite policy dialogue between them, the government and CSOs,*

**Then** *the enabling environment and role for civil society as actors of governance and development in their own right can be enhanced.*

### 3.6 Logical Framework Matrix<sup>10</sup>

This indicative logframe constitutes the basis for the monitoring, reporting and evaluation of the intervention.

On the basis of this logframe matrix, a more detailed logframe (or several) may be developed at contracting stage. In case baselines and targets are not available for the action, they should be informed for each indicator at signature of the contract(s) linked to this AD, or in the first progress report at the latest.

New columns may be added to set intermediary targets (milestones) for the Output and Outcome indicators whenever it is relevant.

- At inception, the first progress report should include the complete logframe (e.g. including baselines/targets).
- Progress reports should provide an updated logframe with current values for each indicator.
- The final report should enclose the logframe with baseline and final values for each indicator.

The indicative logical framework matrix may evolve during the lifetime of the action depending on the different implementation modalities of this action.

The activities, the expected Outputs and related indicators, targets and baselines included in the logframe matrix may be updated during the implementation of the action, no amendment being required to the Financing Decision.

PROJECT MODALITY (3 levels of results / indicators / Source of Data / Assumptions - no activities)

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<sup>10</sup> The CEF being a multidonor trust fund the LOGFRAME that follows is the LOGFRAME of the CEF as approved by the Fund Management Board at the end of the inception phase.



Results	Results chain (a): Main expected results (maximum 10)	Indicators (a): (at least one indicator per expected result)	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
Impact	Increased voice, representation, recognition, and participation of civil society (especially women, youth, and members of marginalised communities) in decision-making, influencing, holding government to account, and seeking redress for violations	<p>1 Proportion of people who believe that they are better informed and have more say due to supported civil society initiatives or public interest media (GOV_TRI_2) disaggregated by sex, age and disability, and other status as relevant.</p> <p>2 Number of processes or policies that increase societies' capacities to resist and mitigate all forms of violence, or that strengthen coping mechanisms, state-society relationship and social cohesion (FCHR_TRI_2)</p>	<p>1 TBD</p> <p>2 TBD</p>	<p>1 +6% increase from baseline per year min.</p> <p>2 +6% increase from baseline per year min.</p>	<p>1 Survey report</p> <p>2 Survey report</p>	Not applicable
Outcome 1	Increased outreach to and mobilisation of diverse citizens at all levels	<p>1.1 Increased and diverse people (including especially women, youth, persons with disabilities and members of marginalised communities) participate actively in influencing governance institutions and policies at all levels, including public service provision, decision-making and budgets in their localities (disaggregated by sex, age and disability)</p> <p>1.2 Increased and diverse people (including especially women, youth and members of marginalised communities) believe that they are better informed and have more say due to supported civil society initiatives (disaggregated by sex, age and disability)</p> <p>1.3 Number of persons from left behind groups benefitting from projects to reduce exclusion,</p>	<p>1.1 TBD</p> <p>1.2 TBD</p> <p>1.3 0</p>	<p>1.1 6%</p> <p>1.2 6%</p> <p>1.3 6100</p>	<p>1.1 Survey report</p> <p>1.2 Survey report</p> <p>1.3 M&amp;E report &amp; Grants report</p>	

		discrimination, and inequality (POV_ARI_1) disaggregated by sex, age, disability and other relevant status of marginalisation				
<b>Outcome 2</b>	Expanded cooperation, partnerships, and networks among civil society entities (organizations)	<p>2.1 Diverse civil society partnerships, networks, and coalitions on governance themes are established and/or strengthened at local and national levels (disaggregated by types of networks and organisations).</p> <p>2.2 Measurable positive impact on governance institutions and policies based on collective civil society advocacy and action.</p>	<p>2.1 0</p> <p>2.2 0</p>	<p>2.1 20</p> <p>2.2 2</p>	<p>2.1 Assessment report/Grant report</p> <p>2.2 Assessment report/Grant report</p>	
<b>Outcome 3</b>	Increased interaction and dialogue between civil society entities, individual citizens, and GOB representatives towards more responsive and inclusive policies	<p>3.1 Number and types of civil society initiatives that decision-makers respond to positively (take action on / accept / adopt) and negatively (officially reject or defer)</p> <p>3.2 Number and types of positive responsive action taken by GOB at all levels (e.g., laws, policies, regulations, or practices) based on interaction with civil society.</p> <p>3.3 Number of gender-transformative policy and legislative reforms in place (GEN_TRI_1)</p>	<p>3.1 0</p> <p>3.2 0</p> <p>3.3 0</p>	<p>3.1 2</p> <p>3.2 2</p> <p>3.3 2</p>	<p>3.1 gazette/government circular</p> <p>3.2 gazette/government circular</p> <p>3.3 gazette/government circular</p>	
<b>Outcome 4</b>	Increased capacities of civil society organisations	4.1 Diverse individuals representing civil society entities demonstrate enhanced knowledge, attitudes and skills on technical governance themes and/or organizational management themes after CEF support (disaggregated by sex, age and disability).	<p>4.1 0</p> <p>4.2 0</p> <p>4.3 0</p>	<p>4.1 20% increased</p> <p>4.2 2500</p> <p>4.3 30</p>	<p>4.1 Survey report</p> <p>4.2 M&amp;E report &amp; Grants report</p>	

