

**FOLLOW-UP ACTION PLAN OF THE EVALUATION OF EU SUPPORT TO CIVIL SOCIETY  
IN THE ENLARGEMENT, NEIGHBOURHOOD REGIONS AND RUSSIA OVER THE PERIOD 2007-2018**

RECOMMENDATIONS, FINAL REPORT	RESPONSES EU SERVICES: (I) ACCEPTED OR NOT, II) ACTIONS TO BE UNDERTAKEN	FOLLOW UP (by who ; by when)
<b>GENERAL RECOMMENDATIONS: STRENGTHEN POLITICAL DIMENSION AND CAPACITIES</b>		
<p><b>RECOMMENDATION 1</b></p> <p>Verify that adequate monitoring of the <u>translation of policy commitments into effective programming is in place</u></p> <p><i>The EU should <b>strengthen its monitoring of the translation of policy commitments towards civil society into effective programming</b>. This particularly concerns the reflection of the <u>earmarking of funds in SSFs (for the Neighbourhood countries) into the commitment of funds in FDs, the contracting of funds compared to this commitment, and the progress of mainstreaming of civil society in all the NEAR regions.</u></i></p> <p><i>The EU should <u>identify factors contributing to the low alignment between earmarking of funds and contracting of targeted and mainstreamed funds and adopt the necessary corrective measures</u>. Alternatively, if the EU does not consider that its indicative commitments to civil society in the SSF have implications for programming, and do not represent targets against which progress should be tracked, the EU should consider reformulating or omitting such declarations in future SSFs to avoid confusion.</i></p> <p><i>The EU should clarify <u>whether its earmarking of funds for support to civil society in the SSFs applies to targeted support and/or mainstreamed support, and whether it includes the share of EIDHR and CSO-LA funds managed by NEAR.</u></i></p> <p><i>The EU could <u>consider earmarking for civil society a specific proportion of funds allocated to the Enlargement candidates and potential candidates in the multi-annual Country Strategy Papers.</u></i></p> <p><i>In light of the failure of CSOs to maintain the proportion of EU funds they secure during the significant expansion of EU development cooperation with the NEAR countries during the period covered by this evaluation, the EU should <u>internally clarify to what extent its declared commitment to civil society as a pillar of development and a strategic partner remains valid</u>. To the extent that the declining share of EU development cooperation delivered via CSOs reflects a de facto downgrading of the priority attached to civil society, the EU should <u>clearly communicate its revised priorities to the relevant stakeholders.</u></i></p>	<p><b>i) Accepted</b></p> <p><i>It is understood that this recommendation is notably relevant for the Neighbourhood region, where earmarking of funds in SSF has been the practice.</i></p> <p><i>Agreed on all recommended actions and slightly reformulated some to operationalise them.</i></p> <p>ii) Actions to be undertaken</p> <ul style="list-style-type: none"> <li>• Continue to ensure that <u>EU policy statements, goals and commitments on support to CSOs, are clear, publicly available and consistently supported/owned by senior management.</u> <ul style="list-style-type: none"> <li>○ <u>Future programming instructions</u> should make sure that programming documents include clear commitments and indicators on civil society engagement.</li> <li>○ Neighbourhood: programming documents should clearly define what 'earmarking' of funds for support to CSOs applies to i.e. targeted support and/or mainstreamed support and thematic funds or not.</li> <li>○ Enlargement: Rather than earmarking funds for CSOs, regional Guidelines for cooperation with civil society, currently under revision for the period 2021-2027, will continue to establish clear objectives, indicators and provide a monitoring framework for support to and cooperation with CS in the Enlargement candidates and potential candidates</li> </ul> </li> <li>• Collect and review <u>data/indicators on civil society engagement in policy dialogue and actual spending on CSO support for each region and monitor that commitments are fulfilled.</u></li> </ul>	<p><b>By Who:</b></p> <p><i>DG NEAR CoTE CS, with support from civil society regional teams in D5 and B2, and in cooperation with Heads of Cooperation in EUDs and DEVCO</i></p> <p><i>Management endorsement and support needed.</i></p> <p><b>By When:</b></p> <p>Programming input: 2020</p> <p>OPEX/EAMR: 2021</p>

