

**Framework Contract COM 2011  
Lot 1: Studies and Technical Assistance in all sectors**

**Specific Contract N° 2013/328993**

**Evaluation of EIDHR CBSS in Bangladesh**

***Final Report***

**Prepared by:**

**Mrs. Abigail Hansen  
Mr. Asif Nasrul Islam**

**June 2014**



The project is financed by  
the European Union



The project is implemented by SACO  
SACO Consortium (SAFEGE/COWI)

*The contents of this publication are the sole responsibility of the consultants and the contractor and can in no way be taken to reflect the views of the European Union.*

**Framework Contract Commission 2011**  
**Lot 1: Studies and technical assistance in all sectors**

**Specific Contract N° 2013/328993**

**Evaluation of EIDHR CBSS in Bangladesh**  
**(from budget 2006 to 2012)**

**Final Report**

**June 2014**

***Report drafted by:***

*Mrs. Abigail Hansen, Team Leader*

*Mr. Asif Nazrul Islam, Consultant*

***Project Implemented by:***

*SACO (SAFEGE-COWI), Member of SACO Consortium*

## **ACKNOWLEDGEMENTS**

This report was written by two independent Consultants, Ms Abigail Hansen and Dr Nazrul Islam. The Consultants would like to thank all those who gave their time and contributed information during the Evaluation. They would like to thank in particular the grantees, institutions and organisations that were visited across Bangladesh, who generously gave their time and shared their insights. The Consultants also extend their thanks to the many individuals and groups who attended meetings, and spoke so eloquently about the projects' impacts on their lives. Finally, they also thank the staff of the European Union Delegation in Bangladesh for facilitating the mission and providing an abundance of information and guidance.

# TABLE OF CONTENTS

EXECUTIVE SUMMARY .....	5
1. INTRODUCTION .....	8
1.1 OBJECTIVES OF THE EVALUATION .....	8
1.2 SCOPE OF THE EVALUATION .....	9
1.3 CONTEXT .....	10
1.3.1 General human rights situation .....	10
1.4 METHODOLOGY .....	12
1.4.1 Sources of information .....	12
1.4.2 Assignment structure.....	12
1.4.3 Sample project selection .....	13
1.4.4 Evaluation questions .....	13
1.4.5 Field visits.....	13
1.4.6 Evaluation constraints .....	13
2. EVALUATION OF THE PORTFOLIO.....	14
2.1 OVERVIEW OF THE PROJECTS.....	14
2.1.1 Annual budget EIDHR CBSS .....	14
2.1.2 Average grant size.....	14
2.1.3 Human rights themes .....	15
2.1.4 Proportion of national/international grantees .....	16
2.2 RELEVANCE .....	17
2.2.1 Relevance to national policies.....	17
2.2.2 Relevance to EU policy .....	18
2.2.3 Relevance to needs.....	19
2.3 EFFECTIVENESS AND EFFICIENCY.....	19
2.3.1 Overall effectiveness & efficiency.....	19
2.3.2 Qualitative aspects .....	20
2.3.3 Project management .....	21
2.3.4 General obstacles to effectiveness .....	22
2.4 IMPACT .....	22
2.4.1 Challenges to Impact.....	24
2.5 SUSTAINABILITY.....	26
2.5.1 Challenges to Sustainability .....	26
3. CONCLUSIONS .....	27
4. RECOMMENDATIONS .....	30

## ACRONYMS AND ABBREVIATIONS

ADR	Alternative dispute resolution
CBSS	(EIDHR) Country Based Support Scheme
CfP	Call(s) for Proposals
C&P	Civil and political (rights)
CSO(s)	Civil Society Organisation(s)
DCI	Development Cooperation Instrument
EC	European Commission
EEAS	European External Action Service
EIDHR	European Instrument on Democracy and Human Rights
EJK	Extra-judicial killings
ESP	Economic, social and political (rights)
EU	European Union
EUD	European Union Delegation
FIDH	<i>Fédération Internationale des ligues des droits de l'homme</i> (International HR NGO)
GIZ	<i>Gesellschaft für Internationale Zusammenarbeit</i> (German development agency)
GoB	Government of Bangladesh
GSP	Generalised Scheme of Preference
HRD	Human Rights Defenders
HRW	Human Rights Watch (International HR NGO)
ICRC	International Committee of the Red Cross
ILO	International Labour Organisation
MS	European Union Member States
NGO	Non Governmental Organisation
NGOAB	NGO Affairs Board (Bangladesh)
NHRC	National Human Rights Commission
OMCT	Organisation mondiale contre la torture
PRAG	Practical Guide to Contract Procedures for EU External Actions
PWD	Persons with disabilities
Sida	Swedish International Development Agency
ToR	Terms of Reference
UN	United Nations
UPR	UN Universal Periodic Review

## EXECUTIVE SUMMARY

The European Union Delegation (EUD) in Bangladesh commissioned a consortium led by SACO (SAFEGE-COWI) to undertake an Evaluation of projects funded under the European Instrument for Democracy and Human Rights (EIDHR) Country Based Support Scheme from the budgets 2006 to 2012. A team of two independent Consultants prepared the present Final Report on behalf of the Consortium.

The Evaluation took place from April to June 2014. A first in-country mission was conducted in Bangladesh in April 2014, with a second in May and June 2014. According to the Terms of Reference, the objective of the Evaluation was to “*carry out an evaluation of the impact and sustainability of outcomes of the EIDHR CBSS programme in Bangladesh [...], in order to provide the Delegation with recommendations concerning strategic programming and operational choices for the implementation of the EIDHR CBSS in future*”.

The Evaluation considered in depth a portfolio of 7 projects, which constituted a representative sample of the 28 projects funded under the EIDHR during the Evaluation period. The 28 projects represented a total EU contribution of 4.94 million euros, that is, an average EU contribution of approximately 176,000 euros per project. The seven projects in the sample studied by the Evaluators were selected according to criteria established during the Evaluation’s inception period, and generally included projects of differing lengths and sizes, past and current projects, national and local activities, and covering a range of themes.

### MAIN CONCLUSIONS:

#### Project portfolio

EIDHR CBSS support doubled from 2006 to 2012, indicating strong EU commitment to supporting human rights in Bangladesh. The diversity of support ensured both top-down and bottom-up approaches, which helped to mitigate project “risks” and ensure broad levels of impact. Gender, minority, indigenous and disabled persons issues were well represented in the human rights themes that were supported. A majority of projects were awarded to Bangladeshi organisations, and all non-Bangladeshi organisations had genuine, local partners. International organisations are considered to give added value to the CBSS programme, since they can bring high levels of capacity, as well as international leverage. Torture, access to justice, and HRD issues were however only marginally addressed by projects, despite the seriousness of the violations and threats.

#### Relevance

The relevance of the projects was high relative to EU priorities and instruments, human rights needs in Bangladesh, and national priorities and strategies, at the time of the Calls for proposals. Strong relevance was observed relative to key human rights concerns and the needs of target groups, with very high relevance to the needs of specific target groups. Projects were particularly relevant at the regional and local level. EU support provided timely and strategic strengthening of civil society participation, and in some cases contributed to Bangladesh’s broader policy reform. The Programme demonstrated relevance to national development and human rights priorities, as expressed by the NHRC, however there is no stand-alone national human rights policy in Bangladesh. The Programme showed strong reactivity to changing country needs, and was relevant to rights-related EU Guidelines (for example the Human Rights Defenders Guidelines). It is noted however that key concerns, such as disappearances and extra-judicial killings, and other important issues such as accountability of important institutions (local courts/police stations) were not directly addressed. It is considered that the priorities for future CBSS will need to be further adjusted, and EU and MS responses strengthened.

## **Effectiveness & efficiency**

The projects were generally effective, in particular projects whose activities were developed with realistic objectives and budgets, and their overall efficiency is considered to have been good. The grantees were greatly assisted by the EU Delegation's flexibility during the implementation of their projects. The projects' geographical breadth and stakeholder outreach are strong indicators of their effectiveness. The objectives of several projects were not realistic, or were affected by external factors such as political unrest in the latter part of 2013; these difficulties were generally due to poor project design, risk identification, or the projects' limited duration. The quality of activities varied significantly, in particular training and awareness-raising activities. Risks of duplication were relatively high, and synergies observed were incidental rather than intended, with little *strategic synergy* being observed.

National, policy-based projects showed strong geographical reach, whereas those focussing on specific or local objectives had stronger grass-roots effectiveness. The Programme demonstrated an appropriate local-national balance. Strong engagement of key stakeholders was observed, including local authorities, public services, and civil society, however little attention was given to involving religious leaders, and little cooperation was observed with key Ministries.

Partnerships were genuine and well-balanced. Grantees adjusted activities to enhance their effectiveness, and projects were managed adequately on a day-to-day basis, however structural and capacity difficulties impeded project impact and effectiveness. Grantees had particular difficulties with financial management and preparing budgets, and some difficulty monitoring results, impact and visibility. The quality of interim and final reporting was variable, and a lack of strategic organisation in implementation was observed. Some organisations diluted their capacities by taking on multiple simultaneous projects.

## **Impact**

Projects generally achieved their expected impacts, however some objectives were too broad, unmeasurable and unrealistic. Strongest impacts were observed where grantees had a specialised thematic focus such as torture or networking of human rights defenders (Odhikar and Uttaran projects respectively); where particular sections of minority groups, for example the low-caste Hindu or Antaj class, were engaged (OXFAM/ ECDO); where objectives and activities were strategic and realistic (Ahshania Mission in Shakkhira); and where strong partnerships were evident (OXFAM/ ECDO). The impacts of the projects were observed at multiple levels, and the direct and measurable impacts of many projects were quite impressive. Numerous indirect and intangible impacts, or secondary direct impacts, were observed, and was one of the major strengths of the Programme. Awareness-raising activities were effective, however the *quality* of awareness was often shallow, and the quality, content and adequacy of training was queried.

## **Sustainability**

The projects demonstrated reasonable overall sustainability, with many projects continuing to use outputs that were produced during the project period, and many groups continuing to function independently; however sustainability was a challenge for some grantees and for some activities. High staff turnover significantly limits project sustainability, and there is little uptake of issues by authorities.