		<p>4.2 Diverse individuals representing civil society entities report that CEF support made a specific positive change in their professional lives, grant projects, and/or organizations (disaggregated by sex and disability and other status as relevant).</p> <p>4.3 Diverse civil society entities successfully implement grants and demonstrate increased thematic and organizational capacities (disaggregated by type of civil society).</p> <p>Number of women's rights organisations, peacebuilding organisations, feminist organisations, and women human rights defenders' organisations who participated in consultations around new policies and draft legislation with the regional, national and local government/state actors (GAP III)</p>			4.3 M&E report & Grants report	
<p><b>Output 1.1</b></p> <p><b>relating to Outcome 1</b></p>	<p>1.1 Civil society initiatives reach more and diverse citizens, especially women, youth and members of marginalised communities.</p>	<p>1.1.1 Number and types of civil society initiatives/campaigns to increase outreach to and/or mobilisation of citizens locally or nationally.</p> <p>1.1.2 Number and types of people, including women, youth, and members of marginalised communities, participating in civil society initiatives.</p> <p>1.1.3 Number of people participating in and influencing public service provision, decision-making and budgets in their localities (GOV_ARI_1)</p>	<p>1.1.1 0</p> <p>1.1.2 0</p> <p>1.1.3 0</p>	<p>1.1.1 10</p> <p>1.1.2 8538000</p> <p>1.1.3 2000</p>	<p>1.1.1 M&amp;E report &amp; Grants report</p> <p>1.1.2 M&amp;E report &amp; Grants report</p> <p>1.1.3 M&amp;E report &amp; Grants report</p>	

<b>Output 1.2</b>  <b>relating to Outcome 1</b>	1.2 Civil society initiatives successfully mobilise diverse citizens	1.2.1 Number of people (including especially women, youth and members of marginalised communities) taking a leading role and/or proactively taking follow-up actions based on civil society initiatives disaggregated by sex, age and disability as relevant.			1.2.1 M&E report & Grants report	
		1.2.2 Number of people (including especially women, young people and members of marginalised communities) reporting that their participation in civil society initiatives made a specific positive change in their lives or communities disaggregated by sex, age and disability.	1.2.1 0	1.2.1 2500	1.2.2 M&E report & Grants report	
		1.2.3 Number of people participating in and influencing public service provision, decision-making and budgets in their localities (GOV_ARI_1)	1.2.2 0	1.2.2 2320	1.2.3 M&E report & Grants report	
			1.2.3 0	1.2.3 2500		
<b>Output 2.1</b>  <b>relating to Outcome 2</b>	2.1 Civil society establishes and/or strengthens alliances for the purpose of enhancing their influence on policy- and decision-making, holding the government to account, and advocating for democratic reforms.	2.1.1 Number and types of civil society alliances, especially those led by women, youth, persons with disabilities and members of marginalised communities.			2.1.1 M&E report & Grants report	
		2.1.2 Number and types of civil society alliances on human rights and governance themes established and functional.	2.1.1 0	2.1.1 55	2.1.2 M&E report & Grants report	
		2.1.3 Number and types of civil society leaders and participants reporting positive change in their views of civil society collaborations.	2.1.2 0	2.1.2 15	2.1.3 M&E report & Grants report	
			2.1.3 0	2.1.3 1200		

