

Recommendations of CSOs in Turkey regarding IPA Regulation and Sub-granting Activities¹

A. Journalists' Association

- It is important to note that the novelty introduced within IPA II framework that enabled the implementation sub-granting programmes by CSOs, fundamentally consolidated the role of CSOs to improve networking among their local constituents as well as strengthening the capacities of local communities. Moreover, thanks to the EU projects that enable sub-granting activities, many young journalists joined into the network of Journalists Association.
- Although there is an increasing censorship and shrinking space in freedom of expression and media, **number of individual blogs and websites established by the independent journalists** as well as **number of journalists that set up his/her own business** can be considered among the indicators for monitoring the effectiveness of EU funds and sub-granting activities. The advocacy campaigns initiated by CSOs on freedom of media and policy proposals on press law developed by CSOs should also be included into the indicators in EU Guidelines.
- It would be useful to get together with CSOs and networks working on “investigative journalism” in Balkan countries (such as Balkan Investigative Reporting Network) to improve and share different reporting practices. Increasing collaboration among Balkan countries and Turkey may further serve for the development of joint reports regarding the state of freedom of media in the region.
- **The financial eligibility rules** need to be clarified by the contracting authority in the very beginning of the sub-granting activities. The confusion in terms of the financial implementation rules may hamper the flexibility of the sub-granting activities, while increasing the bureaucracy during the project implementation process.
- TACSO may help for the production of **infographics** explaining the mechanisms such as PADOR and PROSPECT which may facilitate the process for CSOs.

B. Humanist Bureau

- The consistency between the main objectives of the funds allocated to CSOs working in the field of refugees and the early impact of the funds should be seriously monitored and reconsidered. Depending on our field experience there is a considerable inconsistency

¹ The comments and recommendations highlighted in this report are based on the interviews held with the members of the related CSOs as well as e-mails received regarding their recommendations.

between the expected outcomes of the projects that target to improve the physical conditions of refugees, which is also doubled with the lack of comprehensive and sustainable public policies. Although the increase in the number of CSOs in the field of refugee rights and increase in the number of published reports, training programmes and web sites can be regarded as positive aspects of the existing funds (not only EU but also other international funding opportunities), it is important to question whether the allocated funds serve for an organized civil society or create a “third sector”.

- **Recommendations provided by the Humanist Bureau:**

- 1) Depending on the fact that training, research and modelling activities in the field of refugee rights requires particular expertise, EU should seriously consider not supporting CSOs who were established in a form of “enterprise” for providing training or conducting field research. On the contrary, **a priority can be given to non-for-profit companies** who have a specific experience in conducting field researches and providing trainings.
- 2) Relevancy to ethical principles of humanitarian aid should seriously be considered in the process of allocation of funds and the activities carried out by the beneficiary CSOs should be monitored by independent experts. Moreover, the final beneficiaries should be informed about the ethical principles of humanitarian aid and an effective feedback mechanism should be constituted.
- 3) There is necessity for the **development of an “accreditation system”** for CSOs working in the field of humanitarian aid, in order to assess the compatibility of CSOs with the ethical principles.
- 4) Despite the considerable fund transferred to CSOs working in the field of **seasonal agricultural workers, refugees and Roma population** there is still a significant need for protection and improvement of physical and mental health of children. Thus, future EU programmes may consider putting more emphasis on the provision of **psycho-social support** and make sure that the funds are primarily used by the target group themselves.

C. Go-For Youth Organisations Forum (Go-For)

- There is an apparent shrinking space for youth organisations and very few civil society support programmes directly address the youth issue. Thus, there is a need for a comprehensive approach and specific emphasis on youth rights.
- The fact that “youth” issue is only addressed under “**education, employment and social rights**” creates a certain limitation in terms of promoting the **political and social participation of the young people**. Moreover, “**youth rights**” is not considered among

the priority areas under civil society sector planning. As women's rights, children's rights and freedom of expression, youth rights should also be emphasized under IPA and EIDHR.