## **Calls for Proposals**

The CfP priorities varied considerably from year to year; while this provides flexibility, this can create a perception of lack of continuity and vision. CfP are generally seen as lacking in *flexibility and accessibility*, however it is noted that the EU Financial Framework 2014-20 encourages flexible approaches and modalities. Beneficiaries appreciated the responsiveness and flexibility demonstrated by EUD. EUD provides briefings on project management issues, however increased support in this regard would be



beneficial. The short *duration* of projects and near absence of capacity development support makes it difficult to achieve sustainable results; in addition there is little *continuity* of support to initiatives. The development of consortia, and an EU national civil society platform, would have a federating effect, encourage complementarity, and provide a valuable resource facility.

### **Complementarity**

Projects showed concrete practical complementarity, and built on knowledge gained from other initiatives; but there was little synergy between individual projects. Strong complementarity was observed with EUD projects in governance, democracy, and institutional reform, but complementarity with other initiatives could be enhanced through stronger donor coordination in the human rights sector.

### **Added Value**

It was difficult to assess the specific added value of projects and the EU, however EU support clearly provides a reach and specificity that other development actors cannot. EU enjoys political and moral weight, which conveys benefits, credibility and protection to grantee organisations. EU added value will be of increasing importance in Bangladesh.

### **Visibility**

EU visibility rules were adequately observed; however this can be problematic for activities that touch upon certain sensitive issues. Additional awareness-raising concerning EU support and added value would be beneficial.

### **Approaches**

Specific approaches can be adopted to strengthen human rights in Bangladesh through EU support and diplomacy.

# 1. INTRODUCTION

The European Union Delegation (EUD) in Bangladesh commissioned a consortium led by SACO (SAFEGE-COWI) to undertake an Evaluation of projects funded under the European Instrument for Democracy and Human Rights (EIDHR) from budgets 2006 to 2012. A team of two independent Consultants has prepared the present Final Report on behalf of the Consortium.

The Evaluation took place from April to June 2014, and comprised two in-country missions, and four field visits to various regions in Bangladesh. The first mission was conducted in April, during which an Inception Report was submitted to the EUD, and two field visits took place; the Evaluator Dr Nazrul Islam conducted two further field visits, between the two formal missions. A second in-country mission took place in May-June 2014, concluding with a workshop held in the EU Delegation and led by the Evaluators, which brought together representatives of non-governmental organisations (NGOs) supported by EIDHR in Bangladesh, as well as Delegation staff members. In addition, two briefings were held with EU Member State and partner representatives.

## 1.1 OBJECTIVES OF THE EVALUATION

The general objective of the Evaluation, according to the ToR, was:

*“To carry out an evaluation of the impact and sustainability of outcomes of the EIDHR CBSS programme in Bangladesh [...], in order to provide the Delegation with recommendations concerning strategic programming and operational choices for the implementation of the EIDHR CBSS in future [emphases by authors]”.*

The ToR defined the specific objectives of the Evaluation as follows:

- To assess the programme as a whole, while focusing on outcomes and their sustainability, and on overall programme impact;
- To provide an assessment of the strengths and weaknesses of the current programming and operating modalities of the Programme, and their capacity to achieve stated objectives;
- To make strategic recommendations aimed at improving impact (e.g. choice of priorities, choice of sectors, operating modalities and consultation with civil society,), including identification of opportunities for increased complementarity with other EC-funded instruments and programmes for the period 2014 to 2020.

The Evaluation therefore had a dual-pronged nature:

- The Evaluation objectives in most respects constitute a “classic” assessment, where OECD-DAC<sup>1</sup> and EU evaluation<sup>2</sup> criteria would be addressed either directly or indirectly, however the ToR specifically provide that the relevance, impact, sustainability, and complementarity/ synergy of the programme and projects are to be emphasised.
- The Evaluation objectives focus in particular on future action, with a corresponding institutional dimension, where strategies (and by implication, approaches), priorities, sectors, operational and consultative approaches, and potential complementarity/ synergies for future programming are to be identified.

---

<sup>1</sup> <http://www.oecd.org/dac/evaluation/daccriteriaforevaluatingdevelopmentassistance.htm>

<sup>2</sup> In particular EU coherency and “added value”

## 1.2 SCOPE OF THE EVALUATION

The Evaluation considered a total portfolio of 28 human rights projects funded under the EIDHR Country Based Support Scheme (CBSS) from budgets 2006 to 2012. From these projects, the Evaluators selected seven (7) projects, which in their view constituted a representative sample of all projects funded during the Evaluation period (see selection criteria in *Methodology* below). The 28 projects represented a total EU contribution of 4.94 million euros, which amounts to an average EU contribution of just over 176,000 euros per project (see also *Projects* below).

The projects focused on several key aspects within the range of human rights issues encompassed by the EIDHR. The list below outlines the main focus areas of the projects; it is however to be noted that several projects addressed more than one issue, which means that the total number exceeds 28 (see *Projects* below). They can be loosely categorised as follows:

Theme	N° of Projects
Minorities & vulnerable persons	10
Women's rights & gender issues	9
Media & freedom of expression	4
Labour rights	4
Access to justice	2
Rights of the disabled	2
Indigenous peoples' rights	2
Anti-torture	2
Human rights defenders (HRD)	1
Governance	1
Youth	1

The seven projects in the sample studied by the Evaluators were selected according to the criteria outlined in the Evaluation Methodology below.

The Evaluators were required to provide the current Final Evaluation, and corresponding annexes, based on the following specific tasks:

- **Analysis of sector trends:** Provide an analysis of the trends in the sectors covered by EIDHR objectives during the evaluation period in Bangladesh, in particular regarding: "*Strengthening the role of civil society in promoting human rights and democratic reform, in supporting the peaceful conciliation of group interests and in consolidating political participation and representation*";
- **Assessment of sample projects:** Provide a sample assessment of approximately 10 EIDHR CBSS projects, taking into account the impact of the actions (on target groups, final beneficiaries etc.); the sustainability of the actions (at financial, institutional and policy levels); and complementarity with other instruments;
- **Assessment of programming and modalities:** Provide an assessment of the programming and implementing modalities in terms of their ability to reach stated objectives;
- **Recommendations:** Provide recommendations for the future focus of EIDHR in Bangladesh.

## 1.3 CONTEXT

The human rights situation in Bangladesh has long been described as highly problematic, and is directly linked to challenges related to political stability, poverty and development, and marginalisation of vulnerable groups. This is all the more tragic when one considers that “*Bangladesh was created because of human rights violations*”<sup>3</sup>, in the wake of the 1970 elections, and subsequent repression of its people. This brutal birth foreshadowed, and perhaps predicated, the violence and deep insecurity<sup>4</sup> that has marked elections, coups, states of emergency, and other power transfers in the years since the country’s independence. This in turn has been translated into severe abuses of power and authority by security forces, and by the some members of the Executive.

In addition to, or perhaps because of, its political instability, Bangladesh is a relatively poor<sup>5</sup> and vulnerable country, with 43% of the population living below the international poverty line; difficulties in accessing health<sup>6</sup>, education<sup>7</sup>, justice<sup>8</sup> and other social services<sup>9</sup>, in particular in rural areas and particularly for women; and overall development indicators<sup>10</sup> amongst the lowest in the world.

Added to its development difficulties and internal political turmoil, the country is profoundly exposed to natural and man-made catastrophes, including cyclones and flooding (with Bangladesh considered the most vulnerable to the effects of climate change<sup>11</sup>, including both sea level rise and extreme weather events, with its concomitant social and economic effects), the 2004 tsunami etc. This means that environmental issues have acquired an acute sensitivity in the country, with civil society organisations pitted not only against the government and local authorities, but also against powerful interests in the national and international private sphere<sup>12</sup>.

Finally, the country is subject to varying degrees of conflict with its immediate neighbours, for example, long-standing disputes with India concerning water supply, land, maritime waters, and transit and immigration disputes; and on-going border skirmishes, shootings and deaths on the Indo-Bangladeshi border, primarily arising from illegal immigration and trafficking, although these issues seem to be improving since 2013. In addition, tensions between Bangladesh and Myanmar have recently increased concerning Rohingya Muslim refugees in southern Bangladesh, adding to existing maritime boundary disputes and associated energy exploration.

### 1.3.1 General human rights situation

Bangladesh is plagued by a broad range of very serious human rights challenges, with key areas of concern regarding long-standing and systemic human rights violations including:

---

<sup>3</sup> <http://www.amnestyusa.org/our-work/countries/asia-and-the-pacific/bangladesh>

<sup>4</sup> “Violence is a pervasive feature of politics, including political campaigns and elections, and elections frequently are marred by violence, intimidation of voters, and rigging.” Country Reports on Human Rights Practices, Bureau of Democracy, Human Rights and Labor, US State Department 1999

<sup>5</sup> Annual per capita GDP of USD 2,100 (est. 2013), [ranked 194<sup>th</sup>](#) out of 208 countries

<sup>6</sup> <http://www.ban.searo.who.int/en/Section25.htm>

<sup>7</sup> [http://r4d.dfid.gov.uk/PDF/Outputs/ImpAccess\\_RPC/PTA51.pdf](http://r4d.dfid.gov.uk/PDF/Outputs/ImpAccess_RPC/PTA51.pdf)

<sup>8</sup> <http://www.isca.in/IJSS/Archive/v1i3/2.ISCA-JSS-2012-015.pdf> ;

<sup>9</sup> <http://www.asianlii.org/asia/other/ADBLPRes/2005/2.pdf>

<sup>10</sup> [http://www.unicef.org/socialpolicy/files/A\\_Case\\_for\\_Geographic\\_Targeting\\_of\\_Social\\_Services\\_to\\_Accelerate\\_Poverty\\_Reduction\\_in\\_Bangladesh.pdf](http://www.unicef.org/socialpolicy/files/A_Case_for_Geographic_Targeting_of_Social_Services_to_Accelerate_Poverty_Reduction_in_Bangladesh.pdf)

<sup>11</sup> UNICEF ; World Bank ; UNDP etc.

<sup>12</sup> <http://blogs.worldbank.org/endpovertyinsouthasia/bangladesh-most-climate-vulnerable-country> ;

<http://germanwatch.org/en/download/8551.pdf> etc.