<b>Output 2.2</b> <b>relating to Outcome 2</b>	2.2 Civil society alliances take collective advocacy action on CEF themes.	2.2.1 Number and types of collective civil society actions on governance themes, including peer-to-peer learning and knowledge sharing activities.			2.2.1 M&E report & Grants report	
		2.2.2 Number and types of collective civil society work products or initiatives, such as research studies, action-oriented projects, policy positions, joint recommendations, and media campaigns.	2.2.1 TBD	2.2.1 Types-12 Actions 60	2.2.2 M&E report & Grants report	
		2.2.3 Number of civil society organisations that contribute to multi-stakeholder dialogue or to the respect for human rights (FCHR_ARI_1)	2.2.2 TBD	2.2.2 10	2.2.3 M&E report & Grants report	
<b>Output 3.1</b> <b>Relating to Outcome 3</b>	3.1 Civil society initiates interactions and dialogues with GOB at all levels on governance themes	3.1.1 Number and types of interactions and dialogues between civil society entities and GOB at all levels	2.2.3 0	2.2.3 20		
		3.1.2 Number and types of civil society entities and numbers and types of mobilized individuals (including especially women, youth, persons with disabilities and members of marginalised communities) involved in civil society interactions with GOB at all levels.	3.1.1 0	3.1.1 25	3.1.1 M&E report & Grants report	
		3.1.3 Number of persons who gained access to formal judicial procedure or alternative justice process (FCHR_ARI_2)	3.1.2 0	3.1.2 2500	3.1.2 M&E report & Grants report	
<b>Output 4.1</b>	4.1 CSO personnel, especially women, including women with disabilities and other marginalised groups receive training to enhance	4.1.1 Number and types of civil society training needs identified, and manuals developed, including on gender inequality, disability, human	3.1.3 0	3.1.3 2000	3.1.3 M&E report & Grants report	
			4.1.1 0	4.1.1 10		
			4.1.2 0	4.1.2 575		

	their technical knowledge and organizational skills	<p>rights, project management and inclusivity themes.</p> <p>4.1.2 Number and types of individuals representing (number and types of) civil society entities who receive training on CEF themes (especially women, youth and members of marginalised communities, including those with disabilities)</p>			<p>4.1.1 M&amp;E report &amp; Grants report</p> <p>4.1.2 M&amp;E report &amp; Grants report</p>	
<b>Output 4.2</b>	4.2: Civil Society Leaders and personnel apply their learning in their organizations including for grants project planning and implementation	<p>4.2.1 Number and types of civil society entities, including those focused primarily on advancing women's rights and gender equality, disability rights, that receive grants and/or related technical assistance to enhance their influence on decision-makers (Need to replace the statement with below text) Number of Civil Society leaders and personnel enable to transformed their knowledge and skills in project implementation and management</p> <p>4.2.2 Number and types of innovations by grantees, such as statistical research, technology-based approaches, data-driven advocacy recommendations, multi-media, policy analysis, and legislative drafting (see, e.g., New Tactics for Human Rights) Number and types of innovations applied by grantees, for solution of local/national challenges and problems on civic rights and governance issue</p>	<p>4.2.1 0</p> <p>4.2.2 0</p> <p>4.2.3 0</p>	<p>4.2.1 3075</p> <p>4.2.2 20</p> <p>4.2.3 50</p>	<p>4.2.1 3075</p> <p>4.2.2 20</p> <p>4.2.3 50</p>	



		4.2.3 Number of civil society initiatives that contribute to preventing or reducing conflicts (FCHR_TRI_1)				
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## 4 IMPLEMENTATION ARRANGEMENTS

### 4.1 Financing Agreement

In order to implement this action, it is not envisaged to conclude a financing agreement with the Government of Bangladesh.

### 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 60 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 Implementation of the Budget Support Component: NOT APPLICABLE

### 4.4 Implementation Modalities

The Commission will ensure that the EU 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>11</sup>

#### 4.4.1 Direct Management (Grants)

N/A

#### 4.4.2 Direct Management (Prize(s))

N/A

#### 4.4.3 Direct Management (Procurement)

N/A

#### 4.4.4 Indirect Management with an entrusted entity

This action may be implemented in indirect management with an entity, which will be selected by the Commission's services using the following criteria:

- The entrusted entity should either be one of the partners of the Civic Engagement Fund "CEF" or have the ability to join the existing CEF structure.
- The entrusted entity should possess experience in one or more fields relevant to the action, such as implementing activities to support and strengthen non-state actors, conducting capacity-building initiatives, engaging in networking, developing partnerships, and/or facilitating dialogue.
- The entrusted entity should have the capacity to ensure regular participation to all activities carried out by the fund including its governance structure where feasible.

<sup>11</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.

Therefore, the implementation of the action by this entity entails a direct participation of said entity to the CEF placed within the existing CEF structure.