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<p><u>What works and should continue?</u></p> <p>EU policy statements, goals and commitments regarding support to CSOs, including funding commitments and 'earmarking' of funds for CSOs are clear and publicly available.</p> <p>Since most actions which support CSOs are clearly identified, the allocation of EU funds to support these actions is very straightforward. Most relevant actions can be identified by their contract type (grant contract) and implementing organisation (any non-profit non-state actor). A minority of relevant actions can only be identified by a subjective assessment of their objectives. This can be done with a reasonable level of accuracy using simple keyword searches, and this can be improved by opening Annex A of the grant contract/the action document/the Terms of Reference, depending on the type of action. This is the approach taken in this evaluation for example.</p> <p><u>What should be strengthened?</u></p> <ul style="list-style-type: none"> <li>• DG NEAR should have, at EUD level and at HQ, a reasonably current assessment of actual spending on CSO support.</li> <li>• DG NEAR should monitor the implementation of policy commitments and fund allocations to CSO support, by collecting and reviewing data on actual spending on CSO support.</li> <li>• DG NEAR should reinforce its reporting on actual spending, and on the coherence between its allocation of funds and its actual contracting.</li> <li>• Where significant inconsistencies are identified, as for example in this evaluation, DG NEAR should promptly identify the causal factors and take corrective action.</li> </ul> <p><u>How should this be done?</u></p> <ul style="list-style-type: none"> <li>• DG NEAR CoTE could verify the concerns identified in this report regarding the apparent significant difference between commitment of funds to support CSOs and funds actually allocated to this. Assuming that these concerns are confirmed, DG NEAR CoTE should propose next steps.</li> </ul> <p><i><u>Main implementation responsibility:</u> DG NEAR CoTE, NEAR management</i></p> <p><i><u>Main associated actors:</u> Heads of Cooperation in EUDs</i></p>	<ul style="list-style-type: none"> <li>○ Report <u>annually at Directorate level to DG management</u> on CS involvement and actual contracting of CSO support for all three regions, at HQ and Dels, and on the coherence between its allocation of funds and its actual contracting support.</li> <li>○ Explore, in cooperation with DEVCO, how <u>OPSYS and the EAMR exercise</u> could support this data collection.</li> </ul>	

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<p><b>RECOMMENDATION 2</b></p> <p><b>Make greater use of the grant contract modality of FSTP to support mainstreaming of civil society.</b></p> <p><i>EUDs in NEAR countries should consider permitting FSTP in a greater proportion of Calls for Proposals beyond the governance-human rights-gender equality thematic cluster.</i></p> <p><i>This would facilitate the engagement of a greater number and wider range of civil society actors. It could contribute to more grassroots and geographically diverse participation, as well as the engagement of specialised actors.</i></p> <p><i>Since the slower acceptance of FSTP among staff responsible for CfP beyond the governance-human rights-gender equality thematic cluster may reflect a lower awareness of this modality among these staff, NEAR CoTE could consider one or several studies and publications to diffuse best practice and success stories, and address common concerns. This theme could also be reinforced in staff training events and briefings.</i></p> <p><i>This proposal is of medium importance and urgency since it addresses the under-utilisation of an existing modality. The proposed training and research activities would require minimum additional effort by the EU at minimum additional cost and risk.</i></p> <p><u>What works and should continue?</u></p> <p>The modality of grant contract including FSTP, but not the main purpose of the action, is increasingly used in most CfPs and in the direct award of grant contracts, across the countries addressed in this evaluation (see discussion in Finding 2.2).</p> <p><u>What should be strengthened?</u></p> <p>EU services should make <u>greater use</u> of the existing modality of grant contract including FSTP <u>across all sectors</u> (it is currently used more frequently in CfP focused on civil society capacity strengthening, human rights, governance themes and gender equality).</p> <p><u>How should this be done?</u></p> <p>DG NEAR CoTE could facilitate a discussion among DG NEAR HQ and EUD staff regarding experience with FSTP beyond the governance-human rights-gender equality thematic cluster, and clarify the</p>	<p><b>i) Accepted</b></p> <p><i>Agreed on all recommended actions and slightly re-formulated some to operationalise them.</i></p> <p><i>FSTP has been much more used since 2018, also as main purpose of the action, and not only in the sectors mentioned by the evaluation. Furthermore, it has been actively promoted by the CoTE. It has been subject of an instruction note to Delegations (Ares(2017)3255963) and topic of discussion at CiSoNet seminars, etc.