<sup>12</sup> [http://www.fidh.org/IMG/pdf/obs\\_rapportbangladeshuk-ld.pdf](http://www.fidh.org/IMG/pdf/obs_rapportbangladeshuk-ld.pdf) at p. 40

- Arbitrary arrests and detention<sup>13</sup>
- Torture and extrajudicial killings<sup>14</sup>;
- Poor working conditions and labour rights<sup>15</sup>, including child labour<sup>16</sup>;
- Discrimination against women<sup>17</sup>; gender-based violence<sup>18</sup>; and child marriage<sup>19</sup>;
- Discrimination against those with disabilities<sup>20</sup>;
- Discrimination against sexual minorities<sup>21</sup>;
- Discrimination against religious, ethnic and other minorities, including indigenous<sup>22</sup> and Dalit<sup>23</sup> communities;
- Infringements of freedom of expression<sup>24</sup> and of association<sup>25</sup>;
- Land rights violations (primarily indigenous peoples<sup>26</sup>, but also women<sup>27</sup>, minorities<sup>28</sup>, and vulnerable groups and individuals, etc.); and
- Systematic violations of fair trial rights<sup>29</sup>, combined with continuing recourse to (and even *retroactive application* of<sup>30</sup>) the death penalty.
- Related to the overall context as described above, there also exist serious impediments to the realisation of the rights to education and to health, and to overall development.

These ingrained and interrelated difficulties are significantly compounded by other severe constraints, including:

- Lack of independence of the judiciary, prosecutors and lawyers<sup>31</sup>, and weak judicial capacity<sup>32</sup>;
- Politically motivated violence<sup>33</sup>, in particular in the context of elections; and
- Widespread corruption, including in justice, health, education, and law enforcement, with Bangladesh ranked by Transparency International as 136<sup>th</sup> out of 177 countries<sup>34</sup>.

<sup>13</sup> <http://www.humanrights.asia/news/alrc-news/human-rights-council/hrc8/ALRC-CWS-08-012-2008>

<sup>14</sup> <http://www.hrw.org/news/2011/01/24/bangladesh-torture-and-extra-judicial-killings>

<sup>15</sup> <http://www.hrw.org/news/2014/02/06/bangladesh-protect-garment-workers-rights>

<sup>16</sup> <http://www.ilo.org/legacy/english/regions/asro/newdelhi/ipecc/responses/bangladesh/index.htm>

<sup>17</sup> <http://www.unnayan.org/reports/Gender%20Inequality%20In%20Bangladesh.pdf>

<sup>18</sup> <http://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=13374&>

<sup>19</sup> <http://plan-international.org/files/Asia/publications/national-survey-on-child-marriage-by-plan-bangladesh-and-icddr-b>

<sup>20</sup> <http://siteresources.worldbank.org/DISABILITY/Resources/Regions/South%20Asia/DisabilityinBangladesh.pdf>

<sup>21</sup> [http://www.refworld.org/cgi-](http://www.refworld.org/cgi-bin/texis/vtx/rwmain?page=country&category=&publisher=IRBC&type=&coi=BGD&rid=&docid=4dd1122f2&skip=0)

[bin/texis/vtx/rwmain?page=country&category=&publisher=IRBC&type=&coi=BGD&rid=&docid=4dd1122f2&skip=0](http://www.refworld.org/cgi-bin/texis/vtx/rwmain?page=country&category=&publisher=IRBC&type=&coi=BGD&rid=&docid=4dd1122f2&skip=0)

<sup>22</sup> <http://www.iwgia.org/regions/asia/bangladesh>; <http://www.amnesty.org/en/for-media/press-releases/bangladesh-indigenous-peoples-engulfed-chittagong-hill-tracts-land-conflict>

<sup>23</sup> [http://idsn.org/fileadmin/user\\_folder/pdf/New\\_files/UN/UPR/UPR16\\_submission\\_Dalitrights\\_Bangladesh\\_2012-](http://idsn.org/fileadmin/user_folder/pdf/New_files/UN/UPR/UPR16_submission_Dalitrights_Bangladesh_2012-2013.pdf)

[2013.pdf](http://idsn.org/fileadmin/user_folder/pdf/New_files/UN/UPR/UPR16_submission_Dalitrights_Bangladesh_2012-2013.pdf)

<sup>24</sup> <http://www.humanrights.asia/news/ahrc-news/AHRC-STM-057-2012>

<sup>25</sup>

[http://www.ohchr.org/Documents/Issues/FAssociation/Responses2012/NGOs\\_and\\_other\\_stakeholders/BangladeshAin\\_o\\_SalishKendra.pdf](http://www.ohchr.org/Documents/Issues/FAssociation/Responses2012/NGOs_and_other_stakeholders/BangladeshAin_o_SalishKendra.pdf)

<sup>26</sup> <http://livewire.amnesty.org/2013/08/08/bangladesh-must-restore-land-rights-of-indigenous-people/>

<sup>27</sup> <http://www.ohchr.org/Documents/HRBodies/CEDAW/RuralWomen/CDABangladesh.pdf>

<sup>28</sup> [www.hlrn.org/img/violation/Bangladesh0606.doc](http://www.hlrn.org/img/violation/Bangladesh0606.doc)

<sup>29</sup> <http://www.un.org/apps/news/story.asp?NewsID=44089#.U5SAbyir-AQ>

<sup>30</sup> <http://www.hrw.org/news/2013/09/18/bangladesh-death-sentence-violates-fair-trial-standards>

<sup>31</sup> <http://unpan1.un.org/intradoc/groups/public/documents/apcity/unpan020065.pdf> ;

<http://www.humanrights.asia/news/ahrc-news/AHRC-STM-010-2013>

<sup>32</sup> [http://www.ti-bangladesh.org/beta3/images/max\\_file/rp\\_Bangladesh-justice\\_disarray.pdf](http://www.ti-bangladesh.org/beta3/images/max_file/rp_Bangladesh-justice_disarray.pdf)

<sup>33</sup> <http://www.crisisgroup.org/~media/Files/asia/south-asia/bangladesh/226-bangladesh-back-to-the-future.pdf>

<sup>34</sup> <http://cpi.transparency.org/cpi2013/results/>

In addition, poor observance of the rule of law<sup>35</sup> not only enables individuals, including government officials, to commit human rights violations in a pervading culture of impunity, with the government failing to take comprehensive measures to investigate and prosecute cases of security force abuses and killings, but also prevents citizens from enforcing their more general rights.

The Evaluators also note that many of the problems observed – and indeed addressed by EIDHR support in the period under evaluation – cannot be easily reduced to “minority” or other issues, but also to *imbalances of power and wealth*, which is evident in, for example, in endemic land-grabbing, and indeed most of the serious abuses referred to above.

## **1.4 METHODOLOGY**

### **1.4.1 Sources of information**

The Evaluators received extensive information from the EUD in Bangladesh, comprising *inter alia* EU human rights strategies; EIDHR related material; guidelines for the relevant CfP; internal and external analyses of the human rights context in the country; and relevant project documents. The Evaluators also conducted their own extensive research, in particular concerning the human rights situation in Bangladesh and donor modalities, and also obtained documents from programme partners and other relevant stakeholders.

The key source of qualitative and strategic information was derived from direct consultations with programme grantees and their partners, national institutions, human rights actors, opinion leaders, donor representatives, EU Member States (MS), and other stakeholders, based on the Evaluation questions formulated in the Inception Report. Close collaboration between EUD, local partners and the Evaluators helped to facilitate contact with interlocutors.

### **1.4.2 Assignment structure**

The Evaluation was divided into two missions in Bangladesh, the first occurring early April 2014 and the second in late May 2014. The Evaluation therefore comprised the following Phases, most of which were overlapping due to time constraints:

- **Preparation:** inception phase (reading and analysis; preliminary consultations between experts);
- **Mission 1:** inception phase (reading and analysis; briefing with EUD and EU Member State representatives; selection of sample projects; preparation of Inception Report); field phase (preparation of meetings and field trips; consultations with interlocutors; field visits (Mymensingh, Jessore, Khulna, Satkhira);
- **Between missions:** field phase (consultations with interlocutors; field visits (Sylhet, Badda of Dhaka; preliminary analysis; preparation for Workshop in Dhaka);
- **Mission 2:** field phase (briefings EUD; consultations with interlocutors; drafting of preliminary findings for Work-shop; conduct of Workshop and EU partner de-briefing etc.);
- **Drafting:** preparation and submission of Final Report and all Annexes.

---

<sup>35</sup> The World Justice Project ranked Bangladesh 92<sup>nd</sup> out of 99 assessed counties:  
[http://worldjusticeproject.org/sites/default/files/files/wjp\\_rule\\_of\\_law\\_index\\_2014\\_report.pdf](http://worldjusticeproject.org/sites/default/files/files/wjp_rule_of_law_index_2014_report.pdf)

### **1.4.3 Sample project selection**

The ToR provided that the choice of sample projects to be selected for assessment should represent “a mix of actions in Dhaka and outside the capital, covering different sectors and implemented by local as well as international NGOs”. A selection of sample projects was made according to the following project selection criteria:

- Time of implementation
- Project status (closed or on-going)
- Evaluators’ specific expertise
- Grant beneficiary (size/ existence of multiple grants etc.)
- Amount of grant
- Priority and variety of human rights themes
- Region
- Gender issues
- Minorities
- Disability

A list of the selected sample projects is provided in Annexe 2 below.

### **1.4.4 Evaluation questions**

Based on the indications provided in the ToR, the Evaluators prepared an Evaluation Question Template. It is emphasised that these evaluation questions were not “set in stone”, but rather provided a framework and useful “checklist” for the Evaluators during interviews.

### **1.4.5 Field visits**

In addition to the numerous interviews held in and at the outskirts of Dhaka, the evaluators conducted four field trips, visiting various regions, during the Evaluation period, spending between one and three days for each trip. The selection of these regions was made according to where the selected projects were implemented, and where organisations, partners, and beneficiaries were based.

### **1.4.6 Evaluation constraints**

The Evaluation was blessed with very limited practical and substantial constraints. Civil society as a whole is highly engaged in Bangladesh (see Context below), and organisations shared freely their experiences and information; institutions and other stakeholders were equally welcoming; the EUD provided exceptional support; and grantees and beneficiaries were enthusiastic participants in the Evaluation process. Poor infrastructure and limited transport options however meant that valuable time that could have been spent with interlocutors was instead spent jammed in traffic, waiting in airports, and negotiating perilous roads. The Evaluators accept however that such practical challenges constitute an integral part of the country context, and indeed were factored into the Evaluation work-plan, which was intentionally kept flexible and realistic.

It must also be noted that the Evaluation was not intended to carry out 7 full project Evaluations; the short project fiches however do examine specific observations and recommendations, which it is hoped the selected organisations will use to improve future performance, and provide feedback to their donors and their organisations’ representatives and beneficiaries.