#### 4.4.5 Indirect Management with the Partner Country

N/A

#### 4.4.6 Contribution to <name of the relevant Regional Investment Platform>

N/A

#### 4.4.7 EFSD+ operations covered by budgetary guarantees.

N/A

#### 4.4.8 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 indirect management due to circumstances outside of the Commission's control, the direct management modality (grants) will be used instead.

Purpose of the grants: fulfil all specific objectives.

The type of applicant should fall under the European Union's broad description of Civil Society Organisations/Non-Governmental Organisations or an international organisation that is not pillar assessed.

Applicants should be legal persons, national or international non-governmental organisations (NGOs) or civil society organisations (CSOs), non-state actors, with a proven capacity and track record in implementing activities that support and strengthen CSOs.

#### 4.4.9 Other actions or expenditure

N/A

### 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 subject to the following provisions.

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	
Indirect management with an entrusted entity.	6 000 000
<b>Audit and Evaluation</b>	May be covered by another Decision
<b>Total</b>	6 000 000

## 4.7 Organisational Set-up and Responsibilities

The implementation arrangements for this action are structured to enable the EU to participate in a multi-donor fund in Bangladesh. Due to current contractual limitations (where the EU cannot channel funding through certain partners who are not pillar-assessed entities as of the general repository of June 2024), the EU will instead channel the funding through an alternative intermediary organisation that has been pillar assessed.

The current set-up of the CEF follows an established governance and implementation structure with a limited number of bodies to keep the structure lean and establish clear relations among the different bodies. It is founded on best practices for multi-donor CSO funding, featuring an established coordination mechanisms, clear roles and accountability, separate processes for implementation support and grant approvals, transparent grant criteria and a comprehensive Monitoring and Evaluation (M&E) framework.

**At the apex of the structure is the Fund Management Board (FMB)**, composed of core contributing Development Partners (DPs) represented by their highest-level officials (Head of Cooperation or designated senior representative). Initially chaired by SDC, the leadership will rotate annually. The FMB convenes three times annually, making decisions through consensus.

The FMB's mandate includes comprehensive oversight of the CEF, encompassing financial supervision, strategic direction setting, political dialogue facilitation, and coordination. The board approves significant funding allocations, annual budgets, and plans, along with human resources matters related to the Fund Management Agency (FMA), which oversees day-to-day CEF implementation. Additionally, the FMB oversees eligibility criteria and guidelines for grant disbursement, approves the final selection of grant recipients, and oversees capacity-building initiatives. Furthermore, the FMB formalises key management, legal, and fiduciary principles and mechanisms of the fund through written agreements. It is empowered to amend or develop additional by-laws for CEF governance.

**The intermediary structure is the CEF Technical Committee (CTC)**, composed of technical staff appointed from each DP, potentially supported by financial staff where applicable. The chair of the CTC will be from the same DP chairing the FMB. The CTC convenes bi-monthly or more frequently as needed, making decisions by consensus. The CTC's responsibilities include overall performance management oversight of the FMA. Additionally, it is tasked with providing support and ensuring quality assurance, consolidating lessons learned, engaging in dialogue with grant recipients, monitoring risks, and identifying opportunities in collaboration with the FMA. The CTC is authorised to make decisions concerning funding allocation within specified grant windows and ceilings when mandated to do so.

**The Fund Management Agency (FMA) is an international consultancy acting as the Technical Assistance/Secretariat for the fund.** GFA Germany has been competitively selected by SDC through a tender process and is currently establishing an office and team in Bangladesh. The FMA will be delegated authority for operational and financial management, implementation, capacity support, and progress monitoring of the CEF. It will conduct Calls for Proposals and forge strategic partnerships with selected CSOs based on a grants management manual that aligns with the rules and regulations of the multilateral contribution agreement approved by the FMB. This manual will guide day-to-day management and operations. Moreover, the FMA is responsible for formalising grant support agreements with recipient organisations, including standard terms and conditions. These agreements will detail the action description, budget, and log frame as annexes, within specified financial limits and obligations.

The CEF will include various funding windows for both long- and short-term support through core funding or project contributions. Grant applications may be solicited through invitation, open calls,

or procurement. The possible funding windows are: 1) Strategic partnership where a number of organisations will be provided with a type of core funding or funding for specifically agreed upon projects having a clear thematic strategy relevant for SDG 16 and 5 and the CEFs thematic focus and intervention areas. 2) Research, Outreach, and Facts-based Policy Dialogue window will focus on supporting national level policy dialogue and prioritising projects that demonstrate the ability to create broad coalitions and partnerships. 3) Innovation, Learning and Replication to provide project-specific funding toward implementation, learning and replication of innovative practices for enhancing citizens' dialogue, citizen-focused decision-making, and transparent, responsive and accountable governance. The window will prioritise small scale, local organisations, innovation, and practical implementation to citizen engagement and accountability to SDG 5 and 16 in practice.