</i></p> <p><b>ii) Actions to be undertaken</b></p> <ul style="list-style-type: none"> <li>• Ensure that <u>programming instructions</u> refer Delegations/regional units to updated <u>guidance on mainstreaming</u> civil society support into thematic sectors of cooperation and encourage outreach to local/grassroots CSOs.</li> <li>• <u>Enhance coordination with DG DEVCO</u> on programming instructions and follow-up.</li> <li>• Use <u>quality review processes</u> to provide technical support to identify possible opportunities to use FSTP to support mainstreaming of civil society support into thematic sectors of cooperation, if CoTE HR capacities are increased.</li> <li>• Explore how recommended intensified <u>staff training/briefings on mainstreaming</u> can be covered by technical assistance and/or DEVCO global resources.</li> </ul>	<p><b>By Who:</b></p> <p><i>DG NEAR A4, CoTE CS, with support from civil society regional teams in D5 and B2, and in cooperation with Heads of Cooperation in EUDs and DEVCO</i></p> <p><b>By When:</b></p> <p>Programming input: 2020</p>

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<p>advantages and disadvantages, opportunities and risks.</p> <p>Coordination between DG NEAR and DG DEVCO would strengthen this work. Since FSTP is applied globally and regulated in the PRAG, the same issues are likely to be of interest to DG DEVCO, and recommendations would likely affect their work to the same extent as DG NEAR. Coordination and information exchange is necessary to avoid duplication of effort and maximise coherency.</p> <p><i><u>Main implementation responsibility:</u> Heads of Cooperation, EUDs in the NEAR countries.</i></p> <p><i><u>Main associated actors:</u> Heads of Cooperation in DG DEVCO countries, DG NEAR CoTE, DG DEVCO A.5</i></p>		
<p><b>RECOMMENDATION 3</b></p> <p><b>Make greater use of the grant contract modality of FSTP as the main purpose of the action.</b></p> <p>DG NEAR should consider encouraging grant beneficiaries to use the modality of <u>FSTP</u> as the <u>main purpose of the action</u>.</p> <p>The EU should consider providing support to existing foundations and grant-making CSOs, using the modality of FSTP, as the main purpose of the action, in order to provide a large number of small grants using simplified and flexible procedures.</p> <p>In situations where the EU faces persistent difficulty reaching out to specific groups of civil society actors, the EU could also consider making FSTP as the main purpose of the action compulsory, to establish ad hoc grant-making funds (or to provide funds to an existing grant-making non-profit entity).</p> <p>Since some EU staff have reservations about this approach, and there are few studies or evaluations currently available, the EU may consider one or <u>several studies, seminars and/or pilot actions to explore the use of this modality</u>.</p> <p>This proposal is of medium importance and urgency since it addresses the under-utilisation of an existing modality. Its greater use on a pilot basis would require minimum additional effort by the EU at minimum additional cost and risk.</p> <p><u>What works and should continue?</u></p> <p>The modality of grant contract including FSTP, but not the main purpose of the action, is increasingly used in most CfP and in the direct award of grant contracts, across the countries addressed in this evaluation. It</p>	<p><b>i) Accepted</b></p> <p><i>Agreed on all recommended actions and slightly re-formulated some to operationalise them.</i></p> <p><i>FSTP has been much more used since 2018, also as main purpose of the action, and has been actively promoted by the CoTE. It has been subject of an instruction note to Delegations (Ares(2017)3255963) and topic of discussion at CiSoNet seminars, etc. It is understood that the modality of FSTP needs to be used as part of a strategic and balanced mix of funding modalities which complement each other and ensure the maximum outreach to CSOs of different managerial, technical and advocacy capacities capacities.</i></p> <p><b>ii) Actions to be undertaken</b></p> <ul style="list-style-type: none"> <li>• <b>Continue to systematically provide <u>FSTP at bilateral and regional level in all regions</u>, in order to enhance outreach to civil society organisations with different levels of managerial, technical and advocacy capacities;</b></li> <li>• Further research and develop the modality FSTP to increase its efficiency and outreach, drawing on the collection of good practices and lessons learnt from all</li> </ul>	<p><b>By Who:</b></p> <p><i>DG NEAR CoTE CS, civil society regional teams in D5 and B2, Directorate R, Heads of Cooperation in EUDs, civil society focal points in EUDs.</i></p> <p><b>By When:</b></p> <p>FSTP schemes in place as of 2021 programming</p> <p>CiSoNet in 2021</p>