## 2. EVALUATION OF THE PORTFOLIO

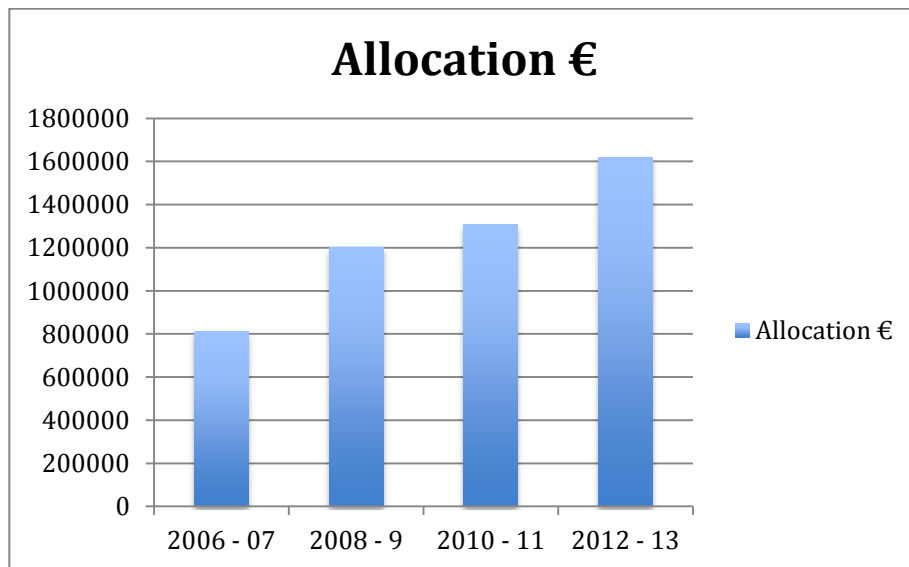
### 2.1 OVERVIEW OF THE PROJECTS

As indicated above, the EIDHR CBSS supported a total of 28 projects during the budgetary period from 2006 to 2012. The following data provides an indicative breakdown of the chief characteristics of these grants, by allocation trend, average project size, national distribution of grantee organisations, and the human rights themes that were addressed.

#### 2.1.1 Annual budget EIDHR CBSS

The chart below provides a breakdown of the allocation of EIDHR funds under the CBSS for the contract years 2006 to 2013 (some projects financed under the 2012 CfP having experienced some delays in commencement, in large part due to the considerable constraints placed on CSOs as described in *Context* above).

The Evaluators note a generally increasing trend in budgetary allocation, with the overall human rights support doubling in the period 2006 to 2012. This is an extremely strong and encouraging indicator of the level of commitment that the EU has placed in supporting Bangladeshi civil society, and the overall respect of human rights in the country, and consequently its democratisation and development.



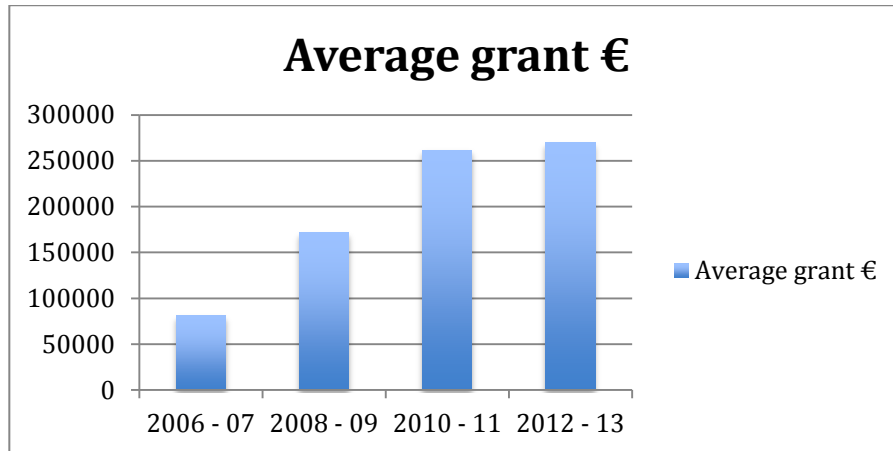
#### 2.1.2 Average grant size

The chart below indicates the average grant size during the period under consideration; one can observe a startling increase in this regard, with projects almost quadrupling in size from 2006 to 2013. The Evaluators have a mixed response to this evident trend: on the one hand, larger grants allow for a considerable investment in CSO capacity and reach, particularly for projects at the national and policy level, which clearly require more significant resources if they are to have any impact.



On the other hand, as observed in *Impacts* below, smaller and more modest projects that were implemented at the local level tended to have more direct, visible, and personal impacts on target groups, and hence should not be excluded from future strategies of support.

The Evaluators are therefore of the overall view that a diversity of not only thematic support (see *HR Themes* immediately below), but also grant size and structure provide a way of ensuring both top-down and bottom-up approaches, which – provided linkages exist to join the two approaches (see *Strategies* below, in particular relative to strengthening and supporting networks, platforms, coalitions etc.) – provide a method of mitigating “risk<sup>36</sup>” and ensuring broad levels of impact.



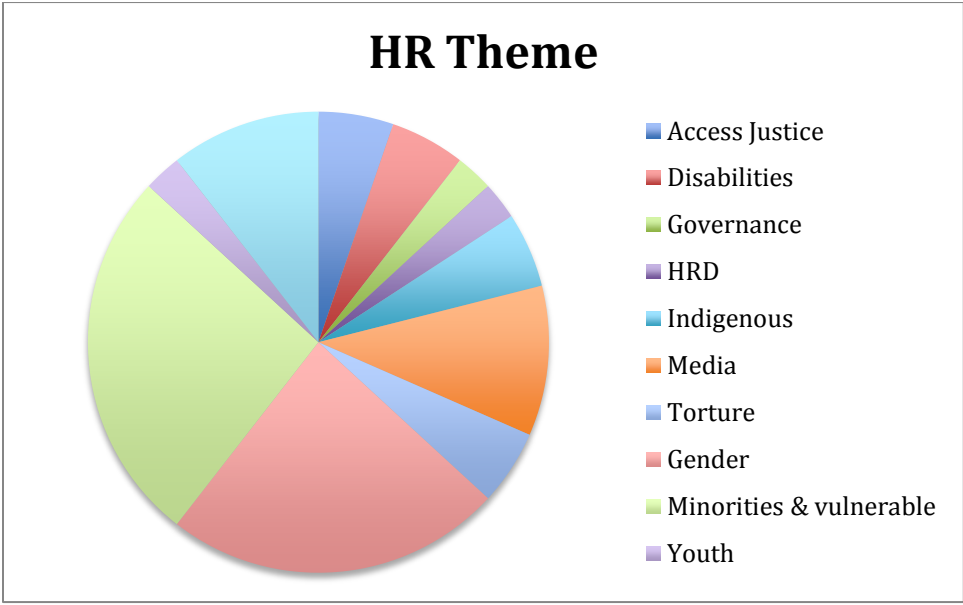
### 2.1.3 Human rights themes

Below is a chart that outlines the proportion to which various human rights themes were addressed by all the projects supported for the budgetary period under consideration. It is to be noted that this chart takes into account multiple themes that were addressed in a single project.

The Evaluators note that Gender issues and Minority<sup>37</sup> issues are well represented in the human rights themes that were supported under the CBSS, and media/ freedom of expression issues also received relatively unusual prominence. It is reassuring to note that the rights of the disabled and indigenous groups were specifically addressed, with some very encouraging results (see *Impacts* below). However, it is also observed with some concern that torture, access to justice and human rights defenders’ issues were only marginally addressed, despite the seriousness of the violations and threats that were occurring during the period under consideration (see also *Relevance* above). As indicated in *Programming* below, it is considered that, while a diversity of themes has been one of the strengths of the CBSS programme, increased priority should be given to violations that represent direct and immediate threats to life, and to the ability of defenders to protect all other rights.

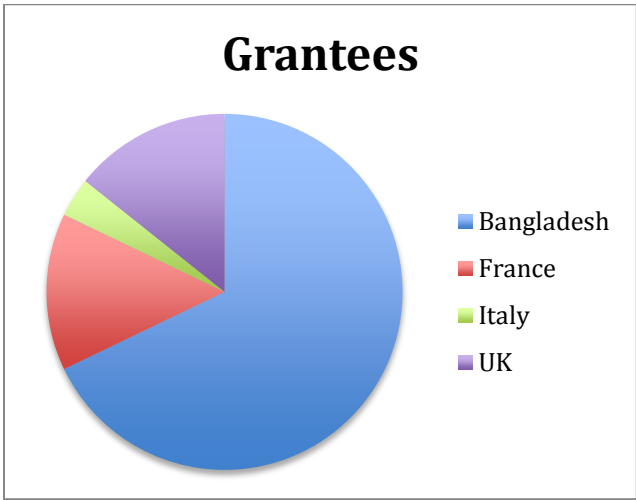
<sup>36</sup> In this context, “risk” refers to the inherent risks of project failure, as well as external risks, such as political upheaval, legislative change, governmental control, dramatic reduction of CSO operational space, etc.

<sup>37</sup> For the purposes of this Evaluation, Minorities included religious and ethnic minorities, as well as vulnerable target groups, such as the ultra-poor.



**2.1.4 Proportion of national/international grantees**

Some civil society stakeholders expressed concern about the proportion of grants that they believed had been awarded to international organisations (see also *Programming* below). The chart below provides a breakdown of grantees by country for the period under consideration. The Evaluators note that a strong majority of projects were awarded to and implemented by Bangladeshi organisations, either national or local in scope; the Evaluators also note that all non-Bangladeshi organisations had genuine, local implementing partners. The Evaluators are of the firm view that the distribution of grants in this respect was not only appropriate, but also beneficial to the Programme as a whole, since the selected international organisations brought very high levels of technical, advocacy and management capacity, as well as inherent international leverage, with such added value clearly being transferred to local project partners in the course of implementation.



## 2.2 RELEVANCE

The relevance of the projects evaluated was found to be relatively high, in terms of alignment with EU priorities and instruments, human rights needs in Bangladesh, and certain government priorities and strategies, at the time of each of the Calls for proposals during the period under evaluation.

Bangladesh's partnership with EU dates back to the country's independence in 1971, and the EU now plays a leading role in the country's trade and development. Bilateral relations between the European Union and Bangladesh, including development cooperation, are governed by the EU-Bangladesh Co-operation Agreement<sup>38</sup>, which states at Article 1 "*Respect for human rights and democratic principles [...] underpins the domestic and international policies of the Parties, and constitutes an essential element of this Agreement*".