The FMA will also organise networking events for peer learning, joint research and policy analysis, and the development of common priorities and policy positions among CSOs. It should also promote CSOs participation in dialogue with the government and with national oversight institutions. The FMA shall further support the development of statutes for the FMB and the CTC, and agreements of cooperation (AoC), stipulating the overall management, financial compliance fiduciary and legal criteria for the CEF.

A code of conduct to guide all bodies of the CEF, including grant recipients, shall further be elaborated and undersigned by the FMB. An annual meeting of the FMB, CTC, and FMA is envisaged.

As part of its prerogative of budget implementation and to safeguard the interests of the Union, **the EU would opt for direct participation and voting rights in the above governance structures** set up for governing the implementation of the action. The EU may sign or enter into joint declarations or statements, to ensuring representation and effective coordination, in addition to for the purpose of enhancing the visibility of the EU and its contribution to this action.

The implementing partner should be represented at the CTC and where agreed upon actively participate to the fund's technical workflows (capacity building, dialogue, launching funding windows, studies, data collection exercises etc.) in conjunction with the FMA. Both parties (the EU and the implementing partner) will engage in the fund led policy dialogue and governance of the fund.

In terms of equitable participation, the fund is equipped with mechanisms to ensure the active and meaningful participation of key stakeholders, including rights holders such as CSOs including indigenous, youth, women's organisations, and organisations representing vulnerable and marginalized groups such as human rights defenders, informal workers, Dalit and LGBTI communities. These arrangements should accommodate the participation of persons with disabilities, ensuring inclusivity in the governance and implementation of the intervention.

#### 4.8 Pre-conditions [Only for project modality]

N/A

## 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, as well as the degree of achievement of its results (Outputs and direct Outcomes) as measured by corresponding indicators, using as reference the logframe matrix.

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).

#### Roles and responsibilities for data collection, analysis and monitoring.

Monitoring and reporting will assess the implementation of the human rights-based approach working principles (applying all human rights for all; meaningful and inclusive participation and access to decision-making; non-discrimination and equality; accountability and rule of law for all; and transparency and access to information supported by disaggregated data). Monitoring and reporting will be based on indicators that are disaggregated by sex, age and disability when applicable. In order to monitor development and equal access, data/indicators will be disaggregated even further when applicable (e.g. by minority group or case). As the Action aims at addressing inequality-reduction, the monitoring should provide the understanding of whether and how the intervention facilitates changes in the drivers of inequality.

All monitoring and reporting shall assess how well the action promotes the principle of gender equality which lies at the heart of this programme and takes a human rights-based approach and enables the rights of persons with disabilities including through strengthening inclusion and diversity. Data collected, where appropriate and possible, will be disaggregated by sex and age, and by disability if tenable.

There will be a separate stream where monitoring and reporting is undertaken for the whole action of the CEF, encompassing all DPs contributions and activities of the fund. The responsibility for this lies with the Fund Management Agency (FMA), responsible for designing, developing and implementing a Monitoring, Evaluation, Adaptation and Learning (MEAL) system specific to the CEF, to ensure that funds are used effectively and that has to be finalised in consultation with the FMB. The FMA will formally report to all contributing DPs through one consolidated (for all DPs jointly) annual operational report each year as well as consolidated (for all DPs jointly) half-yearly and annual financial reports.

## 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 to cover the part implemented by the entrusted entity. 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 evaluations will be covered by another measure constituting a Financing Decision.

Overall, the evaluation of the CEF programme will be the responsibility of the Fund Implementing Agency (FMA). Having regard to the nature of the action, the FMA, will conduct mid-term and a final evaluation for the CEF. It will be carried out for accountability and learning purposes at various levels (including for policy revision), taking into account in particular the fact the innovative structure of the action for the sector (multi-donor trust fund for CSOs in Bangladesh). In addition, all evaluations shall assess to what extent the action is taking into account the human rights-based approach, as well as how it contributes to gender equality and women's empowerment and disability



inclusion Expertise on human rights, gender equality and disability will be ensured in the evaluation teams.

### 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.