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<p>was allowed in some or all lots of 22% of CfP launched in the NEAR countries in the period covered by this evaluation (see discussion in Finding 2.2).</p> <p><u>What should be strengthened?</u></p> <p>EU services should make use of the existing modality of grant contract including FSTP as the main purpose of the action.</p> <p><u>How should this be done?</u></p> <p>DG NEAR CoTE could facilitate a discussion among DG NEAR HQ and EUD staff regarding the potential use of this existing modality, and clarifying the advantages and disadvantages, opportunities and risks associated with it.</p> <p>DG NEAR staff in Delegations could experiment with the use of this existing procedure on a pilot basis, supported by DG NEAR CoTE.</p> <p>Coordination between DG NEAR and DG DEVCO would strengthen this work. Since FSTP is applied globally and regulated in the PRAG, the same issues are likely to be of interest to DG DEVCO, and recommendations would likely affect their work to the same extent as DG NEAR. Coordination and information exchange is necessary to avoid duplication of effort and maximise coherency.</p> <hr/> <p><u>Main implementation responsibility:</u> DG NEAR CoTE</p> <hr/> <p><u>Main associated actors:</u> Heads of Cooperation in DG NEAR countries, Heads of Cooperation in DG DEVCO countries, DG DEVCO A.5</p>	<p>NEAR regions;</p> <ul style="list-style-type: none"> <li>• Discuss findings and follow up with EUDs, including at <u>next CiSoNet</u> in 2021.</li> <li>• <u>Enhance coordination and exchange</u> on best practices with DG DEVCO.</li> <li>• Already undertaken: A <u>best practice seminar</u> on financial support for third parties with implementing partners from all NEAR regions and with Directorate R, was organised in October 2020.</li> </ul>	
<p><b>RECOMMENDATION 4</b></p> <p><b>Improve data management and M&amp;E related to co-applicants and beneficiaries of FSTP.</b></p> <hr/> <p><i>The EU should consider <u>developing the data management tools and monitoring and evaluation mechanisms necessary to capture the EU's goals of strengthening support to local CSOs, including grassroots organisations, those outside the major urban areas, as well as a wider range of civil society actors. Specifically, this would require the encoding in CRIS or its successor</u></i></p>	<p><b>i) Partially accepted</b></p> <p><i>Agreed on all recommended actions, except for having another study as sufficient internal ifncaotion already exists. ,Slightly re-formulated some recommendations to operationalise them.</i></p> <p><b>ii) Actions to be undertaken</b></p> <ul style="list-style-type: none"> <li>• Follow-up with DEVCO and OPSYS team to allow to</li> </ul>	<p><b>By Who:</b></p> <p><i>On OPSYS: CoTE CS, in collaboration with DEVCO and OPSYS team</i></p> <p><i>On monitoring contracts: Regional teams in Enlargement and South with</i></p>

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<p><i>databases of key data of co-applicants, as well as beneficiaries of FSTP, as well as the volume of funds allocated to them. The uploading of action-level evaluation reports should be made compulsory (impossibility to close a contract without uploading any reports produced).</i></p> <p><i>This importance of this recommendation reflects the impossibility of systematic tracking, monitoring, assessment and evaluation of CSO support with the current data management system. The EU does not currently collect the most basic data about a (probably) significant and (almost certainly) rapidly growing proportion of CSOs receiving EU funds. The current arrangements are particularly unsuited for the tracking, monitoring, assessment and evaluation of EU support to local, grassroots and non-capital city CSOs, since these are highly concentrated among co-applicants and FSTP beneficiaries.</i></p> <p><i>The urgency of this recommendation reflects the current, long-awaited adoption by DG NEAR (and DG DEVCO, which should be equally concerned) of a new data management system. The earlier this recommendation is acted on by senior management, the more likely its incorporation into the specifications of the new data management system.</i></p> <p><u>What works and should continue?</u></p> <p>Key data on co-applicants in CfP is registered in PROSPECT.</p> <p>The evaluators understand that the new OPSYS will record some relevant action level data relating to co-applicants. In the interest of effective monitoring of FSTP, this should include the following:</p> <ul style="list-style-type: none"> <li>• Elements recorded by EU staff: name and PADOR number of co-applicants and associates.