The EU's development cooperation in Bangladesh also encourages the strengthening of the relationship between the EU and Bangladesh, and seeks to align development activities with Bangladesh's policies, as well as to coordinate and harmonise its funding with that of other development partners.

### 2.2.1 Relevance to national policies

Bangladesh' national development policies for the period under evaluation were set out in the country's Vision 2021<sup>39</sup> from 2008, and in a number of complementary sector policy documents. It is noted that human rights are addressed in the Vision 2021<sup>40</sup>, however there exists no stand-alone national human rights policy in Bangladesh; the National Human Rights Commission (NHRC) nevertheless prepared its own *Strategic Plan* for the period 2010-15.

Examining these documents as a whole, it appears that the CBSS demonstrated considerable relevance to national development and human rights priorities. In particular, the NHRC identifies two "Highest Priority Areas" as (1) violence by state mechanisms, particularly enforced disappearance, torture and extrajudicial killings (EJK); and (2) violations of economic, social and cultural rights, including [...] discrimination against people with disabilities.

The Evaluators note that the Programme addressed two of these highest priority areas (torture and rights of the disabled), and that other priority areas were also encompassed by the projects, including access to justice; discrimination against women & gender- based violence; and discrimination against indigenous peoples and ethnic and religious minorities. It is observed with some concern however that disappearances and EJK were not directly addressed by the CBSS during the period under consideration (see *Strategies – Priority Areas* below).

While it is clear that the CfP and the projects were relevant to the human rights context in Bangladesh at the time they were designed, it is evident however that the priorities that existed at the beginning of the period under evaluation no longer have the same weight in the current context, and will need to be further adjusted.

---

<sup>38</sup> [http://www.bilaterals.org/IMG/pdf/EU-BD\\_FTA.pdf](http://www.bilaterals.org/IMG/pdf/EU-BD_FTA.pdf)

<sup>39</sup> <http://www.boi.gov.bd/index.php/about-bangladesh1/government-and-policies/government-vision-2021>

<sup>40</sup> "*Human rights will be established on a strong footing with a view to ensuring the rule of law. Independence of the judiciary will be ensured and the institutions of the state and administration will be freed from partisan influence[...]*"

## 2.2.2 Relevance to EU policy

In addition to Bangladesh's policy priorities, EU programming must also be aligned with the strategic objectives of EU development cooperation. These are currently set out in the *2012 Agenda for Change*<sup>41</sup> and include: human rights, democracy and other key elements of good governance, and inclusive and sustainable growth for human development. In addition, due account must be taken of capacities of the Government and other stakeholders; lessons learned from past cooperation; comparative advantages of aid managed by the European Commission; and complementarity with other donors.

The EU provides most of its development assistance for Bangladesh under the financing of the *Development Cooperation Instrument (DCI)*<sup>42</sup>, which amongst other objectives aims to support governance, democracy, human rights and support for institutional reforms. The EU-Bangladesh Country Strategy for 2007-13 was funded with an indicative total amount of €410 million under the DCI country allocation; the Strategy was directly aligned with DCI objectives relative to human rights. This support was instrumental, for example, in creating a photo-ID electoral roll in 2008, which facilitated access to democratic processes for more than 80 million people.

The CfP were first launched in Bangladesh in 2006 under the European Initiative (later Instrument) for Democracy and Human Rights. The Strategy Papers (2007-2010 and 2011-2013) allow for the concrete implementation of EIDHR, carried out under the Annual Action Programmes.

The CBSS is launched under Objective 2 of the EIDHR global strategy, which is to "[strengthen] the role of civil society in promoting human rights and democratic reform".<sup>43</sup> The Evaluators note that this overall objective was regularly adjusted during the period under consideration, in accordance with emerging and specific human rights needs situation in Bangladesh. In addition, since 2011 this objective has been based on the themes identified in the *Human Rights Country Strategy* of the EU Human Rights Task Force in Bangladesh, which conducts meetings with civil society representatives, and ensures "regular and intensive" contacts between the EU Missions and civil society. This has ensured a very high degree of reactivity to changing country needs, whilst maintaining the necessary linkages with EU priorities.

The Programme also exhibited high linkages and relevance to most key rights-related EU Guidelines<sup>44</sup>, and notably HRD, torture, freedom of religion, human rights dialogues, violence against women, freedom of expression, as well as the guidance note and 2010 – 20 Strategy on persons with disabilities<sup>45</sup>. It is noted however that because of programme priorities during the relevant evaluation period, there were no linkages to Guidelines on the Death Penalty and LGBTI persons.

The EIDHR CBSS Programme and projects therefore appear to have been relevant to EU strategies and priorities, at both the country and global level, and demonstrated exceptional responsiveness in this regard. However the rapidly changing political and human rights environment in Bangladesh demands a strengthening of EU and EU-MS responses, and a highly considered implementation of existing strategies, instruments and mechanisms for dialogue (see *Strategy* below).

---

<sup>41</sup> [http://ec.europa.eu/europeaid/what/development-policies/documents/agenda\\_for\\_change\\_en.pdf](http://ec.europa.eu/europeaid/what/development-policies/documents/agenda_for_change_en.pdf)

<sup>42</sup> See generally: [http://ec.europa.eu/europeaid/how/finance/dci\\_en.htm](http://ec.europa.eu/europeaid/how/finance/dci_en.htm)

<sup>43</sup> See generally: [http://ec.europa.eu/europeaid/how/finance/eidhr\\_en.htm](http://ec.europa.eu/europeaid/how/finance/eidhr_en.htm)

<sup>44</sup> [http://eeas.europa.eu/human\\_rights/guidelines/index\\_en.htm](http://eeas.europa.eu/human_rights/guidelines/index_en.htm)

<sup>45</sup> [http://ec.europa.eu/news/justice/101115\\_en.htm](http://ec.europa.eu/news/justice/101115_en.htm)

### **2.2.3 Relevance to needs**

In addition to a strong alignment with EU priorities, high relevance was also observed in terms of the projects' response to key human rights concerns in Bangladesh and the needs of target groups. As indicated at *Overview* above, the projects addressed a broad diversity of themes, including *inter alia* youth and women's, indigenous and disabled persons rights; anti-torture; and access to justice. Activities included policy and law reform efforts, awareness-raising and training at multiple levels concerning key human rights issues, networking, community events, and the fostering of alternative dispute resolution systems (ADR).

The Evaluators observe in particular the very high relevance to the needs of specific target groups, grassroots organisations, and individuals, such as persons with disabilities, indigenous groups, Dalits and women vulnerable to gender-based violence, and explains in large part the high impacts of these specific projects. The projects were also particularly relevant to the needs observed at the regional and local level. Support to law reform occurred at a moment when certain key movements were gathering momentum, for example relative to disabled persons rights and anti-torture efforts; EU support therefore provided a timely and strategic strengthening of civil society participation concerning long-standing and often fraught issues. In addition to addressing specific human rights issues, the projects also contributed to Bangladesh's broader democratic reform (see *Impacts* below).

All of these themes and activities were therefore of a very high relevance for the target groups concerned, and the specific human rights issue being addressed, not only at the time of implementation, but also remain relevant responses in the current context. It is however to be observed that the worsening of the rights situation requires a refocusing of the priorities and responses of EUD and civil society.

## **2.3 EFFECTIVENESS AND EFFICIENCY**

### **2.3.1 Overall effectiveness & efficiency**

The reviewed projects were found to be generally effective in terms of achieving their objectives and planned activities. This was particularly true for projects that had activities that were developed in line with realistic objectives and budgets, and with involvement of the direct beneficiaries in the project design. There were however projects whose objectives could not possibly have been fully attained in the allocated time, or whose results were affected by external factors, such as the increasing restrictions placed on civil society in the country or prolonged political unrest. The Evaluators consider that these difficulties were not due, in general, to an objective inability of behalf of the grantee to achieve the expected results, but rather to deficiencies in project design, for example in the development of objectives and the Logical Framework, the objectively verifiable indicators, and the specific budget-lines.

Project implementation did not meet with significant structural obstacles, and while some activities could not be conducted, or were significantly delayed for reasons primarily linked to the political context described above, the overall majority of project activities were completed, and within a reasonable time. The grantees appreciated, and were greatly assisted by, the EUD's willingness to demonstrate flexibility during the implementation of the projects, for example through the streamlining of procedures for minor alterations of project activities in line with shifting needs or constraints. This flexibility undoubtedly assisted organisations in the realisation of their intended results and their broader impacts.

The efficiency of the project portfolio is considered to have been good to very good, significantly bolstered by the resource- and capacity-sharing that appears to be a very positive hallmark of Bangladeshi civil society, and this is reflected in the subsequent impact and sustainability of the reviewed projects.

### 2.3.2 Qualitative aspects

While the projects were effective in terms of implementing planned activities, as highlighted above, the quality of activities varied significantly from one project to another; nevertheless, the Evaluators are of the view that overall quality was good. This is borne out in the outputs that have been examined (draft legislation, publications, reports, posters and brochures, training materials, etc.) as well as from subjective feedback from partners, final beneficiaries and other stakeholders and observers.

It is however noted by the Evaluators that the quality of some training components was queried by some beneficiaries, who observed an absence of repeat or follow-up training, to “build on skills” and knowledge acquired. Indeed, in some cases, the same persons were receiving the same or similar training, thus resulting in an effective duplication of activities. The quality of the training itself was also queried, with a clear mismatch between the capacity levels of the trainers and trainees, and the clear intimation that some trainers were selected not on the basis of their objective competence but rather as a result of “soft cronyism”.

It is suggested that future programmes and CfP should actively request that a distinction be made between initial and “add-on” training and capacity-building, and must also ensure that project benefits are likely to be distributed equitably, effectively and strategically within target groups. In addition, grantees must establish clear selection criteria for capacity-building candidates, including both trainers and trainees.

The crowded development environment in Bangladesh (see *Cooperation* below), in particular in relation to support to human rights, civil society and governance initiatives, means that the risks of overlapping and duplication are relatively high. While the Evaluators observed no blatant examples of duplication, it is considered that there would have been at least some overlapping of certain activities, with a related dilution of effectiveness and impact. In addition, a more assiduous search for synergies (see *Sustainability* below) could have potentially increased the efficiency and effectiveness of many activities.

The projects’ geographical breadth and stakeholder outreach also provided a strong indicator of their effectiveness. National and policy-based projects clearly demonstrated a strong, though relatively shallow, geographical reach, and were able to influence policy and decision makers at the highest level, whereas those focussing on specific or very local objectives clearly had stronger grass-roots results, which tended in general to involve all levels of the communities concerned.