- There is a need for a comprehensive research on state of youth rights in Turkey. Moreover, in order to strengthen local youth organisations a more sustainable ad-hoc support is required. This necessity introduces the need for a youth specific resource center which may serve as a focal point for youth organisations.
- One of the primary support mechanisms of EU for youth organisations is **Erasmus Programme**; however, Erasmus Programme primarily aim to cover the mobility needs and cultural exchange activities of young people. The general acceptance that youth organisations could largely benefit from Erasmus and National Agency funds limits youth organisations' access to other EU funds which could match with their activities for monitoring, mapping of the state of youth or advocacy for youth rights.
- The politization of public institutions is quite problematic in terms of hampering the equal access of youth organisations to funds. The lack of transparency and accountability in the public organisations restricts the activities of youth organisations which had not been "approved" by public institutions.
- The "maturity assessment" proposed under IPA III Regulation seems quite reasonable to enforce public institutions to make the necessary reforms. However, when it comes to civil society organisations EU should put more emphasis on the need analysis in particular thematic areas and promoting advocacy activities rather than generating a maturity assessment mechanism for civil society organisations.
- Although EU Delegation would better to have a more structured approach while providing support to civil society, EUD is the most accountable and transparent organisation that CSOs in Turkey could easily apply. So that, EUD's existence is quite crucial for enabling environment for civil society actors.

D. International Children's Organisation (ICC)

- Monitoring activities should be built up as an essential part of the sub-granting projects rather than given up to the proposals of CSOs. Depending on the previous experiences of ICC, monitoring activities is highly essential in terms of timely monitoring the early impact of the project activities as well as analyse the risks and unforeseen consequences.
- In the thematic area of child rights, tailor-cut programme monitoring and developing/adapting indicators are required. In order to better analyse the impact child-specific methodologies are needed.

- Based on the fact that sub-granting programmes are not sustainable, and the programme objectives are limited with project duration, a more comprehensive approach should be adopted by the EU Delegation in order to sustain the remarkable impact created by sub-granting projects through reaching out local CSOs and diverse civil society actors. The follow-up activities of sub-granting projects should be determined by analysing the early impact of the projects.
- **The indicators placed in EU Guidelines can be online and open to continuous update**, which may enable CSOs to further develop their logical framework by giving reference to these guidelines.

E. Association for Monitoring of Gender Equality (CEİD)

- Throughout their last two EU funded projects CEİD has developed a unique methodology for gender sensitive data generating. Currently, there is a need for experience sharing with other countries in Western Balkans and Europe to search whether there are different kind of methodologies in terms of gender sensitive data collection. In Turkey none of the public institutions are producing gender segregated data and public institutions rarely make the existing data open to public. CEİD is one of the CSOs who have been working on rights-based monitoring and development of gender equality index. In line with this generated experience EU Guidelines may give priority to make use of the indicators developed by CSOs and mainstream data collection practices of CSOs in public institutions who would like to benefit from EU funds. One of the criteria that might be considered within the framework of **“maturity assessment” prior to transfer of EU funds to beneficiary public institutions** could be ‘gender segregated data collection’.
- CEİD has been working on **gender-based data collection** and have organic link with Turkish Statistical Institute (TÜİK). However, CEİD’s organic link with the TÜİK depends on their personal contacts and Turkey still does not have a national gender index. Thus, it would be useful to search for the good practices in Western Balkans and European countries in which public institutions produce gender sensitive data in coordination with CSOs.
- Depending on CEİD’s current knowledge on the local context, there is a need for capacity building activities for local CSOs on monitoring of gender equality.

F. The Confederation of the Disabled

- The Confederation of the Disabled articulated that the technical assistance provided by EUD during the development of the project proposals for sub-granting activities was quite useful. On the other hand, the incapacity of local CSOs to develop project proposals in

English and the lack of technological literacy still bring about the need for further simplified tools in terms of supporting local CSOs.