</li> <li>• Elements recorded by the grant beneficiary and validated by EU staff: amount of project budget received by each co-applicant, contribution of each co-applicant to co-financing.</li> </ul> <p>In addition to allowing the view, modification and extraction of this data at contract level (which the evaluators understand to be the case), OPSYS should allow the extraction of this data for sets of contracts selected by the user (based on FD, or date, or country where the action takes place or other relevant criteria).</p> <p>The evaluators understand that the new OPSYS will record some relevant action level data relating to FSTP. In the interest of effective monitoring of FSTP, this should include the following:</p> <ul style="list-style-type: none"> <li>• Elements recorded by EU staff: existence of FSTP, whether or not FSTP is the main purpose of the action.</li> <li>• Elements recorded by the grant beneficiary and validated by EU staff: maximum grant size, average grant</li> </ul>	<p>encode/aggregate/extract:</p> <ul style="list-style-type: none"> <li>○ name and PADOR number of co-applicants and associates.</li> <li>○ existence of FSTP, whether or not FSTP is the main purpose of the action, number of FSTP beneficiaries.</li> <li>○ amount of project budget received by each co-applicant, contribution of each co-applicant to co-financing.</li> <li>○ maximum grant size, average grant size and/or number of beneficiary third parties.</li> </ul> <ul style="list-style-type: none"> <li>• Continue good practices, such as monitoring contract in the East, database in the IPA region, share experiences and promote best practices and cross fertilisation.</li> </ul>	<p><i>technical support by CoTE CS</i></p> <p><b>By When:</b></p> <p><i>On OPSYS: 2021</i></p> <p><i>On monitoring contracts as of programming 2021</i></p>

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<p>size and/or number of beneficiary third parties.</p> <p>In addition to allowing the view and extraction of this data at contract level (which the evaluators understand to be the case), OPSYS should allow the extraction of this data for sets of contracts selected by the user (based on FD, or date, or country where the action takes place or other relevant criteria).</p> <p>Since FSTP is likely to be included in the activities and results indicators and targets of the action log frame, OPSYS should allow the extraction of log frame data for sets of contracts selected by the user (based on FD, or date, or country where the action takes place or other relevant criteria).</p> <p>Until the new OPSYS is implemented, monitoring is based on CRIS. This system does not contain action-level data relating to FSTP. The likelihood of FSTP in a grant contract can be deduced from a review of the Guidelines for Applicants or other document on the basis of which the action was selected. Where FSTP is compulsory in a CfP, the existence of FSTP for the resulting actions could be inferred. Annex A to Grant Contracts (the Full Application prepared by the applicant(s)) identifies the thematic scope and methodology of FSTP, and may indicate the volume of funds concerned. In any case, Annex B (the Budget of the Action) contains the grant beneficiary's definitive declaration on the volume of funds concerned.</p> <p><u>What should be strengthened?</u></p> <p>Key data on co-applicants in all actions should be easily available to EU staff responsible for civil society support. This would also ensure the availability of this staff to external experts, in justified circumstances and under control of EU staff.</p> <p>Key data on FSTP should be included in action-level data entered in CRIS.</p> <p><u>How should this be done?</u></p> <p>The extent of the key data on FSTP to be included in data management tools is still to be defined.</p> <p>The requirements for this (including modification of databases, as well as templates for grant applications, grant beneficiary reporting, and possibly other templates, as well as training materials and instructions to EU staff) are still to be defined.</p> <p>A study to develop the above issues as a base for discussion by EU staff could be commissioned.</p> <p>To identify and make recommendations regarding best practice in the identification of appropriate indicators and the assessment of proposals for grant contracts including FSTP. The evaluators understand that NEAR</p>		

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<p>CoTE is organising a seminar/expert group meeting which could contribute to this work.</p> <p><i>Main implementation responsibility: DG NEAR, DG DEVCO</i></p> <p><i>Main associated actors: n.a.</i></p>		