The Evaluators consider that the selection of projects demonstrated a strong local-national balance, and that this considerably added to the programme’s overall effectiveness. Smaller, local projects designated very specific target groups, either by virtue of their needs or their specific location, which allowed for greater effectiveness and efficiency.

Positive engagement of beneficiaries and stakeholders is also observed, including of national political figures; local authorities and institutions; educational, social and other services; and community leaders. The very encouraging concrete *impacts* of such engagement are described further below. Projects also proactively reached out to other organisations and initiatives at the local and national level, and concerning specific thematic issues, but, while some joint activities were undertaken, little *strategic synergy* was observed.

Whilst some engagement was undertaken at the local level with local authorities, including *inter alia* police representatives, little cooperation was observed with key Ministries, such as the Ministry of Law, Justice and Parliamentary Affairs, the Ministry of Home Affairs, the NGO Affairs Bureau, etc. To a certain extent, this is justifiable in the current political climate, however it is considered, even for the most contentious

projects, that some Ministries can nonetheless be approached on less “sensitive” sub-issues, which can then in turn provide entry-points and build trust and confidence regarding other areas of concern. This observation is related to difficulties of strategic planning, which are outlined at *Impacts* below.

### 2.3.3 Project management

Partnerships were genuine and well-balanced, in that they relied on specific contributions and an appropriate division of work between partners. Risks were realistically defined in the project design stage, but political and other unforeseen developments impacting on the human rights and civil society environment were responded to in an adequate manner, and, as indicated above, in consultation with the EUD. Grantees also demonstrated a willingness to *adjust* activities in order to enhance their effectiveness.

While projects were generally managed appropriately on a day-to-day basis, the Evaluators consider that structural and capacity difficulties with project management constituted one of the greatest barriers to project impact and effectiveness under the CBSS programme. On the positive side however, these constitute aspects that can readily and sustainably benefit from increased mentoring, tools, training, and other practical support.

The Evaluators observed general difficulties with financial management and monitoring, and also with expenditure and distribution of funds within some project structures, which created internal tensions and jealousies. It is considered that, in addition to strengthening project beneficiaries’ financial management, monitoring and reporting skills, with associated accountability mechanisms, they could also benefit from a form of *financial mentoring*, providing strategic and practical support in this regard.

While tracking of results, impact and visibility was evident in some projects, generally evaluation and monitoring of activities could be strengthened (see *Impacts* below), with capacity-building or support regarding the qualitative and quantitative follow-up of activities. The quality of interim and final reporting was highly variable, with some evaluations being of very poor quality; it is considered that beneficiary organisations could benefit from practical and qualitative support in this regard, using standard models or templates, providing evaluation tools, and examples of “best practice” etc. The Evaluators also note some indications of a lack of strategic organisation in the execution of activities, with for example one direct beneficiary stating that “*we go to meetings but not in an organised way*”.

To help with overall project management, and perhaps in the context of interim evaluations or monitoring, the Evaluators consider that a system of “*embedded mentoring*” could be established, whereby experts or evaluators would work with and within organisations for a short period, to provide practical real-time technical assistance and support to organisations. Comparable models are used by several cooperation agencies, with for example Sida having “participative” methods amongst its evaluation tools<sup>46</sup>. Other sectors, including in education<sup>47</sup>, also employ embedded evaluation and support modalities.

The Evaluators observed that some organisations had difficulties with the budgets that had been formulated as part of the application process; for example it was observed that some results could not be attained simply because the financial resources allocated to specific activities were inadequate. It would therefore appear that existing and potential beneficiaries could benefit from support with general management skills, including financial skills and preparing budgets for EIDHR CfP (and other donor support), and increasing their awareness of the EU objective of supporting results, rather than simply rewarding the lowest-priced tender; that is, finding a balance between “cost” and “effectiveness”.

---

<sup>46</sup> <http://www.sida.se/Publications/Import/pdf/sv/Evaluation-and-Participation---some-lessons.pdf>

<sup>47</sup> <http://www.gtcenter.org/sites/default/files/docs/GeneratingTeachingEffectiveness.pdf>

Related to this point, it was also observed that some organisations appear to be stretching their capacities too far, taking on multiple simultaneous projects, and therefore diluting their results; the Evaluators also somewhat drily observe that such “double-dipping” (or even “triple-dipping”) exists even with EIDHR global projects. The risk of overreach and dilution could be reduced by imposing stricter capacity conditions, monitoring of human resource allocation, and requiring the declaration of other donor-funded initiatives, particularly those supported by EU-MS.

### **2.3.4 General obstacles to effectiveness**

In addition to the highly complex and restrictive environment in which CSOs are required to operate in Bangladesh, the Evaluators also observed general obstacles that impeded the full realisation of project results.

It is observed, for example, that the projects’ scope do not always adequately match or counter the *real obstacles or inherent constraints* of human rights problems; for example the resources and influence of local land-grabbers, who are in many case local politicians and elected representatives. Related to this, *project resources and duration* are in some cases considered “*inadequate to challenge age-old cultures and mind-sets*”<sup>48</sup>, particularly concerning ethnic minority communities, such as Dalits. While the Evaluators accept that could be said to be due to fixing unrealistic project objectives, as indicated above, it is however also considered to be an inherent constraint of the country context, which should not deter genuine and strategic initiatives to support human rights.

The Evaluators observed that some beneficiaries (particularly smaller and more remote organisations) seemed at a loss to describe how the EU can better support them; it would seem that existing/past beneficiaries and perhaps the general human rights CSO community could benefit from specific awareness-raising in this regard (see also *Visibility* above).

Some more culturally sensitive projects met with resistance from certain religious leaders, but the Evaluators observe that this did not actively impede the activities or results, and beneficiaries understood such distrust as being part of a broader long-term *process* of human rights awareness and reform.

## **2.4 IMPACT**

In general, projects that were already completed achieved the expected impacts, although as indicated above, some projects framed their objectives too high or broadly to realistically achieve the long-term impacts sought. Current projects can be expected to also achieve significant impacts. The Evaluators consider that strongest impact was obtained where grantee organisations have a specialised thematic focus (e.g. indigenous rights; empowerment of women victims of violence); where a broad range of stakeholders were engaged; where objectives and activities were strategically designed and realistically framed (see also *Effectiveness* above); and where strong partnerships were evident.

The impact of the EIDHR projects was observed at multiple levels. At the level of target groups and beneficiaries, this was primarily manifested in the improvement of the target groups’ human rights situation, through *inter alia* awareness-raising and empowerment, and strengthening capacity. Projects with a broader scope had clear impacts at the policy level, with the creation of partnerships, increased engagement with authorities, and strong inputs relative to legal reform.

---

<sup>48</sup> Stakeholder comment, Mission 1



The direct and measurable impacts of many of the projects are quite impressive, with organisations providing clear evidence and monitoring of, for example, the number of final beneficiaries, broken down by region etc. Powerful examples of project “success stories” were also provided, and confirmed. Of particular note is that grantees were directly implicated in the passing of key laws affecting them (for example, new laws on anti-torture and the rights of the disabled); such legislative reform has potentially powerful long-term impacts on entire communities, and such successes also implicitly encourage other civil society representatives to continue participating in high-level reform initiatives.

Numerous indirect and intangible impacts, or secondary direct impacts, have also been observed, which constituted one of the major strengths of the CBSS Programme, and of individual projects. These can be broken down into the following themes:

### **Empowerment**

Empowerment of target groups was the most striking impact of the CBSS Programme, with many target groups reporting that this has spurred them to take positive approaches in enforcing their most basic human rights, at every level. The Evaluators observed indications of increased confidence of direct beneficiaries in dealing with institutions, including institutions not specifically targeted by the action, which consequently improved practical access to education, health, civil rights, land rights, justice etc. This represents a level of empowerment that went beyond objective project results, and in particular impacted positively on women, minorities, and victims of land abuses.

Feelings of powerlessness amongst the *most vulnerable* beneficiary groups, for example indigenous people and Dalit groups, were considerably alleviated, with one stakeholder stating that: “*before these people had no voice; now they can take decisions, and changed a sense of fatalism*”.

### **Gender**

The impact of the projects on women and girls was also remarkable, with numerous projects directly targeting women beneficiaries, and most projects having at least some gender-specific components.

Activities supporting women often had significant empowering impacts *within the family structure*, even where this had not been the intended outcome; activities also lead to an increase in confidence in all their interactions, particularly with the authorities, with one direct beneficiary stating “*I feel like a leader everywhere!*”

The Evaluators note there was equal representation of women in certain projects at the local level, or at least attempts to do so; in addition, women’s action groups, sub-groups or sub-activities were created, to specifically address gender issues. It is considered that women were clearly given the confidence to participate in elections and local governance; such empowerment helps create role models for younger women and girls, which in itself creates potential for long-term impact. It was agreed by target groups that having targeted awareness-raising of men regarding gender-based violence would however complement training and support efforts in the field.

### **Participation, stakeholder engagement and networks**

The Evaluators also observed increased social and political participation in many of the target groups as a result of project activities, and networks and relationship-building have also improved. Certain beneficiaries noted that the projects have allowed them to participate in regional consultations and networks; they have also reported an increased engagement (and confidence) with international organisations, such as the ICRC, the OMCT, etc.

The Evaluators observe that inter-community relations have improved at the local level as a result of some projects, and that local officials, journalists, professionals and civil society members, and in some cases

police representatives, participated in certain meetings and inaugural and concluding programmes of training courses. This helped establish a direct connection between target groups and local elites, and resulted in raising awareness of rights violations, particularly of vulnerable groups, and built support, political will and ownership at the local level. Most importantly, it brought different groups of people together.

### **Visibility & credibility**

Some activities generated enormous general interest amongst local populations, which enhanced the visibility of the EU and of grantees and their partners, as well as of the specific human rights issues concerned.

Significantly, some projects resulted in organisations being included in other programmes and initiatives, as partners and beneficiaries; this has enlarged their reach, empowerment, participation, as well as their visibility. Indeed, through increased visibility, the projects gave human rights organisations tangible protection and credibility. In turn, beneficiary organisations by definition provide protection to other organisations, thereby creating a chain of impact. In addition, local groups benefited from the broader experience of umbrella organisations. However, it was noted that these more subtle effects tend to break down once the project is completed (see also *Sustainability* below).

In addition to increasing awareness of rights issues, some projects resulted in *increased respect* from members of the wider community, and breaking down perceptions and (often administrative or employment) barriers; this aspect was of particular significance for excluded, minority and vulnerable groups.