- The Confederation of the Disabled articulated that they have detected their lack of knowledge on the needs and state of local CSOs during the implementation process of their project. As an outcome, during their project implementation period 54 local councils were established with the participation of in total 758 local CSOs. These local councils and CSOs need further trainings on project development, rights-based approach and strategic planning in order to sustain their activities in localities. The potential created by the sub-granting activities should be supported with follow-up projects, EU granted or not, in order to ensure their sustainability.
- There is a need for mainstreaming gender equality in the activities of both CSOs who are implementing sub-granting projects as well as local CSOs. Development of supportive trainings and informative toolkits may be taken into consideration by TACSO 3 Programme.
- The good practices of CSOs could be disseminated among other CSOs. The annual calendar produced by The Confederation of the Disabled is one of the good practices of taking attention on “important days” such as International Women’s Day, World Children’s Day, World Human Rights Day. “Accessible City Protocol” is another good practice initiated by the Confederation of the Disabled before the local elections to enforce candidate mayors to develop sustainable accessibility plans in terms of their electoral campaign.

Conclusion and the Summary of Overall Recommendations

- It is a fact that almost all of the CSOs are content with the exitance of EUD in Turkey where there is a shrinking space for civil society organisations and transparency of public funds are in question. Most of the CSOs articulated that EUD has been standing as one of the most transparent and accountable organisations where CSOs can appeal for their rights-based activities.
- It is important for IPA III Regulation to have specific focus on enabling environment for civil society actors and to generate an effective response to the shrinking space for civil society organisations. Thus, different from the future criteria that would be set for public institutions, the newly introduced “maturity assessment” in IPA III Regulation should be organised in a constructive way for civil society organisations so as to improve their capacities for better implementation of sub-granting programmes. Thus, “maturity assessment” should be instrumental for CSOs to analyse their capacity building needs.
- For an effective and realistic monitoring, the success indicators that would be identified for public institutions and civil society sector should be diversified. Almost all of the CSOs

argued that although they already have the necessary knowledge on the needs and requirements of local CSOs, it was assumed that they are also well equipped to implement a sub-granting programme which does not match with the reality. EU may consider developing certain training programmes for grantees and prepare informative manuals including the ethical principles of sub-granting activities.

- CSOs, who have been implementing sub-granting programmes, have accumulated a remarkable know-how, developed indicators for rights-based monitoring and reached out various grassroots organisations and local CSOs to strengthen their capacities. **By benefitting from this accumulated know-how the new phase of IPA may serve for strengthening these local networks.**
- Thanks to the innovation of sub-granting programmes that was invented under IPA II, almost all of the CSOs who have been implementing sub-granting programmes argue that they could become a kind of **resource centres** within the scope of their particular thematic area and could be reference points in terms of data, know-how and training methodologies. The data and know-how developed by these organisations can be used as indicators while monitoring the improvements in individual rights and conducive legal environment for CSOs.
- The indicators and data developed by CSOs depending on their experience in the field would better be compiled and made open to the access of all CSOs who would like to conduct rights-based monitoring activities.
- CSOs who have been implementing sub-granting activities may need to carry out the similar activities in the scope of future EU grant programmes in order to consolidate the objectives achieved. So that, deriving from this particular need and by looking into the findings of the monitoring activities, supporting of similar follow-up activities might be emphasized by EUD.
- **The financial eligibility rules regarding sub-granting activities should be made clearer.** The ambiguity regarding the re-allocation of funds under sub-granting programmes (such as the eligibility of payments for rental costs of local CSOs) should be clarified by the contracting authority.
- In the new phase of IPA, sub-granting programmes could be implemented with a more strategic approach so as to strengthen CSOs organisational capacity as well as **enabling certain flexibility** to let them adapt the content of their projects when necessary.
- Instead of project funding, core funding should be prioritized in order to promote sustainability of civil actors and make the impact much more lasting. The survival of human rights organizations is the primary need. Thus, instead of looking for impact in the area of human rights their survival must be prioritized. The impact and its effective governance could be increase by capacity building tools and programs.

- There is a shrinking space in terms of political and social participation of the young people in Turkey. On the other hand, the **emphasis given to youth rights** reduced in the recent years within the scope of EU funds. More specific emphasis should be given for enabling environment for youth organisations and a more strategic intervention logic should be developed for supporting youth organisations while organising the grant programmes. “Youth” may be considered as a separate topic under Human Rights and Civil Society support programmes together with a more structured approach.
- A certain incentive can be given to cross-cutting issues such as gender-equality, child participation, environmental rights, disabled rights etc. to be considered by CSOs while developing their project proposals.