<p><b>RECOMMENDATION 5</b></p> <p><b>Promote the exchange of good practice in mainstreaming in order to adopt this strategy more consistently.</b></p> <p><i>The analysis of financial support to civil society (see Section 4) indicates that mainstreaming has become a significant way of providing support to CSOs, and this evaluation has also found a variety of examples of how mainstream occurs in practice – both in policy dialogue processes and also in delivery of financial support. As explained in Conclusion 6, the level of support to civil society could be increased and made even more significant if there was more understanding of how to put this strategy into practice. As yet, there is not yet a clear or common understanding of ‘mainstreaming’ across all EUDs in NEAR countries.</i></p> <p><i>The EU strategy to mainstream civil society across all sectors should continue to be promoted so that it is adopted more consistently by EUDs, and if efforts to do so could also be <u>monitored and evaluated</u> in order to continuously strengthen this type of support (also see Recommendation 4).</i></p> <p>In addition, as one of the ways of mainstreaming civil society in non-spending activities, <u>further guidance</u> should also be provided on <u>how EUDs can most effectively engage with civil society</u> in a range of policy areas.</p> <p><u>What works and should continue?</u></p> <p>The CoTE has produced a <u>clear communication on the definition of mainstreaming</u> and how it can be implemented at the EUD level. This guidance material should continue to be promoted and supplemented with further communications to reinforce understanding and uptake by EUDs in a more conscious way.</p> <p>In some EUDs, figures indicate a particularly high level of mainstreaming, and this was also reinforced in stakeholder interviews. These EUDs should be encouraged to continue in their efforts to ensure mainstreaming, and to share good practice and lessons they have learned with other EUDs.</p>	<p><b>i) Accepted</b></p> <p><i>Agreed on all recommended actions and slightly re-formulated some to operationalise them.</i></p> <p><i>The CoTE has been promoting mainstreaming of civil society support into thematic sectors of cooperation and policy dialogue since 2017. This has been subject of an instruction note to Delegations (Ares(2017)3166309) specific trainings delivered by the CoTE.</i></p> <p><b>ii) Actions to be undertaken</b></p> <ul style="list-style-type: none"> <li>• Update guidance note on mainstreaming (Ares(2017)3166309) to reflect new Commission Priorities.</li> <li>• Ensure that <u>programming instructions</u> refer Delegations/regional units to updated <u>guidance on mainstreaming</u> civil society support into thematic sectors of cooperation..</li> <li>• <u>Enhance coordination with DG DEVCO</u> on programming instructions and follow-up.</li> <li>• Enhance <u>mainstreaming</u> of civil society support into thematic sectors of cooperation in all regions (at bilateral and regional level).</li> <li>• Explore the possibility of including references to civil society mainstreaming in programming/procurement checklists.</li> <li>• Use <u>quality review processes</u> to provide technical support and reiterate the commitment to mainstreaming civil society support into thematic sectors of cooperation, if</li> </ul>	<p><b>By Who:</b></p> <p><i>DG NEAR A4, CoTE CS, civil society regional teams in D5 and B2, Heads of Cooperation in EUDs</i></p> <p><b>By When:</b></p> <p>Programming instructions: 2020</p> <p>As of 2021 programming</p>

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<p><u>What should be strengthened?</u></p> <p>Knowledge on <u>what mainstreaming means in practice</u> should be further reinforced by the EC HQ and exchanged between EUDs.</p> <p><u>Good practice examples</u> that illustrate the variety of ways of mainstreaming civil society should be identified, and shared between EUDs in order to provide inspiration, and lesson learning.</p> <p><u>How should this be done?</u></p> <p>Guidance materials from the EUD should be produced in order to <u>reinforce and expand on previous communications issued</u>, also considering other ways of communicating the guidance.</p> <p>EUDs should be invited to <u>present good practice at relevant civil society networks and fora</u>.</p> <p><u>Case studies should be produced and disseminated</u> at events and through online media, either as written material or video.</p> <p><i><u>Main implementation responsibility: DG NEAR, CoTE</u></i></p> <p><i><u>Main associated actors: DG DEVCO, EU Delegations</u></i></p>	<p>CoTE HR capacities are increased.</p> <ul style="list-style-type: none"> <li>• Explore how recommended <u>intensified staff training/briefings on mainstreaming</u> can be covered by technical assistance and DEVCO global resources.</li> </ul>	