### **Development**

Certain projects also lead to a greater understanding by target groups of the general value and empowerment provided by education, which has resulted in increased school attendance; in this respect some of the projects had a broader development impact. Projects, in particular those targeting the most vulnerable groups, addressed not only human rights needs but also supported indirectly broader governance and democratic principles, such as voter and birth registration, local participation, and a sense of belonging.

### **Leadership**

The Evaluators noted the strategic creation of youth groups; participants in turn involved, encouraged and mobilised their own parents and own communities. These young persons were thus effectively “trained” as potential leaders, and now take an active part in preventing conflict, in particular relative to land-related issues, and also continue to implement other independent human rights and development initiatives (see also *Sustainability* below).

## **2.4.1 Challenges to Impact**

The Evaluators note with some concern the lack of representation of women employed to implement some projects, including those aimed at empowering and protecting women. Project implementers have stated that it is difficult to recruit women for some activities, for example for security reasons. The Evaluators consider however that stronger measures should be taken to recruit female employees, and/or to minimise any risks or obstacles. Projects, in particular those targeting gender issues, should demonstrate how they intend to achieve an *appropriate* gender representation in their implementation, and allow adequate resources to ensure women are encouraged in recruitment processes and in project

implementation, such as providing specific skills training, and taking specific measures to minimise risk and adapt conditions for women.

While the Evaluators note that training and awareness-raising activities did indeed enhance knowledge of rights for certain target groups (and they informally “tested” this knowledge), in some cases it was observed that the *quality* of awareness was rather shallow (see also *Effectiveness* above). Related to this, even where target groups demonstrate increased knowledge of rights, they did not seem to have any awareness of the avenues of recourse available to them in enforcing such rights. Hence, knowledge of concepts and their practical application should be made a key requirement of all human rights training, since information without action is unlikely to change violation patterns.

It is also observed that widespread illiteracy (particularly of women) created some problems of involvement in training activities since, even where training is not reliant on written materials, potential participants often lack the confidence to attend, with some target group members stating they did not attend sessions from fear (and possibly, sadly, a sense of shame); this represents a significant inherent barrier to participation in projects.

Some direct beneficiaries queried the quality, content balance, adequacy and intensity of training, and the expertise of trainers. It is considered that organisations could benefit from access to examples of other training modules, templates and programme structure, and support concerning selection criteria for both trainers and trainees. The Evaluators also observe that some training materials were very dense, and should be far more “user-friendly”.

Corruption undermines many cooperation initiatives (see also *Context* above), and where it directly interferes with access to justice, to health, to education and to the fulfilment of other rights, it becomes in itself a free-standing, if insidious, human rights issue. In this respect it almost certainly had direct and indirect effects on project implementation under the Programme.

The impacts observed with respect to empowerment of beneficiaries will almost certainly help to counter some forms of corruption, particularly at the local level. However, the Evaluators consider that support could be directed towards anti-corruption efforts in the country, either directly in specific human rights sectors (minorities and indigenous groups, for example concerning access to administrative services, education, health, application of quotas and other laws; etc.), but perhaps more realistically, in *partnership or synergy* with specific anti-corruption initiatives, in the context of other EU support (justice, general governance, etc.) or those supported by EU-MS and other donor countries and agencies.

Finally, some beneficiary organisations were harassed, and in some cases individuals arrested and charged, during and after project implementation. The Evaluators cannot find that this was directly related to EU support, however it raises the very real issue of risk to grantees, and the extent to which EU can, should or would provide protection to project beneficiaries. When queried directly at the stakeholder workshop held in the context of this Evaluation, participants did not respond directly, but it is clear that with the worsening human rights situation, and the related risks to HRD, this must be addressed frontally, both by EUD, EU headquarters in Brussels and by grantees themselves. The EU has a particular responsibility in this regard, since the objective of all EU support should first be to “do no harm”. Examples of assistance could be the provision of awareness-raising to CSO (risk, risk mitigation, and the extent of EU support in this regard), and even direct protection to defenders, perhaps through a central EUD contingency reserve, or as *required* activities and/or budget lines in proposals, or as a service contract with practical and technical expertise from established defender protection organisations.

## 2.5 SUSTAINABILITY

The issue of project sustainability was integrated directly into the CfP for the entire period under consideration, with applicants required to give it special consideration and this being specifically assessed and scored by EUD. Various approaches were adopted by grantees, with the most common comprising awareness-raising and capacity-building activities. In addition, legislative reform was a major component of some projects.

The Evaluators consider that the projects demonstrated reasonable overall sustainability, or had elements of sustainability that were related to specific activities.

Many projects produced a wide array of *physical outputs*, such as forms, posters, leaflets, publications, films, and the Evaluators note that most grantees continue to use these materials in the context of their other activities, and intend to re-publish certain documents. Some *groups* formed in the context of the projects (including women's and youth groups) continue to function independently and fruitfully, having used their skills and expanded their vision to include broader development issues (orphans, canal protection, health, rebuilding, forestry etc.), and have undertaken their own fund-raising activities.

In addition, certain capacity building activities, such as training, provided a reasonable potential for sustainability, with training of trainers activities showing strong sustainability and multiplier effects.

### 2.5.1 Challenges to Sustainability

Sustainability proved to be a significant challenge for some grantees and for some activities. The Evaluators note that unfortunately not all groups, networks or partnerships formed during the projects managed to develop the ownership and commitment necessary to continue, with groups often not surviving the project itself. Similarly, activities related to awareness-raising and law reform efforts tend to lapse at the conclusion of the activities; and that while certain activities attracted a great deal of public and media attention, such interest tends to diminish at the conclusion of the project. This weakness could be alleviated through an emphasis on cross-linkages between activities in project design and implementation, or in tandem with other projects (see *Synergies* below). Related to this, project design and budgeting does not provide for any form of follow-up of activities, hence evidence of impact, and any possibilities to consolidate gains, are consequently lost.

High staff turnover as a result of the financial fragility of CSOs (with project staffing largely dependent on funds provided under specific donor grants) leads to a lack of institutional knowledge and memory, which limits projects' sustainability since projects and their benefits cannot be readily consolidated and built upon. This issue is related to that of project continuity, which is discussed at *Programming* below.

Finally, and most importantly, the overall political context, as described above, also renders sustainability difficult, with little or no uptake of priority issues by authorities or national institutions. This is particularly problematic for projects concerned with highly sensitive issues, such as torture and land rights, but is also evident for the full ambit of human rights concerns.

### 3. CONCLUSIONS

<b>PROJECT PORTFOLIO</b>
EIDHR CBSS support doubled from 2006 to 2012, indicating strong EU commitment to supporting Bangladeshi civil society and human rights.
The diversity of thematic support, grant size and structure ensured both top-down and bottom-up approaches, which helped to mitigate project “risks” and ensure broad levels of impact.
Gender issues and Minority issues, freedom of expression, disabled persons rights and indigenous and minority issues were well represented in the human rights themes that were supported under the CBSS.
A majority of projects were awarded to national or local Bangladeshi organisations, and all non-Bangladeshi organisations had genuine, local implementing partners.
The distribution of grants in this respect was not only appropriate, but also beneficial to the Programme as a whole, since international organisations can bring high levels of capacity, as well as inherent international leverage.
However torture, access to justice and HRD issues were only marginally addressed, despite the seriousness of the violations and threats (see R.2)
<b>RELEVANCE</b>
The relevance of the projects was relatively high, in terms of alignment with EU priorities and instruments, human rights needs in Bangladesh, and certain government priorities and strategies, at the time of each of the Calls for proposals.
Strong relevance was observed in relative to key human rights concerns in Bangladesh and the needs of target groups.
Very high relevance to the needs of <u>specific</u> target groups, organisations, and individuals was observed, which resulted in high impacts; projects were also particularly relevant at the <u>regional and local level</u> . EU support therefore provided timely and strategic strengthening of civil society participation; the projects also contributed to Bangladesh’s broader democratic reform.
CBSS demonstrated considerable relevance to national development and human rights priorities, as expressed by the NHRC, however there is no stand-alone national human rights policy in Bangladesh (see R.3)
It is also noted that disappearances and EJK were not directly addressed by the CBSS during the period under consideration.
The human rights priorities in Bangladesh will need to be further adjusted (see R.2)
The CfP objectives were regularly adjusted, which ensured strong reactivity to changing country needs, while remaining linked to EU priorities, and showed relevance to rights-related EU Guidelines. However the changing rights context in Bangladesh requires a strengthening of EU and MS responses (see R.4)
<b>EFFECTIVENESS &amp; EFFICIENCY</b>
The projects were generally effective; in particular projects whose activities were developed with realistic objectives and budgets.
The overall efficiency of the projects is considered to have been good to very good.
The grantees were greatly assisted by EUD flexibility in the implementation of their projects, which helped them realise intended results and impacts.
Projects’ geographical breadth and stakeholder outreach provided strong indicators of their effectiveness.

Some projects had objectives that were unrealistic, or whose results were affected by foreseeable external factors; these difficulties were generally due to poor project design (see R.5)
The quality of activities varied significantly from project to project, and the quality of some training activities was questionable (see R.6)
Risks of overlapping and duplication were relatively high, and any synergies observed were incidental rather than intended. CSOs did not volunteer information about parallel activities. Some joint activities were undertaken, but little <i>strategic synergy</i> was observed (see R.7)
National and policy-based projects demonstrated strong, though shallow, geographical reach; and influenced policy and decision makers at the highest level. Projects focussing on specific or local objectives had stronger grass-roots effectiveness. The projects demonstrated an appropriate local-national balance.
Positive engagement of key stakeholders was observed, including national political figures; local authorities and institutions; educational, social and other services; and community leaders; however, little cooperation was observed with key Ministries (see R.8)
Partnerships were genuine and well-balanced. Grantees <i>adjusted</i> activities in order to enhance their effectiveness, and generally managed appropriately on a day-to-day basis.
Structural and capacity difficulties in project management impeded project impact and effectiveness. Grantees had particular difficulties with financial management and monitoring, with expenditure and distribution of funds, and with preparing <u>budgets</u> . They had some difficulty tracking results, impact and visibility, and monitoring of activities could be strengthened. The quality of interim and final reporting was variable, with some evaluations being of very poor quality. There was also a lack of strategic organisation in the execution of activities (see R.9)
Some organisations diluted their capacities, taking on multiple simultaneous projects (see R.10)
Some beneficiaries lacked awareness as to how the EU can support them (see R.11)
<b>IMPACT</b>
Projects generally achieved their expected impacts, however some objectives were too broad and unrealistic.
Strongest impacts were observed where grantees had a specialised thematic focus; where a broad range of stakeholders were engaged; where objectives and activities were strategic and realistic; and where strong partnerships were evident.
The impacts of the projects were observed at multiple levels, and the direct and measurable impacts of many projects were quite impressive
Numerous indirect and intangible impacts, or secondary direct impacts, were observed, and was one of the major strengths of the Programme. Such impacts included: empowerment of target groups; gender-specific impacts; participation of target groups in democratic and other processes; reinforcement of stakeholder engagement and networks; visibility and credibility of CSOs; development of leadership skills; and support to overall development (see R.12)
A lack of representation of women employed to implement some projects was observed (see R.13)
Awareness-raising activities were effective, however the <i>quality</i> of awareness was shallow, and participants lacked knowledge of the implementation and enforcement of their rights (see R.14)
Illiteracy (particularly of women) created some problems of involvement in training activities (see R.15)
Some beneficiaries queried the quality, content and adequacy of training (see R.16)
Corruption had direct and indirect effects on projects, however the empowerment of beneficiaries could

help counter some forms of corruption (see R.17)
HRD are at increased risk in Bangladesh, and EU has a duty to protect, and in particular to avoid inadvertently contributing – or being seen to contribute – to such risk (see R.18)
<b>SUSTAINABILITY</b>
Project sustainability was integrated into the CfP, and the projects demonstrated reasonable overall sustainability.
Many projects continue to use outputs in the context of their other activities, and many groups formed continue to function independently.
Sustainability was a challenge for some grantees and for some activities (see R.19)
High staff turnover leads to a loss of institutional knowledge and memory, which limits projects' sustainability.
The country context also renders sustainability difficult, with little uptake of priority issues by authorities or institutions.
<b>CALLS FOR PROPOSALS</b>
The CfP priorities vary considerably from year to year. While this provides flexibility, the justification for these changes and their alignment to the specific situation are uncertain. While CfP are relevant overall, these “unexplained” changes create a perception of lack of continuity and strategic vision (see R.20)
CfP are perceived as lacking in flexibility and accessibility, however the EU Financial Framework 2014-20 encourages flexible approaches. Beneficiaries highly appreciated the responsiveness and flexibility demonstrated by EUD (see R.21 & 22)
CSOs considered there was very limited scope to participate in EU CfP. They consider that a situation of unequal competition exists between international and national NGOs. In reality, the proportion of international grantees is relatively small (see R.23)
EUD provides briefings on project management issues, however these are considered insufficient (see R.24)
The short <i>duration</i> of projects makes it difficult to achieve sustainable results; in addition there is little <i>continuity</i> of support to initiatives. This results in short-term strategies and objectives, with little organisational vision or planning (see R.25)
The development of <u>consortia</u> , thematic networks, <u>communities of interest</u> , etc. would have a federating effect, and encourage joint projects and complementarity. A national civil society platform could provide a valuable resource facility (see R.26 & 27)
Sub-granting can be an effective method of providing funds to smaller initiatives, provided certain conditions are met (see R.28)
<b>COMPLEMENTARITY</b>
Projects showed concrete practical complementarity, and built on knowledge gained from other initiatives.
Coordination in the human rights sector is <i>ad hoc</i> , and should be more assiduously addressed, with the EU taking a lead role (see R.29).
Complementarity and synergies between individual projects was minimal (see R.30).
Strong complementarity was observed with EUD projects in governance, democracy, and economic and institutional reform.

<b>ADDED VALUE</b>
It was difficult to assess the specific added value of projects and the EU, given the lack of awareness of the EU, and a tendency of beneficiaries to confuse initiatives and donors. It is evident however that EU support provided a reach and specificity that others would find difficult to replicate. EU enjoys political and moral weight, which conveys benefits, credibility and protection to grantee organisations. The added value of EU and EIDHR will be of increasing value to Bangladeshi civil society.
<b>VISIBILITY</b>
EU visibility rules were adequately observed; however this can be problematic for certain sensitive issues. Additional awareness-raising of EU support and added value would be beneficial (see R.31 & 32).
<b>PRIORITIES</b>
The diversity of human rights themes addressed by the CBSS is one of its greatest strengths. However, the deteriorating human rights situation requires priority sectors to be re-adjusted (see R.2)
<b>APPROACHES</b>
Specific approaches can be adopted to strengthen human rights in Bangladesh through EU support and diplomacy (see R.33).

## 4. RECOMMENDATIONS

RECOMMENDATION	ENTITY
1. EUD and EU MS should intensify their efforts in support of human rights through <i>inter alia</i> : striving for coherence between EUD & EU-HQ, and between EU MS; intensify dialogue with the GoB; utilise the urgent and flexible modalities allowed under the Financial Framework 2014 – 20.	EU/ EC EUD EU-MS
2. Increased priority should be given to violations that represent direct and immediate threats to life, and to the ability of human rights defenders to protect all other rights.	EUD
3. Consideration should be given to supporting the development of a national human rights policy in Bangladesh.	EUD EU-MS CSO
4. EU-HQ, EUD, and EU-MS should strengthen and intensify their existing efforts, strategies, instruments and dialogue mechanisms, in support of human rights in Bangladesh.	EUD EU-MS
5. Increased support and practical assistance to CSOs in the design of projects should be considered (see also 9. below)	EUD CSO
6. Future CfP and applications should distinguish between initial and “add-on” capacity-building, and ensure that project benefits are distributed equitably between target groups. Grantees should establish clear selection criteria for both trainers and trainees.	EUD CSO
7. Grant applicants should provide information of donor activity related to their intended project, indicating their own added value, and identifying any possible synergies, joint activities, etc.	EUD CSO
8. GoB Ministries should be approached and engaged for potential cooperation, <i>where feasible or possible</i> , particularly concerning less “sensitive” issues, in order to provide entry-points for cooperation at the policy level.	EUD EU-MS CSO



<p><b>9.</b> CSOs should be provided with increased mentoring, tools, training, and other practical project management support; in particular:</p> <ul style="list-style-type: none"> <li>- Financial management, preparing cost-effective budgets, monitoring and reporting capacity (for example through <i>financial mentoring</i>);</li> <li>- General project management skills;</li> <li>- Monitoring and follow-up of activities;</li> <li>- Evaluation models, tools, and “best practices”;</li> <li>- Possibly a system of “<i>embedded mentoring</i>” (experts or evaluators working within organisations for a short period).</li> </ul>	<p>EUD EU-MS CSO</p>
<p><b>10.</b> EUD should impose stricter capacity conditions on grantees, monitor their human resource allocation, and require the declaration of other donor-funded initiatives, both prior and on-going.</p>	<p>EUD</p>
<p><b>11.</b> EUD should increase awareness-raising for CSOs and target groups concerning EU support and added value.</p>	<p>EUD</p>
<p><b>12.</b> Projects targeting gender-based violence should include activities that raise men’s awareness.</p>	<p>EUD EU-MS CSO</p>
<p><b>13.</b> Stronger measures should be taken to recruit female employees, and resources specifically allocated to minimise any risks or obstacles associated with such recruitment.</p>	<p>CSO</p>
<p><b>14.</b> Awareness-raising of human rights should include information concerning their practical application and enforcement, including relevant national institutions and NGOs.</p>	<p>EUD CSO</p>
<p><b>15.</b> Awareness-raising activities should be accessible to a broad range of participants, and take into account barriers such as literacy.</p>	<p>CSO</p>
<p><b>16.</b> CSOs should be provided with standard and “best practice” training models and tools, including selection criteria for trainers and trainees.</p>	<p>EUD</p>
<p><b>17.</b> Support should be directed towards addressing corruption, for example in partnership or synergy with anti-corruption initiatives in specific sectors.</p>	<p>EUD</p>
<p><b>18.</b> Support to protection of HRD should be increased, through for example awareness-raising and technical and other expertise, and stronger networking.</p>	<p>EUD</p>
<p><b>19.</b> Greater emphasis should be placed on linking activities, or other projects, and project design and budgets should provide for follow-up of activities.</p>	<p>CSO</p>
<p><b>20.</b> EUD should indicate the justification for CfP priorities, provide logical links to previous calls, and explain why any changes have occurred.</p>	<p>EUD</p>
<p><b>21.</b> Existing financial instruments and strategy documents should to be interpreted as broadly as possible, to ensure that EIDHR objectives are fulfilled.</p>	<p>EUD</p>
<p><b>22.</b> Where applicants fail on technical grounds, appropriate recourse should be made available.</p>	<p>EUD</p>
<p><b>23.</b> Accessibility to CfP should be increased, through <i>inter alia</i> the provision of simplified Guidelines (in addition to formal GL), “best practice” or model proposals, etc.</p>	<p>EUD</p>
<p><b>24.</b> EUD should provide specific and regular training and support concerning project management, and preparation of proposals, budgets, indicators, etc. This could be provided “in-house” or through technical assistance contracts.</p>	<p>EUD</p>

25. EUD should consider longer project lengths, or address continuity through an adjustment of existing procedures, for example changes in assessment scoring and CfP structures (division into lots, etc.)	EUD
26. CSO are strongly encouraged to move towards greater federation of their efforts, through for example the creation of consortia.	CSO
27. EUD should consider supporting an <u>EU Civil Society Platform/ HRD network</u> .	EUD
28. EUD should continue sub-granting as a funding modality, but should exercise caution in this regard (see main Evaluation for elements to be considered).	EUD
29. Coordination in the human rights sector should be strengthened and formalised, and EUD should take a leading role in this regard.	EUD EU-MS
30. CSOs should seek greater complementarity in their projects and activities (see also 19.)	CSO
31. Grantees should be provided further support regarding the <u>extent</u> to which EU visibility rules must be applied.	EUD
32. Awareness raising efforts concerning the specific role of the EU in Bangladesh should be strengthened.	EUD CSO
33. Specific approaches to strengthen human rights should be adopted including <i>inter alia</i> : <ul style="list-style-type: none"> <li>- Strengthening dialogue;</li> <li>- Utilising the 2014 - 2020 Financial Framework;</li> <li>- Addressing root causes;</li> <li>- Protecting defenders, and increasing civil society space;</li> <li>- Follow-up of existing initiatives;</li> <li>- Using and supporting existing institutions;</li> <li>- Supporting strategic coalitions &amp; similar structures.</li> </ul>	EU/EC EUD EU-MS CSO